



IDEA DATA  
CENTER

Collect, Report, Analyze, and  
Use High-Quality Part B Data



# The Nuts and Bolts of Reporting Compliance

---

Nancy Johnson, IDEA Data Center

Jennifer Wolfsheimer, IDEA Data Center

November 15–16, 2022



# Participant Outcomes

- Recognize the importance of data quality for compliance indicators
- Gain understanding about how to report pre-finding corrections
- Increase knowledge about database collection and monitoring
- Gain ideas from state colleagues

# Agenda

- Overview of reporting for SPP/APR compliance indicators
- Identifying annual databases and monitoring to collect data
- Reporting pre-finding corrections
- State collaboration and discussion

# Would You Rather...?



- Eat Kansas City or Memphis style BBQ?
- Attend the Super Bowl or Game Seven of the World Series?
- Vacation in the mountains or by the ocean?

# Overview of Reporting for the Compliance Indicators

# Which Indicators Are Compliance Indicators?

- **Indicator 4B.** Suspension and Expulsion
- **Indicator 9.** Disproportionate Representation
- **Indicator 10.** Disproportionate Representation in Specific Disability Categories
- **Indicator 11.** Child Find
- **Indicator 12.** Early Childhood Transition
- **Indicator 13.** Secondary Transition

# What Are Some of the Compliance Requirements?

Identification of compliance/noncompliance for current or lag year

- Use data for indicator rate calculation
- Provide description(s) of aspects of compliance determination, for example
  - **Indicator 4**—The review of policies, procedures, and practices for indicators
  - **Indicators 9 & 10**—How the state made its annual determination that the identified disproportionate representation was a result of inappropriate identification
  - **Indicators 11, 12, & 13**—The method the state used to collect these data, and, if from monitoring, the procedures it followed to collect these data

# What Are Some of the Compliance Requirements? (cont.)

Correction of findings of noncompliance identified for FFY (previous year)

- Describe how the state verified that the source of noncompliance is correctly implementing the *regulatory requirements*
- Describe how the state verified that each *individual case* of noncompliance was corrected



# Data Quality

- Checks and balances
- Consistency
- Specifics of how the state collected and documented the data
- Fidelity of implementation
- Data processes documentation

# Annual Databases or Monitoring to Collect Data

# Annual Databases or Monitoring for Collecting Data

- If data are from state monitoring, describe the method the state used to select LEAs for monitoring
- If data are from a state database, include data for the entire reporting year

# Scenario 1: Annual Databases or Monitoring

The state pulls data from its database to generate a report to collect data for Indicator 11 for each LEA. The LEAs submit data one time each year, which the state uses for reporting data in the APR. Reported data are for the entire reporting period, and the state includes and evaluates all LEAs for compliance with the timelines.



## Scenario 2: Annual Databases or Monitoring



The state collects individual student data based on a monitoring cycle of data from one-sixth of school districts for each year of the SPP. The state monitors all school districts within the SPP.



## Scenario 3: Annual Databases or Monitoring

The state collects individual student data by requesting files through its monitoring cycle. The state monitors all school districts within the SPP.



# Scenario 4: Annual Databases or Monitoring



The state collects data from a sample of districts. The state looks at individual student data through a database, based on the sample of districts. The state accounts for all school districts in the sample within the SPP.

# Databases vs. Monitoring Scenario Answers

- Scenario 1—Database  
Why?
- Scenario 2—Monitoring  
Why?
- Scenario 3—Monitoring  
Why?
- Scenario 4 —Monitoring  
Why?





# Pre-Finding Corrections

# What Is Pre-Finding Correction?

If the LEA

- Immediately corrects noncompliance
- Before the state issues a finding and
- Provides documentation of the correction

The state may choose not to issue a written finding of noncompliance

# Pre-Finding Correction

The state must still confirm that the LEA corrected noncompliance in a manner consistent with “OSEP Memo 09-02”

Has the LEA

- Correctly implemented the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data, such as data it subsequently collected through on-site monitoring or a state data system; and
- Corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the district

# Pre-Finding Correction (cont.)

You monitor 100 files in five different LEAs

- LEA 1—20/20 (100%)
- LEA 2—10/20 (50%)
- LEA 3—19/20 (95%)
- LEA 4—6/20 (30%)
- LEA 5—12/20 (60%)

In the week following the monitoring, LEAs 3 and 4 submitted data demonstrating correction for the individual file(s) you found out of compliance and provided subsequent data showing 100% compliance.

The state reviewed documentation, verified correction, and did not make a finding of noncompliance for LEAs 3 and 4.

# Reporting Pre-Finding Corrections in the SPP/APR

What would the actual data be?

**Table 1. FFY 2019 SPP/APR data**

(a) Number of children for whom parental consent to evaluate was received	(b) Number of children whose evaluations were completed within 60 days (or State-established timeline)	FFY 2018 Data	FFY 2020 Target	FFY 2019 Data	Status	Slippage
100	57	100%	100%	57%	Did not meet target	Slippage

# Reporting Pre-Finding Corrections in the SPP/APR (cont.)

How would you report the correction?

Provide additional information about this indicator (optional)

**Table 2. Correction of findings of noncompliance identified in FFY 2019**

Findings of noncompliance identified	Findings of noncompliance verified as corrected within one year	Findings of noncompliance subsequently corrected	Findings not yet verified as corrected
18	18	0	0

## FFY 2019 Findings of Noncompliance Verified as Corrected

- Describe how the state verified that the source of noncompliance is correctly implementing the *regulatory requirements*
- Describe how the state verified that each *individual case* of noncompliance was corrected

# Pre-Finding Correction

You monitor 100 files in five different LEAs

- LEA 1—20/20 (100%)
- LEA 2—10/20 (50%)
- LEA 3—19/20 (95%)
- LEA 4—6/20 (30%)
- LEA 5—12/20 (60%)

In the week following the monitoring, all LEAs submitted data demonstrating correction for the individual file(s) you found out of compliance and provided subsequent data showing 100% compliance.

The state reviewed documentation, verified correction, and did not make a finding of noncompliance.

# Reporting Pre-Finding Corrections in the SPP/APR

What would the actual data be?

**Table 3. FFY 2019 SPP/APR data**

(a) Number of children for whom parental consent to evaluate was received	(b) Number of children whose evaluations were completed within 60 days (or State-established timeline)	FFY 2018 Data	FFY 2020 Target	FFY 2019 Data	Status	Slippage
100	57	100%	100%	57%	Did not meet target	Slippage



# Reporting Pre-Finding Corrections in the SPP/APR (cont.)



How would you report the correction? Provide additional information about this indicator (optional)

**Table 4.     Correction of findings of noncompliance identified in FFY 2019**

Findings of noncompliance identified	Findings of noncompliance verified as corrected within one year	Findings of noncompliance subsequently corrected	Findings not yet verified as corrected
	0	0	0

If you did not make findings, the correction language is not available in the system. Pre-finding corrections can be entered into the additional information (optional) textbox.

# Reporting Pre-Finding Corrections: Table Talk



- Does your state allow for pre-finding corrections?
- If so, how does your state report pre-finding corrections?
- Will your state make any changes as a result of today's discussion?

# Resources

- [OSEP Memo 09-02: Reporting on Correction of Noncompliance in the Annual Performance Report Required Under Section 616 and 642 of the Individuals with Disabilities in Education Act](#)
- [OSEP Monthly TA Call - December 16, 2019](#)
- [A State Guide on Identifying, Correcting, and Reporting Noncompliance with IDEA Requirements](#)
- [SEA Data Processes Toolkit](#)

# Contact Us



- Nancy Johnson, [ntjohnson11@gmail.com](mailto:ntjohnson11@gmail.com)
- Jennifer Wolfsheimer, [jwolfsh@wested.org](mailto:jwolfsh@wested.org)



IDEA DATA  
CENTER

Collect, Report, Analyze, and  
Use High-Quality Part B Data

# For More Information



**Visit the IDC website**

<http://ideadata.org/>



**Follow us on Twitter**

<https://twitter.com/ideadatacenter>



**Follow us on LinkedIn**

<http://www.linkedin.com/company/idea-data-center>



IDEA DATA  
CENTER

Collect, Report, Analyze, and  
Use High-Quality Part B Data

The contents of this presentation were developed under a grant from the U.S. Department of Education, #H373Y190001. However, the contents do not necessarily represent the policy of the U.S. Department of Education, and you should not assume endorsement by the federal government.

**Project Officers:** Richelle Davis and Rebecca Smith

