Kansas State Department of Education Management Controls Over IDEA, Part B – Special Education Performance Data

FINAL AUDIT REPORT

ED-OIG/A07-A0020
July 2001

NOTICE

Statements that management practices need improvement, as well as other conclusions and recommendations in this report, represent the opinions of the Office of Inspector General. Determination of corrective action to be taken will be made by appropriate Department of Education officials.

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UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF INSPECTOR GENERAL

ED-OIG/A07-A0020

JUL 2 0 2001

Dr. John A. Tompkins
Commissioner of Education
Kansas Department of Education
120 South East Tenth Avenue
Topeka, KS 66612-1182

Dear Commissioner Tompkins:

Enclosed is our final report entitled *Kansas State Department of Education Management Controls Over IDEA, Part B-Special Education Performance Data*. The report incorporates the comments you provided in response to the draft audit report. If you have any additional comments or information that you believe may have a bearing on the resolution of this audit, you should send them directly to the following Education Department official, who will consider them before taking final Departmental action on the audit:

> Frank Corrigan
> Office of Special Education and Rehabilitative Services
> U.S. Department of Education
> 330 C Street, SW Room 3124
> Washington, DC 20202

Office of Management and Budget Circular A-50 directs Federal agencies to expedite the resolution of audits by initiating timely action on the findings and recommendations contained therein. Therefore, receipt of your comments within 30 days would be greatly appreciated.

In accordance with the Freedom of Information Act (5 U.S.C. §552), reports issued to the Department's grantees and contractors are made available, if requested, to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act.

Sincerely,

Lorraine Lewis

Attachment

Audit of the Kansas State Department of Education Management Controls Over IDEA, Part B – Special Education Performance Data

Table of Contents

Kansas State Department of Education
Management Controls Over
IDEA, Part B – Special Education Performance Data

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Executive Summary

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The Kansas State Department of Education (KSDE) in general has a well-designed Individual with Disabilities Education Act (IDEA), Part B[1] centralized database system. KSDE needs to implement additional internal controls to minimize data errors and irregularities. The integrity of IDEA, Part B state-reported data is of particular importance because the U.S. Department of Education (Department) relies on it to provide to Congress an objective and accurate measure of the success of its special education programs, as required under the Government Performance and Results Act (GPRA) of 1993. The Office of Special Education Programs (OSEP) within the Department's Office of Special Education and Rehabilitative Services (OSERS) administers programs funded under IDEA, Part B. OSEP uses performance data reported by state educational agencies (SEAs) in preparing the Department's report to Congress on the outcomes of IDEA, Part B programs.

For reporting outcomes under the Department's 2001 Annual Plan, OSEP uses SEAs' performance data for the following performance indicators:

- Earlier identification and intervention (intervention)
- Inclusive settings/regular education settings (placement)
- Graduation (exiting)
- Suspensions or expulsions (discipline)
- Qualified personnel (personnel)

KSDE is required by IDEA, Part B to submit this performance data to the Department. Attachment A to this report shows the relationship between IDEA, Part B program objectives, performance indicators and performance data.

Performance Indicator 4.7.c of the Department's 1999 Performance Reports and 2001 Plans states that all departmental program managers will assert that the data used for their program's performance measurement are valid, reliable, and timely, or will have plans for improvement. Annually, Assistant Secretaries must provide the Office of the Under Secretary with a signed formal attestation regarding this data.

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[1] Part B of IDEA authorizes the Secretary of Education to provide grants to states to assist them in providing special education and related services to children with disabilities.

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In order to ensure that KSDE provides valid, reliable, and timely data that Department manager's can attest to, we found that KSDE needs to:

■   comply with OSEP requirements for reporting IDEA, Part B exit data;

■   strengthen system controls over its IDEA, Part B exit data to ensure that the data reported to the Department is valid, reliable, and timely;

■   incorporate on-site verification of its IDEA, Part B data in its monitoring activities; and

■   strengthen management controls over its IDEA, Part B management information system (MIS) function.

Our review of KSDE exit data disclosed numerous errors and irregularities, such as the inclusion of students who did not meet OSEP's age reporting requirements; duplication of reporting data (duplicate exit reporting for the same student); inclusion of in-state transfers; inclusion of prior year exits; and use of recycled student identification numbers.

Our review disclosed that KSDE needs a stronger local education agency (LEA) monitoring function, and stronger management and system controls over its IDEA, Part B data. Specifically, we found that KSDE lacked on-site monitoring procedures for testing the validity and reliability of LEA special education data; an updated MIS procedures manual; a contingency plan for its MIS function; and an independent review function for its IDEA, Part B data. Without a strong internal control environment, KSDE management cannot assure that its IDEA, Part B data is valid, reliable, and timely.

We recommend that the Assistant Secretary for Special Education and Rehabilitative Services:

■   monitor KSDE's compliance with OSEP's exit-age reporting requirement;[2]

■   require KSDE not to report multiple exits for students who transfer and subsequently exit from special education programs in other school districts or agencies;

■   require KSDE to eliminate the option from its data dictionary that allows an LEA to defer reporting an exit to the following school year;

■   require KSDE to strengthen its data-system controls, such as data verification and validation, for its exit performance data reported to the Department, e.g., for detecting duplicate exit data;

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[2] OSEP instructs SEAs to report children ages 14 or older who exit special education programs. For age determination purposes, OSEP requires that children counted on the report be 14 years old or older on December 1 of the school year in question.

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■   request KSDE to revise its edit checks to detect "recycled pseudo social security numbers" (i.e., reuse of student identification numbers);

■   request KSDE to incorporate in its new LEA monitoring process a systematic on-site review of LEAs that includes appropriate testing of the IDEA, Part B performance data;

■   require KSDE to direct its LEAs not to report as drop outs students who cease receiving special education and are later discovered to have moved to another school within or outside the district and are known to be continuing special education;

■   request KSDE to develop and maintain updated written polices and procedures for collecting, reviewing, and reporting special education performance data;

■   request KSDE to direct its LEAs to develop and maintain updated contingency plans for their MIS functions; and

■   request KSDE to review the IEP formats in use in the state and ensure that they provide for consistent and accurate reporting of data by schools to the LEAs and by LEAs to the state.

KSDE generally agreed with our findings but disagreed with several recommendations. We have summarized KSDE's responses at the end of the respective finding to which each relate and provided the full text of the responses as Attachment B.

Audit Results

KSDE's management controls do not provide assurance that the data submitted by KSDE to the Department will meet all of the standards in the Department's *Data Quality Standards.*[3] The *Data Quality Standards* contain six standards for evaluating the quality of reported data:

- Validity – Data adequately represent performance.
- Accurate Description – Definitions and counts are correct.
- Editing – Data are clean.
- Calculation – The math is right.
- Timeliness – Data are recent.
- Reporting – Full disclosure is made.

For each of the D*ata Quality Standards*, the Department provided examples of conditions that meet or fail to meet the standard. The Department also provided *Data Quality Checklists* for use by primary data providers and secondary data managers. For school year 1998-99, KSDE management controls over the collection and reporting of performance data for exiting did not provide Department managers adequate assurance to attest to the validity, reliability, and timeliness of its IDEA, Part B exit data.

All Kansas LEAs use KSDE's system or have integrated KSDE's database specifications in their own systems for collecting, processing, and reporting their special education data. Twice a year LEAs send their special education student files electronically to KSDE. Once KSDE receives these files, it sends them to its centralized database system where it performs two tiers of what KSDE refers to as validity and accuracy tests. The first tier tests data within each LEA data file, and the second tests the data from each LEA file relative to statewide data within the entire KSDE database. Once this process is completed, KSDE formats the data to comply with the Office of Special Education Program's (OSEP's) requirements and submits its files to the Department.

Our review of KSDE's database records for the December 1, 1998, child count demonstrated that its MIS personnel were diligent in applying data validations and checks in an effort to ensure the accuracy of the data. KSDE needs to implement additional internal controls to minimize data errors and irregularities. The integrity of IDEA, Part B state-reported data is of particular importance because the Department relies on it to provide to Congress an objective and accurate

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[3] The Department issued these standards, as part of the 1999 Performance Reports and 2001 Plan, to assist ED managers as they collect, analyze, and report data about federal education programs. Program managers can use the standards as a tool when monitoring grantees and evaluating the quality of the reported data and preparing submissions for the GPRA annual report. The standards are the Department's attempt to provide criteria against which to evaluate grantees data quality.

measure of the success of its special education programs, as required under the Government Performance and Results Act of 1993.

In order to ensure that data are valid, reliable, and timely, KSDE needs to (1) comply with OSEP exit data reporting rules and strengthen its MIS controls over the IDEA, Part B exit data it reports to the Department; (2) incorporate in its monitoring activities on-site verification and substantive testing of its IDEA, Part B data; and (3) strengthen its management controls over its IDEA, Part B MIS function.

Finding No. 1 – KSDE IDEA, Part B Exit[4] Data Reported to the Department Is Not Reliable

We found numerous errors and irregularities in KSDE exit data reported to the Department. Specifically, we found that of the 7,382 children KSDE reported as having exited special education programs during school year 1998-99: (1) 506 were not 14 years of age or older as of December 1, which is contrary to OSEP requirements; and (2) 456 were erroneously counted more than once. In addition, KSDE did not comply with OSEP rules in reporting exits discovered after the June 30 reporting date nor did it perform sufficient database analysis to identify and resolve numerous instances where the data fields used to determine inclusion on its exit reports to OSEP contained internally inconsistent data.

The cumulative effect of KSDE's misreporting was that Kansas' special education programs were performing better than they appeared to be. The inflated numbers were primarily in the dropouts and transfers' exit classifications rather than in the graduation and program completion. At the same time, KSDE's misreporting affected the quality of the Department's IDEA, Part B exit data.

Exit data reported to the Department included children age 13, which is contrary to OSEP's guidance and resulted in KSDE's exit data being overstated

KSDE did not comply with OSEP rules[5] when reporting on children who had exited special education programs. OSEP instructs SEAs to report children ages 14 or older who exit special education programs. For age determination purposes OSEP requires that children counted on the report be 14 years old or older on December 1 of the school year in question. Compliance by all states is required for comparability between exit data and child count data, as well as comparability in the data reported by the various states.

For school year 1998-99, KSDE incorrectly used June 30, 1999, rather than December 1, 1998, to determine the age of students in reporting its exit data to the Department. This departure from OSEP rules resulted in 506 children, who were age 13, as of the December 1, 1998, child count, being included in the statewide exit data.

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[4] The Department requires states to report to OSEP an unduplicated count of all children with disabilities who exited special education during the reporting year. OSEP's instructions define exited students as children who (a) no longer receive special education; (b) graduated with a regular high school diploma; (c) received a general equivalency diploma; (d) reached maximum age; (e) died; (f) moved, but are known to be continuing in another educational program; (g) moved, and are not known to be continuing in another educational program; or (h) dropped out. The Department's IDEA, Part B performance indicator 4.1 "Graduation" measures as its objective that "the percentage of children with disabilities exiting school with a regular high school diploma will increase, and the percentage who drop out will decrease."

[5] OSEP IDEA, Part B Data Dictionary, September 1998.

Table 1.1 illustrates the number of exited students KSDE should have reported to the Department had it adhered to OSEP's age requirements.

Table 1.1
Exit Count of Students Age 14 Years or Older
As of the School Year 1998-99 Child Count

KSDE special education exits reported to the Department	7,382
Less: Exits age 13 years old as of the December 1 child count	506
Actual counts of KSDE exits age 14 years or older as of the December 1 child count	6,876

Exit data reported to the Department included instances of children who were erroneously counted as having exited special education more than once

OSEP's reporting instructions specify that states provide unduplicated exit data. Our database analysis revealed that 456 of the 6,876 children age 14 years or older were reported to the Department as exited as many as four times during the 1998-99 school year. We found that 6,014 students were reported as exited once, 358 students twice, 46 students were reported as exited three times and two students were reported as exited four times. Most of the multiple reporting was due to in-state transfers. KSDE also reported two individuals as dropping out of school twice, three individuals as graduating twice, and one who both dropped out and graduated.

Table 1.2 illustrates the net effect this duplicate reporting had on the exit data KSDE reported to the Department.

Table 1.2
Unduplicated Exit Count of Children Ages 14 or Older
As of the School Year 1998-99 Child Count

Actual KSDE exit count of students age 14 years or older as of the December 1 child count		6,876
Less duplicated exit data:		
• 358 students counted as exited twice (358 x1)	358	
• 46 students counted as exited three times (46 x 2)	92	
• 2 students counted as exited four times (2 x 3)	6	
		456
Unduplicated KSDE exit count of children age 14 or older as of the December 1 child count date		6,420

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KSDE did not comply with OSEP rules in reporting exits discovered after the June 30 reporting date

Using KSDE's 1998-99 data dictionary, the KSDE MIS database manager instructed LEAs, to choose among two reporting options for cases in which an exit is discovered after the reporting period. One option was to report to KSDE corrected exit information for the reporting period that just ended. The second option was to defer reporting the exit to the following school year, a practice that the MIS database manger and the LEAs commonly referred to as "archiving". This latter option, which was inconsistent with OSEP rules, affected statewide data comparability.

Given the above situation, we were not able to quantify the exact number of deferred records. However, we found that 253 of the 1998-99 exits were reported to KSDE during the month of July and 1,091 during August 1998. This compares to an average of 406 exited students per month from September 1998 through April 1999. The relatively large number of exits during August might have been due to KSDE's practice of archiving.

KSDE did not perform sufficient analysis to identify internally inconsistent data

Our database review revealed that KSDE did not perform sufficient analyses to determine whether exit status students had appropriate status codes, unique student identifiers, and current individualized educational programs (IEPs).

Comparison of exit and current status students revealed questionable status codes

KSDE reported exit data without performing sufficient analyses to identify possible inconsistencies between exit status and current status records. We performed a comparison of the reported exits and current status students and found several inconsistencies that indicated that the exit status of some students might have been in error. For example:

- One hundred ninety-eight of the 4,826 exit status students (none of which were in-state transfers) had current status records, indicating that the student had been misclassified as an exit, the student had re-entered the program, or the current status record was in error.

- Nine hundred thirty-four of the 1,594 in-state transfer students did not have current status records in the database, which indicated incorrect in-state transfer classifications, changes in student identifiers, or failures by the new LEAs to report the students.

Correction of these inconsistencies would result in additional students being added or removed from the reported exits. Comparing current and exit status student information would help

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identify and correct additional instances where LEAs had misreported student status information or reused "pseudo social security numbers."[6]

Comparison of student identification data revealed duplications

We found 75 instances of the same social security or "pseudo social security number" being assigned to more than one student. Seven of the 75 instances were due to the assignment of the same social security numbers to different students; and 66 of the 68 were due to one LEA reusing pseudo social security numbers that had been previously assigned to students who had exited the program. While these duplications were due to errors at the LEA level, KSDE could have discovered them had they compared exit and current status information as we did during our review and had they conducted on-site LEA monitoring.

The practice of recycling pseudo social security numbers can significantly hinder KSDE's ability to provide valid, reliable, and timely IDEA, Part B performance data to the Department.

Comparison of current and exit status records would have revealed potential errors in exit dates

IDEA, Part B requires that IEP meetings be held at least annually. This is reflected in KSDE's child count reporting, which excludes students whose IEP meeting dates are more than one year old. This means that all exit dates should either be immediately after the expiration of the IEP, for students who completed the objectives or withdrew from the program, or less than one year old for other exits. Students continuing in the IDEA, Part B program should have IEP meeting dates that are less than one year old.

The Department's *Data Quality Standards* provide that data are collected and reported in a timely manner and that the activities being measured occurred or existed at the time for which they are reported.

Our calculations of IEP expiration dates revealed several situations that raise questions about the validity, reliability, and timeliness of the exit data reported to the Department. For example:

- We found 127 exit-status students, 14 years of age or older, whose IEP meeting dates were blank or were more than a year old as of June 30, 1998, the previous reporting period. In some instances, IEPs dated as far back as January 1993. Late reporting of exits can compound the data validity and reliability issue even further if any of these students were under the age of 14 as of December 1 of the year following their last IEP meeting dates. We found that 36, or about 28 percent, of the 127 students would not have been 14 years old had the exit been reported in the year that their IEP expired.

- Another 136 exit-status students whose IEPs had expired after June 30, 1998, recorded exit dates from 30 to 261 days after the IEP expiration. This indicates that the exit dates may be

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[6] KSDE instructs its LEAs to assign "pseudo social security numbers" to students when it is not possible for the LEA to obtain the student's social security number.

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the dates that the district discovered the exit instead of the actual exit date, which might have been in the previous reporting period.

- Of the 701 reported graduates, 49 had IEP expiration dates that were from 30 to 205 days old, raising questions about whether the student withdrew from special education prior to graduation.

- Finally, 249 current status students, age 14 or older, had IEPs that expired prior to the end of the reporting period, which indicates that these students might have actually exited the program, causing the exit data to be understated.

Recommendations

We recommend that the Assistant Secretary for Special Education and Rehabilitative Services:

1.1. Monitor KSDE's compliance with the OSEP requirement to use students' ages as of the December 1 child count date in reporting exits.

1.2. Require KSDE not to report multiple exits for students who transfer and subsequently exit from special education programs in other school districts or agencies.

1.3. Require KSDE to eliminate the "archiving of exits" reporting option from its data dictionary.

1.4. Require KSDE to strengthen its data-system controls, such as data verification and validation, for its exit performance data reported to the Department, e.g., for detecting duplicate exit data, inaccurate student status information, and expired IEPs.

1.5. Request KSDE to revise its edit checks to detect student records containing recycled pseudo social security numbers.

KSDE Response and OIG Comments

Recommendation 1.1:

KSDE agreed with our finding but disagreed with our recommendation. KSDE stated that OSEP and Westat, OSEP's contractor, are aware of the fact that the state of Kansas, as well as other states, use the end of the school year age for exit age determination rather than the student's age as of the December 1 child-count. KSDE further stated that both OSEP and Westat have acknowledged that reporting students who exit age 14 or older as of the December 1, child-count date is flawed. According to KSDE, OSEP is proposing changing the exit age reporting

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requirement for students' 14 years old and older as of their exit date. KSDE stated that they would not take a corrective action at this time.

We do not agree with KSDE. Using any other date than the one prescribed by OSEP would result in inconsistent and unreliable national exit data. OSEP's Table 4 "*Report of Children With Disabilities Exiting Special Education, 1998-99 School Year*" instructs states to "Report the number of students ages 14-21 that exited special education by age-year, disability condition, and basis of exit." For age determination purposes, OSEP's data dictionary defines age as "…a child's actual age in years on the date of the child count: December 1 or the last Friday in October of the current school year…." Until OSEP formally changes this requirement, KSDE should use OSEP's current published criteria when reporting exits.

Recommendation 1.2:

KSDE agreed with our finding but disagreed with our recommendation. KSDE acknowledged that there are duplicate exit counts across school districts but that OSEP has not provided instructions to states on how to eliminate duplicate exit counts, i.e., students who exit two or more districts within a school year. KSDE stated that OSEP needs to issue a directive specifying which exit takes precedence when a student has multiple exit dates within a school year and that, until the directive occurs, KSDE will make no change.

During our audit it came to our attention that there is no formal definition for the term "catchment area" for reporting exits in OSEP's table four. We also found that OSEP and Westat defined the term "catchment area" differently.

OSEP's reporting instructions clearly specify that states must provide unduplicated exit data. Counting all exit activity for each individual LEA, rather than each individual student does not provide the Department with an "unduplicated exit data" count. KSDE's unwillingness to correct this weakness affects national exit data comparability and makes the Kansas data invalid and unreliable. KSDE could reduce the likelihood of duplicated exit data by incorporating a simple edit check into its system.

Recommendation 1.3:

KSDE generally agreed with our finding but not with our recommendation. KSDE stated that while the practice of archiving is and always has been an option for districts in reporting their exits, KSDE did not require nor recommend that school districts archive exited students. KSDE stated that it instructs LEAs to report only those exits that have occurred within the designated 12-month reporting period. KSDE further stated that its data verification process includes an edit check "e," which flags exits outside the current reporting period and excludes these exits from Table 4. KSDE stated that they have revised the section in the report preparation instructions to clarify how to report unknown exits.

The revised data dictionary section dealing with unknown exits still needs to clarify that archiving exits for OSEP reporting purposes is not an option and that OSEP allows states to submit IDEA, Part B data corrections through September of each reporting period.

With respect to KSDE's data verification process, KSDE's edit checks cannot detect archived exits nor can they exclude these exits from being reported in OSEP's Table 4. An archived exit does not reflect the actual student exit date but rather an artificially assigned exit date. Because such artificial exit dates fall within the designated 12-month reporting period, KSDE's edit checks would not be able to detect them nor exclude them from the exit count. KSDE's 1998-99 data dictionary instructed LEAs that "…the student may be archived until the next years EOY [end-of-year] collection with an exit date of August 10…."

Recommendations 1.4 and 1.5:

KSDE generally agreed with our finding but disagreed with our recommendation. KSDE stated that they do "…not view a student who exits at one point in the school year and then re-enters special education at a later point in the school year, who has been indicated as an exit, as an error in exit status…." KSDE recognized that "…due to possible human error, an entry error could occur…." KSDE stated that they include "…in its verification program a search for duplicate social security numbers that allows the detection of a recycled pseudo social security number within a district…." KSDE stated that "as all of these circumstances require human analysis and human checks, no corrective action is needed."

KSDE stated that "…due to the requirement that parents must be provided notice of a meeting and are to attend if at all possible, many parents choose to not redo an IEP if they know their child is graduating, dropping out, or transferring…." KSDE further stated that "…just due to human circumstance, various IEP meeting dates are beyond the annual review date." KSDE stated that they report exit data "…as soon as the LEAs are aware of it…." KSDE stated that LEAs schedule annual review meetings within the one-year time frame but may not actually hold the meeting due to various reasons. KSDE noted that this is "…indeed the case for approximately 4% of special education students in Kansas…." KSDE stated that decisions made by parents are not controllable by KSDE or by the LEAs. KSDE stated that "as all of these circumstances require human analysis and human checks, no corrective action is needed."

Although we agree with KSDE that some circumstances may require human analysis and human checks, a simple addition to their current edit checks identifying exits with current status would minimize the risk of including duplicated exit data in the data it reports to the Department. With regard to reporting exited students with expired IEPs, KSDE's own data dictionary clearly instructs LEAs to report only the active IEP currently in force for the student.

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Finding No. 2 –Monitoring System Being Developed Lacks Systematic On-Site Verification of IDEA, Part B Data

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KSDE did not incorporate substantive on-site testing of IDEA, Part B data reported to the Department in its LEA review activities. As previously discussed under Finding 1, during our LEA review we found numerous errors and irregularities, such as the inclusion of in-state transfers as exits, and invalid and unreliable reporting of social security numbers, that could have been corrected had they been detected by substantive on-site testing.

Specifically, we found invalid and unreliable data in the following areas:

- **Exit data.** At two of the three LEAs reviewed, Salina and Pittsburg, we found that one out of seven and three out of nine student files reviewed in our dropout samples, respectively, were misclassified. The LEAs had erroneously classified these students as dropouts, when in fact they had moved and were known to be continuing special education. At all three LEAs reviewed, we found numerous instances of data errors and irregularities such as inadequate documentation supporting exit classifications; exits reported in the wrong year; and errors in exit dates, dates of birth, and social security numbers.

- **Placement data.** We found that all three of the LEAs we reviewed exhibited instances of inconsistent placement data. At the Salina and Hiawatha LEAs, 6 of the 50 and 20 of the 50 student files we reviewed, respectively, showed inconsistencies in the amount of time students spent receiving special education services. At the Pittsburg LEA, we found that 2 of the 50 student files we reviewed showed unreliable information regarding special education settings, and 18 of the 50 student files we reviewed showed inconsistencies in the amount of time students spent receiving special education services. We also noted that placement data were inconsistently reported within one LEA.

- **Discipline data.** Two of the three LEAs reviewed showed inconsistent discipline data. For example, at the Pittsburg LEA, KSDE reported only one long term suspension, while the LEA supporting documentation showed three. At the Salina LEA, we also found that KSDE misreported one of two suspensions and failed to report one.

We concluded that had KSDE incorporated data accuracy tests of its IDEA, Part B data to its protocol for LEAs on-site reviews, these errors and irregularities could have been detected and corrected. We also concluded that the presence of these tests may increase LEAs' perception of KSDE's commitment to data validity, reliability, and timeliness and might identify areas where LEAs need further clarification or training.

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KSDE replaced its five-year systematic on-site LEA compliance review process with a control self-assessment system. This new process, piloted in school year 1999-2000, provided for LEA on-site compliance reviews on an "as needed basis" rather than on a periodic basis as required by Kansas State Regulations for Special Education. Section 91-40-51 (b) of the Kansas State Regulations for Special Education, dated May 19, 2000, states that on-site compliance reviews "shall be conducted periodically by the special education section of the department."

KSDE officials stated that the new monitoring system was being developed in response to OSEP's new continuous improvement monitoring policies, which required state-control self-assessments of LEAs. We reviewed OSEP's *Continuous Improvement Monitoring Process 2000-2001 Monitoring Manual* and we did not find any statement in the manual directing SEAs to adopt the control self-assessment process or a similar process as their new monitoring approach. Furthermore, we noticed that at the inception of our audit, KSDE's monitoring staff was comprised of four staff members (one of them a recent hire). During the course of our audit the most senior compliance staff member retired, leaving the team with fewer experienced personnel. We also noted that the prior LEA compliance reports were dated past the State's five-year cycle. In light of these conditions, KSDE needs to assess whether the current staffing structure is adequate to meet the demands prescribed by the five-year compliance review cycle.

KSDE monitoring staff stated that, in addition to their compliance reviews, OSEP performs compliance reviews of selected SEAs. We reviewed OSEP's August 13, 1996, monitoring report of its on-site review of the Kansas State Board of Education's implementation of IDEA, Part B. We found that OSEP's review covered, for the most part, tests of KSDE's compliance with laws and regulations but no substantive testing of the special education data reported by the LEAs.

Although KSDE's new control self-assessment process may be a proactive step towards working in partnership with the LEAs to improve their internal control structures, a control self-assessment is not a replacement for the assurances provided by on-site monitoring reviews. The lack of a systematic on-site monitoring approach (i.e., reviewing LEAs only on an "as needed basis") increases the risk that data errors and irregularities could go undetected.

Recommendations

We recommend that the Assistant Secretary for Special Education and Rehabilitative Services:

2.1. Request KSDE to incorporate in its new LEA monitoring process a systematic on-site review of LEAs by KSDE personnel that includes substantive testing of the child count, placement, personnel, exit, and discipline data reported to the Department.

2.2. Require KSDE to direct its LEAs to accurately report dropout students and not include individuals who cease receiving special education and are later discovered to have moved

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to another school within or outside the district and are known to be continuing special education.

KSDE Response

KSDE generally agreed with our finding but disagreed with our recommendations. KSDE's response asserted that systematic on-site verification is a major facet of Kansas' continuous improvement monitoring process.

OIG Comment

KSDE did not provide support for the above assertion. Their response did not state that the continuous improvement monitoring process provides for systematic on-site review of LEAs by KSDE personnel. In our discussion of this finding as well as our recommendation, we refer to "systematic on-site verification" to mean systematic on-site review of LEAs by KSDE personnel that includes substantive testing of the child count, placement, personnel, exit, and discipline data reported to the Department.

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Finding No. 3 – KSDE Needs to Strengthen its Management Controls Over its IDEA, Part B Management Information System Function to Ensure Data Validity, Reliability, and Timeliness

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Our review disclosed that additional management controls are needed for KSDE management to minimize the risk of data vulnerabilities due to errors and irregularities. These controls will also help to ensure that the Department will meet its *Data Quality Standards*. Specifically, we found that KSDE management lacked an updated MIS procedures manual; a contingency plan for its MIS function; and an independent review function with respect to the IDEA, Part B data it reports to the Department. In addition, we found that KSDE needs to strengthen its controls over its data processing activities and establish policies and procedures that ensure appropriate segregation of duties.

Need for Updated MIS Operating Policies and Procedures

According to KSDE officials, the IDEA, Part B MIS policy and procedures manual has not been updated since at least 1995. In addition, the MIS database has since been upgraded. Thus, the existing manual is also obsolete.

Standards for Internal Control in the Federal Government[7] provides that all transactions and other significant events be clearly documented and readily available for examination. The Federal Internal Control Standards require that this documentation should appear in management directives, administrative policies, or operating manuals. Furthermore, the Federal Internal Control Standards state that transactions should be promptly recorded to maintain their relevance and value to management in controlling operations and making decisions.

KSDE management will not have reasonable assurance of data validity, reliability, and timeliness until they update, formally document, and clearly communicate to the MIS database manager IDEA, Part B data management objectives, policies, and procedures.

Need for Contingency Planning

KSDE officials acknowledged that they did not have a formal, written contingency plan for the IDEA, Part B MIS function. KSDE officials told us that they believed that one of their data coordinators, the person responsible for compiling the state's personnel records, could assume the MIS database manager responsibilities if the MIS database manager was not available.

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[7] The General Accounting Office issued the *Standards for Internal Control in the Federal Government* (GAO/AIMD-00-21.3.1) in November 1999, hereinafter referred to as the "Federal Internal Control Standards."

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Furthermore, we noted that the three LEAs we reviewed also lacked formal written contingency plans.

Federal Internal Control Standards provide that management establish a positive control environment in which, among other things, it plans and ensures continuity of needed skills and abilities, and ensures that data centers and client-server operation controls include contingency and disaster planning.

The absence of formal, written contingency plans, combined with the absence of an updated MIS procedures manual, increases the risk of erroneous data not being detected and corrected, when changes that occur affect program operations, including personnel changes.

Need for Independent Review of Data Submitted to the Department

We found that no one other than the MIS database manager reviewed the IDEA, Part B data that the KSDE submitted to the Department. KSDE's MIS has computerized edit checks built into the system to review the format, existence, and reasonableness of the data; but human input and/or changes to this data, due to edit checks or analytical reviews, can result in data errors. Furthermore, our review of the KSDE MIS database disclosed that the computerized built-in edit checks did not detect the significant number of errors and irregularities we discussed in Finding 1 of this report.

Similarly, we found that at the three LEAs the database managers also submitted their IDEA, Part B data without independent-party review.

Federal Internal Control Standards provide that management perform reviews at each functional or activity level. Furthermore, the Department's *Data Quality Standards* provide that a different person, who is familiar with the data, systematically review the data.

Without an independent review function, KSDE management and users of the information do not have reasonable assurance of the validity, reliability, and timeliness of its IDEA, Part B data submitted to the Department.

Need for Additional Controls Over Data Processing Activities

The KSDE MIS database manager has incorporated into the IDEA, Part B data system a number of systematic controls that enhance data validity, reliability, and timeliness. Nevertheless, our review of the database disclosed that its computerized built-in edit checks did not always detect errors and irregularities, such as recycled pseudo social security numbers, duplicate exit data, and child counts with expired IEPs. We also noted that KSDE did not require LEAs to use a standardized IEP data collection form. This practice may have also contributed to some of the data errors and irregularities we discussed in Finding 1 of this report.

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Need for Policies and Practices Regarding Segregation of Duties

During a KSDE MIS demonstration session, we observed that their MIS database manager made corrections and changes to student data rejected by the system's built-in edit checks. We also noted that the MIS database manager corrected some duplicate data by changing them to exits without prior LEA consultation or review of LEA supporting documentation. This action constituted a breach of the internal control of segregation of duties. Without proper segregation of duties and functions there was no way to distinguish between the data the LEA submitted to KSDE from the changes the database manager made to the LEA data.

Federal Internal Control Standards provide that key duties and responsibilities need to be divided or segregated among different people to reduce the risk of error or fraud. This should include separating the responsibilities for authorizing transactions, processing, recording and reviewing transactions, and handling any related assets. The Standards further state that no one individual should control all key aspects of a transaction or event. Also, the Department's *Data Quality Standards* provide that data errors should be traced back to the original source and mistakes corrected by the MIS personnel, in the case of KSDE.

Without proper segregation of data inputting and verification duties, there is an increased risk that data manipulation may go undetected, and as such, KSDE management and users of the information do not have reasonable assurance that the data reported to the Department are valid and reliable.

Recommendations

We recommend that the Assistant Secretary for Special Education and Rehabilitative Services:

3.1   Request KSDE to develop and maintain updated written polices and procedures for collecting, reviewing, and reporting special education performance data to include: (1) a formal contingency plan for the MIS function, (2) procedures requiring independent reviews of all data submitted to the Department, and (3) policies and procedures that ensure segregation of data inputting and editing functions.

3.2   Request KSDE to require LEAs to develop and maintain updated contingency plans for their MIS functions.

3.3   Request KSDE to review the IEP formats in use in the state and ensure that they provide for consistent and accurate reporting of data by schools to the LEAs and by LEAs to the state.

KSDE Response

KSDE generally agreed with our recommendations. KSDE disagreed with our recommendation that it require LEAs to use standardized IEP forms. The KSDE response noted that its data dictionary already provides for consistency in the data submitted by LEAs.

OIG Comment

While KSDE's data dictionary provides for data consistency, we found that all of the IEP forms in our sample were not formatted in ways that would assure consistency in the data reported to the state. Specifically, some IEP forms only provided for the reporting of special education service time in terms of minutes and did not indicate the number of days and weeks over which this service time occurred, as required by the data dictionary. Another problem is that the schools in some LEAs each had their own IEP formats, which would increase the risk that the LEA data entry person would make errors. We modified our recommendation to more specifically address the problems we identified.

Background

The Government Performance and Results Act (GPRA), enacted in 1993, provides for the establishment of strategic planning and performance measurement in the Federal Government. Congress intended the Act to:

■ Help federal managers improve service delivery by requiring that they plan for meeting program objectives and by providing them with information about program results and service quality;

■ Improve congressional decision making by providing more objective information on achieving statutory objectives, and on the relative effectiveness and efficiency of federal programs and spending; and

■ Improve internal management of the Federal Government.

GPRA requires that the head of each agency submit to the Director of the Office of Management and Budget and to Congress a five-year strategic plan for program activities and a performance plan for each fiscal year covered under the plan. The performance plans must establish performance indicators to be used in measuring or assessing the relevant outputs and outcomes of each program activity.

The Department of Education published its Strategic Plan 1998-2002 in September 1997. The Department's 1999 Performance Reports and 2001 Plans were submitted to Congress in March 2000. The 2001 Annual Plan contained nine performance indicators for the IDEA, Part B – Special Education Program. The Department relies on state-reported data for measuring the performance of six of the nine indicators listed in the plan, i.e., inclusive settings, earlier identification and intervention, regular education settings, suspensions or expulsions, graduation, and qualified personnel. Attachment A to this report shows the relationship between the IDEA, Part B program objectives, performance indicators, and performance data.

Performance Indicator 4.7.c of the Department's 1999 Performance Reports and 2001 Plans states that all departmental program managers will assert that the data used for their program's performance measurement are reliable, valid, and timely, or will have plans for improvement. Annually, the Assistant Secretaries must provide the Office of the Under Secretary with a signed formal attestation covering their data. The Department developed *Data Quality Standards* to assist departmental managers as they collect, analyze, and report data about federal programs. For the IDEA, Part B special education programs, the data used for measuring performance included data reported by the individual states.

KSDE is responsible for reporting to the Department (including the data collection and processing) IDEA, Part B – Special Education data for the State of Kansas. The State of Kansas has 81 LEAs and received over $44 million of IDEA, Part B funds for the 1999-00 award year. OSEP reported that on December 1, 1998, the State had a total of 58,425 children receiving special education services.

Objectives, Scope, and Methodology

Our objectives were to: (1) identify the process used by KSDE to accumulate and report performance data to the Department, (2) determine whether KSDE's management controls ensured that performance data are reliable, and (3) identify barriers or obstacles, if any, that may impact KSDE's ability to provide quality performance data. The audit was limited to state-reported data used by OSEP to report on program objectives and outcomes as required by GPRA.

Our review covered the state-reported 1998-99 school year IDEA, Part B data for six of the nine Department of Education performance indicators:

- Inclusive settings (Indicator 1.1)
- Earlier identification and intervention (Indicator 2.1);
- Regular education settings (Indicator 3.1);
- Suspensions or expulsions (Indicator 3.3);
- Graduation (Indicator 4.1); and
- Qualified personnel (Indicator 5.1)

As of December 1, 1998, 52 of the 81 LEAs in Kansas were unified school districts and/or cooperatives serving over 90 percent of the children reported under the IDEA, Part B program. To ensure we evaluated procedures at LEAs with varying age populations of children with disabilities, we focused our review on unified school districts and cooperatives, which included schools covering preschools and grades K through 12. To ensure we evaluated procedures at LEAs with varying database systems, we grouped the 52 LEAs based on their type of database system.[8] Finally, to ensure we evaluated procedures at LEAs with varying student populations, we grouped the LEAs by their reported child count.

As shown in Table 4.1, we randomly selected an LEA from each group, as follows:

Table 4.1
KSDE LEA Population Subject to Our Sample Selection
By Database Type and Child Count

Clusters	Database Type (See footnote 8 on preceding page.)	Child Count
1	Custom LEAs (5)[9]	2,029-6,017
2	File maker Pro LEAs (18)	935-2,206
3	File maker Pro LEAs (28)	301-732

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[8] Kansas LEAs collect, process, and report IDEA, Part B data using one of two database systems: the State provided system, "File Maker Pro", or "custom" database systems developed by some of the larger LEAs for their own use, while incorporating State specifications.

[9] We excluded one of six KSDE "custom" database LEAs from our sampling universe because it was not within the child count parameters of cluster number one.

To identify the process KSDE uses in accumulating and reporting performance data to the Department, we interviewed KSDE officials and staff responsible for collecting, processing, and reporting the performance data to OSEP. For the three LEAs selected for our review, we interviewed LEA officials to gain an understanding of the procedures that the LEAs used in collecting, processing, and reporting the IDEA, Part B supporting data to KSDE.

To determine whether KSDE management controls ensure performance data are valid, reliable, and timely, we: (1) reviewed and tested school year 1998-99 IDEA, Part B MIS database controls; (2) selected a random sample of student and personnel records from KSDE's IDEA, Part B database; and (3) verified the validity and reliability of the data reported to the Department by comparing this data to supporting school and student records.

Table 4.2 shows the number of students reported to the Department and the number of student records randomly selected for each of the LEAs we visited.

Table 4.2
Total Child Count and Number of Student Records Reviewed for Selected LEAs

LEA	Total Students Reported	Student Records Reviewed
Salina	2,029	106
Pittsburg	1,430	98
Hiawatha	306	63

Table 4.3 shows a breakdown, by population and sample size, of the student and school data sets reviewed at each of the selected LEAs. These data sets support the six IDEA performance indicators that rely on state-reported data: inclusive settings (indicator 1.1), earlier identification and intervention (indicator 2.1), regular education settings (indicator 3.1), suspensions or expulsions (indicator 3.3), graduation (indicator 4.1), and qualified personnel (indicator 5.1).

Table 4.3
Total Numbers Student and Personnel, and Numbers of Students and Personnel Records Reviewed, Broken Down By Performance Indicator

LEA	Child Count & Placement (Data sets supporting Indicators 1.1, 2.1, 3.1)		Graduation and Dropout (Data sets supporting Indicator 4.1)		Discipline (Data sets supporting Indicator 3.3)		Personnel (Data sets supporting Indicator 5.1)	
	Total Students Reported	Student Files Reviewed	Total Students Reported	Student Files Reviewed	Total Students Reported	Student Files Reviewed	Total Certified Teachers Reported	Personnel Files Reviewed
Salina	2,029	50	91	20	36	36	184	40
Pittsburg	1,430	50	96	20	28	28	135	36
Hiawatha	306	50	13	13	0	0	32	32

In addition, we reviewed the state of Kansas' fiscal years 1997, 1998, and 1999 single audit reports and KSDE's most recent on-site compliance review reports for the three selected LEAs.

We performed fieldwork at the KSDE in Topeka, special education offices in Salina, Pittsburg, and Hiawatha, and at our offices in Kansas City, Missouri. Our fieldwork was conducted from June 27 to December 15, 2000. Our audit was performed in accordance with generally accepted government auditing standards appropriate to the scope of review.

Statement on Management Controls

For our review, we assessed KSDE's management controls, policies, procedures and practices applicable to KSDE's process for collecting and reporting performance data for the IDEA, Part B program as required by GPRA. Our assessment was performed to determine whether the processes used by KSDE and the reviewed LEAs provided a reasonable level of assurance that KSDE reported reliable performance data to OSEP.

For the purpose of this report, we classified KSDE's controls into the following categories:

- Guidance and technical assistance,
- Collection of data from LEAs,
- Data compilation and report preparation, and
- Monitoring LEA data collection and reporting processes.

Because of inherent limitations, a study and evaluation made for the limited purpose described above would not necessarily disclose all material weaknesses in the management controls. However, our assessment disclosed management control weaknesses, which could adversely affect KSDE's ability to report accurate performance data for GPRA. These weaknesses are discussed in the Audit Results section of this report.

IDEA, Part B Program Objectives, Performance Indicators and Performance Data
FY 2001 Annual Plan[1]

PROGRAM OBJECTIVE	PERFORMANCE INDICATOR	PERFORMANCE DATA COLLECTED FROM OSEP FORMS
All preschool children with disabilities receive services that prepare them to enter school ready to learn.	**1.1 Inclusive settings.** The percentage of preschool children with disabilities who are receiving special education and related services in inclusive settings will increase.	SEAs report the number of students ages 3-5 by age and educational placement
All children who would typically be identified as being eligible for special education at age 8 or older and who are experiencing early reading or behavioral difficulties receive appropriate services earlier to avoid falling behind their peers.	**2.1 Earlier identification and intervention.** The percentage of children served under IDEA ages 6 or 7, compared to ages 6-21, will increase.	SEAs report number of disabled children receiving special education by: ■ disability and age and ■ disability and ethnicity
All children with disabilities have access to the general curriculum and assessments, with appropriate accommodations, support and services, consistent with high standards.	**3.1 Regular education settings .** The percentage of children with disabilities ages 6-21 who are reported by states as being served in the regular education classroom at least 80 percent of the day will increase.	SEAs report the number of students ages 6-21, by age category, disability and placement
	3.3 Suspensions or expulsions. The percentage of children with disabilities who are subject to long-term suspension or expulsion, unilateral change in placement or change in placement if their current placement is likely to result in injury to someone, will decrease.	SEAs report the number of students suspended or expelled, unilateral removed or removed based on hearing by: ■ disability and basis of removal and ■ ethnicity and basis of removal
Secondary school students with disabilities receive the support they need to complete high school and prepare for postsecondary education or employment.	**4.1 Graduation.** The percentage of children with disabilities exiting school with a regular diploma will increase and the percentage who drop out will decrease.	SEAs report the number of students ages 14-21 that exited special education by: ■ age, disability and basis of exit, ■ age and basis of exit and ■ ethnicity and basis of exit
States are addressing their needs for professional development consistent with their comprehensive system of personnel development.	**5.1 Qualified personnel.** The number of states and outlying areas where at least 90 percent of special education teachers are fully certified will increase.	SEAs report the number and type of teachers and other personnel to provide special education and related services for children ages 3-21. SEAs must report the number of staff: ■ fully certified and ■ not fully certified

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[1] Source: ED-OIG/A09-A0001

KSDE's Comments to the Report

May 15, 2001

Lorraine Lewis
U.S. Department of Education
Office of Inspector General
400 Maryland Avenue; SW
Washington, DC 20202-1510

Re: ED Audit Control No. A07-A0020
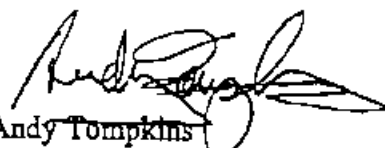
Dear Lorraine:

Attached please find the Kansas State Department of Education's response to the draft audit report received on April 30, 2001. Comments, discussion, corrective actions, and alternative corrective actions are provided for each specific finding.

.As many of the recommendations require OSEP and Westat interpretation regarding their reporting requirements, we would be happy to discuss these with you at anytime.

Thank you for the opportunity to respond to the draft findings.

Sincerely,

Andy Tompkins
Commissioner of Education

Alexa Pochowski
Director of Special Education

cc: Maria Rodriguez, Auditor
William Allen, Regional Inspector General

Response to Office of Inspector General Audit No. A07-A0020

The Kansas State Department of Education (KSDE) acknowledges that the attached audit results provide three overall findings with one, of five, data tables in question. KSDE provides the following discussion and proposed corrective actions, when necessary.

Finding No. 1: KSDE IDEA, Part B Exit Data Reported to the Department are not Reliable

A. Exit data reported to the department included children age 13, which is contrary to OSEP's guidance and resulted in KSDE's exit data being overstated.

Discussion:

Westat, contracted by OSEP to provide technical assistance to states regarding data reporting, and OSEP are well aware of KS' and other states' use of end of school year age rather than the age on December 1. Though the 1999 data reflected 506 students who were not 14 years of age by December 1, 1998, these same 506 students would not have been reported on the December 1, 1999 report. Upon reviewing both 1998 and 2000 data, the number of students who were not 14 on December 1 (but were by June 1) were 492 and 547 respectively. Therefore, over these three years, approximately 1500 students who were legitimately 14 year olds, would never have been reported as exited in any fiscal year. KS has consistently reported data in this manner ensuring comparability and reliability over the past 10 years.

Corrective Action:

Both OSEP and Westat have addressed this issue, most recently during the "Improving Accuracy of Part B Data" session of the 15th Annual Conference on the Management of Federal/State Data Systems held this past March in Arlington, VA. OSEP and Westat recognized that calculating age of exit based on a December 1 date is flawed as the date of exit can occur anytime from July 1 through June 30, yet age is calculated based on one date in time. It has been proposed that the age of the student on the reported date of exit be used. As a result, KSDE will take no corrective action at this time.

B. Exit data reported to the department included instances of children who were erroneously counted as having exited special education more than once.

Discussion:

KSDE acknowledges that there are duplicated counts across districts. The KSDE duplicate process eliminates duplicate students within the same LEA. However, no instructions are provided by OSEP or Westat regarding the elimination of duplicated students who exit two or more districts within one school year. If a student moves and

is known to be continuing in another district and then completes his/her objectives in this new district, and then moves to a third district where he/she reenters special education, and then graduates, there is no guidance from OSEP as to which exit takes precedent. KSDE counts all exits to accurately reflect all exit activity for each individual LEA. There is no system available nationwide that allowed the tracking of students across multiple districts.

Corrective Action:

OSEP needs to issue a directive that specifies which exit takes precedence or that duplicate exits may exist across exiting categories. This directive would ensure comparability across all states. Until the directive occurs, KSDE will make no change.

C. Exit data reported to the department erroneously included in-state transfers and students who were misclassified as in-state transfers.

Discussion:

Per the OSEP data dictionary, "moved, known to be continuing" includes transfers. (See attachment A, page 74 taken from OSEP Data Dictionary: November 2000.) Thus OSEP has instructed states to include all students who transfer within state and are to be recorded on row F of table 4 (see attachment B, Table 4) as "moved, known to be continuing." KSDE has also interpreted the term "catchment area" to mean LEA, not the state of KS. The intent, according to OSEP, is to collect data for any student who moves within state and continued in either general or special education. A student who moves from one LEA and returns to the same LEA is a good example of someone who is recorded as "moved, known to be continuing." KSDE is correct to include in-state transfers in the exiting counts.

Corrective Action:

As the attached OSEP Data Dictionary page and Table 4 (attachments A and B) indicates, OSEP has directed states to include transfers under "moved, known to be continuing." KSDE will make no change.

In terms of dropouts who continue, however, KSDE recognizes that it is unable to detect, through its verification procedure, students who dropped out of one district, but were active in another district within the same school year. KSDE has added a data field to its verification process to detect such students to ensure those students are not counted as dropouts. A sample report is attached (attachment C).

D. KSDE did not comply with OSEP rules in reporting exits discovered after the June 30 reporting date.

Discussion:

KSDE, as the auditors verified via onsite visits, reports that many students exit an LEA and the date of the exit is legitimately unknown. While the practice of archiving is and always has been an option for districts, KSDE does not require, nor recommend that districts archive exited students. Approximately 60% of LEAs archive data as it is an efficient means to keep separate records of active versus inactive students. KSDE instructs LEAs to report only those exits, which have occurred within the designated 12 month reporting period. The data verification process included an edit check "e", which flags exits outside the current reporting period. Students with "e" errors are not included on table 4. KSDE also provides an exit log (see attachment D, exit log) for districts to report newly discovered exits after the end of year data has been submitted to KSDE. Districts are instructed to mail completed logs to KSDE as exits are discovered. Data collected from the exit log are used to make revisions to OSEP Part B data table 4 entitled Exiting Report, revisions OSEP requires of states.

After a review of the 7,382 students who exited, all students have an exit date within the reporting year. The computer is programmed to exclude any student with an exit date that is from a prior year. There is no evidence to conclude students who exited in prior years are included in KSDE's Table 4 exit report.

Corrective Action:

The KSDE data manager brought this concern to the attention of the 109 LEA MIS clerks from across the state during the 2000-01 training workshops. No data clerk in the state interpreted this section of the data dictionary as deferring an exit until the following year. To ensure this practice continues, KSDE has revised the section in the report preparation instructions to clarify how to report unknown exits. (See attachment E, page 2 of KSDE's 2001-2002 Data Dictionary.)

E. KSDE did not perform sufficient analysis to identify internally inconsistent data.

Discussion:

The KSDE individual student database system has a built-in system for analyzing the reliability of all data submitted. A series of more than 60 data verifications (see attachment F) are processed for each of the 110 data fields submitted for each individual student record. If any data discrepancies are detected, a verification report (see attachment G, sample verification report) is mailed to the relevant LEA for confirmation and/or correction.

The KSDE special education individual student database has been noted for its sophisticated data management system. Other states have modeled their systems after the KSDE system because of its superior programming. The KSDE database is continually upgraded and enhanced to ensure data accuracy.

1. Comparison of exit and current status revealed questionable status codes.

KSDE does not view a student who exits at one point in the school year and then re-enters special education at a later point in the school year, who has been indicated as an exit, as an error in exit status. It is common for a student to complete objectives outlined for the student that year to withdraw from special education and then to re-enter at a later date. The fact that a student is active at the end of the year does not negate the fact that earlier in the year he/she completed his/her objectives and thus resulting in a reportable exit.

In addition, of the reported 934 in-state transfers reported by the OIG as having inactive records, per OSEP definition, students who transfer are to be reported as "moved, known to be continuing in either special or general education." Because the KSDE Individual student database contains data for special education students only, those students who continue in the general education system would not be in the student database. The database maintained by KSDE is solely for special education students and it cannot be assumed that all students, who move, remain active in special education. It addition, KSDE has never collected individual student data on students in general education.

2. Comparison of student identification data revealed duplications.

Discussion:

KSDE does not have the legal authority to require parents or districts to disclose a student's social security number for purposes of maintaining data. The social security number is one of several fields that may be used as a unique identifier. KSDE provides an option to assign a "pseudo social security number" for parents who choose not to release their child's social security number. In those few instances, a district can choose to use the KSDE pseudo social security number procedure which requires the LEA to enter nine characters in the data field, beginning with X, then the three digit LEA number followed by 00001 for the first student, 00002 for the second student and so on. This system allows for 99,999 numbers.

During the 1998-99 school year, 4,222 of the 58,433 (or 7%) students in 241 districts were assigned a pseudo social security number. On the average, this equates to about 17 students per district. At this rate, it would take over 5,700 years before a school district would need to recycle a pseudo social security number.

Corrective Action:

KSDE recognizes that due to possible human error, an entry error could occur. KSDE includes in its verification program a search for duplicate social security numbers that allows the detection of a recycled pseudo social security number within a district. The attached sample duplicate verification form shows such an example (see attachment H).

> 3. **Comparison of current and exit status records would have revealed potential errors in exit dates.**

While many LEAs have formal special education withdrawal, transfer, and formal dropout procedures and forms, it is not required. Thus, if a student did not complete any formal procedure immediately after the expiration of the IEP, the district would not be aware and the graduation, dropout or transfer date would be significantly later than the IEP expiration date. Due to the requirement that parents must be provided notice of a meeting and are to attend if at all possible, many parents choose to not redo an IEP if they know their child is graduating, dropping out, or transferring. In addition, many of these same parents are at risk themselves, and disengage themselves from the very same process that is to help their child not be at-risk as well. Finally, just due to human circumstance, various IEP meeting dates are beyond the annual review date.

Of paramount importance, is the issue of unknown exit dates. The actual day a student exits special education may be undetermined in many cases. As noted by the auditors while onsite at various districts, in many instances a student may exit an LEA and MIS data clerk will be informed weeks, months or a full school year later. KSDE reports the data as soon as the LEAs are aware of it. In addition, KSDE provides several methods to ensure exits are reported in a timely manner. Decisions made by parents are not controllable by KSDE or by the LEAs.

LEAs schedule annual review meetings within the one-year time frame but may not actually hold the meeting due to: inability to locate parents; inability to reach a mutually agreeable date and time; the student is hospitalized; parents seek additional information and so forth. This is indeed the case for approximately 4% of special education students in Kansas. However, in each of these cases, no assumption can be made that they have exited special education.

Corrective Action:

As all of these circumstances require human analysis and human checks, no corrective action is needed.

Finding No. 2: Monitoring System Being Developed Lacks Systematic Onsite Verification of IDEA, Part B Data

A. **Exit data:** As reported, one LEA "erroneously classified students as dropouts" while later these students were found to be continued in special education in another LEA. As often happens, the original LEA finds a student to no longer be in attendance. Contacting the parents may result in notification that the child has chosen to dropout. Later, the child reconsiders, moves and re-enrolls elsewhere. The original LEA correctly reported the child dropped out. Again, the LEA reports this exit information <u>when</u> they become aware of it, often during the following school year. A specific day of exit may not exist, other than the date the district verifies that the student has dropped out.

B. **Placement data:** As reported, inconsistencies occurred in the amount of time students spent receiving special education services in comparison to their IEP. Because these data are reported at only two points in time, frequency and duration of services can only be reported "as anticipated." These anticipated services as written on the IEP, are the district's good faith effort to provide a free appropriate public education as required by law.

Corrective Action:

This is a major facet of Kansas' continuous improvement monitoring process. (See attachment I, a newsletter that describes Kansas' Continuous Improvement Monitoring process approved by OSEP.) It will continue to be part of each onsite visit to each of the local entities according the schedule outlined in attachment B. Each LEA will be required to address this issue, if found to be in non-compliance, and will be required to address how they plan to correct it as part of their action plan.

C. **Discipline data:** Discipline data will become part of the review of the continuous improvement monitoring process.

Finding No. 3: KSDE Needs to Strengthen its Management Controls Over its IDEA, Part B Management Information System Function to Ensure Data Validity, Reliability, and Timeliness

A. Need for updated MIS operating policies and procedures.

Discussion:

KSDE acknowledges that at the time of the OIG audit, the MIS procedure manual had not been updated since 1997.

Corrective Action:

In November 2000, a revised MIS procedure manual was completed and is available. All MIS processes were updated based on the current version of the database. A copy is available upon request. In addition, the MIS procedure manual will be annually updated by July 1st of each consecutive year to ensure the continued timeliness and accuracy of procedures to be followed.

B. Need for contingency planning.

Discussion:

KSDE concurs with the OIG findings.

Corrective Action:

The following describes the contingency plan for backup to the IDEA, Part B MIS function. This plan ensures the continuity of data management and the maintenance of the integrity of the data. In addition, this contingency plan will become part of the MIS procedure manual sent to all LEAs who will be directed to develop a local contingency plan.

Four levels of backup to KSDE's data manager exist to ensure the continuity of data management. These four positions include the computer programmer who developed and/or modifies the data program, a technical support assistant, a data technician, and staff members from KSDE's computer information and communication services (CICS) team. The first three positions are able to perform all needed functions including the import of data, data verifications, and the creation of needed Part B data tables. KSDE's data manager meets with the programmer and technical support assistant quarterly and more often if needed. The data manager meets at least weekly with the KSDE data technician. Because the procedure manual is current and up-to-date, CICS personnel are also able to perform all of the needed functions. However, to ensure a complete understanding of the data program, the data manager will provide annual training to KSDE's CICS personnel to familiarize them with program changes.

C. Need for independent review of data submitted to the department.

Discussion:

KSDE concurs with the OIG findings.

Corrective Action:

To ensure the integrity of the data, the computer initially verifies the process. In addition, KSDE Student Support Services continuous improvement monitors presently perform a periodic, independent review of each special education entity's data.

The Continuous Improvement Monitoring (CIM) process consists of extensive data collection and analysis concentrated during the initial year of the five-year process. The are used to review all services provided, where services are delivered, the number and type of students served, the personnel who provide services, dropout rates, graduation rates and expulsion and suspension data for students with disabilities. The local MIS

data is the primary data source and is compared to both state and national data trends. Local data that exceed state and national data trends are used as indicators of improvement needed and form the basis of the improvement plan. Both the local CIM team and the onsite review team review these data. This ensures the accuracy of the data as this intense review completed by both internal and external reviewers, includes verification of the data the special education entity reported. In addition, the CIM includes an onsite visit by an external review team consisting of KSDE staff and other knowledgeable LEA staff members. This visit includes a sample of student files reviewed for compliance with federal and state laws and regulations as well as interview with teachers, principals, and some of the students whose files have been reviewed.

D. Need for additional controls over data processing activities.

Discussion:

It was recommended that KSDE require LEAs to use a standardized IEP data collection form. (It is not our understanding the OIG is recommending KS require the use of a standardized IEP form across all LEAs as neither federal or state law or regulation makes this requirement.) As part of the MIS procedure manual, MIS reporting specifications have been in use since 1988 (see attachment J, an outline of the specifications required). These same specifications are required of all LEAs and will continue to be used.

Corrective Action:

None.

D. Need for additional controls over data processing activities.

Discussion:

Many individuals at the LEA and SEA level review the MIS data, including state auditors and special education continuous improvement monitors. KSDE's MIS computerized edit check has one primary function; to detect possible data discrepancies for verification. KSDE understands that in special education, as in any entity that deals with human beings, there will always be exceptions and students who do not fit the norm. During the data collection process, many students' data will be flagged as being discrepant (i.e., not normal) when in reality, what was reported was correct because it happened in real life. Because of this, KSDE uses human input to verify the reality of many real life scenarios and analytically reviews the data to assure its accuracy. Because of the humanness of the data reported, human review of the data and its corresponding human analysis is a necessary part of the data reporting to enhance the quality and accuracy of the data collected.

Corrective Action:

KSDE acknowledges that its preprogrammed set of edit checks do not detect all possible data permutations that may (or may not) result in error. KSDE will add additional verification checks as they are detected in the system. However, it should be noted that, for example, the KS Part B Child Count Table I for FY 99 was found to be 99.97% accurate.

E. Need for policies and practices regarding segregation of duties.

Discussion:

OIG noted that they observed the KSDE data manager modified LEA data without supporting documentation from the LEA including phone logs (see attachment K, sample phone log). This is not accurate. While onsite at KSDE, the data manager demonstrated data reporting functions while using "dummy" data files. At no time, did the data manager use actual data from LEAs. All modifications observed by OIG were conducted for demonstration purposes only.

The KSDE data manager does not modify any data element without corresponding written documentation from the LEA. In addition, KSDE has strict criteria for data modification. The LEA must submit data modifications in written form. An example of a written modification may be a returned duplicate or verification check (see previous attached duplicate verification log).

Corrective Action:

The procedure manual will reiterate the LEAs use of the written form to document any data changes that need to be made.

Moved, known to be continuing

Students with disabilities who *moved* out of the catchment area and are *known to be continuing* in another educational program. There need not be evidence that the student is continuing in *special education*, only that he/she is continuing in a general education program. This definition includes transfers, and students with disabilities in residential drug/alcohol rehabilitation centers or *correctional facilities*.

Source

Nonregulatory definition developed by OSEP for data collection

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The above defined term appears on the following table:

Exiting Special Education

TABLE 4

REPORT OF CHILDREN WITH DISABILITIES EXITING
SPECIAL EDUCATION

1998-99 SCHOOL YEAR

Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 1820-0521. The time required to complete this information collection is estimated to average 8 hours per SEA and 3.5 hours per LEA response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: U.S. Department of Education, Washington, D.C. 20202-4651. If you have comments or concerns regarding the status of your individual submission of this form, write directly to: Office of Special Education Programs, U.S. Department of Education, 600 Independence Avenue, SW, Washington, D.C. 20202-4651.

Authorization: 20 U.S.C. 1418(a)(1)(A)(v) and 1418(a)(2)

Due Date: November 1, 1999

Sampling Allowed: Yes

Send Form to: Thomas Hehir
                      Office of Special Education Programs
                      U.S. Department of Education
                      Program Support Services Group
                      Mail Stop 3512-2651
                      600 Independence Avenue, SW
                      Washington, D.C. 20202
                      Attn: Cheryl Broady

General Instructions

Provide a count of the number of children with disabilities reported under IDEA, Part B who exited special education in 1998-99. Data are to be provided by age, disability category, basis of exit, and race/ethnicity. All data provided must sum, as an unduplicated count, to Section B of the table where you report the total for all disabilities.

Sampling Guidelines

States may use sampling to obtain these data. When sampling is used, a description of the sampling methodology, including a statement about how the design will yield valid and reliable estimates that must be submitted to OSEP for approval. The level of precision of the estimates to be obtained must be specified. States must submit sampling plans to OSEP for approval by September 30, 1998.

OSEP will evaluate the validity of the sampling plans using the guidelines below; changes in the guidelines are in bold.

1. The sampling framework may include all school districts or a sample of districts. If a State chooses to sample districts, all districts with average daily memberships of over 25,000 *must* be included in the sample. States with more than 25 districts with ADMs over 25,000 *must* include all districts with over 50,000 ADM and sample the remaining districts. The total number of districts sampled *must* equal or exceed 100. If the total number districts in the State is 100 or fewer, data must be collected from all districts.

2. When sampling students, whether for all districts or for a sample of districts, data must be collected separately for each Federal disability category. All students whose domicile is in a district must be eligible for the sample including those students served in cooperatives and/or intermediate units or in residential programs out of the district.

3. A minimum sample of 100 children *must* be used by all districts, except where the total number in a disability category is less than 100. In such a case, data *must* be collected for all students in that category.

States that use sampling will provide OSEP with weighted rather than unweighted data. A description of the final sample sizes and the weights used should also be provided at the time the data are provided.

Specific Instructions

Sections A-C

In these tables, enter an unduplicated count of all children with disabilities, by age category and disability, who exited special education during the reporting year. States must use a 12-month interval for reporting exiting data. *In the upper right hand corner of the form, States must specify the 12-month reporting period being used.* The exiting report is due on the November 1st subsequent to the completion of the State's 12-month reporting period. Place zeros (0) in categories where no children have exited the program. Enter (-9) for categories not used by the State.

Row A.   No longer receives special education. Total who were served in special education during the previous reporting year but at some point during that 12-month period, returned to regular education as a result of having met the objectives of their IEP. These are students who no longer have an IEP and are receiving all of their educational services from a general education program.

Row B.   Graduated with regular high school diploma. Total who exited an educational program through receipt of a high school diploma identical to that for which students without disabilities are eligible.

Row C.   Received a certificate. Total who exited an educational program and received a certificate of completion, modified diploma, or some similar document. If your State does not use certificates, enter -9 in the appropriate cells.

Row D.   Reached maximum age. Total who exited special education because of reaching the maximum age for receipt of special education services, including students with disabilities who reached the maximum age and did not receive a diploma.

Row E.   Died. Total who died. Breakouts by age are optional for students who died.

Row F.   Moved, known to be continuing. Total who moved out of the catchment area and are *KNOWN* to be continuing in another educational program. There need not be evidence that the student is continuing in special education, only that he/she is continuing in a general education program. This row includes transfers and students in residential drug/alcohol rehabilitation centers or correctional facilities.

Row G.   Moved, not known to be continuing. Total who moved out of the catchment area and are *NOT KNOWN* to be continuing in another educational program. This row includes students who have moved out of the catchment area, and there is no evidence (e.g., a record request) to indicate that they have enrolled in another educational program.

Row H.   Dropped out. Total who were enrolled at some point in the reporting year, were not enrolled at the end of the reporting year, and did not exit through any of the other bases described. This row includes dropouts, runaways, GED recipients,[1] expulsions, status unknown, and other exiters.

Row I.   Total of rows (A)-(H).

Section A

Report the number of students ages 14-21 that exited special education by age-year, disability condition, and basis of exit.

Section B

Report the total number of students ages 14-21 that exited special education by age-year and basis of exit. These figures must equal the sum of the data reported in Section A.

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[1] In States where students may receive a GED without dropping out of school, students who were jointly enrolled in secondary education and a GED program may be reported as graduating with a diploma (Row B). In all other cases, GED recipients should be reported in Row H.

Evidence of a Reported Drop Out, Continuing in another Kansas LEA

Student Name	Birth date	CID	LEA	Att Build	Exit Date	Active CID	Active LEA	Corrections
▓▓▓▓▓		123	456	1234	10/16/00	987	874	
		123	552	6663	5/16/01	552	663	
		123	456	5552	4/15/01	882	882	

Signature _____   Date _____

Please verify your records and and modify any reported drop out as Moved, known to be continuing

Exit Log

Please record information for students who exited your Lea prior to July 1, who were reported as active on your End of Year data submission. Mail completed form to KSDE by September 30.

LEA or COOP Number

STUDENT NAME	EXIT DATE	EXIT STATUS

DATES -
Note: Format for all dates is MM/DD/YYYY.

Birth Date (F#5)- The birthday of the student as shown on the birth certificate or superseding court document.

Exit Date (F#21)- The date when the student exited from all Special Education services. This would include the date any student moved or transferred, completed goals or objectives, graduates, etc. Record an exit date only for those students who have exited during the current school year (July 1-June 30). For students who exit, return and exit again, report only the last exit during the school year. See Status Codes for acceptable exit codes.

Special Case: Unknown Exit Dates

A student is discovered as exited. The student's exit date is unknown. The student was reported to KSDE as active on prior collections, but the active status is now in question.
① Research all sources to ascertain the actual exit date. Report discovered dates using the Exit Log.
① If the IEP of an exited student is expired, search records for an exit date soon after the IEP expiration.
❖ If an exit date remains uncertain, but it was determined the student exited sometime during the summer, ⇨ enter July 1 of the current fiscal year as the exit date.
❖ If a student did not enroll or attend this year, and the exit is unknown and no duplicate was discovered in another district, ⇨ enter the day prior to the first day of school as the exit date.
                An Exit Log is provided in the appendix to report discovered exits to KSDE.

Not an Exit - Examples of continuing students, when special education services continue.

O Promotion from preschool to elementary school, elem. to middle school, middle to high school.
O Objectives are completed for one service, yet other services continue. ·
O A student moves from one school to another school within the same USD or Coop.
O A student is removed from their current educational placement because of suspension or expulsion.

IEP Staffing or Annual Review Meeting Date (F#18)- Students age 3 through 22. The meeting date of the IEP currently in force for the student. The day the IEP was written. Report only the active IEP in effect at the time of the data submission. Initiation dates or any future date subsequent to the collection dates, (December 1 or June 30) are **NOT** acceptable for any student including Continuing.

Days -- See Service Times

Duplicated Student Records-
Students reported as active in 2 or more Districts or Agencies on the same data collection are considered duplicates. Two students with the same Social Security Number are also considered duplicates. Students with a funding code 5 or an inactive status are not considered duplicates. A duplicate verification check will be mailed listing all duplicates discovered. Upon receipt of a duplicate student check the LEA must research student and building records to determine the student's status on December 1, or June 30. If a student was reported as active and an exit date has been discovered, the exit date and status code must be reported to KSDE. See Exit Date for special cases.

If a duplicate check shows 2 students with the same name – verify the status of **your** student only.
If a duplicate check shows 2 different students – verify the SSN of **your** student only.

Enrollment Building - See LEAs and Buildings

<u>Codes</u> <u>Check Description</u>

ALL   Record has exceeded the maximum number of fields needing verification (12). Please resubmit a new record.

A1   Principal Attendance building not a valid building number.

A2   Subsequent Attendance building not a valid building number.

A5   Principal and Subsequent building fields contain the same number.

a   Principal Attendance building does not belong to Attendance LEA.

B   Date of birth missing or not a valid date.

b   Birth date in error because calculated Dec. 1 age is greater than 22, or age less than 2 and funding code is not 8.

C   Student age is 6 or greater and exceptionality is EC.

C2   Primary exceptionality is DD and age is outside the 3 - 9 range.

C3   Primary exceptionality is DD and Secondary exceptionality is a disability code.

c   County of residence missing or invalid.

D#   Days missing or not in range 1-5 for service line. Checked for all service lines (# = service line number.)

E   Ethnic missing or not one of A, B, H, P, W.

e   Exit date outside range of July 1-June 30 of current fiscal year.

e1   Exit date is > 30 days after IEP expiration date.

F   Funding missing or not 1, 2, 4, 5.

F1   Funding=1 Primary exceptionality is "GI" and second exceptionality is "GI" or blank, or Assign child count is not a 3-digit number.

F2   Funding=2 and Assign child count is not a 4-digit number.

F3   Funding=1 and students age is ≤ 2 or students age is ≥ 23.

F4   Funding=4 and primary exceptionality is "GI" and second exceptionality is a disability code.

F5   Funding=4 and primary exceptionality is a disability code and second exceptionality is "GI"

F6   Funding=4 and primary exceptionality is a disability code and second exceptionality is a disability code.

F7   Funding=4 and primary exceptionality is a disability code and second exceptionality is blank.

-G   Grade missing or not one of PH, PC, KG, 01, 02, 03, 04, 05, 06, 07, 08, 09, 10, 11, 12, UP, UI, UJ, US, PS.

g   Grade level does not match age range. Age verified to be with in a specific range for each grade.
PH=3-6; PC=3-6; KG=5-7; 01=5-8; 02=6-9; 03=6-10; 04=7-11; 05=8-12; 06=9-13; 07=10-14; 08=11-15; 09=12-16; 10=13-17; 11=14-18; 12=15-22; UP=5-9; UI=8-12; UJ=11-16; US=16-22; PS=17-22.

H   Primary or Secondary exceptionality is SL (Speech Language) and SS (Related Service) is used.

h   Grade is PH (Preschool Home-based) and Home is NOT an attendance building (9990).

I   IEP or IFSP staffing date is missing or is an valid date.

i   IEP or IFSP staffing date is older than 12/01/2000 for Dec. 1, or 6/30/2001 for EOY collections.

i2   IEP date is after the exit date.

J   IEP or IFSP staffing date is after 12/01/2001 for Dec. 1, or 6/30/2002 or EOY collections.

j   Primary attendance building does not match service settings for selected buildings. See table on page A-4

K   Language of student missing or not one of A, C, D, E, F, G, H, I, K, L, M, N, O, P, R, S, T, V, W, X.

k   All Day Preschool / Kindergarten is not Y or blank

L#   Setting missing or not one of A, B, C, D, E, F, G, H, I, J, L, M, O, P, R, S, T, X, Y for service line. Checked for all service lines (# = service line number).

l   Assign child count LEA or Building does not belong to reporting COOP.

Verification Checks for Student MIS Import Verify

Codes Check Description

M#	Minutes missing or minutes > 420 for service line. Checked for all service lines. (# = service line number.)
m	Status code M used for a student under the age of 21.
N	First, Middle, or Last name of student missing. "-" allowed for middle initial if not known. Verification generated if non-alpha characters are used, includes commas or parenthesis.
O	Neighborhood building not a valid building number, including 9991, 9993, 9988, 9989, 9994
o	Neighborhood building does not belong to Neighborhood LEA
O1	September 20 enrollment building is an invalid number, nonexistent or generic buildings 9988-9995
O2	September 20 enrollment building does not belong to Assign child count LEA (Fund 1 only)
P#	Service code invalid for service line. All service lines must have valid service code. (# = service line number.)
Q	Primary Exceptionality missing or invalid.
q	Secondary Exceptionality invalid.
q2	Early Childhood Disability NOT used in combination with another disability code or DD.
R	Extended School Term Services not Y or blank.
r	Special transportation provided not Y or blank.
S	Enrollment Status missing or not valid status code. Valid codes and status groups: [Active = C, E, K, N, Q, R] or [Inactive = D, G, H, L, M, O, U, W, X, T]
S3	Students age 3 (w/ birthdays after July 1, 2001) and status is not (N) New referral.
s	Student Social Security Number missing, all zeros or non-numeric (except 1st letter X)
s9	Student Social Security Number contains less than 9 numbers.
T#	Teacher SSN missing for service line. Always checked for first service line. For all other lines, only checked if service is not blank. (# = service line number.)
t	Total time for all services (except AC, AS, SH & IT and placements S, T & X), when the total time exceeds 75,600 minutes (37,000 for students age 3 & 4)
U	Neighborhood LEA missing or not a valid LEA number.
u	Attendance LEA missing or not a valid LEA number.
W#	Weeks missing or not in range 1-52 for service line. Checked for all service lines. (#= service line number.)
X1	Exit date missing or not a valid date for student with exit status.
X2	Exit date valid but status is not an exit status.
x	Sex is not M or F, or is blank
Z	Behavior Intervention Plan is not Y or blank.

The following have data needing verification as indicated by the code in the 'Verification Code' column. You may write the correct data in the 'Correct Data' column and return to Data Manager for the Student MIS. Your database will be corrected, so it can be used for the Federal Report. The name is included so you may look in the appropriate database, to see what was submitted previously.

Name	Birth Date	CID	E LEA	E Bldg	E1	E2	FileName	Verification Code	Correct Data
▮		259	259 (020)	1914	SL		259D99.TXT	o ✓	1914... Corrosia
▮		259	259	1644	SL		259D99.TXT	hj	FC
▮		259	259	1612	SL		259D99.TXT	hj	PC
▮		259	259	1842 SET'	MR		259D99.TXT	j	AB... 9990
▮		259	259	1847 1790	BD		259D99.TXT	ao ✓	1977 Juycn - Dropton (Cherry)
▮		259	259	1780	LD		259D99.TXT	P3	delete L34...
▮		259	259	1006	LD	SL	259D99.TXT	j	AJ...
▮		259	259	1040	BD	HI	259D99.TXT	aj	J
▮		259	259	1836	LD		259D99.TXT	N	Dr Chrin
▮		259	259	1914	SL		259D99.TXT	o ✓	oK
▮		259	259	1833	HI	SL	259D99.TXT	i	Dr N T...
▮		259	259 (X.)	1885	GI		259D99.TXT	o ✓	OK
▮		259	259	1865	GI		259D99.TXT	o ✓	oK
▮		259	259	1792	LD		259D99.TXT	i	Set T
▮		259	259	1638	LD		259D99.TXT	i	Set T (...)
▮		259	259	1780	OH		259D99.TXT	i	Set T

SPECIAL EDUCATION

Continuous Improvement Monitoring

KSDE
Kansas State
Department of Education
Student Support Services
120 SE 10" Ave Topeka KS 66612
Ph: 785-291-3097 Fax: 786-296-6715

Alexa Pochowski, Ph.D.
Kansas State Department of Education (KSDE)
Student Support Services (SSS)

Why Change?

KSDE Student Support Services (SSS) staff is committed to improving the outcomes for exceptional students and the supervision of special education supports and services in the state of Kansas by changing its monitoring process from one focused on enforcement to one focused on providing technical assistance, data-based decision making, and technical support. While SSS must continue to exercise its general supervisory authority to ensure that federal and state laws and regulations are followed by local school districts, the "how" this is done and the ultimate "what" is done, has and will continue to change. The purpose of the new approach is continuous improvement.

The reauthorization of the Individuals with Disabilities Education Act (IDEA) in 1997, brought new and sometimes perplexing changes making implementation somewhat more difficult. For example, the revised IDEA urged local educators to improve academic progress for students with disabilities by requiring schools to provide access to the general curriculum. This mandate may be somewhat more difficult to ensure than, for instance, the IDEA provision requiring schools to opt for the most inclusive setting. SSS is trying to proactively assist local school districts in meeting these mandates.

The new system, called Continuous Improvement Monitoring (CIM), is a collaborative process. It relies on using meaningful and multiple sources of data, such as parent/staff survey data, graduation rates, dropout rates, and the performance of students with exceptionalities on state and local assessments to gauge the effectiveness of special education supports and services.

Why Continuous Improvement Monitoring?

Since 1992, the Kansas Quality Performance Accreditation (QPA) system has guided schools in a process focused on the continuous improvement of schools by reviewing student academic performance and other indicators of success. QPA was predicated on the belief that improvement is an endless journey; a journey that is expected to move all schools and all students toward higher levels of performance.

Historically, however, there was no direct link between QPA and special education monitoring. Both were carried out as separate and parallel processes. Many reasons exist as to why this occurred including:

- The focus of special education monitoring was legal and procedural
- Special education monitoring occurred at the district, cooperative or interlocal level with no dissemination to buildings
- Monitoring was an episodic event, not an ongoing process
- QPA did not mandate the inclusion of special education services as part of its process
- Prior to 1997, there was no mandate that all students were to be included in state and local assessments or have access to the general curriculum

The reauthorization of IDEA in 1997 ensured the alignment of the purposes of special education monitoring with school improvement. This is exemplified in 34 CFR, appendix A to Part 300.

Pre-1997 IDEA Monitoring

- A district was monitored once every five years

- KSDE compliance monitors conducted a comprehensive review of legal requirements

- KSDE issued citations for violations of law

- KSDE provided a product, in the form of a compliance report with corrective actions needed

- Logs and numbers of staff trained were kept

- Corrective actions were required and sanctions imposed if not completed satisfactorily

- Activities done by KSDE and the local entity were independent of each other

- The assessment was done strictly by external reviewers

- The purposes of monitoring was for KSDE to ensure LEAs were following the laws and regulations.

- The outcome for the local entities was to implement corrective actions

Continuous Improvement Monitoring

- The improvement cycle is ongoing and continuous

- The LEAs are involved in continuous self-assessment and report the findings to KSDE technical assistance staff

- LEAs analyze data to identify areas for improvement

- KSDE provides guidance in the development of strategies for improvement

- Effective staff development is noted through results achieved

- Resource and technical assistance are provided to assist in implementing improvement strategies

- Both KSDE and the local entity actively engage in collaborative activities including the self-assessment, staff development, file reviews and others

- The local entity in collaboration with others do a self-assessment

- The purpose of the process is collaborative planning and developing strategies for improvement of student outcomes

- The outcome for the local entities is the implementation of the improvement strategies outlined in the Self-Assessment Guidance Document

What is the CIM Self-Assessment Guidance Document?

The CIM Self-Assessment Guidance Document is the most important document of the process. The purpose of the self-assessment is to indicate how well local entities are improving results for children with exceptionalities. The data gathered and/or generated establishes a baseline for measurement of progress. Specifically, the self-assessment measures progress toward meeting Kansas' performance goals and indicators and adherence to pertinent federal and state regulations, policies, and procedures. The CIM Self-Assessment Guidance Document is based on the U.S. Department of Education Office of Special Education Program's (OSEP) Process Cluster Areas.

Within the Self-Assessment Document, the five cluster areas are described, and desired results or multiple indicators of progress are included. In terms of the indicators of progress, and based on a review of appropriate data sources, the local entities describe their strengths, identify a baseline for identified concerns, provide an analysis of their data, offer improvement or maintenance strategies, and describe methods used to measure progress. The following summarizes the cluster areas, corresponding objectives and the desired results.

LEA General Supervision: Each local agency must have mechanisms in place to ensure appropriate supports and services are provided to include:
- ✓ Parent and child protections
- ✓ Decision-making based on data from all sources
- ✓ Complaints, mediations, and due process hearings resolved in a timely fashion
- ✓ Systemic issues identified
- ✓ Interagency coordination and fiscal responsibility ensured
- ✓ Appropriate services provided to youth with disabilities in juvenile and adult correctional facilities
- ✓ Appropriate services provided to children with disabilities in out-of-district placements

Parent Involvement: Parents should be actively involved in all aspects of educational planning for their child to include involvement in:
- ✓ Training and information dissemination
- ✓ Decisions made regarding transition services
- ✓ Program improvement activities

Child Find, Initial Evaluation, Reevaluation & Eligibility: All students are identified and evaluated for services through implementation of a comprehensive, coordinated Child Find system to include:
- ✓ The determination of need based on information from an appropriate evaluation

Transition (Early Childhood and Secondary): Planning and needed supports and services for children leaving infant-toddler and going to early childhood and for preparing students with disabilities for life after they leave the education system must be done and include:
- ✓ Children, at age three, receiving appropriate services
- ✓ Youth with exceptionalities actively involved in their own transition planning
- ✓ Appropriate services provided to youth with exceptionalities to prepare them for independent living, employment, post-secondary education and life skills

FAPE in the LRE: Local entities must ensure that students with exceptionalities are provided an education based on individual needs at no cost to the parent in a school as close to their home as possible and educated with non-disabled peers and include:
- ✓ Special education and related services provided as appropriate and as needed
- ✓ Special education and related services provided at no cost to the parent, including children placed out-of-district
- ✓ Services provided by trained personnel
- ✓ Services provided in the least restrictive environment
- ✓ Progress of students with exceptionalities monitored continuously and compared to the progress of all students
- ✓ All placement options available
- ✓ Students with disabilities participate as appropriate in activities and services with nondisabled peers

FY 2002 ASCII TEXT FILE SPECIFICATION
FOR LEAs _NOT_ USING KV 10.FP5

Sequence	Field Name	Field Size
1.	Last Name, Student's Legal	15
2.	First Name, Student's Legal	11
3.	Middle Initial, Student's Legal	1
4.	Social Security Number of Student	9
5.	Birth Date	10
6.	Ethnic Group	1
7.	Language of Student	1
8.	Assign Child Count	4
9.	LEA of Neighborhood Building	3
10.	Neighborhood School Building Number	4
11.	Attendance LEA of Principal Attendance Building	3
12.	Attendance Building Number 1 (Principal)	4
13.	Attendance Building Number 2 (Subsequent)	4
14.	September 20 Enrollment Building	4
15.	Grade Level	2
16.	Funding Source	1
17.	County of Parent/Guardian Residence	2
18.	IEP or IFSP Staffing or Annual Rev. Meeting Date	10
19.	Primary Exceptionality	2
20.	Secondary Exceptionality	2
21.	Exit Date	10
22.	Status Code	1
23.	Service 1	2
24.	Service Setting 1	1
25.	Minutes 1	3
26.	Days 1	1
27.	Weeks 1	2
28.	Teacher SSN 1	9
29.	Service 2	2
30.	Service Setting 2	1
31.	Minutes 2	3
32.	Days 2	1

33.	Weeks 2	2
34.	Teacher SSN 2	9
35.	Service 3	2
36.	Service Setting 3	1
37.	Minutes 3	3
38.	Days 3	1
39.	Weeks 3	2
40.	Teacher SSN 3	9
41.	Service 4	2
42.	Service Setting 4	1
43.	Minutes 4	3
44.	Days 4	1
45.	Weeks 4	2
46.	Teacher SSN 4	9
47.	Service 5	2
48.	Service Setting 5	1
49.	Minutes 5	3
50.	Days 5	1
51.	Weeks 5	2
52.	Teacher SSN 5	9
53.	Service 6	2
54.	Service Setting 6	1
55.	Minutes 6	3
56.	Days 6	1
57.	Weeks 6	2
58.	Teacher SSN 6	9
59.	Service 7	2
60.	Service Setting 7	1
61.	Minutes 7	3
62.	Days 7	1
63.	Weeks 7	2
64.	Teacher SSN 7	9
65.	Service 8	2
66.	Service Setting 8	1
67.	Minutes 8	3
68.	Days 8	1

These field numbers will be referenced with their corresponding field definition through out the Data Dictionary. For example Exit Date (F#19)

Phone Log

Fields labeled in red MUST have information in the box to save

Call Date	Staff Member	Method of Contact	Type of Call
7/12/00	Vosburgh	Phone	Technical Assistance

Caller First Name	Caller Last Name	Phone Number of Caller	Position of Caller
Shawna	Deters		SPED Staff

USD #	District/Organization Name	Name of School Building
442	Marshall Co. SPED	

Child's Name	Child's Age	Child's Grade	Current Label of Child:
▇▇▇▇			

Summary (NO CONFIDENTIAL INFORMATION TO BE INCLUDED HERE)

Discovered a student who was reported as active, but graduated

Response:

Modify active status to graduated

Primary Topic of Call	Secondary Topic of Call	Duration of Call
MIS/Personnel Report	Not Identified	5

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