Preparing for FY24 Monitoring Obligations

Monitoring Team

Federal Programs and Oversight

Aug. 22-24, 2023

#TNBestforAll

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Monitoring Team

- **Geneva Taylor** | *Senior Director of Compliance*

- **Ashley Colbert** | *East TN IDEA and Perkins V Monitoring Specialist*
- **Stan Cook** | *Middle TN IDEA and Perkins V Monitoring Specialist*
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- **Teri Manning** | *ESSA Compliance Manager*
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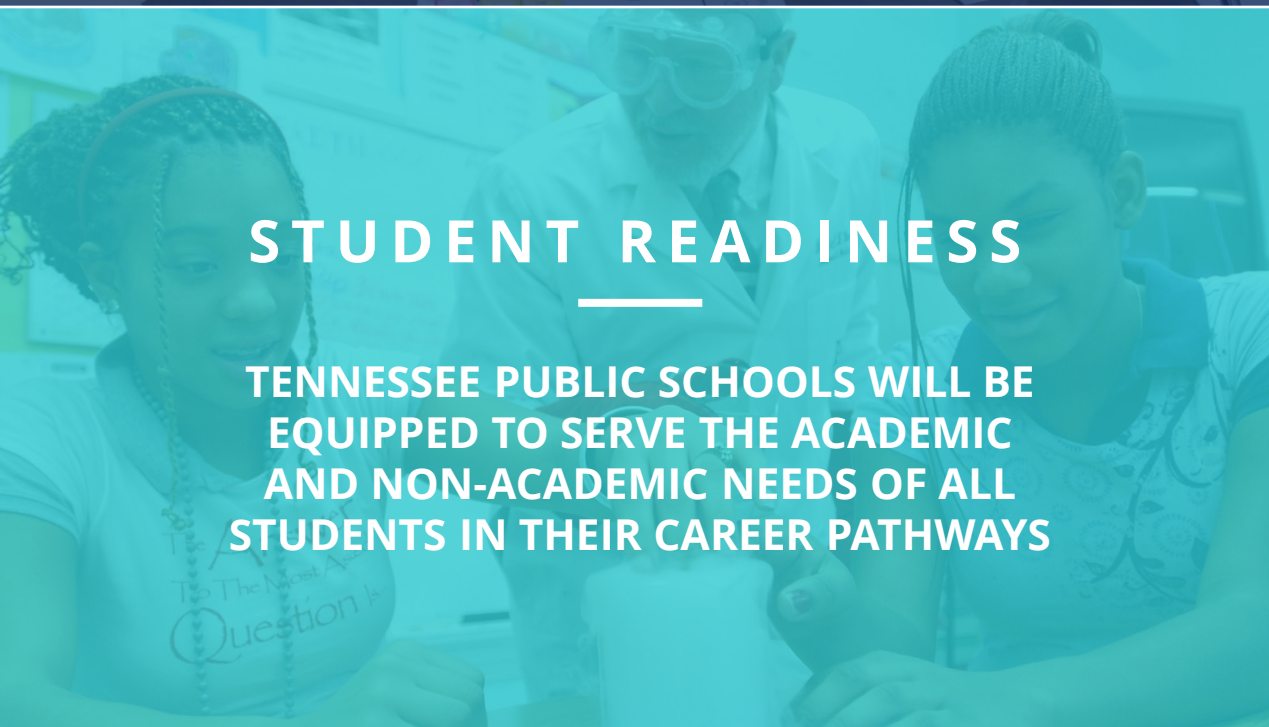- **Laura Dunn** | *IDEA Compliance Manager*

BEST FOR ALL

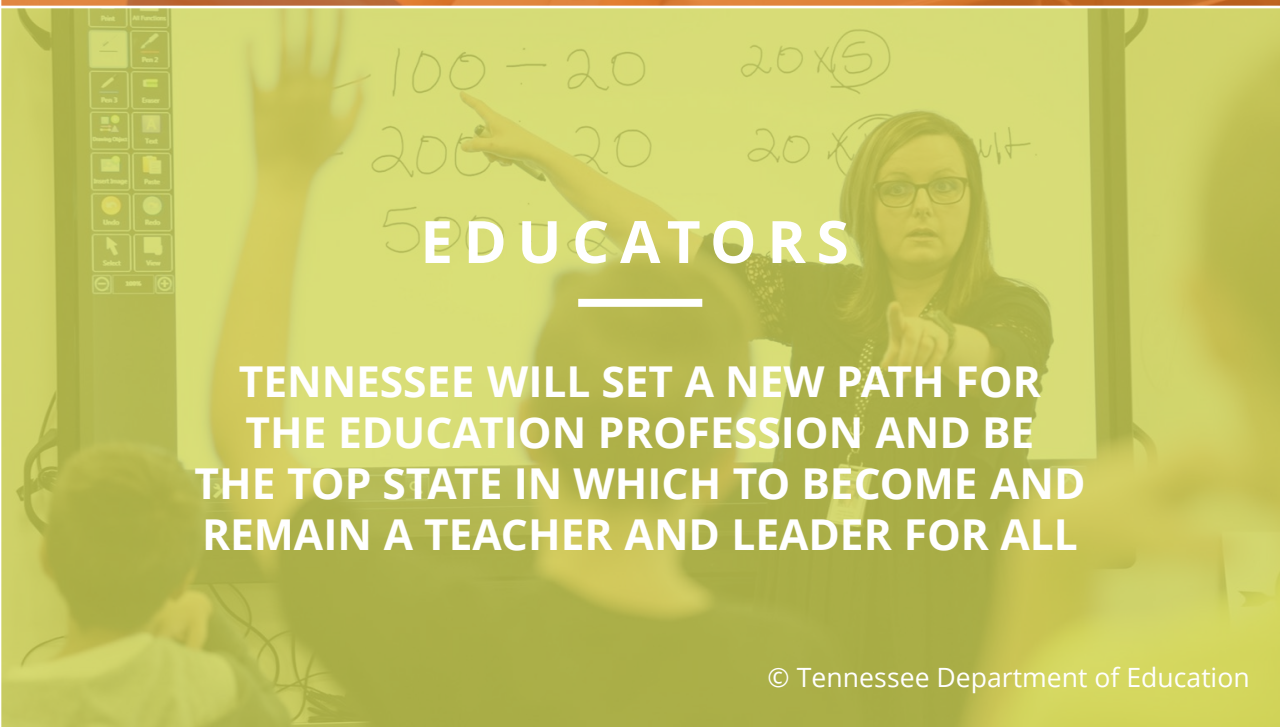We will set all students on a path to success.
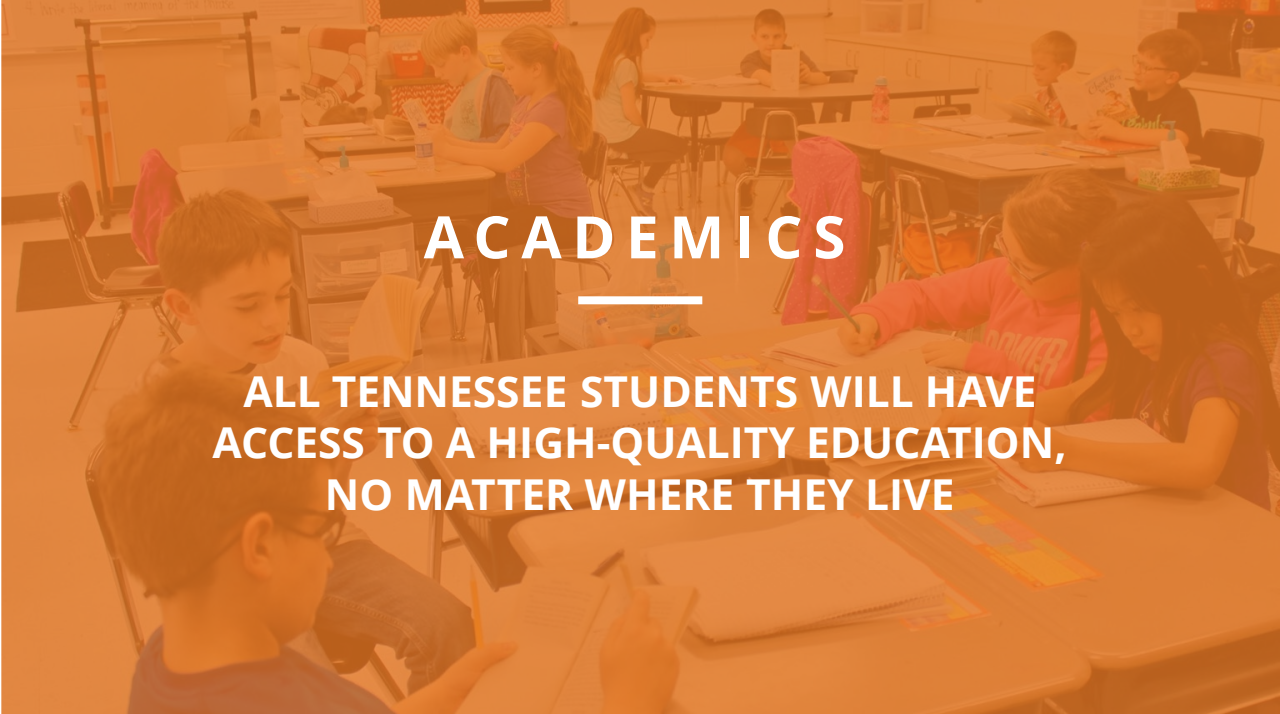
ACADEMICS

ALL TENNESSEE STUDENTS WILL HAVE ACCESS TO A HIGH-QUALITY EDUCATION, NO MATTER WHERE THEY LIVE

STUDENT READINESS

TENNESSEE PUBLIC SCHOOLS WILL BE EQUIPPED TO SERVE THE ACADEMIC AND NON-ACADEMIC NEEDS OF ALL STUDENTS IN THEIR CAREER PATHWAYS

EDUCATORS

TENNESSEE WILL SET A NEW PATH FOR THE EDUCATION PROFESSION AND BE THE TOP STATE IN WHICH TO BECOME AND REMAIN A TEACHER AND LEADER FOR ALL

Agenda

- Results-Based Monitoring (RBM) Overview
  - Level 3
  - Level 2
- Preparing for FY24 RBM
- LEA Pre-Work: Monitoring Obligations
- Submitting the Instrument
- Introduction and Cross-Cutting Review: Level 3
- Visit and Follow-up
- Individualized Education Plan (IEP) Monitoring
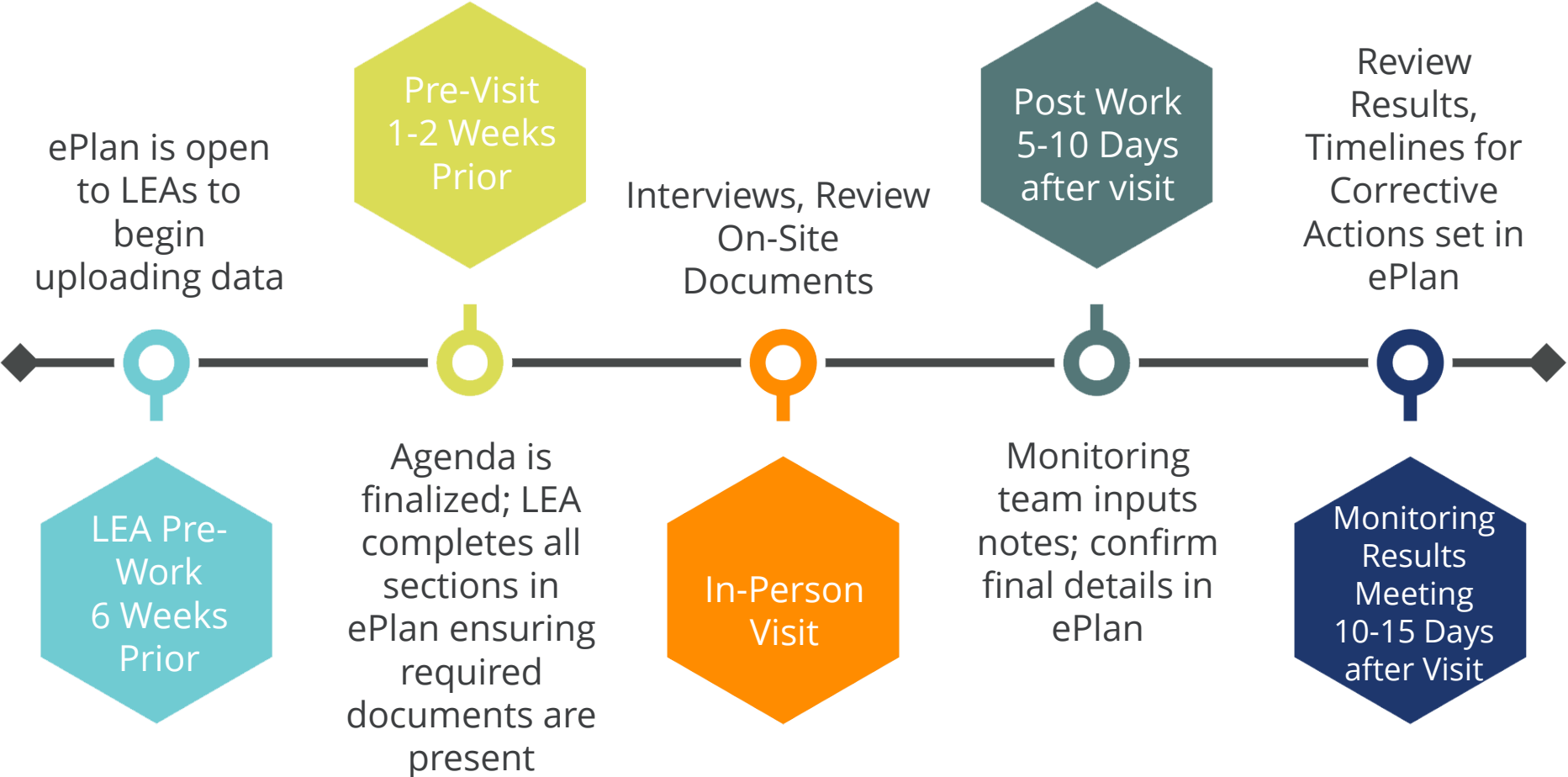- Closing

The Department's Monitoring Commitments

▪ Engage in meaningful and open dialogue,

▪ Reduce the number of findings of non-compliance through training and technical assistance prior to monitoring,

▪ Provide an accurate, comprehensive review of the state of compliance for Every Student Succeeds Act (ESSA) and Individuals with Disabilities Education Act (IDEA) programs,

▪ Highlight areas that exceed requirements,

▪ Provide individualized follow-up assistance based on results, and

▪ Empower local education agencies (LEAs) and schools to build on compliance to implement and execute effective programs.

Results-Based Monitoring (RBM) Overview

Level 3

RBM Level 3 Timeline

ePlan is open to LEAs to begin uploading data

Pre-Visit 1-2 Weeks Prior

Interviews, Review On-Site Documents

Post Work 5-10 Days after visit

Review Results, Timelines for Corrective Actions set in ePlan

LEA Pre-Work 6 Weeks Prior

Agenda is finalized; LEA completes all sections in ePlan ensuring required documents are present

In-Person Visit

Monitoring team inputs notes; confirm final details in ePlan

Monitoring Results Meeting 10-15 Days after Visit

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RBM: Level 3 Compliance Monitoring

- Identify 10% of LEAs for significant review via the risk analysis process (~15 LEAs)

- The introduction meeting will be held virtually one business day prior to the scheduled monitoring dates.

- Federal Programs and Oversight (FPO) and Fiscal Monitoring Team will conduct onsite visits to LEAs.

- LEA and School level (in-person) interviews

RBM: Level 3 School Visits

	20 Most Populous	Other LEAs
Title I Schools	3	2
Non-Public Schools	1	1
Virtual Schools	1	1
Alternative Schools	1	1
Charter Schools	1	N/A
Career and Technical Education (CTE) Programs	20% or 2 CTE Programs	

* All schools are as applicable

RBM: Level 3 Compliance Monitoring

- Scheduling occurs through the FPO.Monitoring@tn.gov account with individual invites for each event/discussion.

- Pre-work deadlines are rolling, and the **instrument is due 10 business** days before assigned dates.

- First visits and virtual discussions begin in mid-October.

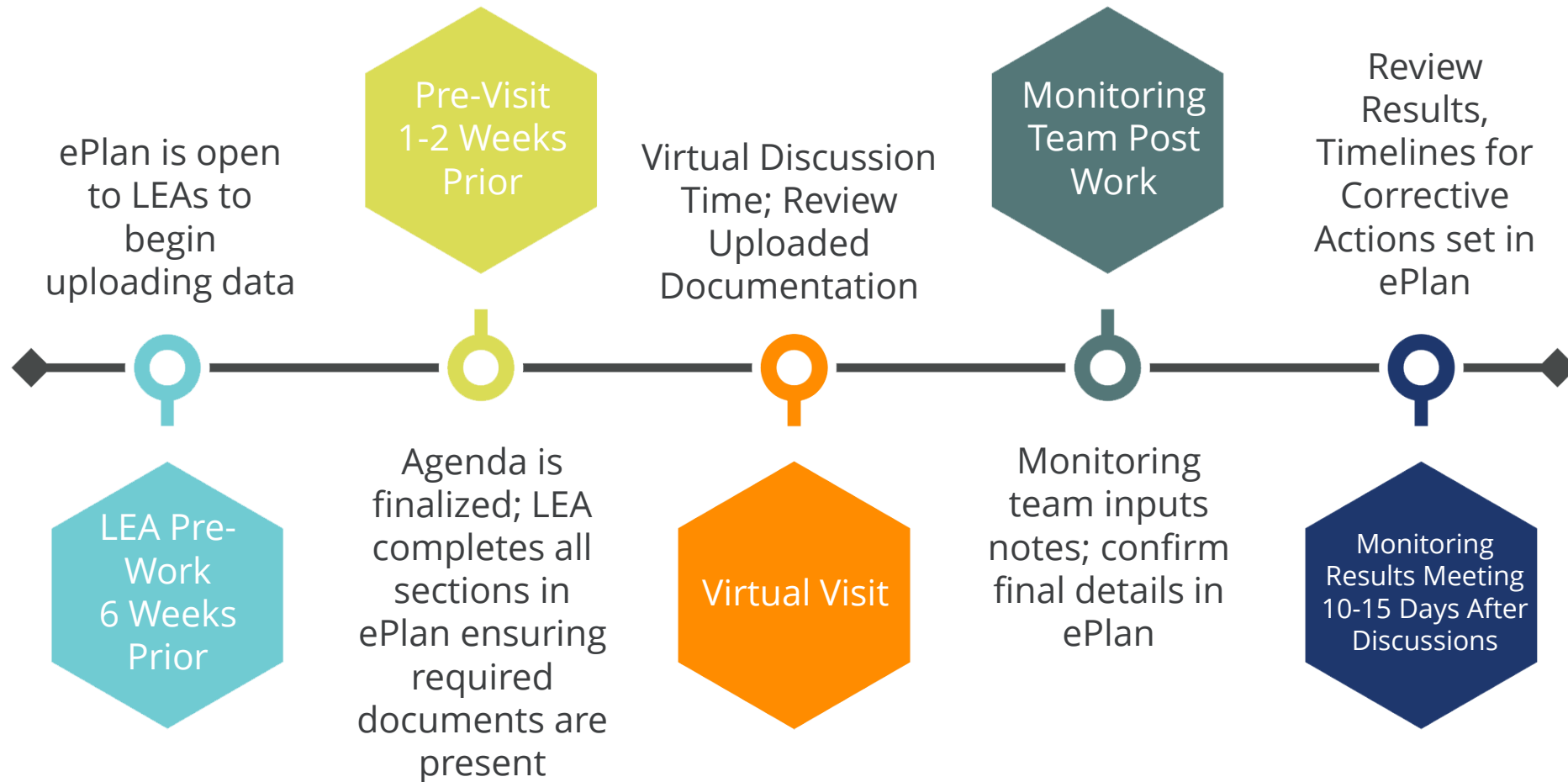# RBM: Level 3 Compliance Monitoring

- In-person visits will take place over 1-5 days to allow for travel between schools within the LEA.

  - Each school visit averages 2.5-3 hours in length.

- All in-person visits are completed by **March 31, 2024.** *Note: Monitoring Results Reviews may still be scheduled into April.*

- Monitoring Results Reviews (results discussion) will remain virtual via Microsoft Teams.

Results-Based Monitoring

Level 2

TN Department of **Education**

RBM Level 2 Timeline

ePlan is open to LEAs to begin uploading data

Pre-Visit 1-2 Weeks Prior

Virtual Discussion Time; Review Uploaded Documentation

Monitoring Team Post Work

Review Results, Timelines for Corrective Actions set in ePlan

LEA Pre-Work 6 Weeks Prior

Agenda is finalized; LEA completes all sections in ePlan ensuring required documents are present

Virtual Visit

Monitoring team inputs notes; confirm final details in ePlan

Monitoring Results Meeting 10-15 Days After Discussions

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RBM: Level 2 Compliance Monitoring

- Identify approximately 10% of LEAs for elevated review (~15 LEAs)

- FPO and Fiscal monitoring team will hold virtual conversations with LEAs.

- LEA-level virtual discussion will be used to seek clarity on answers and uploads.

- Not all LEA-level staff will be required to attend a virtual conversation; confirmation of availability will be made before the virtual meeting date.

RBM: Level 2 Compliance Monitoring

- Scheduling occurs through the FPO.Monitoring@tn.gov account with individual invites for each event/discussion.

- Pre-work deadlines are rolling, and the **instrument is due 10 business** days before assigned dates.

- First visits and virtual discussions begin in mid-October.

RBM: Level 2 Updates

School-Level Reviews

- Removed from the process

- Some questions at the LEA level may require school-specific responses.

Preparing for FY24 RBM

Access to ePlan

- Users with appropriate access may log in to ePlan, then choose Monitoring Instruments > 2024 > Results-Based Monitoring: Level 3 or Results-Based Monitoring: Level 2.

- Click **Draft Started** at the top of the _Sections_ page to begin pre-work.

- If access is needed, complete and return the [ePlan LEA User Access Form](#).

- The instrument opens on **Sept. 5.**

Documentation

- Most pages within the instrument require uploaded evidence.

- LEAs must upload at least the minimum number of documents identified next to each document name.

- If there is more than one upload, continue to add items until the proper evidence has been provided.

- **Do not upload Personally Identifiable Information (PII).**

  - *ID numbers are encouraged instead of PII.*

  - *OMB Memorandum M-07-1616 refers to information used to distinguish an individual's identity, either alone or when combined with other personal or identifying information that is linkable to a specific individual. Although ePlan is a secure platform, LEAs must protect PII, and the department reviews uploads to determine compliance in the Monitoring Instrument in ePlan.*

Practices

- Most pages within the monitoring instrument require responses to short questions or statements.

- Next to each item, use the drop-down box to choose from the list.

- Some pages require users to choose between *Agree* and *Disagree*.

- If the LEA or school chooses **Disagree**, the user must provide a justification.

  - *This requirement does not necessarily identify that the item is out of compliance.*

- Some pages have an option to choose Not Applicable or N/A. If the user chooses **Agree**, **Yes**, or **N/A,** there is no need to justify the response.

Narratives

- Several pages within the instrument require responses to questions in an open response text box.

- Read each question or statement thoroughly and respond with enough information to address all elements of the question or statement.
  - *Note: Users do not need to reiterate items already uploaded and may instead refer monitors to specific pages of a policy to review if the answer is contained in an upload.*
  - Users can bold, italicize, or underline font; change the font size or color; add bullets or numbers to lists; and use other options in the menu to add emphasis or bring attention to specific parts of the answer.

- If additional information is needed, please upload a companion document in the most appropriate area on the *Related Documents* page and communicate the name of the upload in the response area.

How to Prepare

- Divide responsibilities with colleagues in the LEA.

- Decide who at each school will be the point person for school-level pages (Level 3 only).

Divide and Conquer

- Discuss responsibilities and timeline with colleagues.

1. First, gather uploads.

2. Then, answer Agree/Disagree questions.

   - Explain Disagree answers succinctly.

3. Answer open response questions.

   - Refer to uploads when convenient/necessary.

Tip: Do not use placeholder documents or placeholder language in answers. ePlan will remind you of blank areas with validation errors and warnings.

Ask for Help

- A pre-monitoring meeting will be offered to each LEA via Microsoft Teams approximately four weeks before the monitoring dates.

- Please ask clarifying questions.

- Ask for a technical assistance (TA) meeting for support if needed.

LEA Pre-Work

Monitoring Obligations

Pre-Work: Monitoring Obligations

- The monitoring team:
  - notifies LEAs of their monitoring type, date(s), selected school(s), and scheduled exit date;
  - marks specific sections as not applicable based on the student population of each LEA;
  - conducts a conference call with LEA leaders to discuss the visit, expectations, and agenda, and to answer any questions; and
  - reviews information in ePlan, education information system (EIS), state report card, annual performance report (APR), etc.

Pre-Work: Monitoring Obligations

- LEA-level leaders:
  - review the monitoring instrument,
  - participate in a pre-visit conference call via Microsoft Teams with the monitoring team,
  - schedule meetings with LEA-level and school personnel to prepare for the monitoring,
  - contact FPO and fiscal divisional coordinators or project directors for assistance,
  - upload required evidence and respond to pre-visit questions,
  - submit pre-work to the department for review prior to the visit/conversation,
  - confirm the agenda and needs of the monitoring team, and
  - collect information not uploaded or explain why items were not available.

Pre-Work: Monitoring Obligations

▪ The monitoring team:

– reviews submitted pre-visit responses,

– reviews submitted required evidence,

– makes notes on compliant and questionable information, and

– prepares on-site questions to facilitate conversation.

Do you have the documentation you need to get started?

- Meeting Documentation
  - Agendas with dates and titles
  - Presentation Materials
  - Proof of Attendance (Sign-In Sheet)
    - Legible name and role of attendee
- Written Policies and Procedures
- Completed Forms, Surveys, and Assessments
- Registration Documentation
  - No barriers to enrollment are present for any subgroups
- Please review the required/optional documents requested for each applicable page.

Default View of Monitoring Instrument

- The default view of the monitoring instrument has no school selected.

- Notice the dropdown box above the dark blue Description bar.

Page Names

- Pages that require LEA response begin with **LEA**.

- Pages that require site-level information begin with **School** or **Facility** (if applicable).

- Pages that are only viewable to the department begin with **TDOE**.

Level 3 Only: Choosing Sites

- **LEA Users** have access to adjust all pages, as do school users with appropriate access.
- Plan with your **selected schools** to determine which pages they are responsible for completing.

Choosing Sites

- Ensure the correct school is chosen from the **dropdown.**
- Only complete pages that begin with **School.**
- **Caution!** LEA-level pages still appear below the Site Level section.

All Levels: Page Layout

- **Documentation**
  - Required and Optional
- **Practices**
  - Agree, Disagree, N/A
    - Disagree answers require a short explanation.
  - Choose what is accurate so the department can meet you where you are.
- **Narratives**
  - Answer the question, but do not provide more than what is asked.

All Levels: LEA Level Sections

- Cross-Cutting
- Every Student Succeeds Act (ESSA)
- Individuals with Disabilities Act (IDEA)
- Strengthening Career and Technical Education for the 21st Century Act (Perkins V)
- Relief Funding
- Students Served by Neglected and/or Delinquent Programs
- Extended Learning
- Fiscal Oversight

All Levels: ESSA

- Title I, Part A—Improving Basic Programs
- Title I, Part A—Students in Foster Care
- Title I, Part C—Education of Migratory Children
- Title II, Part A—Supporting Effective Instruction
- Title III, Part A—English Language Acquisition
- Title III, Part A—Immigrant Students
- Title IV, Part A—Student Support and Academic Enrichment

- Title IX, Part A—Education for Homeless Children and Youth
- Title I, Part A—Targeted Assistance School Improvement Plan Components
- Title V, Part B—Rural Education Initiative
- ESSA Equitable Services to Non-Public Schools
- ESSA Charter School Oversight
- ESSA Alternative Education Oversight
- ESSA Virtual School Oversight

All Levels: IDEA Pages

- IDEA, Part B—General, State Eligibility & LEA Eligibility
- IDEA, Part B—Evaluations, Eligibility Determinations, IEPs & Educational Placement
- IDEA, Part B—Procedural Safeguards & Monitoring, Enforcement, Confidentiality & Program Information
- IDEA State Level Requirements
- IDEA, Part B—Preschool
- Adult Students Detained in Jail
- IDEA Equitable Services to Non-Public Schools
- IDEA Charter School Oversight
- IDEA Alternative Education Oversight
- IDEA Virtual School Oversight

All Levels: Strengthening Career and Technical Education for the 21st Century Perkins V Pages (If Applicable)

- Perkins V Cross-Cutting

- Perkins V Effective Educators

- Perkins V Students with Disabilities (SWD)

- Perkins V Students in Special Populations (non-SWD subgroups)

- Perkins V Equitable Services to Non-Public Schools

- Perkins V Charter Schools

All Levels: Relief Funding (ESSER)

- Elementary and Secondary Schools Emergency Relief (ESSER) 2.0
- ESSER 3.0

All Levels: Neglected and Delinquent Pages (If Applicable)

- ESSA Title I, Part A—Neglected

- ESSA Title I, Part D—State Agencies

- ESSA Title I, Part D—LEAs

Level 3 Only: Extended Learning Pages (If Applicable)

- LEA or community-based organization (CBO) Extended Learning

All Levels: Fiscal Oversight Pages

- General Fiscal

- Compensation

- Travel

- Equipment

- Procurement and Contracts

- ESSA Use of Funds

- IDEA Use of Funds

- Perkins V Use of Funds

- ESSER Use of Funds

Submitting the Instrument
Prior to In-Person/Virtual Visit

Reminders

- Upload ***current*** items for **Fiscal** pages.
- Upload ***last school year*** (if correct) for **Program** pages.
  - Upload ***current year*** if it is compliant for **Program** pages.
- **Reach out for support.**

Submit the Instrument

- After responding to all areas, use the Validation column of the *Sections* page to confirm all items were completed.

- Confirm each uploaded document is accurate and complete. Once LEA and school users have completed all requirements, the **LEA IDEA Director**, **ESSA Director**, **CTE Director**, and **Finance Director** (in this order), must return to the *Sections* page to change the status to **Reviewed**.

- The director of schools (**LEA Authorized Representative**) must return to the *Sections* page to change the status to **LEA Authorized Representative Approved** to submit the pre-visit work to the department.

Submit the Instrument

- Additional instructions, including reminders that **pre-work is due 10 business days prior to the first day of the scheduled (virtual) on-site visit,** are provided in the ePlan Monitoring Instrument. Please navigate from the _Sections_ page to _Instructions and Reference Notes_ for complete details.

Introduction and Cross-Cutting Review

Level 3 In-Person

Pre-Visit Teams Meeting

New: Introductions will occur via Teams at the LEA-level.

- Team introductions of monitoring team visiting
- LEA introductions
- Review agenda and school-visit plans
- Review any missing/needed documentation
- Discuss cross-cutting items

Visit and Follow Up

Level 3 In-Person

Level 2 Virtual

During the Visit (In-Person or Virtual)

- FPO team members:
  - visit selected schools,
    - Interview leadership team, staff, and parents.
    - Review delivery of services and implementation of IEPs.
    - Review documentation.
  - end by interviewing LEA-level program directors, and
  - meet with LEA-level leaders to debrief and ask any additional follow-up questions.

School-Level Reminders

- For Level 3 school visits, the monitoring team must meet concurrently (in separate spaces) with:
  - Person(s) most knowledgeable about:
    - ESSA programs
    - IDEA programs
    - CTE programs
    - inventory (separate visit)
  - We do not need to speak with every teacher.
  - Lead team members do not have to be in every interview.
  - LEA-level members do not need to attend school visits.

Post Visit and Follow-Up

- The monitoring team:
  - finalizes the monitoring results,
  - formally exits with LEA-level leaders during a Microsoft Teams (virtual) meeting (date shared in the notification email),
  - shares the results via ePlan, and
  - changes the status to closed when all obligations are met.

Post Visit and Follow-Up

- The LEA-level leadership team:
  - asks questions about monitoring results, action steps, and deadlines;
  - acknowledges that the results were reviewed with them via ePlan;
  - begins responding to results requiring action via ePlan; and
  - proactively reaches out to the monitoring team with questions while working on results.

- The assigned FPO divisional coordinators will follow up on findings of non-compliance and provide support.
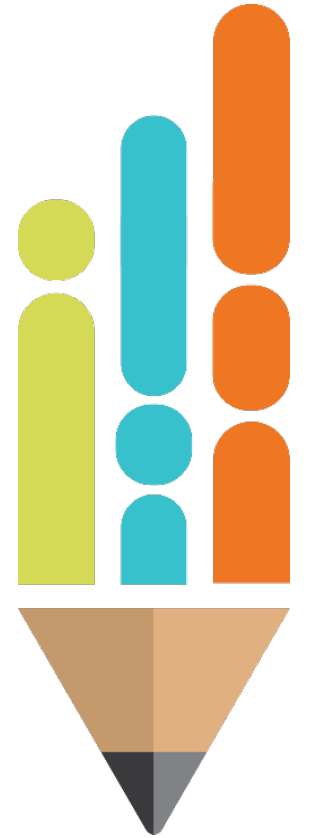
IEP Monitoring
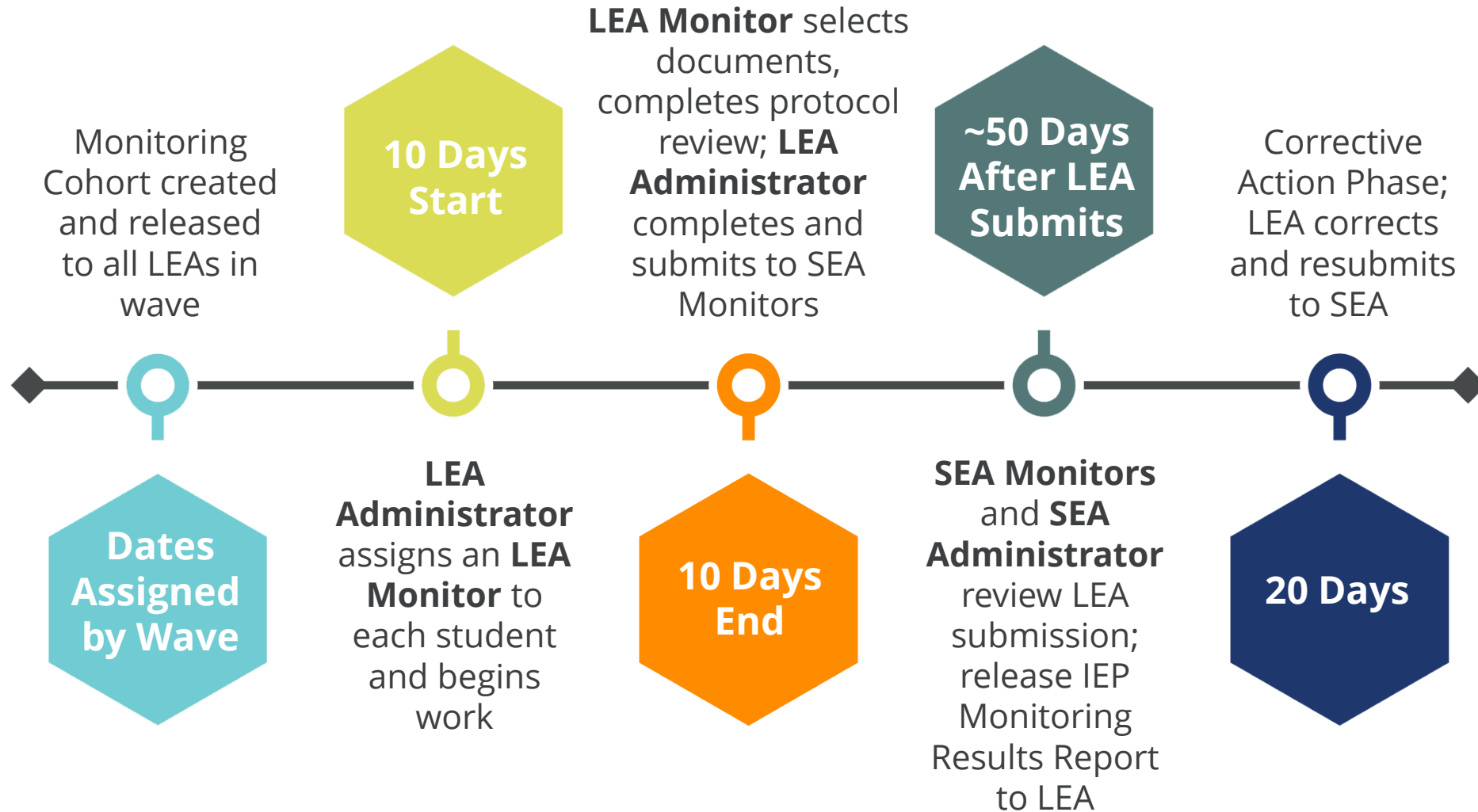
TN Department of **Education**

IEP Monitoring: Wave Assignments

- LEAs are assigned to "waves" annually based on multiple factors which include but are not limited to:

  - Number of findings in previous year's IEP Monitoring

  - Level of Results-Based Monitoring in the current year

  - Compliance percentage factoring in both state education agency (SEA) level findings and LEA level (self-identification) findings.

IEP Monitoring Timeline

Monitoring Cohort created and released to all LEAs in wave

10 Days Start

LEA Monitor selects documents, completes protocol review; **LEA Administrator** completes and submits to SEA Monitors

~50 Days After LEA Submits

Corrective Action Phase; LEA corrects and resubmits to SEA

Dates Assigned by Wave

LEA Administrator assigns an **LEA Monitor** to each student and begins work

10 Days End

SEA Monitors and **SEA Administrator** review LEA submission; release IEP Monitoring Results Report to LEA

20 Days

IEP Monitoring Process Roles

LEA Monitor

- SPED Teacher
- School Psychologist
- SLP
- Secretary
- Case Manager

LEA Administrator

- IDEA Director
- SPED Supervisor

SEA Monitor

- Stanley Cook
- LaTrese Watson
- Ashley Colbert

SEA Administrator

- Laura Dunn

IEP Monitoring: Mitigating Risk

- The **LEA Monitor** is responsible for reviewing and linking/uploading all required documents corresponding to each indicator for each student.
    - Ensure all linked/uploaded documents are completed and signed if applicable
    - Ensure all linked/uploaded documents correspond to current IEP/Evaluation
    - If IEP has been translated to a language other than English, please link English version of document.
    - Notify IEP Monitoring Team immediately if indicators are not as expected for a given student
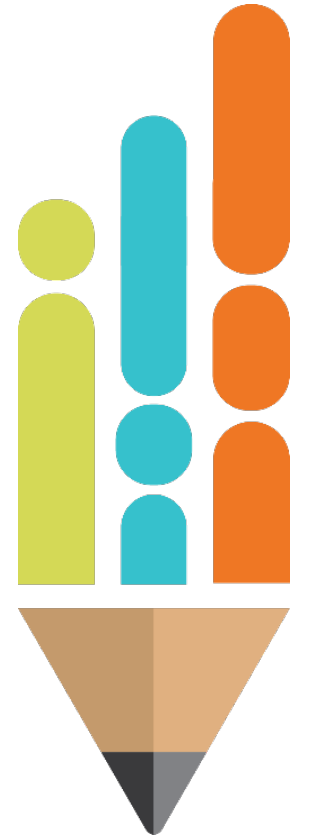
IEP Monitoring: Mitigating Risk

- The **LEA Administrator** is responsible for reviewing linked/uploaded documents and "agreeing" or "disagreeing" with LEA Monitor responses.
  - Ensure all linked/uploaded documents are completed and signed if applicable
  - Ensure all linked/uploaded documents correspond to current IEP/Evaluation
  - If using "set agreement" ensure that all documents and responses have been carefully reviewed before agreeing.

IEP Monitoring: Mitigating Risk

- The "initial review" phase is designed to identify areas of compliance/noncompliance before submitting to for SEA review.
- This time period is not to be used to reconvene meetings or fix identified errors.
- Data gathered through the "initial review" process should be used in conjunction with the IEP Monitoring Results Review Report to develop staff training and professional development to guide corrective actions.

IEP Monitoring: Required Documents

- Current IEP
  - Invitation
  - Prior Written Notice
  - If student is 16+: Age-Appropriate Transition Assessment
  - Signature Pages
- Current Initial/Re-Evaluation Summary Report
  - Invitations
  - Prior Written Notices
  - General Education and Special Education Observations
  - Signature Pages
- Current Eligibility
  - Invitations
  - Prior Written Notices
  - Signature Pages
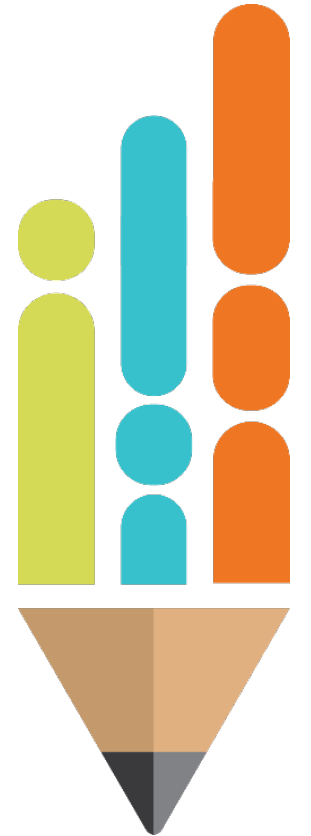
PULSE Improvements to IEP Monitoring Platform

Signature of Receipt

Electronic signature capability is available.

Document Storage

The signature of receipt and required training documentation is stored within the monitoring system.

IEP Monitoring Results

Findings are organized by student in addition to being organized by item number.

Closing

Results-Based Monitoring: Resources

- *FY23 Monitoring Results*
  - *ePlan > Monitoring Instrument > FY23 > Sections Page > Monitoring Results – LEA Response*
- Review risk analysis data
  - *ePlan > Data and Information > FY24 > Results-Based Monitoring Risk Analysis*
  - [FY24 Risk Analysis Guide](#)
- [FPO Monitoring Office Hours](#)
  - Mondays from 1 – 3 p.m. CT │ 2 – 4 p.m. ET
- FPO Regional Support
  - *ePlan > TDOE Resources > TDOE Support Teams (Consultants Maps)*

IEP Monitoring: Resources

- [Monitoring Office Hours](#)

    - Mondays from 1 – 2 p.m. CT/ 2 – 3 p.m. ET

- IEP Monitoring Protocol

    - *TN PULSE > Resource Library > TDOE IEP Monitoring Tool*

    - *ePlan > TDOE Resources > Monitoring > 2023-24 > FY24 IEP Monitoring*

- IEP Monitoring Protocol Summer Training PowerPoint and Webinar

    - *TN PULSE > Resource Library > TDOE IEP Monitoring Tool*

    - *ePlan > TDOE Resources > Monitoring > 2023-24 > FY24 IEP Monitoring*

Contact Information

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- Stan Cook | Stanley.Cook@tn.gov
- LaTrese Watson | LaTrese.Watson@tn.gov

Thank You!

Questions?

Tuesday-Thursday
Please Share Your Feedback:

You may access the PD by navigating here:
https://stateoftennessee.formstack.com/forms/2023fpi_pd_survey
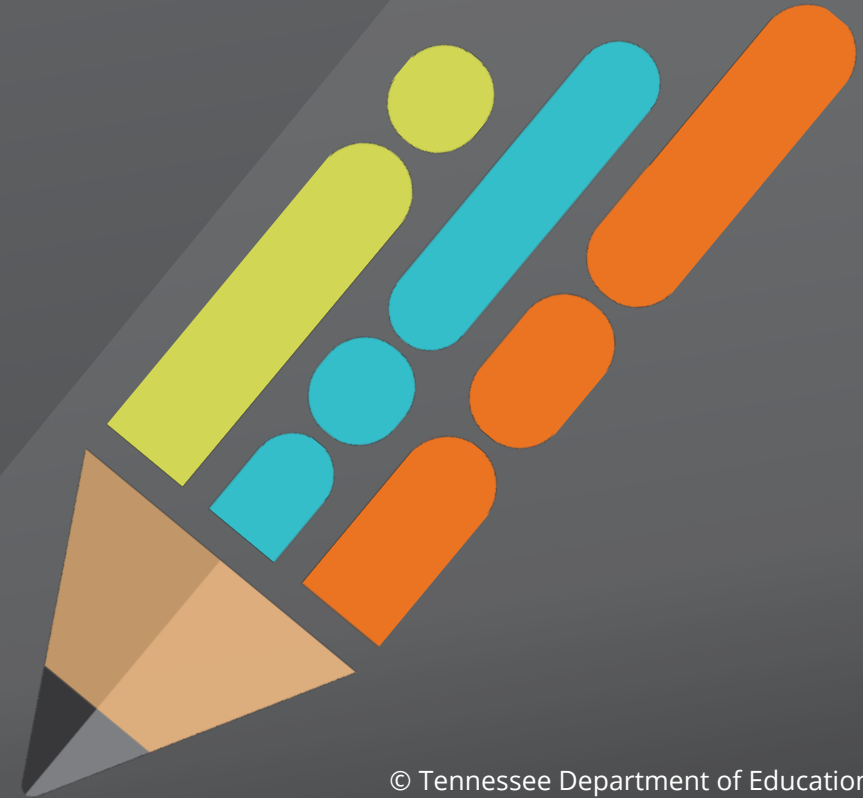
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1-800-232-5454

Notifications can also be submitted electronically at:

http://www.comptroller.tn.gov/hotline