Gap Analysis: Monitoring, Integrated Monitoring

For more information, visit <https://ectacenter.org/topics/gensup/dms-preparing.asp>

# Using this Worksheet

This worksheet is based on the [OSEP Integrated Monitoring Protocol](https://sites.ed.gov/idea/grantees/#DMS), and can help identify gaps in your monitoring system. By completing the worksheet, you will assess your state’s status on the ten Overarching Questions included in the protocol. Use this information to develop plan(s) to address gaps.

# Integrated Monitoring: Component Definition

A multifaceted process or system that is designed to examine and evaluate each State’s general supervision system with an emphasis on improved educational results, functional outcomes and compliance with IDEA statutory and regulatory requirements.

# Instructions

Compile, organize, and make accessible to team members all written documents, including internal and public-facing policies and procedures, for each system assessed. Then, use the gap analysis worksheet to review each overarching question's Protocol Items and complete the following:

* Use the Systems Overview developed in **Step 3** to identify current policies, procedures, and practices related to each Protocol Item.
* Determine if what you are doing aligns with the foundational information in **Step 4**.
* Determine if what you are doing (or need to do) is described in your written procedures. Record the document and page number or section where this information can be found.
* Determine and record a status code: 1, 2, 3, or 4.
* Note anything missing or that needs modification.
* Document your key conclusions for the overarching question.

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| --- | --- |
| Status Code | Definition |
| 1 | We are doing it correctly and it is documented. |
| 2 | We are doing it correctly, but it needs to be documented. |
| 3 | We are doing some of it, but not all of it, and documentation needs to be developed or modified. |
| 4 | We need to give this item a lot of attention. |

# Overarching Questions

1. What components of the State’s general supervision system are used to identify noncompliance and improved results and functional outcomes?
2. (If applicable) How does the State use its data system(s) to identify noncompliance and/or improved results and functional outcomes?
3. How does the State use its data system(s) to inform monitoring priorities (e.g., districts/areas for focused monitoring, revision to policies, etc.)?
4. How does the State determine which LEAs/EIS providers are monitored and when they are monitored?
5. How does the State define and implement focused monitoring (if applicable)?
6. Describe the State’s monitoring process and the areas covered by the monitoring.
7. How does the State use the other components of its general supervision system (e.g., self-assessments, desk audits, local APRs, due process hearing decisions, State complaint decisions) to identify noncompliance and address results?
8. Under what conditions does the State make a finding of noncompliance?
9. When are LEAs/EIS providers notified of findings of noncompliance or the need for improved results? (When/how does the State “write the ticket”?)
10. What are the barriers that impede the State’s ability to identify noncompliance or areas in need of improvement?

## **A.** What components of the State’s general supervision system are used to identify noncompliance and improved results and functional outcomes?

* [34 CFR §300.149(a)](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-B/subject-group-ECFRf3191dc58290c0e/section-300.149#p-300.149(a)) and [(b) — SEA responsibility for general supervision](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-B/subject-group-ECFRf3191dc58290c0e/section-300.149#p-300.149(b))
* [34 CFR §300.600(b) — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-F/subject-group-ECFR76957f34acb3422/section-300.600#p-300.600(b))
* [34 CFR §303.120(a)](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-B/subject-group-ECFR8b0af1d9e085a1a/section-303.120#p-303.120(a)) and [(b) — Lead agency role in supervision, monitoring, funding, interagency coordination, and other responsibilities](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-B/subject-group-ECFR8b0af1d9e085a1a/section-303.120#p-303.120(b))
* [34 CFR §303.700(b) — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-H/subject-group-ECFRe32b04708514b9c/section-303.700#p-303.700(b))

### General Information

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 1 | The components of its general supervision and monitoring system. |  |  |  |
| 2 | How it uses its data system(s) to identify noncompliance and improved results and functional outcomes, if applicable. |  |  |  |
| 3 | How it is using its dispute resolution system (complaints, due process) to track and determine whether noncompliance was identified and whether further follow-up and correction are required (See also separate Dispute Resolution Protocol); and whether it has procedures in place to track and conduct appropriate follow up when there are informal allegations of noncompliance from credible sources that are not yet the subject of a formal State complaint or due process complaint. |  |  |  |
| 4 | Any other components-such as self-assessments, desk audits, State Performance Plan/Annual Performance Report (SPP/APR) data, and other relevant data sources-it uses to identify noncompliance, results and functional outcomes. |  |  |  |

### Possible Follow-Up Questions

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| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 5 | When and how does the State identify noncompliance, results and functional outcomes? (Does the State use any method of pre-finding correction? If so, what is that process/how does the State define pre-finding correction? Does the State conduct cyclical monitoring activities?)  *As noted in Question 4 of the* [*Frequently Asked Questions Regarding Identification and Correction of Noncompliance and Reporting on Correction in the State Performance Plan (SPP)/Annual Performance Report (APR) September 3, 2008*](https://ectacenter.org/~pdfs/events/OSEP-FAQ-Identification-Correction.pdf)*, pre-finding correction is utilized, “if the LEA or EIS program immediately (i.e., before the State issues a finding) corrects noncompliance and provides documentation of such correction, the State may choose not to make a finding.”* |  |  |  |
| 6 | Does the State allow its LEAs/EIS providers to correct noncompliance before the State issues a formal finding? |  |  |  |
| 7 | When the State reports SPP/APR compliance data to OSEP, does that data reflect actual indicator data that includes noncompliance, if applicable, or does it reflect indicator data that has been compiled after the State has addressed noncompliance? |  |  |  |
| 8 | What mechanisms does the State use to ensure that each of its LEAs/EIS providers self-identifies noncompliance if there are no on-site visits? |  |  |  |
| 9 | Does the State have procedures for monitoring when it is not able to go on-site? |  |  |  |
| 10 | How do LEA/EIS provider determinations impact activities within the State's monitoring system? |  |  |  |

### Key Conclusions

## **B.** (If applicable) How does the State use its data system(s) to identify noncompliance and/or improved results and functional outcomes?

* [34 CFR §300.601 — State performance plans and data collection](https://www.ecfr.gov/cgi-bin/text-idx?SID=d8cf5e381e12fe34194a1903a87a95df&mc=true&node=se34.2.300_1601&rgn=div8)
* [34 CFR §303.701 — State performance plans and data collection](https://www.ecfr.gov/cgi-bin/text-idx?SID=2f18db0eb85f3403763c4a9b56467f86&mc=true&node=se34.2.303_1701&rgn=div8)

### General Information

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 1 | The State should be able to describe how it accesses information from its data system(s). |  |  |  |
| 2 | The State should review data in its data system(s) on a regular basis (could be yearly or more frequently). |  |  |  |

### Possible Follow-Up Questions

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 3 | How often does the State review information in its data system(s)? |  |  |  |
| 4 | What actions does the State take when information in the data system(s) indicates noncompliance? (Follow-up with program to determine accuracy of information?) |  |  |  |
| 5 | What actions does the State take when information in the data system(s) indicates performance issues? (Follow-up with program to determine accuracy of information?) |  |  |  |
| 6 | What mechanism does the State have in place to analyze the LEAs'/EIS providers’ data, and how frequently does it analyze this data? |  |  |  |
| 7 | If State does not use a data system(s) to identify noncompliance, how do the State and the LEAs/EIS providers collect data to identify noncompliance? |  |  |  |

### Key Conclusions

## **C.** How does the State use its data system(s) to inform monitoring priorities (e.g., districts/areas for focused monitoring, revision to policies, etc.)?

* [34 CFR §300.601 — State performance plans and data collection](https://www.ecfr.gov/cgi-bin/text-idx?SID=d8cf5e381e12fe34194a1903a87a95df&mc=true&node=se34.2.300_1601&rgn=div8)
* [34 CFR §303.701 — State performance plans and data collection](https://www.ecfr.gov/cgi-bin/text-idx?SID=2f18db0eb85f3403763c4a9b56467f86&mc=true&node=se34.2.303_1701&rgn=div8)

### General Information

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 1 | The State must be able to describe how it selects programs for monitoring and focused monitoring. |  |  |  |
| 2 | The State must be able to explain its process for selecting the topics for which it will monitor. |  |  |  |
| 3 | The State must be able to explain why the data is representative of the LEAs/EIS providers in the State, in the identified timeframe and is valid and reliable. |  |  |  |

### Possible Follow-up Questions

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 4 | What, if any, reports does the State generate from its data system(s) to obtain information about compliance or results/functional outcomes in public agencies when planning its monitoring activities? |  |  |  |
| 5 | If applicable, how is the data system(s) used to identify Statewide or system-wide trends in compliance and/or results/functional outcomes? |  |  |  |
| 6 | How, if at all, are educational results and functional outcomes for all children with disabilities considered in determining monitoring priorities? |  |  |  |

### Key Conclusions

## **D.** How does the State determine which LEAs/EIS providers are monitored and when they are monitored?

* [2 CFR §200.329 — Monitoring and reporting program performance](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR36520e4111dce32/section-200.329)
* [2 CFR §200.332(b) — Requirements for pass-through entities](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR031321e29ac5bbd/section-200.332#p-200.332(b))
* [34 CFR §300.600 — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-F/subject-group-ECFR76957f34acb3422/section-300.600)
* [34 CFR §303.120(a) — Lead agency role in supervision, monitoring, funding, interagency coordination, and other responsibilities](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-B/subject-group-ECFR8b0af1d9e085a1a/section-303.120#p-303.120(a))
* [34 CFR §303.700 — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-H/subject-group-ECFRe32b04708514b9c/section-303.700)

### General Information

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 1 | The State can describe its method for monitoring LEAs/EIS providers (via cyclical, risk based, or other monitoring). |  |  |  |
| 2 | The State included a narrative in its SPP/APR outlining its general supervision system, including its monitoring cycle. |  |  |  |

### Possible Follow-up Questions

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| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 3 | How did the State establish its system for selecting LEAs/EIS providers for monitoring? |  |  |  |
| 4 | If the State uses some form of risk assessment, how is it used in the State's monitoring system? |  |  |  |
| 5 | Under what circumstances, if any, would the State conduct monitoring outside of its established selection criteria (e.g., off-cycle, follow-up, etc.)? |  |  |  |
| 6 | Who conducts the monitoring visits? (e.g., State personnel, contractors, etc.) |  |  |  |
| 7 | How long has it been since the State last monitored all of its LEAs/EIS providers? Does the State have a schedule for ensuring that all LEAs/EIS providers are monitored? |  |  |  |
| 8 | Are there any discrepancies between how the State conducts its monitoring and the process that the State describes in its SPP/APR? |  |  |  |

### Key Conclusions

## **E.** How does the State define and implement focused monitoring (if applicable)?

* [2 CFR §200.329 — Monitoring and reporting program performance](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR36520e4111dce32/section-200.329)
* [2 CFR §200.332(b)](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR031321e29ac5bbd/section-200.332#p-200.332(b)) and [(d) — Requirements for pass-through entities](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR031321e29ac5bbd/section-200.332#p-200.332(d))
* [34 CFR §300.600 — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-F/subject-group-ECFR76957f34acb3422/section-300.600)
* [34 CFR §303.120(a) — Lead agency role in supervision, monitoring, funding, interagency coordination, and other responsibilities](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-B/subject-group-ECFR8b0af1d9e085a1a/section-303.120#p-303.120(a))
* [34 CFR §303.700 — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-H/subject-group-ECFRe32b04708514b9c/section-303.700)

### General Information

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 1 | Describe its process for selecting programs for focused monitoring. |  |  |  |
| 2 | Identify the extent of noncompliance, level of improved results, or other criteria that would trigger a focused monitoring activity. |  |  |  |
| 3 | Describe its method for conducting focused monitoring. |  |  |  |
| 4 | Describe how it selects areas for focused monitoring. |  |  |  |

### Possible Follow-up Questions

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 5 | How many programs are selected for focused monitoring visits each year? (e.g., a specific number each year, variability based on certain factors, a specific sample size) |  |  |  |
| 6 | What would trigger a focused monitoring visit? |  |  |  |
| 7 | What method does the State use for conducting focused monitoring (is it on-site, desk audit, self-assessment, etc.)? |  |  |  |
| 8 | What is the purpose of focused monitoring in the State? |  |  |  |
| 9 | What does the State examine or review when conducting a focused monitoring visit or other focused monitoring activity? |  |  |  |
| 10 | Is the State reviewing one or a few topic(s) in-depth, or is the State closely examining an LEA/EIS provider(s)? |  |  |  |
| 11 | What criteria does the State use in determining how many topics the State explores during focused monitoring? |  |  |  |

### Key Conclusions

## **F.** Describe the State’s monitoring process and the areas covered by the monitoring?

* [2 CFR §200.329 — Monitoring and reporting program performance](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR36520e4111dce32/section-200.329)
* [2 CFR §200.332(b)](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR031321e29ac5bbd/section-200.332#p-200.332(b)) and [(d) — Requirements for pass-through entities](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR031321e29ac5bbd/section-200.332#p-200.332(d))
* [34 CFR §300.600 — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-F/subject-group-ECFR76957f34acb3422/section-300.600)
* [34 CFR §303.120(a) — Lead agency role in supervision, monitoring, funding, interagency coordination, and other responsibilities](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-B/subject-group-ECFR8b0af1d9e085a1a/section-303.120#p-303.120(a))
* [34 CFR §303.700 — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-H/subject-group-ECFRe32b04708514b9c/section-303.700)

### General Information

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 1 | The State must be able to describe the content and structure of its monitoring. |  |  |  |

### Possible Follow-up Questions

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 2 | What are the areas covered during the monitoring? |  |  |  |
| 3 | What data is examined as part of the monitoring? |  |  |  |
| 4 | Are individual files and IEPs/IFSPs examined as part of the monitoring process? |  |  |  |
| 5 | Is improving educational results and functional outcomes for children with disabilities discussed during the monitoring? If so, how? |  |  |  |

### Key Conclusions

## **G.** How does the State use the other components of its general supervision system (e.g., self-assessments, desk audits, local APRs, due process hearing decisions, State complaint decisions) to identify noncompliance and address results?

* [2 CFR §200.332(d)](https://www.ecfr.gov/current/title-2/part-200/section-200.332#p-200.332(d)), [(e)](https://www.ecfr.gov/current/title-2/part-200/section-200.332#p-200.332(e)), and [(f) — Requirements for pass-through entities](https://www.ecfr.gov/current/title-2/part-200/section-200.332#p-200.332(f))
* [34 CFR §300.149(a)](https://www.ecfr.gov/current/title-34/part-300/section-300.149#p-300.149(a)) and [(b) — SEA responsibility for general supervision](https://www.ecfr.gov/current/title-34/part-300/section-300.149#p-300.149(b))
* [34 CFR §303.120(a)](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-B/subject-group-ECFR8b0af1d9e085a1a/section-303.120#p-303.120(a)) and [(b) — Lead agency role in supervision, monitoring, funding, interagency coordination, and other responsibilities](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-B/subject-group-ECFR8b0af1d9e085a1a/section-303.120#p-303.120(a))

### General Information

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 1 | What other components of its general supervision system it uses to identify noncompliance. |  |  |  |
| 2 | What other components of its general supervision system it uses to address results and functional outcomes. |  |  |  |

### Possible Follow-up Questions

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 3 | What does the State do when one of these methods reveals potential noncompliance or results issues? (Verify data reported is valid and correct? Allow for pre-finding correction?) |  |  |  |

### Key Conclusions

## **H.** Under what conditions does the State make a finding of noncompliance?

* [34 CFR §300.600 — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-F/subject-group-ECFR76957f34acb3422/section-300.600)
* [34 CFR §303.700 — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-H/subject-group-ECFRe32b04708514b9c/section-303.700)

### General Information

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 1 | The State must make a finding when it discovers any noncompliance, including child-specific and systemic noncompliance. |  |  |  |
| 2 | The State may first investigate data or information that indicates potential noncompliance to determine whether it is actual noncompliance or incorrect reporting of data or information (see data protocol). |  |  |  |
| 3 | The State may not have a threshold that is different from 100% compliance for making findings of noncompliance. |  |  |  |
| 4 | The State may choose not to issue a finding if the program corrects the noncompliance (per [OSEP Memo 09-02 to Chief State School Officers Reporting on Correction of Noncompliance (October 17, 2008)](https://sites.ed.gov/idea/files/idea/policy/speced/guid/idea/memosdcltrs/osep09-02timelycorrectionmemo.pdf)) prior to issuance of the finding, but the State’s SPP/APR data reporting must reflect the pre-finding correction data. |  |  |  |

### Possible Follow-up Questions

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 5 | What evidence is necessary for the State to make a finding? |  |  |  |
| 6 | What is the State’s timeline from identification of the noncompliance to the issuance of a written finding? |  |  |  |
| 7 | Does the State issue findings at the child-level or only at the LEA/EIS provider level? (e.g., if 10 records are out of compliance with a particular IDEA requirement in one program, does the State issue the program 10 findings or one finding?) |  |  |  |
| 8 | Does the State allow programs to correct noncompliance prior to the issuance of a written finding (pre-finding correction)? |  |  |  |

### Key Conclusions

## **I.** When are LEAs/EIS providers notified of findings of noncompliance or the need for improved results? (When/how does the State “write the ticket”?)

* [34 CFR §300.600 — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-F/subject-group-ECFR76957f34acb3422/section-300.600)
* [34 CFR §303.700 — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-H/subject-group-ECFRe32b04708514b9c/section-303.700)

### General Information

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 1 | The State must describe how a public agency is notified of a monitoring finding and the timelines for issuing findings and for the correction of such findings. |  |  |  |
| 2 | The State must begin the one-year timeline for correction as soon as the written notification is issued. |  |  |  |

### Possible Follow-up Questions

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 3 | What procedures does the State have in place to provide written notification of noncompliance? |  |  |  |
| 4 | When and how does the State notify the LEA/EIS provider of the findings of noncompliance? |  |  |  |
| 5 | How, if at all, does the State address educational results and functional outcomes in its monitoring? |  |  |  |
| 6 | How, if at all, does the State notify the LEA/EIS provider of the specific actions it needs to take to correct the noncompliance when it issues the finding? |  |  |  |
| 7 | How long does it take the State to issue a written finding of noncompliance? |  |  |  |
| 8 | What is the amount of time between the discovery of noncompliance and the issuance of written findings? (e.g., 6 weeks, 2 months, 3 months, etc.)? |  |  |  |
| 9 | When does the one-year timeline for correction begin? |  |  |  |
| 10 | What information is included in a written finding of noncompliance? |  |  |  |

### Key Conclusions

## **J.** What are the barriers that impede the State’s ability to identify noncompliance or areas in need of improvement?

* [2 CFR §200.332(b) — Requirements for pass-through entities](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR031321e29ac5bbd/section-200.332#p-200.332(b))
* [34 CFR §300.600 — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-F/subject-group-ECFR76957f34acb3422/section-300.600)
* [34 CFR §303.120(a) — Lead agency role in supervision, monitoring, funding, interagency coordination, and other responsibilities](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-B/subject-group-ECFR8b0af1d9e085a1a/section-303.120#p-303.120(a))
* [34 CFR §303.700 — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-H/subject-group-ECFRe32b04708514b9c/section-303.700)

### General Information

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 1 | The State must be able to recognize and describe any barriers it faces to identify noncompliance and areas in need of improvement (e.g., insufficient staff, infrastructure inconsistencies, limited data system(s), unclear or insufficient governmental authority over or structuring of certain programs). |  |  |  |

### Possible Follow-up Questions

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 2 | What is the State doing to address these barriers? |  |  |  |
| 3 | What measures has the State taken to conduct an in-depth root cause analysis of the barriers to identifying noncompliance? |  |  |  |
| 4 | Has the State worked with stakeholders, including the LEAs/EIS providers, local providers, and parents, to address the identified barriers? |  |  |  |

### Key Conclusions





This worksheet was adapted by ECTA and CADRE from the *DMS Protocols Adapted for TA Centers Use–Dispute Resolution: State Complaints*, developed by the National Center for Systemic Improvement (NCSI).

The contents of this document were developed under cooperative agreements #H326P170001 (ECTA) and #H326X230002 (CADRE), and grants #H373Z190002 (DaSy) and #H373F200001 (CIFR), from the Office of Special Education Programs, U.S. Department of Education. However, the content does not necessarily represent the policy of the U.S. Department of Education, and you should not assume endorsement by the Federal Government.

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