

## **Overview of Focused Monitoring in General Supervision**

General Supervision of Early Intervention in the Massachusetts system is designed to promote core values and to ensure compliance with federal and state requirements through training, technical assistance, and monitoring. General Supervision focuses on identifying commendable practices, suggesting improvements to enhance quality of services and identifying and enforcing corrective action plans in areas of non-compliance.

This concept of general supervision, including focused monitoring, is the primary method for federal and state monitoring of the implementation of IDEA. There are two primary mechanisms states use to report data to the Office of Special Education Programs (OSEP) about the implementation of Part C of IDEA. The first is the “Annual Child Count” or “618” data which includes submission of tables on: the number of all eligible children with IFSPs on October 1st of each year; the types of services and settings in which children receive services; exiting data on children who have transitioned out of Early Intervention; and the number of full-time equivalents for a variety of personnel delivering services.

The second mechanism for reporting required data each year is the State Performance Plan (SPP) and Annual Performance Report (APR). This report addresses five targeted areas including Early Intervention Services in natural environments, child find and public awareness, family centered services, effective transition, and a general supervision system including monitoring, complaints, and hearings.

Similarly programs within Massachusetts are required to submit an annual report/self assessment based on federal indicators that have been selected as target areas of the State Performance Plan. The DPH utilizes information from the Early Intervention Information System (EIS), Annual Report/Self Assessment, and the Complaint Management System as criteria in making Local Program Determinations. Each local program will receive a determination of “meets requirements”, “needs assistance”, “needs intervention” or “needs substantial intervention” based on compliance with Part C of IDEA.

The Massachusetts stakeholders group and DPH agreed that local program determinations will be used to identify programs in need of Focused Monitoring onsite visits. Programs that receive the category of “needs intervention” or “needs substantial intervention” will receive onsite visits to develop strategies and improvement activities that are specific to the issues identified for that program to ensure identification of noncompliance is corrected in a timely manner.

## State Monitoring of Local Programs

### PURPOSE

The purpose of the Massachusetts Monitoring Process is to:

1. Monitor and evaluate program compliance with federal Part C IDEA regulations;
2. Monitor program compliance with Department of Public Health Early Intervention Operational Standards to ensure that eligible children and families receive timely, comprehensive, community-based services that enhance the developmental progress of children birth to three.
3. Monitor and evaluate vendor and program contract activities;
4. Contribute to ongoing quality improvement of programs and vendors to assure a baseline of quality services for all families participating in the Massachusetts Early Intervention system.

### PROCESS

There are five components of the Massachusetts Focused Monitoring System:

- (1) Annual Report/Self Assessment; (2) Focused Monitoring Site Visit; (3) Data Verification Process; (4) Dispute Resolution System (5) Local Determinations.

#### Monitoring Schedule

Annual Report/Self Assessment
Focused Monitoring Site Visit
Data Verification Process
Dispute Resolution System
Local Determinations

1. Annual Report/Self Assessment  
EIPs are required to complete the Annual Report/Self Assessment every year, which is a key piece of data gathering for federal and state reporting requirements. The information requested annually is based on the federal indicators that have been selected as target areas of the State Performance Plan. The information obtained from the Annual Report/Self Assessment is used to report on Indicators #1 of the SPP/APR and in making Local Program Determinations. Regional Specialists are available to review the results with program and vendor administrative staff. A Corrective Action and/or Quality Improvement plan is requested to address any issues of non-compliance identified through the Annual Report/Self Assessment and submitted to the Regional Specialist within 30 days of written notification.

2. Focused Monitoring Site Visit  
Annually DPH staff will analyze data and rank programs based on local determination categories. Early Intervention Programs that receive the category of needs intervention or needs substantial intervention will receive site visits to develop strategies for improvement and correction of noncompliance.
3. Data Verification Process  
Throughout the year, activities are completed by the lead agency to verify the reliability, accuracy and timeliness of data reported by providers to the DPH. Several methods for data verification are utilized, such as EIIS error reports, Service Delivery Report, Verification of selected indicators during Focused Monitoring, and data reports summarizing contract performance. (*Refer to Data Verification Plan—Massachusetts Focused Monitoring*)
4. Dispute Resolution System  
Written complaints are investigated to determine whether there are any findings of non-compliance with IDEA. The DPH as lead agency for EI in Massachusetts sends a written response to the family, the program and the DPH Regional Specialist within 60 days. If an area of non-compliance is identified a corrective action plan is requested of the program by the Regional Specialist. Programs have one year to come into compliance. (*Refer to EIOS – Procedural Safeguards*)

The EIP must submit the Corrective Action or Quality Improvement plan to the Regional Specialist within identified timelines. The Regional Specialist reviews and approves the Corrective Action/Quality Improvement Plan and develops a follow-up monitoring plan as appropriate. Any areas of noncompliance must be corrected within one year from written notification.

5. Local Program Determinations  
In making Local Program Determinations, the DPH uses the four compliance indicators, six measures for Timely and Accurate Data and two for Complaint Management issues. DPH takes into consideration the percent of Massachusetts' target population served by the program and the percent of community-based services provided.  
Four Compliance Indicators:
  1. Percent of children who receive 100% of their IFSP services provided in a timely manner
  2. Percent of IFSP clients for whom an evaluation, assessment and initial IFSP meeting were conducted within 45 day of the Date of Referral
  3. Transition planning for children leaving EI services
  4. Timely correction of non-compliance correction within 12 months

Timely and Accurate Data Indicators:

5. Submission of Annual Report on time
6. Percent of clients matching EIIS on all 5 File Review data areas
7. EIIS Referral and Discharge data is transmitted in a timely manner
8. Percent of FY07 SDR clients that match to EIIS
9. Percent of clients with no EIIS logic issues
10. Percent of IFSP clients having complete EIIS data forms

Complaint Management Data:

11. Three or more phone calls of a similar nature to DPH in a three month period
12. Findings and/or decisions in favor of a complainant derived from a Formal Administrative Complaint, and/or Due Process Hearing

The Department used the following criteria and review process for the FY 2007 Local Determinations:

Meets Requirements:

- Compliance rate is at or above 90% on all four compliance indicators 1- 4, or below 90% in only one of the non-compliance indicators 5 – 12.

Needs Assistance:

- Compliance rate is at or below 90% in two or three indicators; only one below in a compliance indicator 1 – 4; and any two or three below the state baseline of 90% in the non-compliance indicators 5 – 12.

Needs Intervention:

- Compliance rate is at or below 90% in three or four indicators with two or more in the compliance indicators 1 – 4, or four or more in noncompliance indicators 5 – 12.

Needs Substantial Intervention:

- Compliance rate is at or below 90% in ten or more indicators 1 -12.

The DPH will advise local EIPs that receive a “Need Assistance” determination for two consecutive years or “Needs Intervention” or “Substantial Intervention” of available technical assistance to help the EIP address areas in which the program needs assistance. The EIP will report in the Corrective Action Plan the technical assistance sources from which the EIP received technical assistance. The DPH may impose a moratorium on referrals or withhold funds to programs that fall in “Needs Intervention” or “Needs Substantial Intervention” and are unable to come into compliance in a timely manner.

Local Determinations will be completed in the spring of each year. Please note that the criteria and state baseline may change from year to year with the goal being 100% in all of the compliance indicators.

## **CERTIFICATION AND CONTRACT ADMINISTRATION**

Program Certification will be granted for one year. Conditional or Provisional Certification is granted to a program, upon the recommendation of the Regional Specialist and approved by the Director of Early Intervention or Part C Coordinator, to programs with significant pending corrective action plans. DPH staff review program performance in April to evaluate certifications and contracts for the next fiscal year. Programs are notified of status in June.

## **Massachusetts Focused Monitoring**

### Stakeholders Group

A stakeholders group representative of the broad range of persons involved in the Early Intervention system including Lead Agency Staff, ICC Chair, provider and parent representatives, ICC representative for the Low Incidence Committee is responsible for advising the lead agency on the focused monitoring process as well as changes made to that process.

### Indicators and Selection Measures

Based on available data the Massachusetts stakeholders group agreed to use the local program determinations to identify programs in need of Focused Monitoring onsite visits. Programs that fall into the category of “needs intervention” or “needs substantial intervention” will receive onsite visits to develop strategies on an improvement plan specific to the issues identified for that program.

### The Focused Monitoring Schedule

The schedule for selection of onsite Focused Monitoring visits is as follows:

In May of each year DPH will analyze data and rank programs based on local determinations made by DPH in accordance with federal regulations. Programs that fall into the category of “needs intervention” or “needs substantial intervention” in this process will receive a focused monitoring visit based on issues identified through annual reporting for that program. In June and July EI programs will be notified of the annual onsite monitoring schedule. The number of programs visited each year will change depending on the results of the Local Determinations.

### Focused Monitoring Team

Focused Monitoring teams are comprised of parents and Regional EI Specialists. Each program’s regional specialist will facilitate the teams activities based on data that is submitted and reviewed prior to the visit. Regional EI Specialists and two parents will participate in the onsite protocols and information gathering process to formulate a final report.

### Components of a Focused Monitoring Visit

#### *Pre-Planning Conference Call*

Before the actual onsite visit there will be a pre-planning conference call to discuss the program chosen for the onsite visit, reason for selection, data to support the choosing of the program, and the history of corrective action and training for this program. From this call it will be determined what information will be requested from the program and DPH EIS for the desk audit meeting.

### *Desk Audit*

Prior to the onsite visit the monitoring team will meet to review information and data gathered about the program. Available data may include previous monitoring reports, any formal and informal complaints based on discussions with the Director, Office of Family Rights & Due Process, EIS data, Service Delivery Report, etc. The outcome of the meeting will be to hypothesize why the program has data that suggest low performance. The hypotheses will drive the components of the onsite visit.

### *Planning and Scheduling*

The EI Program Director will develop a plan along with the Regional EI Specialist (Team Facilitator) to decide the best methods for gathering information from families, staff, and community partners prior to the on-site visit.

The plan will also include the following information:

- The Schedule for Onsite Visits will be posted on PLP Website, and in the Parent Leadership newsletter – program parents are then able to respond to the PLP website/phone to participate in providing feedback
- DPH will provide EIP with metered envelopes and letters to be sent to families notifying them of the upcoming onsite visit
- Families will be able to participate in the Focused Monitoring process through interviews scheduled during the onsite visit

The DPH will assist in identifying resources to meet the language capacity needs of families interested in participating.

### *Onsite Visit*

Components of the visit will include meetings with program administrators, file reviews, interviews with parents, staff, and community partners. However, each on-site visit will be unique. The goal of the focused monitoring is to determine the root causes for low performance in order to develop corrective action/improvement plans with strategies for continuous improvement.

The Focused Monitoring Team will debrief at the end of each day during the on-site visit; the team will meet with the program director to review findings and confirm visit components.

### *Exit Interview*

The Focused Monitoring Team will meet with the program director at the end of the last day of the on-site visit to summarize the results and discuss any need for corrective action or improvement planning.

*Focused Monitoring Summary Report*

Within one month (30 business days) of the on-site visit, the focused monitoring team will send a letter/report to the program summarizing the results and findings of the visit. Corrective action plans will be requested at this time.

If a corrective action plan is required, EIPs will have 60 business days in which to respond. (*See Corrective Action Plan Format*)

*Follow Up Visits*

As needed, a member of the focused monitoring team will be available to provide technical assistance and support, and make an on-site visit to verify the data reported in the corrective action plan and progress updates. This information may also be used as part of the data verification visits.