



CIFR 2024 Fiscal Webinar Series: Unlocking CEIS: A Deep Dive Into Monitoring Requirements

June 20, 2024



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Session Overview

- Overview of Coordinated Early Intervening Services (CEIS)
- Mechanisms to Monitor CEIS
- Monitoring the CEIS Program Requirements
 - Fiscal
 - Program
 - Data
- CEIS Scenarios and Resources

Purpose-Driven Data: Putting the “Why” Into Fiscal Processes

Questions to consider throughout this session:

- Why are CEIS monitoring requirements important?
- How does this monitoring help my state’s ability to realize the goals of IDEA?
- How do CEIS data guide our actions? In what ways do I use data to inform decisions, supports for LEAs, and state processes for monitoring voluntary and comprehensive CEIS?

Overview of Coordinated Early Intervening Services (CEIS)

Coordinated Early Intervening Services

- Services to help children who need additional academic or behavioral support to be successful in school
- Can include professional development and educational and behavioral evaluations, services, and supports (34 CFR §300.226(b); 34 CFR §300.646(d)(1)(i))
- May be voluntary CEIS or mandatory, comprehensive CEIS (CCEIS)

Voluntary CEIS and CCEIS

Voluntary CEIS

34 CFR §300.226

- Triggered by student need for academic and behavioral support
- Use up to 15 percent of IDEA allocation
- Serve children grades **K–12**
- Serve children without disabilities

Comprehensive CEIS (CCEIS)

34 CFR §300.646

- Triggered by significant disproportionality determination
 - Required to use exactly 15percent of IDEA allocation
 - Serve children **ages 3–grade 12**
 - Serve children with and without disabilities*
- * Cannot exclusively serve children with disabilities

Mechanisms to Monitor CEIS

SEA Monitoring Responsibilities

SEAs must maintain adequate oversight to ensure LEA compliance with voluntary and comprehensive CEIS fiscal, data, and programmatic implementation including:

- LEA review and possible revision of policies, procedures, and practices (PPP)
- Issuing findings of noncompliance as appropriate
- Root cause analysis
- Developing and implementing voluntary and comprehensive CEIS activities
- Alignment and allowable use of funds
- Accurate and submission of high-quality data

Ways That SEAs Can Monitor CEIS

- Provide guidance for what information is required from the LEAs
- Request LEAs to submit a plan
- Require LEAs to submit proposed activities in their budget applications
- Provide tracking forms and tools to LEAs to support data collection and reporting

Monitoring the CEIS Fiscal Requirements

Monitoring the Amounts Reserved

- For voluntary CEIS, SEAs need to ensure that LEAs reserve no more than 15 percent of IDEA Part B Section 611 and Section 619 funds.
- For CCEIS, SEAs need to monitor that LEAs reserve exactly 15 percent of the total Section 611 and Section 619 funds as required.
 - For CCEIS, funds may be reserved from 1 of 3 different fiscal years depending on when they were identified with significant disproportionality.
- For both voluntary CEIS and CCEIS, LEAs can use Section 611 funds, Section 619 funds, or a combination of both.

Monitoring Non-Supplanting

Requirement to Supplement Not Supplant

Part B funds provided to LEAs must be used to supplement—and not supplant—state, local, and other federal funds (34 CFR §300.202(a)(3))

Monitoring the Use of LEA Maintenance of Effort (MOE) Adjustment

“...for any fiscal year for which the allocation received by an LEA under §300.705 exceeds the amount the LEA received for the previous fiscal year, the LEA may reduce the level of expenditures otherwise required by §300.203(b) by not more than 50 percent of the amount of that excess.”

34 CFR §300.205(a)

LEA MOE Adjustment and CEIS

- The total amount used for voluntary CEIS and MOE adjustment together cannot exceed the lesser of the total maximum amount available for MOE adjustment or for voluntary CEIS.
- LEAs required to implement CCEIS are not permitted to take an LEA MOE adjustment.

Fiscal Monitoring Considerations

- How does the state support and monitor budgets developed for CEIS?
 - Are budgeted items aligned with LEA plans and allowable expenditures?
- How does the state monitor expenditures to ensure compliance with fiscal requirements?
 - How does the state verify allowable expenditures and that funds are spent within the period of performance?

Monitoring Allowable Uses of Funds

LEAs can use voluntary or comprehensive CEIS funds for professional development and educational and behavioral evaluations, services, and supports

LEAs implementing CCEIS must:

- Review PPP and publicly report any changes that occurred because of the review.
- Identify and address the factors contributing to the significant disproportionality.

Sample Allowable Uses of CCEIS Funds

- Educational and behavioral evaluations, services, and supports
- Identifying and addressing factors related to policies, practices, and procedures that are contributing factors to significant disproportionality
- Creating and using a multi-tiered system of prevention and intervention
- Family supports
- Action plan development
- Funding new positions that are providing direct services to the selected targeted student group or overseeing/supporting those direct services or other CCEIS activities

Monitoring Compliance with Uniform Grant Guidance

As a reminder, use of funds must be allowable under the Uniform Grant Guidance at 2 CFR §§200.403–405

Costs must be:

- necessary for the performance of the CEIS activity and supplement and not supplant other activities
- reasonable for the market and area where the activity is occurring
- allocable to or incurred for CEIS purposes
- adequately documented using standard cost principles for federal awards

OSEP Fiscal Findings

“While the state described its system for identifying and addressing significant disproportionality, the state should consider the potential benefit of additional oversight over LEAs’ use of CCEIS funds.”

OSEP Recommendation to Fiscal Monitoring Findings

The state should:

- Consider additional monitoring of the implementation of LEAs' CCEIS plans to ensure the reserved funds are spent in a timely and appropriate manner and that LEAs use these funds to address the factors they identified which contribute to significant disproportionality.

Questions About Fiscal Monitoring?



Monitoring the CEIS Program Requirements

CEIS Program Monitoring: Implementation

- SEAs must monitor the implementation of voluntary and comprehensive CEIS activities.
- SEAs should provide TA to LEAs identified with or at risk of being identified with significant disproportionality.

Addressing Significant Disproportionality

The state should have:

- Information addressing how it selected its definition of significant disproportionality
- A process for requiring the review and, if appropriate, revision of PPP for LEAs determined to have significant disproportionality
- Evidence of how it ensures that LEAs identified as having significant disproportionality publicly report on the revisions made

CCEIS Program Monitoring: Policies, Procedures, and Practices

- SEAs must ensure the review and, if appropriate, revision of PPP that the LEA identifies as factors contributing to the significant disproportionality (identification, placement, or disciplinary removals)
- SEAs must maintain adequate oversight to verify findings of the LEA's PPP review and root cause analysis
- If the state finds noncompliance, the noncompliance must be corrected as soon as possible (no later than one year after the findings)

Monitoring Mechanism: CEIS Plan

SEAs can request that the LEA develop a plan that:

- Details how the funds will be spent
- Contains additional components for LEAs implementing CCEIS including:
 - The process for LEAs to submit data
 - The targeted group of students being served by CCEIS activities
 - The process for tracking students being served

Supporting the Development of CCEIS Plans

The SEA can support LEAs with:

- Conducting a root cause analysis and PPP review to identify contributing factors to your significant disproportionality (identification, placement, or disciplinary removals)
- Creating a CCEIS plan with strategies that align to the findings of your root cause analysis

OSEP does not identify any specific process for identifying the contributing factors of significant disproportionality, but states should have one in place and should monitor that this is occurring with identified LEAs.

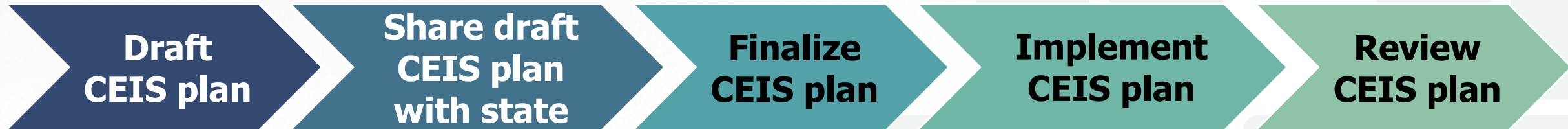
LEA CEIS Plans

CEIS plans should facilitate:

- Effective action
- Monitoring
- Evaluation
- Accurate documentation
- Explanation of uses of CEIS funds

They should address the frequency of monitoring the plan by the LEA and SEA.

Sample Process of LEA Plan Development



Questions About Program Monitoring?



Monitoring CEIS Data Requirements

Required CEIS Data Reporting

Voluntary CEIS

- *N* of students that received CEIS in the reporting school year
- *N* of students that received CEIS in the reporting school year and past two years and were identified as needing special education and related services
- LEAs that voluntarily reserved funds for CEIS
- Amount LEAs reserved for CEIS

Comprehensive CEIS

- *N* of students with disabilities that received CCEIS in the reporting school year
- *N* of students without disabilities that received CCEIS in the reporting school year
- LEAs identified as having significant disproportionality
- Area(s) LEAs identified as having significant disproportionality
- Amount reserved for CCEIS

Monitoring CEIS Data Considerations

- What systems are in place for LEAs to submit data?
- How often do LEAs submit data?
- How often does the SEA verify data?
- What internal controls or processes and procedures ensure the accuracy, reliability, and validity of LEA data reported to the state?

Questions About Monitoring Data Collection and Reporting?



CEIS Scenarios

CCEIS Scenario

- An LEA was identified as having significant disproportionality in disciplinary actions, specifically the disproportionate suspension of Black children with disabilities. At the time of identification, the LEA was already implementing Positive Behavior Interventions and Supports (PBIS).
- Root cause analysis showed that the higher removal of Black children started in elementary school and continued through middle school but decreased in high school.
- The disproportionate suspension of Black students was evident in about half of the LEA's elementary schools, three of the middle schools, and two high schools.
- The LEA determined that most behavior intervention plans for students with disabilities were very similar with little or no differentiation for student needs.

Allowable and Non-Allowable Activities for CCEIS Scenario

Proposed activity



- Pay the salary of two new staff members for two years to create and implement a CCEIS plan



- Pay the salary of the existing staff to continue to implement PBIS



- Hire literacy coaches for the schools where discipline is an issue

Why or why not?

- Creating an effective CCEIS plan takes time
- The LEA is already implementing PBIS
- The LEA did not determine that poor academic performance was a contributing factor to the discipline issues

Voluntary CEIS Scenario

- The student population in an LEA has grown and become more mobile with children experiencing disruptions in education. The LEA has an increasing number of children with disabilities experiencing frequent family moves that result in new schools or school districts.
- Analysis showed lower academic performance and higher disciplinary rates for these mobile students in elementary grades.
- The LEA examined achievement data and has seen a slight to moderate decrease in math and reading proficiency in the elementary grades and an increase in office referrals and disciplinary incidents that result in out of school suspension (OSS).
- Data showed that many of the students had attended multiple schools in multiple LEAs during their elementary school years, were performing poorly, and had experienced several disciplinary referrals resulting in OSS.

Allowable and Non-Allowable Activities for Voluntary CEIS Scenario

Proposed activity



- Hire academic coaches to work with teachers to help them differentiate their instruction
- Pay for the salaries of additional special education teachers to reduce pupil teacher ratio in classroom
- Provide transportation home for students who stay after school for tutoring



Why or why not?

- Academic coaches may help teachers differentiate instruction, engage students, help students experience success, and improve student outcomes
- CEIS funds may only be used to provide early intervening services to students without disabilities
- Because transportation is necessary for students to be able to attend the after-school tutoring, the LEA may use CEIS funds to pay for transportation

Proactively Addressing CEIS Monitoring Requirements

Clear Policies and Procedures

Policies and Procedures at the SEA level for both LEA and SEA staff

- Having clear policies and procedures in place supports consistency, communication and compliance

Develop guidance documents for LEAs for both voluntary CEIS and CCEIS

- Support with practical strategies for LEA staff to manage the requirements
- Provide tracking forms/tools to use to support with data collection and reporting

Support SEA staff who work with LEAs on voluntary CEIS and CCEIS with ongoing training on monitoring practices

- Provide clear direction on what SEA staff should look for when monitoring

OSEP Documentation Findings: Policies and Procedures

- The significant disproportionality documentation “does not fully explain the State’s complete process for identifying significant disproportionality. Specifically, the document does not include the required activities in 34 C.F.R. § 300.646(c) and (d) for LEAs identified with significant disproportionality.”
- Just one staff member conducts the reviews of CCEIS Tool and CCEIS Application submitted by LEAs.

OSEP Recommendations to Documentation Findings

The state should:

- “Revise its written policies and procedures regarding significant disproportionality to reflect the State practices related to timelines and deadlines for all required activities for LEAs identified with significant disproportionality.”
- “Establish a team of personnel responsible for conducting the review of, and providing approval for, the CCEIS Tool and CCEIS Application submitted by LEAs identified with significant disproportionality.”

Professional Development

Supporting communication and coordination between LEA programmatic and fiscal teams

- Offering professional development opportunities appropriate for both fiscal and programmatic staff to encourage collaboration

Ongoing targeted training for both voluntary CEIS and CCEIS

- Data collection and reporting
- Program and plan development
- Fiscal requirements and allowable uses of funds
- What voluntary CEIS is and how an LEA can develop an intervention program

Technical Assistance for LEAs

Fiscal and programmatic data collection and tracking

- Information and guidance on what information is required to be tracked

Support for plan and budget development

- Guidance for what information must and should be included in a plan and aligning activities to the budget
- Mechanisms to conduct a root cause analysis and review of PPP

Share These Resources With SEA and LEA Staff

[Quick Reference Guide on Coordinated Early Intervening Services \(CIFR\)](#)

[Coordinated Early Intervening Services \(CEIS\) Step by Step \(CIFR\)](#)

[Data Center for Addressing Significant Disproportionality Website \(DCASD\)](#)

[A Comparison of Mandatory Comprehensive Coordinated Early Intervening Services \(CCEIS\) and Voluntary Coordinated Early Intervening Services \(CEIS\) \(IDC\)](#)

Share These Resources With SEA and LEA Staff

SEA and LEA Edit Check and Data Display Tools (IDC)

Tap Into the Power of 618 Data (IDC)

CEIS Fiscal Monitoring Protocol (ED)

DMS 2.0 Document Review & Request Template (ED)

EMAPS User Guide: IDEA Part B Maintenance of Effort (MOE)

Reduction and Coordinated Early Intervening Services (CEIS) (ED)

Share These Resources With SEA and LEA Staff

Coming soon!

“Considerations for Reviewing and Monitoring Allowable Activities for CEIS”

OSEP Monitoring Protocols

Significant Disproportionality Protocol (ED)

CEIS Monitoring Protocol (ED)

TA Center Adapted OSEP DMS Protocol—
Part B Significant Disproportionality (NCSI)

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