



ALASKA EARLY INTERVENTION GENERAL SUPERVISION MANUAL

Monitoring
Technical Assistance
Enforcement

Alaska has established a general supervision system that monitors the implementation of Part C Individuals with Disabilities Education Act (IDEA) by early intervention programs. State monitoring activities ensure that IDEA program requirements to improve educational results and functional outcomes for all children with disabilities are met. This manual provides guidance and information about the Part C Individuals with Disabilities Education Act (IDEA) General Supervision, Monitoring, Technical Assistance, Improvement, and Enforcement Procedures.

Alaska conducts fiscal monitoring as part of General Supervision of Regional EI Program providers. This manual explains the policies and procedures for the fiscal monitoring process.

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Introduction

States must establish a general supervision system that monitors the implementation of Part C Individuals with Disabilities Education Act (IDEA) by early intervention programs. State monitoring activities ensure that programs meet the IDEA program requirements to improve educational results and functional outcomes for all children with disabilities. This manual provides guidance and information about the Part C Individuals with Disabilities Education Act (IDEA) Monitoring and Improvement Procedures.

The purpose of the Alaska Infant Learning Program General Supervision System manual is to provide guidance and information about General Supervision activities, including Monitoring and Improvement Procedures, for the Alaska Department of Health, Senior and Disabilities Services, Early Intervention/Infant Learning Program (ILP). This guide will help Regional EI Programs, the Alaska Interagency Coordinating Council (ICC) and other stakeholders understand how Alaska ILP:

- 1) Monitors for compliance and quality
- 2) Identifies noncompliance
- 3) Ensures timely correction of noncompliance

It outlines the procedures and steps that state staff follow in carrying out general supervision and monitoring activities. The *General Supervision Manual* is designed for use by both the state and Regional EI Program staff, and describes Alaska Part C supervision activities, the responsibilities of the state early intervention office and those of the Regional EI Programs and early intervention providers in the monitoring process.

The Alaska Department of Health, Senior and Disabilities Services, is the lead agency for Alaska ILP Part C Early Intervention of the Individuals with Disabilities Education Act (IDEA). The Individuals with Disabilities Education Act mandates that lead agency monitor and enforce IDEA Part C requirements to improve educational results and functional outcomes for all infants and toddlers with disabilities. (34 CFR IDEA State Monitoring and Enforcement [§303.700\(b\).](#))

The Alaska ILP ensures and enforces implementation of IDEA through:

- 1) State Performance Plan/Annual Performance Report (SPP/APR) including the State Systemic Improvement Plan (SSIP)
- 2) Data accuracy and validation
- 3) Quality, compliance, and results indicators
- 4) Alaska Part C rules and regulations including fiscal indicators and fiscal requirements such as use of funds, coordination of resources, payor of last resort, and system of payments
- 5) Alaska Part C procedural safeguards
- 6) Interagency agreements
- 7) Contracts with Regional EI Programs

- 8) Dispute resolution
- 9) Annual Monitoring and Local Determinations
- 10) Periodic On-Site Monitoring
- 11) Training and technical assistance

Alaska ILP uses a statewide, comprehensive, coordinated, multidisciplinary, interagency system to provide early intervention services for infants and toddlers with disabilities and their families. Alaska ILP sets program expectations and provides resources and support. Alaska ILP ensure compliance with the federal requirements of Part C of the IDEA and Uniform Guidance. The Alaska ILP General Supervision System makes sure that EI programs meet federal and state regulations.

Alaska ILP's monitoring takes an outcome-oriented approach. Monitoring activities include database reviews, desk audits, on-site monitoring, record reviews, dispute resolution activities, and audit reviews. The Alaska ILP Monitoring and Improvement System uses information from the monitoring activities to:

- 1) Support continuous improvement through technical assistance and professional development
- 2) Identify noncompliance and performance issues on an ongoing basis
- 3) Ensure that Regional EI Programs are compliant with IDEA, SPP/APR indicators, and state priority areas
- 4) Correct areas of noncompliance

As the lead agency, Senior and Disabilities Services is responsible for the general administration and supervision of Alaska's ILP system. The Part C state office must monitor all Regional EI Programs implementing Part C of IDEA whether they received Part C funds or not. IDEA requires that Part C programs monitor and enforce the use of federal Part C funds. To learn more, go to [20 U.S.C. §1435\(a\)\(10\)](#) and [34 CFR§303.120](#).

Alaska ILP Part C of IDEA Early Intervention program provides fiscal oversight through several divisions, including:

- 1) SDS administrative staff, including Administrative Operations Manager
- 2) Department of Administration, Division of Finance State Single Audit
- 3) Department of Health, Audit Section
- 4) Department of Health, Division of Healthcare Services

Alaska ILP conducts fiscal monitoring in Alaska, which includes administrative fiscal reviews and reviews for appropriate use of funds. Alaska ILP monitors how the Regional EI Programs coordinate resources at the regional level, how they implement Alaska's payor of last resort and system of payments requirements, and validate whether Regional EI Programs follow:

- 1) Part C IDEA federal rules and regulations
- 2) Alaska's Part C regulations and policies
- 3) Regional EI Program grants/contracts and provider agreements

The Regional EI Program must ensure families have access to the early intervention services required by Part C of IDEA when such services are identified on the infant or toddler's Individual Family Service Plan (IFSP). These services must be provided by qualified personnel, which may include local community providers. The IDEA Part C System of Payments regulations allow Alaska to use public benefits or insurance and private insurance to fund IDEA early intervention services.

The Part C Coordinator, Alaska ILP State staff, and other state staff also:

- 1) Identify and coordinate all available resources
- 2) Assign financial responsibility
- 3) Resolve disputes related to financial responsibility
- 4) Use methods to establish financial responsibility

Definition: "Early intervention service provider or EIS provider means an entity (whether public, private, or nonprofit) or an individual that provides early intervention services under part C of the Act, whether or not the entity or individual receives Federal funds under part C of the Act, and may include, where appropriate, the lead agency and a public agency responsible for providing early intervention services to infants and toddlers with disabilities in the State under part C of the Act." — [34 CFR §303.12](#)

Purpose of the General Supervision Manual

The General Supervision Manual outlines procedures used to identify practices that lead to compliant and high-quality services, improve performance, and identify and ensure timely correction in areas of noncompliance and underperformance.

The purpose of the manual is to inform the Regional EI Programs about the core requirements of IDEA and how to demonstrate compliance with the federal IDEA requirements. The manual also helps Regional EI Programs understand general supervision, monitoring procedures and expectations of their participation.

Next, this manual establishes guidelines and protocols for state staff for conducting monitoring, including procedures to:

- 1) Identify noncompliance and performance issues
- 2) Verify correction of noncompliance
- 3) Offer technical assistance
- 4) Use sanctions and incentives to support and sustain correction and improvement

Overview of the General Supervision System

The Alaska EI/ILP Program has a system of General Supervision in place to ensure that IDEA Part C requirements are met. [34 CFR §303.120](#) and [34 CFR §303.700](#) All service providers in the Alaska Early Intervention/Infant Learning Program are subject to oversight under the general supervision system, including grantees and their subcontractors.

General Supervision and monitoring align with the mission, vision, and purpose of Part C in Alaska by focusing on:

- 1) Improving early intervention results and functional outcomes for all infants and toddlers with disabilities; and
- 2) Ensuring that Regional EI Programs meet the program requirements under part C of the Act, with a particular emphasis on those requirements that are most closely related to improving early intervention results for infants and toddlers with disabilities.” — 34 CFR §303.700(b)
- 3) Ensuring that our state system collects and reports valid and reliable data.

It is responsive to the state’s data and program improvement needs related to Results Driven Accountability (RDA), including the State Performance Plan/Annual Performance Report (SPP/APR) and State Systemic Improvement Plan (SSIP), State and local annual determinations of performance and compliance, and Differentiated Monitoring and Support (DMS).

We use the following core principles to guide our Results Driven Accountability (RDA).

- 1) Partnership with stakeholders
- 2) Transparent and understandable to educators and families
- 3) Drives improved results
- 4) Protects children and families
- 5) Differentiated incentives and supports to states
- 6) Encourages states to target resources and reduces burden
- 7) Responsive to needs

Alaska considers equity, data-informed decision-making, and continuous improvement when developing, implementing, and revising our general supervision system. Our general supervision and monitoring activities are designed and used to support equity by identifying and addressing disparities related to access (child find, evaluation and assessment, and eligibility), program experiences, and the provision of services and supports necessary to ensure positive outcomes for each and every child and family served by early intervention service (EIS) providers.

Alaska also implements data-informed decision-making as a foundational concept for improving results and outcomes for each and every child and their family and ensuring compliance with IDEA requirements. We utilize data-informed decision-making to help reduce systemic inequities, answer important questions related to equity, and ensure the EIS providers are

effectively monitored and supported through correction of noncompliance and continuous improvement activities.

Information gathered during general supervision and monitoring activities reflects and impacts our priorities by informing the training we offer, technical assistance activities with Regional EI Programs, topics addressed in monthly ILP Coordinator teleconferences and biannual ILP Coordinator face to face meetings. In addition, we use data gathered to select and revise specific compliance and results indicators in addition to the SPP/APR indicators utilized in annual Regional EI Program self-assessments and informing local determinations.

General Supervision and monitoring activities are completed by the State Department of Health, Senior and Disabilities Services, Early Intervention/Infant Learning Program staff, including the Part C Coordinator, the Unit/Data Manager, Technical Assistants, and the CSPD Coordinator. Other participants who may be involved in the local monitoring process include members of the ICC, Parent Information and Training Center Staff, Peer ILP Coordinators, parents, and community partners.

Components of this system include:

- 1) Integrated monitoring activities
- 2) Data on processes and results
- 3) SPP/APR
- 4) Fiscal management
- 5) Effective dispute resolution
- 6) Policies, procedures and practices resulting in effective implementation
- 7) Improvement, correction, incentives, and sanctions

Mechanisms used to identify and verify correction of noncompliance and improve results include:

- 1) State monitoring
- 2) State database reports
- 3) Dispute resolution
- 4) Fiscal management
- 5) Contract monitoring
- 6) Technical assistance
- 7) Other mechanisms embedded in the General Supervision System.

Integrated Monitoring System

Alaska monitors all Regional EI Programs annually for SPP/APR indicators, including notification of findings of noncompliance and verification of correction. Monitoring verifies that valid and reliable data are reported in the APR and used to make decisions about Regional EI Program compliance and performance. In addition, Alaska's integrated monitoring includes

supplementary measurements for results indicators and related requirements. The frequency of comprehensive program monitoring for Regional EI Programs is based on an established schedule of every 6 years, or on the results of the current FFY SPP/APR.

The Alaska ILP Integrated Monitoring System also addresses monitoring of administrative, personnel and fiscal monitoring measures and standards. The monitoring of these measures is integrated into child record reviews, grant and audit review procedures, annual local determination procedures, and comprehensive program monitoring.

The Part C Coordinator may also perform focused monitoring on emergent issues in a specific region if any are discovered through fiscal or programmatic data reviews, technical assistance, or informal and formal dispute resolution processes.

The Alaska ILP monitoring procedures include combinations of off-site and on-site desk reviews, data verification, interviews, focus groups, record or document reviews, and self-assessments. These tools ensure that the state has a reasonably designed system of general supervision and oversight that results in compliance with IDEA and improved results for children and families.

Monitoring Policies

- 1) The state monitors all Regional EI Programs regardless of whether they received Part C federal funds.
- 2) All EI providers, including Regional EI Programs, will be monitored each year for SPP/APR indicators and at least once every six years for priority indicators selected by the state, fiscal review process and indicators related to the coordination of resources, payor of last resort, and system of payments.
- 3) The state identifies emergent issues using formal and informal dispute resolution processes, information gathered through technical assistance and professional development activities, and other components of the general supervision system. The state also uses this information to determine if monitoring of any Regional EI Program needs to be completed more frequently than scheduled.
- 4) Integrated monitoring is completed through data review and verification, annual self-assessment, annual desk audit, and onsite monitoring visits. Data verification is completed by reviewing original source documents in child records or other programmatic documents.
- 5) Fiscal reviews and monitoring of Part C requirements for payor of last resort, system of payments, and coordination of resources are conducted at least once every six years in conjunction with monitoring of indicators selected by Alaska.
- 6) When noncompliance is discovered, the state issues findings of noncompliance within 90 days of discovery and requires correction as soon as possible, but no later than one year from identification.
- 7) Regional EI Programs who have noncompliance or issues with performance on SPP/APR Compliance or Results Indicators, Related Requirements, or Fiscal Measures will conduct

root cause analyses and develop corrective action plans. These plans hold program and providers accountable for correcting or improving noncompliance or issues with performance by directing them to change policies and procedures or other internal mechanisms that led to the noncompliance.

- 8) The state provides targeted technical assistance to Regional EI Programs to correct or improve noncompliance or issues with performance so they can be sustained over time.
- 9) For instances where the Regional EI Program had noncompliance, Alaska ILP will verify that the Regional EI Program has corrected noncompliance and is correctly implementing the requirement. Alaska ILP will establish a threshold for the number of records and timespan for the review based on the program enrollment numbers. The Regional EI Program must demonstrate 100 percent compliance and each individual child's noncompliance must be corrected. For fiscal findings that do not directly relate to the child but rather to appropriate use of funds or accuracy with invoices or payments, staff will review evidence to verify the correction was made. Data may come from subsequent desk reviews, on-site monitoring or a database.
- 10) The state provides written communication to the EI Program when noncompliance has been verified as corrected.
- 11) The state reports publicly each Regional EI Programs' performance on all SPP/APR indicators 120 days after the SPP/APR is submitted to the Office of Special Education Programs (OSEP) each year.
- 12) The state completes local determinations annually for each Regional EI Program.

Overview of the Monitoring Process

The Alaska ILP has developed a process to monitor Regional EI Programs that is based on the following key principles:

- 1) A selection of indicators is used to monitor each regional EI's level of performance including compliance. The indicators are based on the Individuals with Disabilities Education Act (IDEA) and closely align with improving results for children and families. These include the required State Performance Plan (SPP)/Annual Performance Report (APR) indicators and other priority related requirements identified by the state with the assistance of a stakeholder group (**Appendix A**). The state ensures implementation of all IDEA requirements through the various components of the state's general supervision system.
- 2) Data are reviewed and analyzed throughout the year to:
 - a. identify emerging issues, and
 - b. initiate preventative supports including developing and/or modifying planned training and Technical Assistance (TA) (statewide and program- specific).
- 3) Multiple data sources are used to respond to the monitoring indicators. The data system responds to as many indicators as possible while other data sources (e.g., self-

assessment record review, onsite data collections) are more focused in scope and are used to capture indicator data not collected by other means.

- 4) Data analysis at the state office is used to:
 - a. monitor all Regional EI Programs once annually on their performance with the SPP/APR required indicators and selected other state priority indicators;
 - b. track progress in the correction of noncompliance on an ongoing basis; and
 - c. identify targeted training and technical assistance needs to ensure improvement.
- 5) Monitoring data are used annually to respond to SPP indicators and develop the APR.
- 6) On-site visits are provided to Regional EI Programs with needs identified through ILP's data-based decision-making processes. The visits focus on validation of data between the child record and ILP data system as well as any identified areas of need. Visits are structured to uncover and provide technical assistance related to the underlying issues that contribute to programs' low performance and/or noncompliance.
- 7) Technical assistance is provided based on local ILP requests and state priorities.
- 8) Steps to ensure timely and accurate data are incorporated into monthly and quarterly activities at the state and program levels.

The Alaska ILP monitoring process is structured to manage the various activities that must be completed throughout the year within specific time frames for both the state office and Regional EI Programs. This is important since completing activities in accordance with requirements is equally important as completing activities by established timelines.

Annual Monitoring Procedures

Alaska ILP monitors each Regional EI Program annually for the SPP/APR Compliance and Results Indicators, Related Requirements, and Fiscal Measures, conducts comprehensive program monitoring with data verification and community input once every six years, and can choose to complete focused monitoring with a Regional EI Program at any time emerging issues are identified.

The monitoring procedures identify the activities or combination of activities used to collect data for IDEA compliance and results indicators, and related IDEA requirements. Alaska ILP staff determine whether Regional EI Programs are correctly implementing requirements for the coordination of resources, payor of last resort, and system of payments.

Monitoring activities include both off-site and on-site activities such as:

- 1) Data review and verification
- 2) Records review
- 3) Interviews
- 4) Focus groups
- 5) Complaints (both formal and informal)
- 6) Due process
- 7) Fiscal monitoring and review of audit findings

- 8) Review of contract performance and deliverables
- 9) Annual database reports
- 10) Annual self-assessment
- 11) Other available methods

The amount of data for monitoring is identified for each monitoring indicator and, in some monitoring requirements, the state will request supporting documentation to verify the accuracy of the data.

Each year, the Alaska ILP informs and provides TA to Regional EI Program administrators and staff regarding expectations, procedures and tools that will be used for:

- 1) collecting data
- 2) monitoring programs,
- 3) correcting noncompliance, and
- 4) providing TA during the next fiscal year.

Appendix B table depicts these activities and the time frame in which they are to be conducted.

Annual Self-Assessment

In May of each year state monitoring staff deploys the Self-Assessment: Child Record Review (**Appendix C**) through the ILP database. This record review tool is used to report data on the Alaska ILP priority related requirements and indicators of quality not collected via data calculations in the state data system. The monitoring and TA staff will provide training and TA to Regional EI Programs as they complete the self-assessment, if needed

Regional EI Programs complete the record review items on the self-assessment by reviewing a selection of child records randomly selected by the state ILP Database. The number of files to be reviewed will be determined utilizing the Raosoft® Sample Size Calculator at <http://www.raosoft.com/samplesize.html> with a margin of error of 15% and a confidence interval of 85%. The number of child records to be reviewed will be calculated using based on all children who were enrolled in the program in the previous year. Regional EI Programs are required to complete a review of only those activities that occurred during the fiscal year in the child's record for each self-assessment item in accordance with the corresponding guidance for each item.

Regional EI Programs are encouraged to request TA if they have questions regarding the self-assessment process or if individual record review items or the rating is not clear. The self-assessment must be submitted to the state by June 15. The state monitoring staff review each Regional EI Program's self-assessment for completeness and log the date the self-assessment was submitted in the ILP database into the Quarterly Reporting Master (**Appendix D**).

Annual Desk Audit

The Alaska ILP uses a desk audit process one time per year (August/September) to analyze data and information from a variety of sources that are representative of each Regional EI Program's performance on each Alaska monitoring indicator. This data analysis is completed for the purpose of monitoring each program every year without conducting an on-site visit. Data and information that are reviewed include:

- 1) Data system reports
- 2) Verification of child data
- 3) 618 data reports (Child Count and Settings and Exiting Data)
- 4) Annual self-assessment results
- 5) Family survey results
- 6) Child outcome data
- 7) Complaints (informal and formal)
- 8) Dispute resolution data
- 9) Previous monitoring reports including evidence of correction of noncompliance collected through the ILP database
- 10) Previous CAP(s) and their completion

Regional EI Programs are required to enter and verify accuracy of all child-specific data in the state database within 30 days of the end of each quarter. State TA staff confirm that each Regional EI Program has completed the quarterly data cleaning process and respond to any TA requests identified by the programs to enhance performance around specific requirements of IDEA. This process serves as an ongoing preventative activity.

Regional EI's have 30 days to verify the accuracy of their data (July 30th). State monitoring provide each Regional EI Program with an opportunity to confirm, correct and/or clarify compiled performance data for each monitoring indicator as part of the Annual Desk Audit Process. (See the Annual Desk Audit section below for more detail.)

Annual Monitoring Timelines

The Alaska ILP monitoring process is structured to manage the various activities that must be completed throughout the year within specific time frames for both the state office and Regional EI Programs. This is important since completing activities in accordance with requirements is equally important as completing activities by established timelines.

(Appendix B)

Alaska ILP will review data in the ILP database at the end of each fiscal year to identify noncompliance and assess progress toward federal and local targets for implementation of Part C IDEA requirements. Data for the SPP/APR will be reviewed for compliance one time per year during the local determinations process. Regional EI Programs will receive findings of noncompliance when noncompliance is identified through annual local determinations, or within 90 days of identification of noncompliance.

SPP/APR monitoring will follow a series of steps according to the following timelines:

- August 1st: First data freeze
- August 1st to September 30th: Data clarification period
- September 30th: Final data freeze for SPP/APR by this date
- October 30th: Local Determinations Completed by this date
- September 30th through December 31st: Analyze data and prepare draft SPP/APR
- January 30th: Finalize SPP/ APR and initiate ICC certification
- By February 1st: Submit SPP/APR

Grant and Provider Agreement Monitoring

In partnership with the Alaska Grants and Contracts Unit, the Audit Unit and the Division of Financial Management Services, Regional EI Programs report quarterly and are monitored annually on compliance with grant and audit regulations and ILP monitoring measures related to IDEA.

Comprehensive Program Monitoring

Communication with Regional EI Programs prior to, during, and after Alaska ILP's comprehensive monitoring helps Regional EI Programs understand the monitoring process, their involvement in it, and the results of the monitoring. Regional EI Programs can expect the following process:

- 1) Prior to the start of monitoring, Regional EI Programs will get information about the monitoring process, including what will be monitored, how and when it will be done, and who will need to be involved. At this time, Regional EI Programs may be advised to upload source documents into the ILP Database, inform families and community programs of their roles during the upcoming monitoring, and arrange staff time and schedules to be available during monitoring.
- 2) During monitoring, Alaska ILP will schedule meetings with Regional EI Program leadership and staff to tell them about preliminary summaries and to respond to and ask questions.
- 3) Alaska ILP will develop a report based on the data to summarize strengths, areas of improvement, and any compliance issues along with the data supporting these conclusions. Alaska ILP will issue a findings letter where noncompliance was identified along with the actions required to correct the noncompliance.
- 4) Alaska ILP will schedule meetings with the Regional EI Program to discuss the summary and to plan next steps, including corrective actions, root cause analyses, technical assistance, and other actions as appropriate.

If noncompliance is identified through any of the monitoring activities, the Regional EI Program will be encouraged to correct the noncompliance as soon as possible but are **required** to correct within than one year after the identification of the noncompliance.

Comprehensive Program Monitoring Timeline

Comprehensive Program monitoring is a process by which selected Regional EI Programs are monitored by Alaska ILP Part C staff using both off-site and on-site monitoring activities. The team conducts record reviews, parent and provider interviews, and administrative, personnel and fiscal reviews. The process validates data in the ILP data system, evaluates documentation of services, assesses the Regional EI Program's performance on quality measures and efforts to improve outcomes for all infants and toddlers with disabilities or developmental delay and their families. Follow-up technical assistance is provided based on need.

Comprehensive program monitoring also allows Alaska ILP staff to determine if the Regional EI Program's strategies have resulted in qualitative and quantitative improvements. It also helps create specific, tailored activities if improvement has not been achieved or sustained.

As part of comprehensive program monitoring, Alaska ILP staff conduct a review of source documents for data entered in the ILP database. If needed, they request additional source documents to validate the accuracy of data in the ILP database and to monitor for compliance and quality using the state's priority indicators.

Both on-site and off-site activities for comprehensive program monitoring will be conducted in the order below. A timeline for each step will be developed for each Regional EI Program monitored:

- Selection of Programs: *After issuance of local determinations - October*
- Letter informing Regional EI Program of monitoring: *60 days prior to visit*
- Pre-monitoring activities: *Begins 60 days prior to visit*
- On-Site Monitoring activities: *Visit days*
- Comprehensive monitoring report issued to Regional EI Program, identifying strengths, needs, and areas for improvement: *Within 60 days of site visit.*
- Development and approval of plans for improvement: *Within 120 days of site visit.*
- Progress monitoring of improvement plan: *No longer than 1 year from visit*
- Post-monitoring activities completed: *No longer than 1 year from visit to make improvements.*

Step 1: Selection of Programs

The state maintains a monitoring schedule which ensures each program is monitored at least once every 6 years. The schedule will be developed and maintained by the Alaska ILP Team. The state identifies emergent issues local determinations, formal and informal dispute resolution information, technical assistance feedback, professional development activities, and other components of the general supervision system. The state also uses this information to determine if monitoring of any Regional EI Program or community provider needs to be completed more frequently than scheduled.

Selection of sites for on-site monitoring is conducted by October 30th each year. Onsite monitoring visits are focused on needs identified through other monitoring components including requests for technical assistance. Programs are selected for onsite monitoring based on the following criteria:

- 1) History of longstanding noncompliance
- 2) History of low performance
- 3) New EIS Coordinator at prior low-performing or challenged agency
- 4) No onsite visit in the past 5 years.

Alaska ILP will monitor Regional EI Programs on a six-year cycle. In cases of emergent issues, Alaska ILP may perform focused monitoring on the issues identified in specific regions outside of the monitoring cycle.

Step 2: Letter informing EI program of monitoring

Regional EI Programs in the selected cohort are notified of the scheduled monitoring activity by letter and electronic mail a minimum of 60 days prior to the start of comprehensive monitoring activities. The letter will include:

- 1) Date of start of comprehensive monitoring
- 2) Pre-monitoring activities checklist found in **Appendix F**
- 3) Documents and information required for the monitoring activity

Regional EI Programs are expected to plan for the monitoring activity. After receiving notification of the visit and the planned activities, the Regional EI Program must plan the accommodations and time needed for staff and family interviews and for Alaska ILP record reviews. Regional EI Programs should start collecting any documents needed for the fiscal monitoring.

Alaska ILP conducts comprehensive monitoring with every Regional EI Program serving infants and toddlers with disabilities within a 6-year cycle. Comprehensive monitoring is not intended to be a punitive action or an indication that the Regional EI Program is not meeting compliance or providing high-quality services.

Step 3. Pre-monitoring planning activities

Pre-monitoring activities apply to both on-site and off-site monitoring activities. The pre-monitoring activities may be conducted virtually.

Pre-Monitoring Planning Meeting

The pre-monitoring planning meeting and agenda allow the Regional EI Program and Alaska ILP staff to discuss the purpose of the comprehensive monitoring and the agenda for the on-site visit, agree on logistics, and ask questions about the visit. The Regional EI Program will give Alaska ILP documents as requested during the pre-monitoring period. The team will identify who will be involved in the process and create a specific timeline and schedule for monitoring

activities. The Regional EI Program will be asked to provide an overview of the structure of their child records and process for granting access to the monitoring team. The procedures for requesting parental consent for visit observation will be discussed.

Review Existing Data

The ILP Data Manager and Program Technical Assistants will review the compliance and performance history of the program for the period since the last Comprehensive Monitoring. Any indicators which have shown historical noncompliance will be flagged for additional follow-up

Request electronic access be set up

If necessary, the Regional EI Program will work with their agency administration and IT team to set up electronic access to child records.

Select records for review (Appendix I)

A set of child identification numbers from the ILP Database will be generated as a list of child records to be reviewed during the monitoring period. The number of files to be reviewed will be determined utilizing the Raosoft® Sample Size Calculator at <http://www.raosoft.com/samplesize.html> with a margin of error of 10% and a confidence interval of 90%. A randomizer built into Appendix I – Record Selection Form will randomly select the appropriate number of child records for review.

- 1) Alaska ILP Part C staff will perform the following steps to develop a list of child records to be reviewed as part of comprehensive program monitoring:
- 2) Run a Child Count Report for the program for December 1 of the subsequent fiscal year and note the number of children enrolled in the program since July 1 of the current fiscal year, shown on the Total Enrollment tab (Sheet 7).
- 3) Enter this number as the population size in the Raosoft® Sample Size Calculator.
- 4) Set the margin of error to 10%, the confidence interval to 90%, and the response distribution to 50%. Note the recommended sample size.
- 5) Select all children from the Total Enrollment tab of the report (Sheet 7) and paste them into the Randomizer Template sheet of Appendix I – Record Selection form.
- 6) Ensure that the template formulas in column B is applied to all rows.
- 7) Ensure that the template formula in column C is applied to a number of rows equally the sample size number.
- 8) Once column C is populated with the list of sample records, highlight the column and past it in to row I as VALUES, in order to record a final list of files for review.
- 9) Communicate which child records are being reviewed to the Regional EI Program being monitored.

Step 4: Off-Site Monitoring Activities

Request Administrative, Personnel and Fiscal Source Documents

Prior to the on-site visit, the monitoring team will provide the Regional EI Program with a request for any administrative or personnel policies and procedures, documents, or records required. Requested records will be submitted to the ILP State Team via secure email if they contain confidential information. Fiscal records from GEMS will be reviewed, and additional fiscal records requested if needed, such as billing logs or invoices.

Surveys of families, personnel and/or community providers

Prior to the on-site visit, the ILP State Team may conduct electronic surveys of program staff, community partners, and ILP families.

Step 5: On-Site Monitoring Activities

Opening Meeting

An entrance meeting is held with local regional program administrators and staff to review the purpose of the on-site visit, agency performance trend data, the agenda and activities that will occur. This is also an opportunity for the regional program to share general information with the on-site review team.

Child File Reviews

Alaska ILP staff review children's records to examine original source documents. They validate whether the data in the child records matches the data the program has entered into the ILP Database utilizing Appendix J – File Review Form. Regional EI Programs are responsible for providing selected child records on the first day of the monitoring.

- 1) Review child record documents to validate data elements.
 - a. Compare the data elements from the database (these may be pre-filled by ILP staff prior to site visit), with the source documents and record on the file review form spreadsheet whether the data match, whether family circumstances were documented, and any notes differences, discrepancies or needed improvements to documentation.
 - b. If there are missing child record documents when checking the data elements, ask additional questions about these data elements as a part of the interview process.
- 2) Share a summary and details of the information collected on the spreadsheet with the Regional EI Program, so that they can review any discrepancies noted.
- 3) A data accuracy score will be assigned based on the percent of data reviewed in the child record that matches the data in the ILP database. Data accuracy of less than 100% will result in a program finding, documented in a separate findings letter. The appropriate level of corrective action required will be determined based on whether the inaccuracies are determined to be systemic.

Family Contacts

Alaska ILP staff would like to accompany Regional EI Program staff on 1-3 home visits, in order to gain a better understanding of the work of the program, home visiting protocols, and relationships with parents.

Staff interviews

The Alaska ILP staff interviews the Regional EI Program administrators, Family Service Coordinators (FSC), service providers, and the fiscal manager. Interview questions are used to

triangulate data gathered from other monitoring activities. A summary of data collected through staff interviews will be included in the monitoring report.

Parent interviews and/or focus groups

Alaska ILP staff will interview families of infants and toddlers with disabilities or developmental delays to better understand compliance and performance in the Regional EI Programs. Families may be selected in the following ways:

- 1) By the state staff or by the Regional EI Program
- 2) According to specific information, such as families involved in dispute resolution processes, or children with non-compliant IFSPs
- 3) Based on a random selection
- 4) Referred by other providers in the community who have expressed concerns.

Whenever possible, the Regional EI Program will be informed in advance of the names of any families selected by the state for an interview. However, in some circumstances, additional families may be identified to be interviewed based on review of records. The Regional EI Program is responsible for coordinating the interviews with families. Interview questions are used to triangulate data gathered from other monitoring activities. A summary of data collected through family interviews is included in the monitoring report.

All recently enrolled families in a region will be invited to an in-person or virtual focus group, or individual phone calls or virtual meetings will be conducted for select families.

Community Provider interviews

State staff will interview community providers from related programs to better understand compliance and performance in the Regional EI Programs.

Administrative, Personnel and Fiscal monitoring activities

Fiscal monitoring may include document and record reviews, interviews, and/or a demonstration of financial processes and systems. The fiscal monitoring manual lists the fiscal monitoring indicators related to coordination of resources, payor of last resort, and system of payments. Regional EI Programs will be informed in advance of materials that must be provided.

Preliminary Data Analysis and Report

Data that is collected during the on-site visit is reviewed while on-site to allow sharing of findings related to data validation, data quality, and documentation. The analysis includes triangulation of data from multiple sources and should guide discussion of next steps in program quality improvement and technical assistance.

Closing Meeting

Discuss results of preliminary monitoring report, root causes of areas of concern, and plan for future technical assistance

Step 6: Post-monitoring activities

After the conclusion of on-site monitoring, Alaska ILP will conduct a debrief meeting with the Regional EI Program, provide a summary of the visit, and identify timelines for post-monitoring activities.

A detailed monitoring report will describe the program's performance related to data validation, data quality and documentation, and will also address areas in need of improvement and actions that must be taken to make these improvements. Any compliance findings will be issued in a separate letter, which will result in the requirement of a CAP if findings are systemic.

Annual Local Determinations

The Individuals with Disabilities Education Act (IDEA) requires each state lead agency to develop a state performance plan and annual performance report (SPP/APR). The plan and report evaluate the state's efforts to implement the requirements and purposes of the IDEA. This also describes how the state will improve its implementation.

When making determinations, the Part C Coordinator and the Part C state team use both the compliance and results indicators. The coordinator uses information from the state's database, SPP/APR, and the dispute resolution system as criteria for making local determinations.

(Appendix E)

The SPP/APR includes indicators that measure child and family outcomes and other indicators that measure compliance with the requirements of the IDEA.

Alaska ILP uses the information provided by each Regional EI Program for the state's annual performance report, information obtained through any monitoring visits, and any data collected in the state's data management system to determine if the Regional EI Program:

- 1) Meets the requirements and purposes of Part C of IDEA
- 2) Needs assistance in implementing the requirements of Part C of IDEA
- 3) Needs intervention in implementing the requirements of Part C of IDEA
- 4) Needs substantial intervention in implementing the requirements of Part C of IDEA

As a result of the review of this data, the state provides a summary of each program's performance on each Alaska monitoring measurement (**Appendix A**). Regional EI Programs confirm the data or provide copies of documentation that substantiate that data entry was not correct if the program does not agree with the data as reported. This information must be submitted within 30 days of receiving the summary from the state. Following confirmation or correction of the Regional EI Program data, the state uses the data to:

- 1) make status determinations of local program performance;
- 2) select programs for on-site monitoring visits;
- 3) identify areas of noncompliance and low performance;
- 4) notify programs of these findings and decisions; and

- 5) use these data to respond to the SPP/APR in the subsequent year.

By compiling and reviewing all the relevant data at one point in time annually, Alaska ILP staff ensures the consistency in their use and application to each Regional EI Program. Descriptions of how the data are used for each monitoring activity follow.

As required by IDEA, the Alaska ILP makes annual status determinations of Regional EI Program performance. Alaska ILP will complete these annually by October 30th. Based on data reviewed in the desk audit process programs are issued one of the following determinations: meets requirements, needs assistance, needs intervention or needs substantial intervention. Determinations are made using a report in the ILP Database. The criteria for making these determinations are based on performance related to three elements: general requirements, compliance indicators and results/quality indicators. **(Appendix E; Appendix F)**

Components of the annual Local Determinations scoring process include performance on SPP/APR compliance indicators, results indicators, and related IDEA requirements. In addition, annual Local Determinations take into account administrative, personnel and fiscal performance. A Local Determination letter is sent to each Regional EI Program, explaining the reason for their determination and any steps that need to be taken as a result of the determination. The program's data and scoresheet will accompany the letter.

Notice and opportunity for a hearing

- 1) Alaska ILP provides reasonable notice and an opportunity to appeal those determinations.
- 2) In order to appeal, the program must submit a written statement of appeal to the Part C Coordinator within 14 days.
- 3) Review of appeal consists of a review of the written statement of appeal and any documentation submitted with the appeal that demonstrates why Alaska ILP should not make the determination described.
- 4) The Part C Coordinator will make a final determination and inform the Regional EI Program.

Identification and Correction of Noncompliance

The state verifies correction of all findings of noncompliance in accordance with OSEP Memorandum 23-01. The state uses updated and subsequent data collected through the ILP database or submitted by the Regional EI Program to verify correction of noncompliance and may request that Regional EI Programs submit supporting information to document correction of these individual instances of noncompliance.

All findings of noncompliance must be corrected within one year of the date of the notification letter from the state to the Regional EI Program. Timely correction of noncompliance is tracked

in the ILP database, through corrective action plans and tools for submission of evidence that demonstrates correction of noncompliance.

Identification of Noncompliance

- 1) Identification of noncompliance and low performance: Through review and analysis of data during the desk audit, noncompliance is identified for each compliance indicator (where the target is set at 100%). The state consistently applies the definition of a finding of noncompliance for each program for each compliance indicator through the ILP database. The expectation is that programs' performance be 100%; less than this will result in a finding.
- 2) Related requirements for Indicators 1, 7, 8a, 8b and 8c will be identified as compliant or noncompliant through the program self-assessment process, with targets of 100%. If noncompliance is identified, a finding will be given.
- 3) Each program will only be given one finding for each indicator per year if noncompliance is found. Correction activities will address correction of both compliance indicator requirements and related requirements.
- 4) Alaska quality indicators evaluated during the program self-assessment will not result in findings of noncompliance, but programs may be required to develop program improvement plans to address quality issues identified.
- 5) Through the desk audit process instances of low performance on results indicators (where the state established the target) are identified for each Regional EI Program. If a program's performance is substantially less than the state established target for any result indicator, the program is required to develop a Corrective Action Plan to address performance on these indicators. Progress toward improving performance is tracked via the Self-Assessment section of the ILP database and Alaska ILP TA staff.
- 6) Alaska ILP notifies each program in writing of the identification of noncompliance and/or low performance and the need to develop a Corrective Improvement Plan (CAP) or Program Improvement Plan (PIP). Regional EI Programs will be notified of their Annual Local Determination in a separate letter (See Annual Local Determinations section).

Longstanding noncompliance extending beyond the one-year correction period will result in additional enforcement actions by Alaska ILP and will affect the Regional EI Program's annual determination. Likewise, the Regional EI Programs timely correction of noncompliance will also be considered in the Regional EI Program's annual determination. Determinations guide the level of need for technical assistance and/or professional development for the agency.

Notification of Noncompliance – Correction Letter

Within 90 days after the identification of non-compliance during the regular course of business, annual monitoring activities, or during an on-site visit or monitoring visit, Alaska ILP will notify the Regional EI Program of any findings of noncompliance. A written letter of findings includes:

- 1) The citation for the requirements with which the contractor is not compliant
- 2) A requirement that the program correct the noncompliance as soon as possible, and in no case more than one year after the date of notification

Corrective Action Plans

When not met, the EI Program will develop and implement a Corrective Action Plan monitored by the Technical Assistance staff and the Part C Coordinator including the following:

- 1) Root cause analysis
- 2) Criteria for quality and results indicators
- 3) Resources to achieve goals, like additional resources, training, or coaching
- 4) Regular meetings to assess progress
- 5) Consequences for not meeting the objectives of the plan

Alaska ILP will provide a list of required child- level and Regional EI Program-level corrective actions for noncompliance identified through record reviews and interviews. Alaska ILP requires that each contractor take action to correct the noncompliance as soon as possible, and in no case later than one year. Regional EI Programs may be instructed to:

- 1) Revise policies, procedures, and practices that contributed to or resulted in noncompliance
- 2) Conduct root cause analyses to identify the contributing factors of the noncompliance
- 3) Develop a corrective action plan to address root causes of the noncompliance
- 4) Submit data to demonstrate correction
- 5) Establish associated timelines

Alaska will consider the following when determining required actions for findings from annual monitoring or long-standing noncompliance:

- 1) Where and with whom the issue is occurring (one or more service coordinators, therapists, regionally, or statewide)
- 2) Historical or trend data
- 3) Contextual factors (the contractor's demonstrated ability to correct prior noncompliance)
- 4) Number of issues or findings of noncompliance

If additional findings of noncompliance are identified through other data collection processes, Alaska ILP will require the Regional EI Program to develop a CAP specific to the additional areas of noncompliance. The CAP will be due to Alaska ILP 30 days after the Regional EI Program's receipt of the monitoring report.

Corrective action plans vary based on the amount and type of noncompliance. Corrective actions may be relatively uncomplicated and brief, like correcting a data error. They also may be multifaceted and complex, like developing a policy and procedures for to support an

appropriate evaluation process. Alaska ILP is committed to providing technical assistance to the Regional EI Program as they develop corrective action plans.

Tracking and Verification of Correction of Noncompliance

Alaska ILP must account for all instances of noncompliance. To determine the steps that the Regional EI Program must take to correct the noncompliance and to document the correction, Alaska ILP may consider whether the noncompliance:

- 1) Is extensive or found in only a small percentage of files
- 2) Shows a denial of a basic right under IDEA
- 3) Represents an isolated instance in the administration of the program
- 4) Reflects a long-standing noncompliance to meet IDEA requirements

In the findings letter and the monitoring report, Alaska ILP will include the required actions a Regional EI Program may need to take, such as developing tracking or changing policies and procedures and may require a Corrective Action Plan (CAP). For any noncompliance concerning a child-specific requirement that is not subject to a specific timeline requirement, Alaska ILP must also confirm that the Regional EI Program has corrected each individual case of noncompliance, unless the child is out of jurisdiction of the Regional EI Program. In addition, Alaska ILP must confirm that each program correctly implements the IDEA requirement. Alaska ILP also must ensure that each Regional EI Program has changed policies and procedures, developed internal tracking protocols, provided training to staff and providers, and other required actions to address the contributing factors that led to the noncompliance, as soon as possible but no later than one year from the date of the identification of noncompliance.

Alaska ILP will consistently count and report findings. They will group individual instances involving the same legal requirement or a standard as one finding. Findings identified through dispute resolution must not be grouped with other findings and must be counted as individual findings. For example, if 7 records did not meet the requirements for compliance for Indicator 1 at a specific regional agency. This is identified as one finding for the agency.

Fiscal strengths and areas of noncompliance are communicated in the Letter of Findings and the monitoring report issued along with comprehensive program monitoring.

To verify correction of noncompliance, Alaska ILP completes the following steps:

- 1) For each child-specific instance of noncompliance, Alaska ILP will review each child's record. For timeline requirements, Alaska ILP will verify that the required actions including evaluation/assessment and initial IFSP, IFSP services, transition plan, transition notice, and transition conference were completed although late, unless the child was no longer in the jurisdiction of the program. For child-specific noncompliance that is not connected to a timeline, the child's record must show that the requirements were implemented correctly, including that the parent signed consent to bill private

insurance, the child received a multidisciplinary team evaluation, or a justification was written in the IFSP when the service was not provided in the natural environment.

- 2) For instances where the Regional EI Program had noncompliance, Alaska ILP will verify that the Regional EI Program has corrected the noncompliance and is correctly implementing the requirements. The Regional EI Program will be required to demonstrate 100% compliance for one quarter in order for the noncompliance to be considered corrected. Data may come from subsequent desk reviews, on-site monitoring, or the database.

Alaska ILP must verify the correction of noncompliance within one year of the identification of the noncompliance. Verification activities will occur before the conclusion of the one-year timeline. In this timeframe, Alaska ILP will notify the Regional EI Program in writing when findings of noncompliance have been verified as corrected.

If a Regional EI Program fails to demonstrate correction within the one-year timeline, Alaska ILP will impose additional corrective actions, sanctions, or enforcement actions based on the level of noncompliance and the duration of the failure to correct the noncompliance. Alaska ILP will continue to collect and review updated data to confirm that child-specific instances of noncompliance have been corrected and that the Regional EI Program is correctly implementing the requirements. If the program is not correctly implementing the regulatory requirements, Alaska will identify the causes of the continued noncompliance and take action to ensure correction, including enforcement actions.

Enforcement actions include, but are not limited to, mandatory technical assistance, increased reporting requirements, and the required use of funds for specific actions. If Alaska ILP finds additional children with noncompliance for the same requirement during later reviews, the Regional EI Program will require the child-specific noncompliance to be corrected but will not issue another finding. Alaska ILP will continue to pull data and verify individual child correction quarterly until the program is at 100 percent compliance and all child-specific noncompliance is corrected. Alaska ILP will maintain written documentation of corrections, including the date the correction of noncompliance was verified.

As part of the state's post-monitoring activities after comprehensive monitoring of Regional EI Programs, Alaska ILP staff meet to review information documented on the file review form for each of the fiscal monitoring indicators. The purpose of this review is to determine if noncompliance was discovered for any of the fiscal monitoring indicators and to decide on required actions that must be taken to ensure correction for each noncompliant fiscal requirement.

Fiscal findings of noncompliance are incorporated into the Letter of Findings that is issued by Alaska ILP within 90 days of comprehensive monitoring with other findings of noncompliance such as services not being implemented in accordance with the IFSP or lack of written justifications when services are not provided in natural environments. The citations for the

fiscal requirements with which the Regional EI Program is not compliant, along with the required actions needed to demonstrate correction, are included in the Letter of Findings.

Child-Related Fiscal Noncompliance

Some fiscal findings that relate directly to the child, such as the parent did not provide consent prior to billing private insurance or System of Payments policies were not provided to families, will require Regional EI Programs to determine the root cause of the noncompliance, change procedures, train staff, or institute other supports to ensure that the requirements will be implemented correctly and that all individual child noncompliance for these items are corrected. To verify correction of these types of fiscal findings, the state must complete 2 steps:

- 1) Review source documents to verify that each individual child's noncompliance was corrected; and
- 2) Review other child's records to determine if the program is correctly implementing the fiscal requirements and is at 100% compliance.

These fiscal findings must be corrected as soon as possible, but no later than one year from the date of the Letter of Findings when noncompliance is identified.

Correction of Agency -Related Fiscal Noncompliance

Agency-Related Fiscal Noncompliance

For other fiscal findings, such as those related to inaccurate invoices or payments, inappropriate use of funds, or lack of obtaining prior approvals when required, corrections may include reimbursing funds, correcting invoices, using other sources of funds to make payments, and others. Internal procedures may also need to be reviewed and modified along with staff training to ensure noncompliance does not continue. Evidence of correction will need to be provided to Alaska ILP and Fiscal staff as soon as possible, but no later than 60 days of the Letter of Findings for their review and verification of correction.

All fiscal findings must be verified within the established timelines for each requirement to be considered corrected on time. Alaska ILP provides written documentation to the Regional EI Programs of their correction of fiscal findings in the same manner they provide written documentation of correction of other programmatic findings.

If fiscal findings are not corrected on time, sanctions can be taken against the Regional EI Program. Sanctions may include technical assistance, withholding of funds, or the discontinuation of their contract if necessary.

Closure of findings of noncompliance

Alaska ILP will inform the Regional EI Program in writing that the finding of noncompliance is closed after Alaska ILP verifies the correction of the noncompliance including child-specific noncompliance, correct implementation of the requirement by the program, and 100 percent compliance. The Regional EI Program should continue to conduct record review activities to identify any areas of need that may arise before future monitoring activities.

Incentives and Sanctions

The Alaska ILP reserves the right to use any appropriate enforcement actions to correct persistent deficiencies related to compliance indicators and IDEA requirements. Persistent deficiencies are defined as substantial non-compliance identified by the state either through data reports, on-site review, corrective actions taken, previous monitoring reports, unique characteristics of the Regional EI Program, the program's efforts and capacity to correct the identified problem and other quality assurance activities that have continued without significant improvement for six months or when noncompliance is not corrected within one year. Sanctions can also be imposed related to local status determinations.

Enforcement actions may include:

- 1) Directing the use of funds to correct the noncompliance;
- 2) Directing the use of TA and/or training;
- 3) Imposing special conditions on the Regional EI Program contract;
- 4) Denying or recouping payment for services for which noncompliance is documented; and/or
- 5) Terminating or not renewing the Regional EI Program contract.

The Alaska ILP provides written notification of impending enforcement action including timelines. The program has the opportunity to meet with state staff to review the available data, explain what will be necessary to achieve compliance, and review the evidence of change that will be necessary to demonstrate sufficient improvement to reverse the enforcement action, if appropriate.

Incentives may include:

- 1) Public recognition of high performing programs during stakeholder engagement activities, at the fall ILP Coordinator meeting, and with the Interagency Coordinating Council.
- 2) Public recognition on ILP website.
- 3) A certificate of achievement and window sticker for programs to display in their facility.

Dispute Resolution

The Alaska ILP Part C Coordinator oversees the Part C of the IDEA dispute resolution process as outlined in the Alaska EI/ILP Policies. The Coordinator and the Alaska ILP staff support families and Regional EI Programs to:

- 1) Access the Part C procedural safeguard system
- 2) Provide technical assistance to the regional contractors on the implementation of the procedural safeguards
- 3) Complete Part C formal investigations within federal timelines

Regional EI Programs are encouraged to quickly resolve complaints informally with families at the local level when possible. Programs are required to collect data on informal complaints made by families at the local level. A summary of the date, number, topic, activities, and resolution date of complaints must be provided to the State ILP program by each Regional EI Program during quarterly narrative reporting. Upon receipt, the State ILP team will review the complaint data, looking for patterns of complaints and will initiate an investigation when concerning patterns or red flags are found.

Written complaints received by the state are documented and investigated to determine whether there are any findings of noncompliance with Part C of IDEA. The State of Alaska Department of Law provides consultation to the Alaska ILP team. The Part C Coordinator sends a written response to the family and the Regional EI Program within 60 days of the complaint.

If an area of noncompliance is identified in a Regional EI Program, a corrective action plan is required of the Regional EI Program. The program has one year from the notification of noncompliance to come into compliance. The Regional EI Program must submit the corrective action plan to the Part C Coordinator within identified timelines. The Part C Coordinator reviews and approves the plan and develops a follow-up monitoring plan as appropriate. Data from informal and formal dispute resolution processes are used to help inform annual monitoring as well as focused monitoring if issues emerge throughout the year. Dispute resolution data also is used to help plan technical assistance and training.

Targeted Technical Assistance and Training

Alaska ILP uses data from monitoring to help plan targeted technical assistance and training to support and sustain correction and overall improvement. Alaska ILP identifies specific technical assistance and training for a region or statewide by looking at trends and patterns of noncompliance related to IDEA requirements, results, quality areas, or practices. Technical and training needs may include activities like writing appropriate justifications when services are not provided in natural environments or transition conference requirements that include procedures for inviting LEA staff in sufficient time so they can participate.

Alaska ILP trains the Regional EI Program to use the Local Contributing Factors Tool and other root cause analysis tools or processes to develop a corrective action plan that will be monitored by the Part C staff. Root cause analysis focuses on the infrastructure issues that contribute to the noncompliance. These can include policies and procedures, funding, training and technical assistance, supervision, data, workforce shortages, and provider's practices. Training teaches how to develop and corrective action or improvement strategies to support and sustain correction and improvement. A Program Improvement Plan (PIP) may also be developed to address quality, results, and other areas of concern that do not fall into noncompliance.

Alaska ILP Part C/Early Intervention staff use the Office of Special Education Programs (OSEP) national technical assistance centers to support Part C IDEA practices, processes, and

procedures to achieve compliance, results, and quality. The Alaska ILP Part C team offers professional development and technical assistance to help programs understand and implement IDEA requirements. These tools promote understanding of monitoring and expectations for compliance, correction, and improvement.

Technical assistance provides knowledge, skills, and professional effectiveness to a program to ensure they meet the quality, compliance, and results indicators of the Part C of IDEA regulatory requirements. This assistance may vary in duration, topic, form, and structure. The results of monitoring inform the types of technical assistance and can include mentoring, coaching, training, and consultation. Technical assistance helps Regional EI Programs:

- 1) Identify or emphasize areas that need attention during focused monitoring visits
- 2) Determine need for additional technical assistance

Modify policies and procedures Develop a Program Improvement Plan (PIP) to address areas of low performance, quality or results.

The Alaska ILP Part C staff review progress data on a monthly or quarterly basis to ensure benchmarks are being met.

Reporting to the Public

In accordance with federal requirements, the Alaska ILP annually reports both state and regional program performance data (e.g., 618 and SPP/APR data) to the public. At a minimum the SPP/APR and each regional program's performance on SPP/APR indicators 1 through 8 (timely services, natural environments, child outcomes, family outcomes, children serviced birth to age one and birth to age three, 45-day timeline and transition steps, notification, conference) are publicly reported on the web. The report on program performance includes state targets and each regional program's percentage (and numbers) in comparison to the targets. The Alaska ILP makes every effort to ensure the data are understandable to a wide variety of audiences (e.g., parents, advocates, administrators, state policy makers, service providers).

Alaska ILP/Part C Early Intervention SPP/APR is available on Alaska Department Health website at <https://health.alaska.gov/dsds/Pages/infantlearning/reports/default.aspx>.

Alaska ILP uses data from Indicators 1-12 in the state's Annual Performance Report (APR) to report publicly on the performance of each Regional EI Program. The Regional EI Program's annual report is posted on the Alaska ILP's website within 120 days of submitting the state's SPP/APR to OSEP each year. Each Regional EI Program's data in the annual report is considered when planning comprehensive monitoring once every six years to determine if any SPP/APR indicators need further investigation. This data may also lead to a special focused monitoring visit to investigate any compliance or performance issues related to the SPP/APR in between comprehensive monitoring.

The annual report compiles data for federal indicators and state reporting requirements. The results are used to make determinations. Learn more about determinations in the next section. Reporting of each Regional EI Program's performance is available at: <https://health.alaska.gov/dsds/Pages/infantlearning/reports/default.aspx>. Alaska ILP reports the SPP/APR to the public annually within 120 days of submission in February.

For SPP/APR compliance indicators, Alaska ILP will report data under each indicator in the SPP/APR that reflects the level of compliance prior to the program correcting any identified noncompliance, regardless of whether compliance is corrected prior to or following written notification of noncompliance. These data will be used to report publicly each Regional EI Program's performance on the SPP/APR indicators annually. For compliance indicators, Alaska ILP will report to the Office of Special Education Programs (OSEP) in the SPP/APR the number of findings of noncompliance verified as corrected within one year of written notification and findings corrected more than one year after written notification.

Statewide Data System

On an annual basis (during October/November), the effectiveness of the SPP/APR improvement activities and the indicator targets are reviewed. Changes to improvement activities and targets are incorporated into the SPP/APR during its development. Targets for the Alaska critical priority indicators are reviewed as well. Based on reviews of all monitoring indicators, revisions are made to the monitoring process and tools.

- SPP/APR and 618 Reporting: The SPP and APR Indicators serve as the foundations of accountability for Regional EI Programs, reflecting Federal statutory priority areas under Part C related to the provision of early intervention services. The measurable and rigorous targets established set standards for Regional EI Programs. Reporting of performance on the SPP indicators and 618 data are key components of the EI/ILP accountability system.
- Data System: The Alaska EI/ILP web-based data system provides the EI/ILP team with detailed information regarding every child in the EI/ILP system. Data is collected on referral and enrollment timelines, eligibility determination, IFSP services planned and delivered, child outcomes, and transition activities. All data required for annual SPP/APR reporting, Child Count and Settings, and Exiting Data are collected in the data system. In

Data accuracy

Regional EI Programs are required to enter all the data required for indicators. The data must reflect the required information and quality, be error-free, and include a reliable and consistent source of information.

Data validation

In Alaska, Part C Family Service Coordinators enter child and family data into the Alaska ILP sections in ILP Database. The Part C Family Service Coordinators are the originators of the data

that will be used in their daily work with children and their families. This data includes family demographics; child and family evaluation and assessment; and information about Part C IFSP services planned, provided, and billed for.

Those same data are used to report annually on statewide and regional performance for the SPP/APR. Data used for these purposes must be valid and reliable to make sound conclusions when monitoring and when used for program improvement. For SPP/APR compliance indicators, the data is used to monitor implementation of the requirements.

Alaska ILP provides ILP Database training to Regional EI Programs on a regular basis. They also send reminders of what data must be entered when changes are made to the system, and when new staff at the regional level are onboarded.

Continuous Improvement in the Monitoring Process

Alaska ILP is committed to a continuous improvement approach to improve the monitoring system. The approach uses practices that celebrate successes, recognize lessons learned, and identify revisions needed for the monitoring process. This approach focuses on debriefing the monitoring cycle and surveying cohorts for feedback on the process.

Annual Review of Monitoring Process and Tools

On an annual basis (during March/April), the monitoring process and tools including the annual self-assessment, are reviewed and revised as necessary. Specific record review items may change from year to year and additional tools may be added based upon modifications made to SPP/APR indicators by OSEP, state selected priority indicators, modifications to the data system and feedback from regional programs. Inter-rater reliability tools are also used to ensure consistent monitoring across local ILPs. Programs are informed of changes to the monitoring process and the monitoring tools during May/June each year.