

## **SELECTION OF PROGRAMS OR DISTRICTS FOR ON-SITE MONITORING: CONSIDERATIONS**

Monitoring assists states in ensuring that federal law is being fully implemented. Focused monitoring, as part of a state's model of general supervision, may be operationalized in a number of ways including on-site and off-site (desk audits, etc.) procedures that examine data, policies, and practices of local programs. To use resources most efficiently states may develop selection methods that identify some programs or districts for more comprehensive monitoring than others. This selection process is typically used on an annual basis as part of the state's system of general supervision.

Districts can be selected for monitoring in several ways. Three methods of selecting districts are described in this section. One method is to rank all programs or districts based on specific variables or monitoring priorities. It is usually recommended that states use only two or three monitoring priorities on which to rank programs or districts. The subsequent discussion of selection will use two variables for purposes of examples. The second method groups programs or districts and selects based on a focus on a few monitoring priorities – usually two or three - within the groups. The third selection method follows a cycle to choose programs or districts based on the number of years in the cycle.

Generally, selection of a program or district may be based on an area of focus or monitoring priority. For example in Part C, programs could be selected based on the percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline (State Performance Plan, item 7). For Part B, districts could be ranked based on monitoring priority 1 from the State Performance Plan, the percent of youth with IEPs graduating from high school with a regular diploma.

Once the monitoring priorities are determined the decisions for selection are whether to group the districts or programs within the state based on a specific variable, such as enrollment size or geography or to use a calendar cycle that designates a specific number of programs or districts to be monitored per year without examination of the program or district ranking on the monitoring priority.

In deciding upon the selection method, states must consider the state's capacity to conduct specific activities. When selection is for on-site monitoring, as is the specific emphasis of this section, issues of numbers of personnel to go on-site, length of stay at the site, time for writing and proofing the report writing, negotiating the corrective action plan, and time to follow up on the correction in subsequent years must be considered. Capacity becomes an additive burden as each year's number of site visits is compounded by ensuring districts from preceding years are correcting noncompliance and reaching expected improved results.

### **Method 1: Focus Selection, no grouping**

It is frequently recommended that states divide programs or districts according to specific strata, for example, size of enrollment or service numbers (this is described more fully in Method 2). It is possible, however, for a state to select programs or districts without grouping them first. Using this method, all school districts or programs are ranked on the two monitoring priorities of focus. Thus, if there are 74 programs in the state and there are two monitoring priorities, all 74 programs or districts would be ranked. Based on the capacity determined by the state, on-site visits might be conducted with the three lowest ranked districts for each variable, which in this instance would result in six programs or districts having on-site visits.

Other considerations for decision making rules apply when there are ties in ranks or one or more districts is lowest ranked on both variables. Decisions can be made that districts with the largest population of students or students with disabilities will be chosen when there are ties. When one district is lowest ranked on both variables, the decision could be to conduct the visit in both areas or to choose programs or districts on variable one, then if identified in variable two that program or district would be skipped and the next ranked program or district would be selected. Whatever decision rules states use, these should be explicitly written to ensure their fair application.

### **Method 2: Focus Selection, with Grouping**

Selection issues must be considered in the implementation of a state's monitoring system with regard to whether to group programs or districts based on enrollment or some other category that guides meaningful comparison of data in each monitoring priority. Examination of data reports or profiles of programs or districts grouped by similarity on the monitoring priority or priorities may allow for a more meaningful comparison of the data for that program or district.

Part C has unique challenges in identifying grouping variables. In some states it may make sense to group programs based on the size of the service population, whereas in others geography or ranking all programs as previously described may make the best comparisons.

Part B states have also encountered unique circumstances to consider when deciding whether to use grouping. Several states have grouped districts based on total student enrollment. States that have very large urban populations have divided the urban district into separate enrollment groups that are comparable to similarly sized districts outside the urban area. That is, if an urban district has an enrollment of 200,000 then it might be that that district would be divided as evenly as possible into four groups of approximately 50,000 students using the high schools as the determinate for the "enrollment" group.

In some instances states may want to consult their stakeholder groups for their perspectives. Several possible groupings and comparisons should be considered by states in making the final decision. As with the decision about the number of

monitoring priorities, states must consider the resource allocation and implications when deciding upon the number of groups. For example, in a state that identifies two monitoring priorities for four groups, a minimum of eight districts would be selected (two monitoring priorities times four groups).

Some states have also selected within groups based upon a percent. That is, when dividing the groups results in wide variations in the number of programs or districts in the group, the state may decide to choose x% of programs or districts from each group. Usually the group with the largest number of programs or districts has the smallest student enrollments, while the group with the smallest number of districts has a large student enrollment. It is expected that enrollment groups will have approximately equal enrollments, although not necessarily approximately equal numbers of districts. In an example of four enrollment groups with about 100,000-165,000 in each group, group one has 5 programs or districts, group two 12, group three 32, and group four 75. Using 20%, group one would have one program or district chosen, group two would have two, group three six, group four 15. A total of 24 programs or groups would be monitored on-site in this example.

**Focus Selection with Random Selection:** Some states have also added random selection as a part of the focus selection whether with or without grouping. It can be implemented as another priority or group. For example, if a state has two indicators and does not group, the state would choose one program or district randomly from those not chosen in the focus selection. Thus, as in the earlier example of a state that does not group, choosing four districts in each indicator based on the lowest ranking, the state would add two random districts for a total of ten districts for on-site monitoring activities.

States that have two monitoring priorities and four groups, choosing only one program or district in each group, plus selecting a program or district randomly for each monitoring priority would also monitor 10 programs or districts (two districts times four groups, plus two random) on-site.

As the number of monitoring priorities increases and the number of groups increases the capacity and resources of the states must increase. The magnitude of the increasing numbers through the years needs to be emphasized. As in the example of the state that identified 24 programs or districts, year two could potentially result in 24 programs being examined for corrective action plans, plus 24 newly selected programs or districts being monitored on-site. This capacity need for the state to assist has increased to a total of 48 programs or districts in year two.

### **Method 3: Cyclical Selection**

There are several ways cyclical selection of programs or districts for monitoring may occur. Two will be briefly described. The first selection consideration is to identify the number of programs or districts and divide that by the number of

years in the cycle. For example with 120 districts or programs and a four year cycle, 30 programs or districts would be monitored on-site each year. In this example, there is no specific focus on a specific monitoring priority.

The second selection consideration is to identify programs or districts through the method identified above. Yet, with this consideration, one or more of the monitoring priorities are used to focus the on-site visit. For example, the state would monitor on-site 30 programs or districts but focus their attention to the 45 day time line when on-site in these programs (Part C) or for Part B focus attention on the monitoring priority of graduation.

### **Conclusion**

Selection of programs or districts for on-site monitoring must be systematized and in writing. The method and criteria need to be explicit so that these are transparent to the programs, districts, and public. Stakeholders play an important role in assisting the state in making decisions of monitoring priorities. They may contribute to determining whether a focus or cyclical method is preferred. For focus methods, stakeholders may add perspective to the discussion of grouping versus ranking as a whole. Decisions of selection of LEAs for off-site monitoring are similar to those described above; the important considerations are that methods are explicit and systematic.