Part 1: Establishing an Internal Monitoring Team

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Slide 2 Establishing an Internal Monitoring Team
Welcome to the Internal Monitoring Team Process Course. There are four modules within this course. This is part one where you will learn how to establish an Internal Monitoring Team and use the Office for Exceptional Children's record review tools to look at specific record review items and determine if they are compliant as written, as well as learn some useful tips when reviewing records as part of your internal monitoring process. Check [ODEW's IDEA monitoring webpage]() regularly for updated resources.

Slide 3 Disclaimer
This module will help you establish an internal monitoring team. What is being provided are mere suggestions on how to start your team. Districts need to establish their own policies, procedures, and practices for reviewing their own records to fit their capacity and building structures. The information being presented is to be viewed as suggestions to help get you and your district started.

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An Internal monitoring team is a set of staff members including general education teachers, intervention specialists, related service providers as well as administrators whose role is to review a certain number of ETRs and IEPs to ensure compliance. The next few slides will help you start planning and creating your own internal monitoring team.

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There are three steps you need to think about when setting up your internal monitoring team.
Step 1 Identify your team members
Step 2 Assign Roles and Responsibilities
And Step 3 Draft your internal monitoring policies, procedures and practices.

Slide 6
Step one: Identify your team members.

- Remember there is no set number of staff to be on your Internal monitoring team- when deciding the size, consider how many buildings you have, and whether you want an individual, smaller team at each building or one larger Internal Monitoring Team that encompasses staff from all buildings (this is a district decision).
- Again, you will want a wide variety of staff members represented.
- General education teachers can also be part of the team if the district wants to include them. Math and Reading teachers seem to be the best fit.

The Internal Monitoring team should consist of:

- Two intervention specialists from each building (lead intervention specialists based on building and grade assignments)
- One math and One reading general education teacher from each building
- Two related services providers from each building
- The District Representative from each building.
- And, of course, Special Education Director

In addition, intervention specialists and general education teachers should be selected to represent several grade bands – primary, intermediate, middle, and high school.

Some other team members to consider are: School Psychologists, Speech Language Pathologist, Occupational Therapists, Physical Therapists, and a Transition Coordinator.

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Step 2 is to assign roles and responsibilities to the team members:

- Once you have selected your team members, decide on what their roles and responsibilities are.
- The chairperson is the person who will lead the Internal Monitoring meeting by asking questions around compliance for each item and leading the discussion around each item.
- The timekeeper is the person responsible for keeping the team on track to ensure there is time to review every ETR and IEP during the scheduled meeting time. This person should also help to limit off-topic conversations or conversations that should be held after the meeting time to solve situations.
- The recorder is the person who will take notes on the discussion around each item. If an item was found non-compliant, they should document why it was non-compliant as well as document any key notes for items that were found noncompliant.
- The reviewers will be the people who will be reviewing the records. We don't recommend that the person who drafted either the ETR or the IEP be part of reviewing their own record.
- The organizer will make sure the meetings are organized and everyone has the proper forms and documents needed to review the records. The organizer will also ensure that the comment sheets along with the ETR/IEP get back to the person(s) who will need to make the corrections.
- Some districts add a record keeper, again it is a district decision.
- The record keeper is responsible for selecting and sending out the new records at the beginning of each month. As you know, records typically expire throughout the year. The team should be mindful of academic breaks and holidays.
- Again, these are suggestions. You can make your own roles and responsibilities that best suit your district.

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Now that you have selected your staff for your internal monitoring team and assigned roles and responsibilities to everyone, your next step is to draft your policies, procedures, and practices.
These need to be District Specific and cover these areas. How, Who, record selection and number of times. The next slide will provide you with more information

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Step 3

- Now that you have identified your internal monitoring team and assigned roles and responsibilities, you will need to start working on drafting your Policies, Procedures and Practices (PPP).
- These need to be district specific
- You will need PPP on:
- How will the records be selected.
- Please keep in mind when selecting records to look at those records that are getting ready to expire. Choose a variety of intervention specialist for each meeting that is a varied representation across all buildings.
- How will they be corrected and by whom?
- How many meetings will we have per school year? Once a month, quarter, semester? will be reviewed at a time.
- How many records will we select for review? 1 from each grade level, building intervention specialist? Who selects these records?
- Time Frame
- How long will staff be allowed to review the records they have.

- How long will staff have to make those corrections.
- Who makes the final decision when people don't agree on compliance?
- And Finally Any other procedures that might arise during your team meetings.

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- Now let's talk about the record review tools you will need to use when reviewing records.
- This is an example of the record review guide for Child Find 2. The Child Find section is used when reviewing the ETR. The Record Review Guide is used to decide if an item is compliant or noncompliant.
- The first column is the record review item number.
- The second column will have the citation references for the Code of Federal Regulations better known as CFR and/ or the Ohio Administrative Code, OAC.
- If it starts with 3301 then it references the OAC. The 300 code references the CFR section.
- The third column states the record review question which you will determine is compliant or noncompliant.
- Columns number 4 and 5 work together, column 5 is the evidence you will need to determine whether the record review item is either a yes for compliant, or no for noncompliant.
- Finally, the last column shows you where you might be able to locate the potential sources of documentation for that record review item.

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- The Record Review Comment form will be used to track whether or not each item is compliant.
- There are eight questions for the Child Find section.
- They must be answered as either compliant, noncompliant or not applicable.
- As you can see there are 3 columns used to record the reviewers response to each question
- The first one is used for indicating whether a specific item is compliant or noncompliant.
- "Not Applicable" can also be used if the question does not relate to the actual record you are reviewing.
- The next column labeled "IC" for Individual Correction is used after the record has been reviewed and corrected by the ETR/IEP Team.
- Then, finally, the very last column is where the reviewer writes a comment describing why the record review item was noncompliant and suggests how it can be corrected.

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- When reviewing an IEP, the team will utilize the Delivery of Service section on the Record Review Comment Form.
- This section contains 16 items that must be marked as either compliant, noncompliant or not applicable.

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- The next section on the record review comment form is for Least Restrictive Environment, better known as the LRE.
- There is only one question for LRE.

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- The last section on the record review comment form is for Discipline, or DIS.
- There are only 4 questions for this section.
- They center around Manifestation Determinations, Functional Behavioral Assessments and Behavior intervention Plans.

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- We will use the indicator 13 Checklist to answer the Delivery of Service question 1 in the record review guide, "Does the Transition plan in the current IEP meet all 8 required elements for IDEA?"
- Here is an example of what the indicator 13 checklist comment form looks like.
- Please remember that the checklist will be used whenever an IEP contains a postsecondary transition plan.
- Notice there are 8 different questions, and each question has 3 different rows: one for Education and Training, one for Employment and one for Independent Living.
- The first 2 columns, referring to Education, Training and Employment must be answered. However, the last column, Independent Living is optional since the IEP team will decide if it is necessary for the student.

Slide 16 Correcting and IEP for Compliance

The intervention specialist and team members who wrote the original IEP will correct any findings of noncompliance the internal monitoring team has discovered in their IEP.

If the IEP is still in draft form, the needed corrections would be marked on the IEP and discussed during the IEP team meeting.

If the IEP has already been agreed upon and signed off by all required team members, the IEP team members will have to amend the current IEP to correct those findings of noncompliance.

Parents will have to be contacted and agree with those corrections.

These corrections must be documented on the IEP, and a PR-01 must be completed and sent home explaining what corrections were made through the amendment process.

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- When an ETR is being reviewed, it is best to have at least three different staff members involved.
- Most districts have the school psychologist as one member, an intervention specialist as another and finally either an administrator or a related service provider as the third member.
- Also, a general education teacher could provide valuable insight and should be considered as an additional member of the internal monitoring team.

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- It is always a good idea to have a procedure in place that involves an internal monitoring team review of an ETR before the meeting.
- That way corrections can be done before the parent gets involved and you will only have to hold one ETR meeting.
- Remember, ETRs cannot be amended, a new ETR will need to be drafted, and another meeting be held with the parents if noncompliance is found in an ETR.
- As a reminder, as the internal monitoring team you are providing feedback on compliance, not the needs or eligibility of the student.

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Thank you for completing Module 1 of the Internal Monitoring Process Course. The next three modules of the course will walk you through reviewing an ETR, IEP and Postsecondary Transition Plan.

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