


1 **1.A.5 Topical Monitoring**

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3 **I Policy Index:**

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|  | Policy #: | 1.A.5 |
| | Distribution: | Public |
| | Date Policy Developed: | 6-21-2011 |
| | Date Policy Revised: | N/A |
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| | Supersedes Policy Dated: | N/A |
| | Scheduled Review: | June 2012 |
| | Tracking #: | 1 (New) |
| | Applicable Units: | All |
| | Responsible Authority | BWEIP Manager |

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6 **II Purpose:**

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8 The purpose of this policy is to describe the procedures of topical monitoring by Baby Watch
9 Early Intervention Program (BWEIP) which is applied annually to select early intervention (EI)
10 programs.
11

12 **III Definition(s):**

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14 **Lead Agency (LA):**

15 A Lead Agency is the respective state agency that coordinates Part C funding and within the
16 State of Utah, it is the Utah Department of Health Baby Watch Early Intervention Program
17 (BWEIP).
18

19 **Early Intervention (EI):**

20 For the purposes of this policy, EI refers to programs or services designed for families of infants
21 and toddlers with disabilities.
22

23 **Baby and Toddler Online Tracking System (BTOTS):**

24 BTOTS is a Utah database application designed to track EI activities and information, assist EI
25 providers in day-to-day activities, encourage compliance with state and federal regulations and
26 simplify compliance monitoring by allowing the LA access to statewide child information.
27

28 **Individuals with Disabilities Education Act (IDEA):**

29 A federal law set forth by the United States that governs how states and public agencies provide
30 EI special education and related services to children with disabilities.
31

32 **State Performance Plan (SPP):**

33 A State Performance Plan is a formal document developed by the LA outlining a six (6) year plan
34 to evaluate the state's implementation of Part C regulations and how the state will improve such
35 implementation. The SPP shall include compliance indicators (of which targets are one-hundred
36 percent [100%]) and results indicators (of which targets have been established by the LA).
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Annual Performance Report (APR):

The Annual Performance Report is the formal document completed by the LA, required by and submitted to the Office of Special Education Programs (OSEP) on an annual basis identifying the outcomes of the SPP targets.

Topical Monitoring (Focused Monitoring):

Topical monitoring is an in-depth review of a selected topic in a local EI program. The focus of topical monitoring is to investigate the root cause(s) of low performance, identify areas of need or to analyze high performance in order to ensure that programs meet Individuals with Disabilities Education Act (IDEA) requirements as part of a General Supervision system.

Off-site Monitoring:

Off-site monitoring is all LA monitoring activities of EI programs to promote compliance, technical assistance, improvement strategies, corrective actions, sanctions or incentives to ensure timely correction of all noncompliance and performance in the following areas:

- Review of data accountability plans;
- Review of compliance/monitoring reports collected through BTOTS; and
- Review of materials requested by the LA.

On-site Monitoring:

On-site monitoring refers to any LA oversight activities of EI programs provided at their locations to promote compliance and performance that may identify noncompliance, the need for corrective actions, technical assistance, improvement strategies and incentives or sanctions to ensure timely correction of all instances of noncompliance.

Noncompliance:

Noncompliance is any instance in which IDEA, SPP/APR and/or LA indicators are performed less than the required level by an EI program.

Finding of Noncompliance:

A finding of noncompliance is any finding of noncompliance determined by the LA through off-site or on-site monitoring that includes:

- A written notification of the requirement with which noncompliance is identified;
- A summary of the data that details noncompliance; and
- The requirement that the noncompliance be corrected as soon as possible but no later than one (1) year from the date of the written notification of the finding of noncompliance.

Corrective Action (CA):

Corrective action is the EI program's correction of any findings of noncompliance identified by the LA.

Corrective Action Plan (CAP):

A CAP is a formal written document required by the LA and developed by the EI program outlining activities and timelines to correct specific levels of noncompliance identified by the LA.

94 **Correction of Noncompliance:**

95 Correction of noncompliance is a formal verification by the LA that the EI program has corrected
96 all instances of noncompliance by:

- 97 • A review of data that demonstrate correction of each individual instance of noncompliance
98 by demonstrating that any required actions took place, although late, for timeline specific
99 requirements, unless the child is no longer under the jurisdiction of EI; and
- 100 • A review of subsequent data that demonstrate full compliance at one-hundred percent
101 (100%).

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103 **IV Procedure(s):**

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105 **A. Selection of Topics for Topical Monitoring:**

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107 1. The LA shall select a topic each year for topical monitoring based on its review of
108 program data on federal and state indicators.
 - 109
110 a. The LA may select topics based on systemic noncompliance or low performance
111 across the state, concerns raised by stakeholders or program staff, programs with
112 compliance or high performance and/or requests received from EI programs for
113 further assistance in a targeted area.
 - 114
115 b. The LA's topic selection may be presented to the stakeholders.

116
117 **Note:** A topic may be used for consecutive years, as determined appropriate by the LA.
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119 **B. Selection of Programs for Topical Monitoring:**

- 120
121 1. The LA shall select EI programs to participate in topical monitoring based on the
122 following:
 - 123
124 a. EI programs who are in noncompliance or have low performance within a selected
125 topic;
 - 126
127 b. EI programs with compliance or high performance in the topical area to determine
128 best practices;
 - 129
130 c. EI programs where questions remain regarding data quality or reliability; and/or
 - 131
132 d. EI programs with unique circumstances.
- 133
134 2. EI programs shall be notified of their selection.
135

136 **C. Pre-Visit Topical Monitoring Activities:**

- 137
138 1. Prior to an onsite topical monitoring visit, LA staff may conduct several activities:
 - 139
140 a. A review of BTOTs data;
 - 141
142 b. A review of submitted materials including documentation from child files;
 - 143
144 c. Surveys or telephone interviews with local EI program staff;

- 146 d. Review of purposes of topical monitoring and plans for the onsite visit with program
147 staff; and/or
148
149 e. Review of any additional resources relevant to the topic in the selected program.
150

151 **D. Onsite Topical Monitoring Visit:**

- 152
153 1. Topical monitoring includes an onsite focused monitoring visit to each selected EI
154 program in which LA staff:
155
156 a. Verify data and/or materials reviewed prior to the onsite visit;
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158 b. Review additional data, including child files;
159
160 c. Conduct interviews or focus groups with EI program staff;
161
162 d. Conduct one-on-one interviews and/or focus groups with parents;
163
164 e. Observe EI program staff;
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166 f. Investigate any potential causes of noncompliance or low performance identified
167 through pre-visit activities.
168
169 g. Investigate any potential best practices; and/or
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171 h. Debrief with EI program staff any potential corrective actions and technical
172 assistance related to the topical monitoring.
173

174 **E. Post-Visit Topical Monitoring Activities:**

- 175 1. Following the onsite visit, LA staff will:
176
177 a. Develop and submit to the EI program a report detailing:
178 1) Activities conducted;
179 2) Findings of noncompliance identified along with the requirements for correcting
180 the noncompliance as soon as possible, but in no case later than one (1) year
181 from identification and required corrective actions;
182 3) Areas of low performance and a plan for improved performance including needed
183 technical assistance;
184 4) Root causes identified of the noncompliance or low performance;
185 5) Areas of potential best practice; and
186 6) Required actions.
187
188 b. Follow up with the program to ensure:
189 1) Correction of any identified noncompliance;
190 2) Improved performance; and
191 3) Implementation of any required actions.
192
193

194 **Note:** As needed, additional off-site and onsite activities may occur.
195

- 196 2. Following the completion of topical monitoring activities in all selected EI programs, LA
197 staff will review the data from all EI programs to determine the need for:
198

- 199 a. Statewide technical assistance related to the area;

- 200 b. Additional EI program participation in topical monitoring with the same focus in the
 201 following year; and
 202
 203 c. Any revisions to the topical monitoring approach and materials.
 204

205 **V Related Directive(s):**

206 Part C of IDEA
 207 20 U.S.C. 1435(a)(10)(A)
 208 Section 616 and 642 of the 2004 Amendments of the IDEA
 209 BWEIP policy 1.A.4 – *General Supervision System for Monitoring Implementation of Part C*
 210

211 **VI Revision Log:**

212 May 2011: **New** policy.
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|---------------------------------|--|----------------|
| <i>Susan Ord</i> | | <i>6-21-11</i> |
| Susan Ord, BWEIP Manager | | Date |


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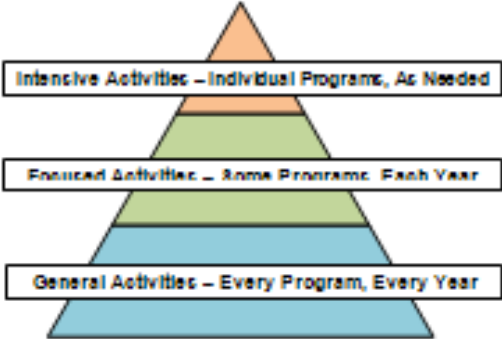
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Attachment 1: State General Supervision System Framework

The *State General Supervision System Framework* may be accessed by LA staff by clicking [here](#).

Note: All Attachments may be accessed on the BWEIP website in the future.

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|  | <p style="text-align: center;">State General Supervision System Framework</p> <p style="text-align: center;"><small>Please refer to BWEIP policy 1.A.4 General Supervision System for Monitoring Implementation of Part C</small></p> |
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