

XI. SUPERVISION, MONITORING AND EVALUATION OF PROGRAMS

A. POLICY

The 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. *Enforcement of 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;*
 - d. *Correction of deficiencies that are identified through monitoring; and*
(34 CFR 303.501)
 - e. *Ensuring that the data gathered during monitoring will be used to effect local continuous improvements in the local provision of services.*

B. PROCEDURES

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.

1. 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:

- a. 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.

- b. 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.
 - c. 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.
 - d. 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.
2. 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). The following Lead Agency mechanisms are included as part of Virginia's Part C system of supervision, monitoring, and evaluation:

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

LICCs through the local fiscal agent/intermediary submit annual contracts for continuing participation in the Part C program. Each contract packet includes a scope of work, specified deliverables, budget information detailing how funds will be used to meet requirements and local needs, and information about local participating agencies/providers.

Contracts also include both fiscal and programmatic assurances as well as terms and conditions of the award with applicable signatures. 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.

- b. Expenditure Reporting–

LICC expenditures of Part C funds are monitored through quarterly Part C expenditure reports which are submitted by each local fiscal agent/intermediary to the Lead Agency at the end of the first, second, third, and fourth quarters. Each local council must also submit a year-end final expenditure report.

- c. Monitoring Improvement Measurement System–
- (1) The LICC system of supervision, monitoring and evaluation:
 - (a) Involves gathering relevant and accurate data on the seventeen components of Virginia’s Part C early intervention service delivery system;
 - (b) 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
 - (c) 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.
 - (2) Every LICC is required to participate fully in the entire Monitoring Improvement Measurement System on an ongoing basis. This includes:
 - (a) Completing a self-study by gathering data on the entire set of measurement system indicators once every four years;
 - (b) Submitting to a state review team all data on the entire set of measurement system indicators once every four years;
 - (c) Preparing a written plan that responds to identified areas of improvement once every four years;
 - (d) Hosting a visit by a state review team once every four years; and
 - (e) Implementing all appropriate and feasible procedures in order to accomplish the identified improvements.
 - (3) 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.
- d. 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.

- e. 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.

3. Technical Assistance Related to the Monitoring Improvement Measurement System

Technical assistance is provided to LICCs and early intervention programs through the following mechanisms.

- a. Lead Agency early intervention technical assistance consultants:
 - (1) Assist localities and programs with implementation of Part C requirements and specific early intervention issues;
 - (2) Support localities in implementing local plans for Part C implementation developed by local interagency coordinating councils; and
 - (3) Support localities in resolving issues of compliance or improvement as indicated by their improvement and monitoring data.
- b. State agencies also provide technical assistance to their local counterparts on Part C issues and requirements. 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.

4. 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.

5. Enforcement of Obligations

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.