



Pennsylvania
Department of Education

Cyclical Monitoring for Continuous Improvement

For School Administrators

Complete Slide Deck



Pennsylvania
Department of Education

Module 1

Overview of Monitoring



The Background of CMCI

- **WHY**
 - Federal requirement 34CFR Sec.300.600 (State Monitoring & Enforcement)
- **WHO**
 - Bureau of Special Education monitors all school districts and charter schools
- **WHEN**
 - Once in every six-year cycle, system in place since 2001-2002
- **WHY**
 - Cyclical, Target, or Focused Monitorings



CMCI: SEA/LEA Accountability

- CMCI Data used for federally required State Performance Plan and Annual Performance Report (SPP/APR)
- Every state required to collect and report annual data on:
 - Federally mandated compliance and performance indicators
 - Established SPP targets
- LEA Annual Determination
- Results Driven Accountability (RDA)
- SSIP (Indicator 17) Reporting



CMCI Process

CMCI Training

- Web-based
- Completed by all relevant team members
- Must be finished by the **Monday after Labor Day**

CMCI Monitoring

- Web uploads
- Virtual meetings
- Onsite/in-person components



Benefits of Hybrid Monitoring

- Integrity and consistency: use of standardized protocols
- Preparation and proactivity: increased lead time to complete components of the monitoring, such as the FSA and EBR
- Flexibility and convenience: uploading of information onto IMS; different modes of providing student files
- Communication: availability of BSE chair to provide technical assistance and supports through regular communication with LEA



Features of Monitoring

Monitoring is a two-week process

- Onsite for two days with three peers
 - Student sample file reviews
 - Classroom observations
- Parent/teacher interviews conducted by peers (phone/virtual)
- Administrative interview and Exit Conference (virtual)
- Post-monitoring activities



Responsibilities of the LEA

- Administrators/critical personnel must be available for BSE Chair to contact during two-week window of monitoring
- LEA must upload all relevant FSA documents and student files to IMS web-based system or provide BSE Chair access to the Student Information System (SIS)
 - Student files are considered complete when they include required signatures
 - LEAs are encouraged to scan/digitize signed student files as they create them



CMCI Components

Facilitated Self Assessment (FSA)

- Information from EBR
- Information from surveys
- Policies and procedures

Administrative Interview

File Review

- Random sample of students
- Performed by BSE Chair and peers

Interviews

- Special education teacher
- General education teacher
- Parents

Classroom Observations

Exit Interview



CMCI Training

- PDE Integrated Monitoring System: Monitoring Resources
 - <https://www.pdeims.com>
- Cyclical Monitoring for Continuous School Improvement (CMCI): For School Administrators
 - Available on Schoology in August
 - Complete by **the Monday after Labor Day**
 - Consists of six modules
- Cyclical Monitoring for Continuous School Improvement (CMCI): Peer Monitoring Training
 - Available on Schoology in August
 - Complete and submit survey by **September 30th**
 - Consists of three modules



LEA CMCI Timeline

- **July**

- Official notification sent to LEAs to be monitored
 - “Week of Monitoring” date
 - BSE Chair

- **By Monday after Labor Day**

- Key LEA personnel complete CMCI course on Schoology

- **Following the Training**

- BSE Chairs contact the LEA to discuss monitoring schedule and provide technical assistance as needed



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Module 2

Timelines and Processes



Importance of Timelines

Required by
BSE

Aids in
preparation

Helps with
strategic
planning

Increases
manageability

Streamlines
organization



Monitoring Segments

Pre-Monitoring Activities

Activities During Monitoring

Post-Monitoring Activities



Pre-Monitoring Timeline

Start of School Year

- Student names for the EBR emailed to LEA
- FSA is opened
- Parent, Teacher, and Student Survey letters and links available

45 Days Prior

- Parent, Teacher, and Student Surveys close
- Summary available on CMCI webpage after five days

30 Days Prior

- Local Task Force Chair notified that LEA is being monitored
- LEA submits FSA and supporting documents via IMS website

10 Days Prior

- BSE Chair provides list of students selected for Student File Review (10 students) and Federal Child Count to the LEA



Timeline During Monitoring

WHEN	WHO	WHAT
Prior to Day 1 of Monitoring	LEA	All documents uploaded/access to SIS
Day 1	Adviser	• Virtual Administrative Interview • Prep for onsite activities
Day 2, 3 (ONSITE)	Adviser & Peers	Adviser and LEA Administration: ▪ Coordinate monitoring activities ▪ Facilities walk-through Peers: ▪ Review student files ▪ Classroom observations



Timeline During Monitoring, continued

WHEN	WHO	WHAT
Day 2-5	Peers	Complete parent, teacher interviews (phone and/or virtually)
Day 4 -10	Adviser (with LEA Administration, as needed)	Complete monitoring activities ▪ FSA Review ▪ EBR review ▪ Federal Child Count Verification ▪ Federal Interest Form ▪ Teacher Class Report, etc. Check peer paperwork



Specific Monitoring Tasks

CMCI TASK	METHOD	WHO/WHEN
STUDENT FILE REVIEWS (Per Random Sampling)	Onsite Paper files	Peers/BSE Chair 1.5-2 days
CLASSROOM OBSERVATIONS (of Student Sample)	Onsite	Peers/BSE Chair/LEA Admin 1.5-2 days
TEACHER INTERVIEWS (of Student Sample)	Virtual/Phone	Peers/BSE Chair Across 1-week span
PARENT INTERVIEWS (of Student Sample)	Virtual/Phone	Peers/BSE Chair Across 1-week span
ADMINISTRATIVE INTERVIEW/ EXIT CONFERENCE	Virtual	BSE Chair/LEA Team



Tasks of the BSE Chair

CMCI TASK	METHOD
EBR REVIEW	Student Information System (SIS)/eFiles uploaded to IMS website
FSA POLICIES/PROCEDURES	eDOCs upload/LEA website
FSA FILE REVIEWS	SIS/eFiles upload
TEACHER CLASS REPORT	Interactive eDOC
FEDERAL CHILDCOUNT REPORT VERIFICATION	SIS/eFiles upload
FEDERAL INTEREST EARNED FORM	Interactive eDOC

An LEA point person must
be available to talk to the
BSE chair during the
monitoring



After the Monitoring

Due Date from Issuing of CAV Report	Task Completed
Within 15 days	• BSE Chair contacts LEA and PaTTAN consultant, to schedule Corrective Action Verification Plan (CAVP) meeting
Within 30 days	• If cited, LEA submits evidence of IEP revision for students whose EBR reviews were non-compliant
Within 60 days	• BSE Chair, PaTTAN consultant, IU TaC, LEA team meet to develop CAVP



After the Monitoring, cont.

From the Date the CAV Report Is Issued	Task Completed
Within 90 days	• If cited, LEA submits evidence of corrected Caseload and Age Range requirements and of IEP teams reconvening to review need for compensatory education
Within 180 days	• If needed, LEA submits Improvement Plan(s) IPs
Within 365 days	• All non-compliant items in Monitoring Report are corrected and verified • Improvement Plan benchmarks completed



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Module 3

Pre-Monitoring Activities



Pre-Monitoring Activities

Parent,
teacher, and
student surveys

Educational
Benefit Review
(EBR)

Facilitated Self-
Assessment
(FSA)

Preparing for
monitoring



Utilizing Surveys

- Three types of surveys
 - Parent
 - Teacher
 - Student
- Accessing and submitting surveys
 - Surveys are accessed via IMS website
 - Survey letters and links are available at the beginning of school year
 - LEA distributes survey completion letter to parents and teachers
 - LEA provides proof of distribution for BSE verification



Survey Results

- Surveys close 45 days prior to monitoring
- Summary report posted on the IMS website five days after the survey due date
- LEAs review the results of the surveys and submit written comments in the Facilitated Self-Assessment (FSA)



Educational Benefit Review

- A systematic approach to reviewing students' records
- Students selected for Educational Benefit Review (EBR) available to the LEA at the beginning of the school year
- LEA will complete EBR of identified students
 - Option to complete EBR as a professional development event
- EBR completed by the beginning of cyclical monitoring
- Relevant information and files uploaded to FSA #23



What Is the FSA?

- Purpose of Facilitated Self-Assessment (FSA)
 - To facilitate discussion between LEA team and BSE Chair to identify areas of compliance, non-compliance, and areas of needed improvement
- Content
 - Contains 23 sections
 - Each section includes:
 - Standards
 - Regulatory Base
 - LEA Procedure
 - BSE Procedure



Completing the FSA

- Completed by LEA team and available from the start of the year
- Submitted **30 days prior** to the monitoring using IMS
 - Answer all narrative questions
 - Upload document or link for policies, written procedures and practices, for evaluation and verification of FSA components
 - Upload FSA Topical area Student Files to IMS web-based system
 - OR Provide BSE Chair access to SIS for a direct review

BSE will review a maximum of 10 files per FSA area, unless otherwise indicated by the Chair



FSA and SPP

- State Performance Plan (SPP) data is pre-populated within the FSA
- Use embedded dashboard to analyze the data
- Provide written summary/explanation of student outcomes, policies, procedures, and program operations
- LEA performance on SPP targets will be included in the annual Special Education Data Reports (SEDR) and/or on PDE website
- BSE Chair will identify specific items the LEA must provide digitally for BSE review



SPP Indicators on the FSA

ITEM #	TOPIC	SPP Indicator
FSA 3	Child Find	SPP 11
FSA 6	Graduation Rates	SPP 1
FSA 7	Dropout Rates	SPP 2
FSA 8	Exclusions, Suspensions and Expulsions	SPP 4A
FSA 11	Least Restrictive Environment	SPP 5
FSA 16	Statewide Assessment Participation	SPP 3A
FSA 21A	Transition Services	SPP 13
FSA 22	Disproportionate Representation	SPP 9-10

Answer questions,
even if LEA meets
SPP requirements



FSA & LEA Policies/Procedures

- School Board Policies: uploaded to IMS system
 - FSA 2 Positive Behavior Support
 - FSA 4 Confidentiality
 - FSA15 Parent Training (School Visitor's Policy)
 - FSA 17 Public School Enrollment
- Notices/Procedures: uploaded to IMS system
 - FSA 3 Child Find
 - FSA 10 Independent Educational Evaluation
 - FSA 13 Provision of Related Services (Psychological Counseling)



FSA & Student Files

Submit student files through CMCI webpage or via SIS access as pertaining to:

- FSA 1 Assistive Technology
- FSA 2 Positive Behavior Support
- FSA 4 Confidentiality
- FSA 5 Dispute Resolution
- FSA 8 Exclusions/Suspensions
- FSA 10 Independent Educational Evaluation (IEE)
- FSA 12 Extended School Year (ESY)
- FSA 14 Caseload and Age Range
- FSA 17 Public School Enrollment
- FSA 18 Surrogate Parents
- FSA 20 Intensive Interagency
- FSA 21 Summary of Academic Achievement
 - FSA 21A 10 Students (16 or older)
- FSA 23 Educational Benefit Review (EBR)



Additional Required Reports

FSA 14 – Caseload and Age Range

- Caseload Age Range Form
- Teacher's Class Report

Federal Financial Interest Earned Form

Files of Students Listed on Federal Child Count Verification



Preparing for Monitoring

- Upload all relevant student files to CMCI webpage OR provide BSE Chair access to SIS
- Coordinate the logistics of a virtual Administrative Interview with BSE Chair
- Identify protocol for peer to complete parent and teacher interviews
- Identify time slots convenient for both parties



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Module 4

Educational Benefit Review



The Purpose of EBR

To determine whether the current design of an IEP is reasonably calculated for a student to receive educational benefit.



The Legal Basis of EBR

- **Board of Education v. Rowley**

- Defined educational benefit “if the student derives more than minimal or trivial progress...”

- **Endrew F. case**

- A school must offer an IEP reasonably calculated to enable a child to make progress appropriate in light of the child’s circumstances.

- **IDEA 34 CFR Sec. 300.324**

- “Each public agency must ensure that the IEP Team:
 - Reviews the IEP periodically, but not less than annually, to determine whether the annual goals for the child are being achieved; and
 - Revises the IEP, as appropriate, to address any lack of expected progress toward the annual goals, and in the general education curriculum, if appropriate.”



What Is EBR?

- A systematic approach to review students' IEPs
- Used to determine if the design of the IEP was reasonably calculated to provide educational benefit across three years of consecutive IEPs
- Benefit is determined by comparing the current IEP with the prior two IEPs
- May be used as a professional development opportunity



The “Who” of EBR

Student Parameters

- 10 - 12 students' IEPs over three years
- All primary disability categories, if available are selected
- Elementary, middle, and high school students

Team Members

- School administrator(s)
- Special education teacher
- General education teacher
- Individuals knowledgeable about the special education programs



EBR Timelines

- Beginning of school year:
 - LEAs will receive a list of students for the EBR
 - Chairperson and LEA will collaborate to identify final list of students for the EBR process
- Complete the EBR process with relevant staff
- 30 days prior to the Week of Monitoring:
 - Upload EBR documents to CMCI webpage as part of FSA submission



The EBR Process

1. Record information from the IEPs for three consecutive years
2. Analyze relationships among specific components of IEPs and across the three years
3. Compare progress across three consecutive IEPs
4. Look for patterns and determine if the IEP was reasonably calculated to result in educational benefit
5. Decide whether appropriate adjustments or revisions were made



Collecting Information

Collect and record the following information from three years of IEPs for each student:

1. Present Levels of Performance
2. Needs/Concerns
3. Annual goals & Program modifications
4. Services/Placement
5. Progress
6. Was the IEP adjusted/revised?



EBR Worksheet Screenshot

EDUCATIONAL BENEFIT REVIEW WORKSHEET

Instructions: LEAs participating in cyclical monitoring are required to use this worksheet to address the Educational Benefit Review (EBR) in FSA #23. The LEA is to form a team, and complete one worksheet for each student on the EBR/FSA #23 list provided to the LEA by the BSE. The LEA is to have the completed worksheet for each student, as well as each student's educational record, available for review by the BSE team chairperson during the onsite review.

The overall purpose of the EBR process is to determine whether the IEP was reasonably calculated to provide for educational benefit. Specific instructions about how to complete the EBR were provided by the BSE during the monitoring training.

Name of Student

LEA

PA Secure ID

Year 1

Present Levels of Performance	Needs/Concerns
Annual Goals/Accommodations & Modifications	Placement/Services



Tips for Recording Information

- Use a separate EBR worksheet for all students
- Copy key phrases from specific components of the IEPs
- Abbreviations are acceptable
- Do not paraphrase or summarize
- Capture progress from progress reports, test scores, report card grades, etc.
- Take note: Was the IEP revised or adjusted?
- For organization – identify sections (academic, social, physical) or content areas (ELA, math, etc.)



EBR Information

Present Levels of Performance	Needs/Concerns	Services/Placement	Progress	Was IEP Adjusted
Snapshot of student's present levels Brief Statement: • Academic • Functional • Vocational • Transition Test Scores Grades	Needs that are impactful to education	What services are provided? Where are students placed?	Did the student make progress?	Yes or No (Reason required)



Analyzing Relationships

- Consider and collect data from each IEP separately
- Determine alignment – the relationship between the components (column to column and year to year)
- Look for patterns of progress across the years
- Is there alignment across the columns for IEPs or are there gaps or broken chains?
- Was the IEP adjusted?



Measuring Educational Benefit

Educational benefits can be measured in a variety of ways, including but not limited to:

- achieving passing marks
- advancing from grade to grade
- making progress towards meeting annual goals
- improving scores on statewide and district-wide assessments;
- and many more!



Making Comparisons

- Consider why items are in an IEP one year and not the other two years.
- If an item disappears from one year to the next, why did it disappear?
- Was the annual goal achieved?
- Was the IEP adjusted?



EBR Questions 1, 2

1. Are the assessments complete and do they identify all of the student's needs, including postsecondary outcomes and/or career assessment/functional vocational evaluation for secondary students?
2. In Year 3, does the IEP, through the Present Level of Academic Achievement and Functional Performance (PLAAFP) statement or other IEP information, identify all of the student's significant needs?



EBR Questions, 3, 4.

3. In Year 3, are all of the student's needs addressed by goals and objectives, transition services, and/or supplementary aids and services, including, for secondary students, postsecondary outcomes, preferences, and interests?
4. In Year 3, are there programs and services to support all of the student's goals and objectives?



EBR Questions, 5, 6.

5. Do the transition services provided for the student over the three-year period of review represent a coordinated set of activities related to the student's vision for adult life?
6. In reviewing the comparison of the PLAAFP from Year 1 to Year 2 and from Year 2 to Year 3, if the student ***did not*** make progress, were the goals and objectives, transition activities, or programs and services in Year 3 changed in the IEP to facilitate the student's future progress?



EBR Questions, 7, 8.

7. In reviewing the comparison of the PLAAFP from Year 1 to Year 2 and from Year 2 to Year 3, if the student did make progress, were the goals and objectives, transition activities, or programs and services in Year 3 changed in the IEP to facilitate the student's future progress, including participation in general education?
8. In reviewing the comparison of the PLAAFP from Year 1 to Year 2 and from Year 2 to Year 3, if the student ***did not*** make progress, were the goals and objectives, transition activities, or programs and services in Year 3 changed in the IEP to facilitate the student's future progress?



EBR Questions, 9, 10.

9. Is this student provided with supplementary aids and services to support participation in extracurricular and non-academic activities if determined to be needed by the IEP team?

10. Based upon the review of Worksheets Year 1, 2 and 3 and questions # 1-9 above, the LEA has determined that the student has received educational benefit?



Entering Information

Enter the information for each student into the FSA #23

Upload relevant documents to the CMCI webpage



EBR – Post-Monitoring Activities

- If the LEA is cited as non-compliant on FSA 23...
 - Within 30 days after date of the Monitoring Report, the LEA must convene IEP team meeting for students whose EBR reviews were non-compliant and
 - Consider revising the IEP, and/or
 - Determine need for compensatory education, if any
- Typically, the BSE Chair will inform LEAs of FSA 23 non-compliance by the end of monitoring



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Module 5

Monitoring Activities



Monitoring Activities

Administrative
Interview

Student File
Review

Observation

Student
interviews

Parent
interviews

Teacher
interviews



Administrative Interview

Purpose: LEA opportunity to provide program overview

- Coordinate date, time and logistics with BSE Chair
- Anticipated duration: 30 minutes
- Review of items listed in Administrative Interview document

LEA attendees:

- Superintendent/Chief Executive Officer,
- Special Education Director,
- Building Principal (at least one each) elementary, middle, and secondary level,
- Others as deemed appropriate by the LEA



LEA Point Person

During Monitoring time frame, LEA point person will be available for BSE Chair to contact for:

- Logistical support
- Interview process support
- Paperwork clarification
- Ongoing questions that may arise



File Review – Onsite

A minimum of ten (10) student files will be reviewed by Peers onsite:

- The list of students will be provided to the LEA **10 days prior** to Day 1 of monitoring.
- If deemed necessary, and approved by the Division Chief, the BSE Chair may request a larger student sample (The LEA will be notified of this prior to date of monitoring)

If the LEA chooses to present files electronically, please ensure that all files are complete and that tech support is available.



Observations – Onsite

Classroom Observation

- Peer or BSE chair will observe the 10 selected students, in their classrooms
- Observations conducted in the students' regular or special education class, with an emphasis on the location where the student receives **most** of their special education services

Facilities Check

- BSE Chair will conduct a walkthrough of relevant classrooms, as needed.



Interviews

- Interviews conducted of parents and special education/general education teachers of the selected students
- Peers conduct interviews during Days 2-5: phone/virtually
- LEA identifies protocol for peer to complete interviews:
 - Identify mode of contact for parents and teachers – (phone, virtual platform etc.)
 - Identify time slots convenient for both parties
 - Phone numbers can be hidden by caller using *67 then typing the phone number
- LEAs discusses and clarifies any concerns with the BSE Chair prior to the monitoring



Federal Child Count

- List of students provided to the LEA 10 days prior to the first day of monitoring
- BSE Chair verifies that students listed on Dec. 1 Child Count had valid IEPs during that time
- If cited, LEA may have to return some funds to IU for specific student(s)



Exit Interview – Virtual

BSE Chair will conduct the exit interview.

Purpose:

- Overview of what may be anticipated in the monitoring report (CAV report), and a brief description of the subsequent Corrective Action Verification Process (CAVP)



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Module 6

Post-Monitoring Activities



Post-Monitoring Activities

Monitoring
Report

CAVP
Meeting

CAVP
Development

Individual
Corrective
Action Plans

Monitoring
Closure



Monitoring Report

- CAV report issued by IMS once all components of the monitoring are reviewed and analyzed by BSE
- BSE Chair contacts the LEA, relevant PaTTAN and IU consultant to schedule CAVP meeting
- Within 60 days of date of CAV report, the BSE Chair, PaTTAN consultant and IU TaC meet with LEA team to develop the Corrective Action Verification Plan (CAVP)

Note: Please make sure all email addresses are updated on IMS



Development of CAVP

- BSE, PaTTAN, and IU staff are available to assist in the development and implementation of the CAVP activities
- IU TAC and PaTTAN consultants provide resources to help create the improvement plan and address systemic noncompliance
- The BSE Chair and PaTTAN consultant work with the LEA to develop a specific CAVP to address areas cited as noncompliant



Corrective Action Requirements

LEAs must correct systemic non-compliance and individual student corrective actions within one year, per OSEP and IDEA requirements

- If this timeline is not met, BSE is obligated to identify that specific LEA as non-compliant in federally mandated reporting
- Shorter timelines or check-ins may occur prior to the one-year deadline



Individual Corrective Action Plans

- Individual Corrective Action Plans (ICAPs) for student files will be verified by Chair by review of files developed *after* the issuing of the monitoring report
- Systemic out of compliance items are verified by reviewing student files developed after the CAV report was issued
- If needed, Improvement plan(s) (IPs) are developed during the CAVP meeting
- IP due date is 180 days from CAV report



Completion of the Monitoring

When the LEA completes all corrective action, BSE will issue a closure letter to the Superintendent/CEO.

Note: The LEA may continue to have open Improvement Plans after the monitoring has been closed out.



Additional Resources



Cyclical Monitoring and Special Education Programmatic Improvement

- A Comprehensive Resource Guide for Educational Leaders



Education Leader

- Educational Benefit Review



Monitoring Resources

[Pennsylvania Department of Education Integrated Monitoring System](#)

PA Office Of Elementary And Secondary Education, Integrated Monitoring System



Username:

Password:

Information

If you are receiving email notifications from Leader Services, you have access to IMS. If this is the first time that you are logging in to IMS, click [here](#) to reset your user and password to meet the current specifications.

[Forgot Username/Password](#) [Contact Us](#) [Request a Login](#)





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This concludes the Modules of the
CMCI Learning Series.

**For information on Peer
Monitoring, please visit the Peer
Monitoring Schoology Module.**



Contact/Mission

For more information on CMCI please visit PDE's website at www.education.pa.gov

Or contact Shatarupa Podder at spodder@pa.gov

The mission of the Department of Education is to ensure that every learner has access to a world-class education system that academically prepares children and adults to succeed as productive citizens. Further, the Department seeks to establish a culture that is committed to improving opportunities throughout the commonwealth by ensuring that technical support, resources, and optimal learning environments are available for all students, whether children or adults.