

XI. SUPERVISION, MONITORING AND EVALUATION OF PROGRAMS

A. POLICY

The State Lead Agency (DMHMRSAS):

- 1. *Is responsible for the general administration and supervision of programs and activities receiving assistance under Part C, and monitoring and evaluating programs and activities used to carry out Part C in Virginia, whether or not the programs and activities are receiving assistance under Part C, and ensures that the State complies with Part C.*
- 2. *Has adopted and uses proper methods of administering each program within Virginia including:*
 - a. *Monitoring of agencies, institutions, and organizations used by Virginia to carry out Part C;*
 - b. *Enforcing any obligations imposed on those agencies under Part C of the Act and these regulations;*
 - c. *Providing technical assistance, if necessary, to those agencies, institutions, and organizations; and*
 - d. *Correcting deficiencies that are identified through monitoring.*
- 3. Has in place monitoring activities focusing on:
 - a. Improving results and functional outcomes for all children with disabilities, and
 - b. Ensuring that public agencies meet the program requirements under Part C of the Act, with a particular emphasis on those requirements that are most closely related to improving results for children with disabilities.
- 4. Has in place a performance plan (available at www.infantva.org) that evaluates the State's efforts to implement the requirements and purposes of Part C of the Act and describes how the State will improve such implementation.
 - a. The State performance plan is reviewed at least every six years and any amendments are submitted to the Secretary.
 - b. As part of the State performance plan, the State establishes measurable and rigorous targets for the indicators established by the Secretary.
- 5. Reports annually to the Secretary on the indicators established by the Secretary for the State Performance Plans.
- 6. Uses the targets established in the State's performance plan to analyze the performance of each local system.
- 7. Reports annually to the public on the performance of each local system located in the State on the targets in the State's performance plan.
- 8. Based on local data related to the priority indicators, information obtained through focused monitoring on-site visits and any other information available, the State Lead Agency determines annually if the local system:
 - a. Meets the requirements and purposes of Part C of the Act;
 - b. Needs assistance in implementing the requirements of Part C of the Act;
 - c. Needs intervention in implementing the requirements of Part C of the Act; or
 - d. Needs substantial intervention in implementing the requirements of Part C of the Act.

(34 CFR 303.501)

(34 CFR 300.600(b))

(34 CFR 300.601(a))

(34 CFR 300.601(b)(1))

(34 CFR 300.602(a))

(34 CFR 300.602(b)(A))

(34 CFR 300.601(a) and 300.603)

Deleted: ement

Deleted: of

Deleted: o

Deleted: of

Deleted: ; and

Deleted: <#>Ensuring that the data gathered during monitoring will be used to effect local continuous improvements in the local provision of services.¶

Formatted: Bullets and Numbering

Formatted: Bullets and Numbering

Formatted: Bullets and Numbering

Formatted: Bullets and Numbering

Formatted: Bullets and Numbering

Formatted: Bullets and Numbering

B. PROCEDURES

The following State Lead Agency mechanisms are included as part of Virginia’s Part C system of supervision, monitoring, and evaluation:

1. Contract for Continuing Participation in Part C Early Intervention for Infants and Toddlers with Disabilities and Their Families–

Local lead agencies submit annual contracts for continuing participation in Part C. The contract includes a scope of work, specified deliverables, a local Part C budget, fiscal and programmatic assurances, and terms and conditions of the contract with applicable signatures. Local lead agency responsibilities for ongoing self-analysis and monitoring and for participation in State monitoring activities are specified in the contract.

2. Expenditure Reporting–

Local lead agency expenditures of Part C funds are monitored through Part C expenditure reports which are submitted by each local lead agency to the State Lead Agency in accordance with the terms of the local contract.

3. Technical Assistance

Technical assistance is provided to the local system through the following mechanisms.

a. State Lead Agency personnel:

- (1) Assist local systems with implementation of Part C requirements and specific early intervention issues; and
- (2) Support local systems in resolving issues of compliance or performance as indicated by their monitoring data.

b. Other participating State agencies provide technical assistance to local Part C personnel on Part C issues and requirements.

4. Focused Monitoring

- a. The State Lead Agency, with the advice and assistance of the Virginia Interagency Coordinating Council (VICC), annually identifies for monitoring a limited number of priority indicators that are based on improving results for children with disabilities and their families.
- b. The State Lead Agency monitors local systems on priority indicators using a variety of data sources, including, but not limited to, the following:

- (1) Infant & Toddler Online Tracking System (ITOTS) data;
- (2) Local record review data;
- (3) Family Survey data;
- (4) Dispute resolution findings; and
- (5) State Lead Agency tracking of timely submission of local data. (See Component XVI - Data Collection for policies and procedures related to collection and reporting of data.)

c. Based on the data, the State Lead Agency determines the percentage of compliance for each local system on each of the priority indicators. Identified noncompliance/nonperformance will be cited in a letter sent to the local system from the State Part C Coordinator within 30 days from the date of identification of the noncompliance/nonperformance.

Deleted: The Lead Agency, with assistance from the VICC and other State agencies involved in Part C implementation, utilizes a variety of mechanisms for supervision, monitoring and evaluation of programs and activities under Part C. Mechanisms include those developed and implemented by/for participating State agencies to supervise their local counterparts, as well as mechanisms developed and implemented by/for the Lead Agency specifically for the Part C early intervention system.¶

Formatted: Bullets and Numbering

Deleted: LICCs through the local

Deleted: the

Deleted: program

Deleted: Each

Deleted: packet

Deleted: information detailing l

Deleted: Contracts also include both

Deleted: as well as

Deleted: award

Deleted: Federally-required pers

Formatted: Bullets and Numbering

Deleted: LICC

Deleted: quarterly

Deleted: fiscal agent/intermediary

Deleted: at the end of the first, {

Deleted: <#>Monitoring Improv

Deleted: <#>Local Interagency

Formatted: Bullets and Numbering

Deleted: Related to the Monitor

Deleted: LICCs and early interv

Deleted: early intervention tec

Deleted: localities and programs

Deleted: <#>Support localities

Formatted: Bullets and Numbering

Deleted: ities

Deleted: improvement

Deleted: improvement and

Deleted: also

Deleted: their

Deleted: counterparts

Formatted: Bullets and Numbering

Formatted

- d. The State Lead Agency works with the local lead agency to develop and implement a corrective action plan for any priority indicator for which the letter from the State Part C Coordinator requires such a plan to ensure noncompliance is corrected as soon as possible but not later than one year from the date of identification of the noncompliance.
 - e. The State Lead Agency ranks all local systems on each priority indicator based on their level of compliance.
 - f. Based on the statewide data on all priority indicators, the State Lead Agency, with the advice and assistance of the VICC, selects the indicators with the lowest statewide performance as focus topics.
 - (1) Within each focus topic, the State Lead Agency selects the lowest performing local systems to receive focused monitoring on-site visits.
 - (2) For those local systems selected for focused monitoring on-site visits, the State Lead Agency conducts an in-depth analysis of the factors contributing to noncompliance, develops a corrective action plan with the local system, and provides intensive technical assistance to ensure noncompliance is corrected as soon as possible but not later than one year from the date of identification of the noncompliance.
 - g. The State Lead Agency develops an annual profile for each local system that includes information about local performance on each of the priority indicators.
5. Public Reporting
The State Lead Agency makes statewide data and the annual profile for each local system available to the public annually through a variety of mechanisms, which may include, but are not limited to, the following:
- 1. Publishing this information on the State Part C website.
 - 2. Making it available to the media, and
 - 3. Distributing it through public agencies.
6. Corrective Action Plans
- a. The State Lead Agency works with the local lead agency to develop a corrective action plan for any Part C requirement for which a letter from the State Part C Coordinator requires such a plan to ensure noncompliance is corrected as soon as possible but not later than one year from the date of identification of the noncompliance.
 - b. The local lead agency must submit the corrective action plan to the State Lead Agency by the date given in the letter from the State Part C Coordinator.
 - c. The State Lead Agency monitors correction of noncompliance, through a variety of mechanisms, including but not limited to, site visits, record reviews and progress reports.
 - d. Once a local system reaches the compliance/performance target(s) established for the monitoring indicator(s), the local system is informed in writing that they are released from the corrective action plan for that indicator.
7. Determinations
- a. The State Lead Agency annually determines if the local system:
 - (1) Meets requirements;
 - (2) Needs assistance;
 - (3) Needs intervention; or
 - (4) Needs substantial intervention.
 - b. The State Lead Agency considers the following in making that determination:
 - (1) Performance on compliance and performance indicators on the State Performance Plan;
 - (2) Whether data submitted by the local lead agency is valid, reliable and timely;
 - (3) Whether there is uncorrected noncompliance from other sources;

- (4) Any audit findings; and
- (5) Other information, as appropriate.

8. Enforcement of Obligations

The State Lead Agency uses enforcement actions, as needed and as described in the most current terms of the Local Contract for Continuing Participation in Part C.

Deleted: Assistance in implementing required improvements is provided by state-level staff familiar with the topic/component identified for corrective action and by the local interagency coordinating council coordinator.

Deleted: <#>Written Plan for Improvement¶
 ¶ Any compliance issues identified through improvement and monitoring measurement are addressed in a written plan for improvement. Specific timelines are required for each identified area of improvement. The Lead Agency monitors and supports the successful completion of the improvement actions included in the plan within the specified time.¶
 ¶

Formatted: Bullets and Numbering

Deleted: The Lead Agency, with the assistance of the VICC and other State agencies involved in Part C, enforces obligations of agencies, institutions, and organizations used by Virginia to carry out Part C. Every effort is made to ensure compliance through technical assistance and improvement plans. In the event that a LICC demonstrates a persistent unwillingness to address areas requiring improvement identified in the Monitoring Improvement Measurement System, funds can be withheld until the required improvements are addressed. Under those circumstances, the Lead Agency is responsible for ensuring that services are made available to eligible children and their families.

The Lead Agency, with assistance from the VICC and other State agencies involved in Part C implementation, utilizes a variety of mechanisms for supervision, monitoring and evaluation of programs and activities under Part C. Mechanisms include those developed and implemented by/for participating State agencies to supervise their local counterparts, as well as mechanisms developed and implemented by/for the Lead Agency specifically for the Part C early intervention system.

Supervision, Monitoring and Evaluation Through Participating Agency Mechanisms

Through mechanisms developed and implemented by/for participating State agencies for supervision, monitoring, and evaluation, the Part C system ensures compliance and accountability of programs operated by local counterparts and any contractual services. The following state agency mechanisms are included as part of Virginia's Part C system of supervision, monitoring, and evaluation:

The Department of Mental Health, Mental Retardation and Substance Abuse Services (DMHMRSAS) provides a comprehensive system of services to adults and children through 40 Community Services Boards. It is the policy of the DMHMRSAS to have each Community Services Board submit a performance contract (included in Appendix Z) annually for access to State and local funds administered by DMHMRSAS. All programs administered by the respective community services board are included in the contract, with a specific reporting section for early intervention programs. Projections of numbers of persons to be served and numbers of direct service units to be provided, as well as demographic information, are included in the contract. The portion of the contract dealing with early intervention is reviewed by Lead Agency personnel. Community Services Boards submit year-end reports that reflect actual data. Actual service data are compared to the performance projections in the contract. Fiscal information is also included in the contract. Projections are submitted at the time of the initial performance contract. Quarterly performance reports submitted trigger the funding flow from the State to the locality. Year-end actual expenditures and revenues are reported at the conclusion of the fiscal year.

The Department of Education monitors and evaluates the services provided through local school divisions through a process that includes a review of areas that overlap with the Part C program, such as provisions for child find, confidentiality, transition and service provision.

The Department of Social Services and the Department for the Blind and Vision Impaired also monitor and evaluate services, including those that overlap with Part C, which are administered by their local counterparts.

Approximately 21 of the 45 early intervention programs in Virginia and a number of the other public and private agencies that provide Part C early intervention services are certified to receive Medicaid reimbursement for services. These programs undergo a review by the Division of Licensure and Certification of the Virginia Department of Health, addressing Medicare/Medicaid requirements and/or conditions of participation. Occupational therapy, physical therapy and speech-language pathology services are some of the services covered by this review. All early intervention programs are encouraged to become Medicaid certified.

Supervision, Monitoring and Evaluation Through Lead Agency Mechanisms Developed and Implemented Specifically for Virginia's Part C Early Intervention System

Through mechanisms developed and implemented by/for the Lead Agency (with assistance from the VICC and the other State agencies involved in Part C) for supervision, monitoring, and evaluation, the Part C system further ensures compliance and accountability of local interagency coordinating councils (LICCs).

Page 104: [2] Deleted	Kyla Patterson	11/6/2006 8:09:00 PM
-----------------------	----------------	----------------------

LICCs through the local fiscal agent/intermediary

Page 104: [3] Deleted	Kyla Patterson	11/6/2006 8:10:00 PM
-----------------------	----------------	----------------------

information detailing how funds will be used to meet requirements and local needs, and information about local participating agencies/providers.

Page 104: [4] Deleted	Kyla Patterson	11/6/2006 8:12:00 PM
-----------------------	----------------	----------------------

Federally-required personnel information is also collected via the contract process. In May of each year (beginning 1999), LICCs are required to submit a narrative description of the progress made and obstacles encountered in implementing Part C at the local level for the previous 12-month period.

Each LICC has in place local policies and procedures that correspond with State Part C policies and procedures. LICCs are required to annually review and revise their local policies and procedures, to document the review and revision process(es), and to submit changes to local policies and procedures to the Lead Agency for review.

Page 104: [5] Deleted	Kyla Patterson	11/6/2006 8:14:00 PM
-----------------------	----------------	----------------------

at the end of the first, second, third, and fourth quarters. Each local council must also submit a year-end final expenditure report

Page 104: [6] Deleted	Kyla Patterson	11/6/2006 8:14:00 PM
-----------------------	----------------	----------------------

Monitoring Improvement Measurement System–

The LICC system of supervision, monitoring and evaluation:

- Involves gathering relevant and accurate data on the seventeen components of Virginia's Part C early intervention service delivery system;
- Includes provisions for developing a plan of improvement that corresponds to local- or state-level program weaknesses or areas that are not consistent with Virginia's Policies and Procedures; and
- Consists of a self-study data gathering process followed by the development of a local improvement plan followed by an on-site visit by a state review team.

Every LICC is required to participate fully in the entire Monitoring Improvement Measurement System on an ongoing basis. This includes:

- Completing a self-study by gathering data on the entire set of measurement system indicators once every four years;
- Submitting to a state review team all data on the entire set of measurement system indicators once every four years;
- Preparing a written plan that responds to identified areas of improvement once every four years;
- Hosting a visit by a state review team once every four years; and
- Implementing all appropriate and feasible procedures in order to accomplish the identified improvements.

Virginia's Monitoring Improvement Measurement System is implemented with ten of the forty local service delivery systems each year resulting in a

complete set of data on Virginia's system every four years.
Family Survey–

A family survey is utilized statewide. This is a two-stage survey instrument designed to track individual family-level data at two points in a family's experience in the early intervention system – at the time of the initial IFSP, and at the time of transition from early intervention. This two-stage instrument captures a family's views about its experiences when accessing the early intervention system, preparing for and developing an individualized family service plan, during service delivery, and during transition out of early intervention. The family survey has been integrated into the Monitoring Improvement Measurement System. The majority of the indicators included in the family survey meet one or more of the required indicators within the supervision, monitoring and evaluation system.

Every LICC is required to disseminate these instruments to every Part C eligible family in their service delivery system and to maintain a local family survey database to be used for local improvement efforts. Furthermore, every LICC is required to submit data collected to the State Part C office on a quarterly basis for statewide aggregate analysis.

Page 104: [7] Deleted	Kyla Patterson	11/6/2006 8:15:00 PM
------------------------------	-----------------------	-----------------------------

Local Interagency Agreements, Contracts and Memoranda of Understanding–

LICCs have in place local interagency agreements, contracts and/or memoranda of understanding. These vehicles are between the LICC or local fiscal agent/intermediary and local agencies/ providers involved in Part C services at the local level. They identify the responsibilities of those agencies/providers regarding provision of services and financial matters. All local interagency agreements, contracts, and memoranda of understanding comply with State requirements. LICCs are required to annually review and evaluate the effectiveness of their local interagency agreements, contracts and/or memoranda of understanding and to modify as necessary.

Page 104: [8] Deleted	Kyla Patterson	11/6/2006 8:16:00 PM
------------------------------	-----------------------	-----------------------------

Related to the Monitoring Improvement Measurement System

Page 104: [9] Deleted	Kyla Patterson	11/6/2006 8:16:00 PM
------------------------------	-----------------------	-----------------------------

LICCs and early intervention programs

Page 104: [10] Deleted	Kyla Patterson	11/6/2006 8:16:00 PM
-------------------------------	-----------------------	-----------------------------

early intervention technical assistance consultants

Page 104: [11] Deleted	Kyla Patterson	11/6/2006 8:17:00 PM
-------------------------------	-----------------------	-----------------------------

Support localities in implementing local plans for Part C implementation developed by local interagency coordinating councils; and

Page 104: [12] Formatted	Kyla Patterson	11/6/2006 8:23:00 PM
---------------------------------	-----------------------	-----------------------------

Outline numbered + Level: 4 + Numbering Style: a, b, c, ... + Start at: 1
+ Alignment: Left + Aligned at: 54 pt + Tab after: 72 pt + Indent at:
72 pt