

**Washington Integrated System of Monitoring (WISM) Final Report**  
 Adapted from Critical Elements Analysis Guide (CrEAG) IDEA 2004 - Part B (3/9/2011)

LEA/ESA: \_\_\_\_\_ Designated Local Contact: \_\_\_\_\_ Date(s): \_\_\_\_\_  
 Reviewer(s): \_\_\_\_\_ Report Issued: \_\_\_\_\_

**Critical Element I – Data Management: Does the LEA/ESA have a data system that is reasonably designed to timely collect and report data that are valid and reliable and reflect actual practice and performance?**

**Related Questions**

A. How does the LEA/ESA ensure that its data systems collect and report valid and reliable data in a timely manner?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
B. How does the LEA/ESA ensure that data collected at the local level reflect actual practice and performance?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
C. Describe the LEA/ESA’s procedures for ensuring timely correction.	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
D. If applicable, describe the LEA/ESA’s procedures for collecting and reporting CEIS program data.	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>

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		<b>Actions Required:</b>
		<b>Actions Recommended:</b>
<b>Document Review</b>	<b>Post-Review Requests:</b>	
<ul style="list-style-type: none"> <li>• District Performance Data Profiles</li> <li>• IDEA Compliance Package – iGrants Form package 442</li> <li>• SD’s response to pre-visit documentation request</li> <li>• File review results</li> <li>• Suspension/Expulsion report</li> <li>• Fiscal <u>Program Risk-Based Self-Assessment</u></li> <li>• Special Education Personnel report</li> <li>• November 1, LRE report</li> <li>• Bell schedules – from district’s website</li> </ul>		
<b>Interview Info.</b>	<b>Interview Summary:</b>	
<ul style="list-style-type: none"> <li>• Data Verification Focus Group</li> <li>• Special Education Administration</li> </ul>		
<b>Related Requirements</b>		
<b>IDEA 2004 REQUIREMENTS:</b> 34 CFR §300.640 [Annual report of children served--report requirement] 34 CFR §300.641 [Annual report of children served--information required in the report] 34 CFR §300.642 [Data Reporting] 34 CFR §300.643 [Annual report of children served—certification] 34 CFR §300.644 [Annual report of children served--criteria for counting]	<b>WASHINGTON ADMINISTRATIVE CODE:</b> 392-172A-06045 School district information for OSPI 392-172A-07015 Performance goals and indicators 392-172A-07020 State performance plans and data collection 392-172A-07025 State use of targets and reporting 392-172A-07030 State enforcement 392-172A-07035 Child Count	

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children] 34 CFR §§ 300.600 through 300.608 [State enforcement]	
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<b>Critical Element II – Fiscal (A): Does the LEA/ESA have procedures that are reasonably designed to ensure that funds are budgeted and expended in accordance with Federal requirements?</b>	
<b>Related Questions</b>	
A. How does the LEA/ESA ensure that funds are used to provide services in accordance with the requirements of EDGAR and the IDEA?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
B. Does the LEA/ESA have procedures in place to track time and effort for personnel and related costs charged to IDEA Part B funds?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
C. How does the LEA/ESA ensure that it expends IDEA funds only for the excess costs of providing special education and related services to eligible children with disabilities?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
D. If applicable, describe the process for documenting and reporting CEIS fiscal data.	<b>District Response:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>

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Document Review	Post-Review Requests:
<ul style="list-style-type: none"> <li>• LEA/ESA policies and procedures related to obligation, liquidation and distribution of funds</li> <li>• LEA/ESA monitoring/tracking reports related to obligation and liquidation of funds</li> <li>• Pre-Visit Time &amp; Effort Documentation</li> <li>• Pre-Visit – P-223H Information</li> <li>• Excess Cost Template (Federal Fund Application - Form package 267)</li> <li>• District’s <u>Program Risk-Based Self-Assessment</u></li> </ul>	
Interview Info.	Interview Summary
<ul style="list-style-type: none"> <li>• Special Education Administration</li> </ul>	

**Critical Element II – Fiscal (B): Does the LEA/ESA have procedures that are reasonably designed to ensure the allowable use of IDEA funds?**

**Related Questions**

A. How does the LEA/ESA ensure that it uses the required proportionate share of Federal funds under 34 CFR §300.133(b) to provide equitable services to children with disabilities placed by their parents in private schools?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b> Refer to question A-1 of the Private School Q&A (published by the Federal Office of Special Education Programs in April 2011) for additional guidance– <a href="http://idea.ed.gov/explore/view/p/%2Croot%2Cdynamic%2CQaCorner%2C1%2C">http://idea.ed.gov/explore/view/p/%2Croot%2Cdynamic%2CQaCorner%2C1%2C</a>

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B. How does the LEA/ESA ensure that it maintains financial and programmatic records for the period of time required by State and Federal law?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
C. How does the LEA/ESA ensure sole use of property purchased by it with Part B funds? How does the LEA/ESA ensure that it maintains a physical inventory of property purchased with Part B funds?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
D. Describe the LEA/ESA procedures for ensuring that contracts paid using IDEA Part B funds are properly approved, have clear deliverables, and are properly monitored.	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b> <i>Technical Assistance Note: The district may be jeopardizing their ability to seek Medicaid reimbursement by charging this contract to federal funds.</i>
Document Review	Post-Review Requests:

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<ul style="list-style-type: none"> <li>• LEA/ESA policies and procedures related to obligation, liquidation and distribution of funds</li> <li>• LEA/ESA monitoring/tracking reports related to obligation and liquidation of funds</li> <li>• Pre-Visit Documentation for Contracted Services</li> </ul>	
Interview Info.	Interview Summary
Related Requirements	
<p>EDGAR:</p> <p>34 CFR §76.702 [Fiscal control and fund accounting procedures]</p> <p>34 CFR §76.703 [When a LEA/ESA may begin to obligate funds]</p> <p>34 CFR §76.707 [When obligations are made]</p> <p>34 CFR §76.708 [When certain subgrantees may begin to obligate funds]</p> <p>34 CFR §76.709 [Funds may be obligated during a “carryover period”] (Tydings Amendment to GEPA)</p> <p>34 CFR §76.710 [Obligations made during a carryover period are subject to current statutes, regulations, and applications]</p> <p>34 CFR §80.22 [Allowable costs]</p> <p>34 CFR §80.23 [Period of availability of funds]</p>	
<p>IDEA 2004 REQUIREMENTS:</p> <p>34 CFR §300.12 [Educational service agency]</p> <p>34 CFR §300.16 [Excess costs]</p> <p>34 CFR §300.28 [Local educational agency]</p> <p>34 CFR §§300.200-300.230 [Subpart C - Local Educational Agency Eligibility]</p> <p>34 CFR §§300.704 [LEA/ESA level activities]Appendix A to Part 300 [Excess Costs Calculation]</p>	
<p>WASHINGTON ADMINISTRATIVE CODE:</p> <p>372-172A-01055 [Education service district]</p> <p>372-172A-01075 [Excess cost]</p> <p>372-172A-01115 [Local educational agency]</p> <p>372-172A-06000—06095 [Local Educational Agency Eligibility]372-172A-07055 [State safety net fund for high need students]</p> <p>Appendix A [Allowable Costs]</p> <p>Appendix B [Selected Items of Cost]</p>	

OMB Circular A-87:  
Appendix A [Allowable Costs]  
Appendix B [Selected Items of Cost]

OMB Circular A-133 Compliance Supplement for Department of Education (June 2010):  
Section C: Cash Management  
Section H: Period of Availability of Federal Funds  
Section L: Reporting  
Section M: Sub-Recipient Monitoring



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<b>Critical Element III – Dispute Resolution: Does the LEA/ESA have procedures and practices that are reasonably designed to implement the dispute resolution requirements of IDEA?</b>	
<b>Related Questions</b>	
<b>LEA/ESA Complaints</b>	
A. How does the LEA/ESA ensure the implementation of complaint decisions to address district systemic issues and/or student specific violations?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
<b>Due Process</b>	
B. How does the LEA/ESA ensure that resolution sessions occur within 15-days or 7 if expedited, of the parent filing of a due process complaint unless the parties agree to waive or agree to mediation?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
C. How does the LEA/ESA ensure that it implements the resolution agreements consistent with 34 CFR §300.510?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
D. How does the LEA/ESA ensure the implementation of administrative law judge decisions, including addressing district-wide violations to ensure	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>

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violations do not recur?	<b>Actions Required:</b>	
	<b>Actions Recommended:</b>	
<b>Mediation</b>		
E. How does the LEA/ESA ensure that it implements mediation decisions?	<b>District Response:</b>	
	<b>Reviewer Notes/Observations:</b>	
	<b>Actions Required:</b>	
	<b>Actions Recommended:</b>	
<b>Document Review</b>		
<ul style="list-style-type: none"> <li>• Citizen Complaint and Due Process Files</li> <li>• Documentation of Due Process Decision Implementation (District &amp; Student Specific) – iGrants Form package 267</li> <li>• LEA/ESA-developed Materials Related to Complaints, Due Process, &amp; Mediation (response to pre-visit documentation request)</li> </ul>	Post-Review Requests:	
<b>Interview Info.</b>	<b>Interview Summary:</b>	
<b>Related Requirements</b>		
<b>IDEA 2004 REQUIREMENTS:</b> 34 CFR §300.151(b) [Resolving a complaint] 34 CFR §§300.152 - 153 [Complaint procedures and filing a complaint] 34 CFR §300.506 [Mediation] 34 CFR §300.510 [Resolution process] 34 CFR §300.514 [Finality of decision; appeal; impartial review]	<b>WASHINGTON ADMINISTRATIVE CODE</b> 392-172A-05030 Investigation of the complaint and decision 392-172A-05070 Resolution of a dispute through mediation 392-172A-05090 Resolution process 392-172A-05125 Student’s status during proceedings	

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34 CFR § 300.518 Child’s status during appeal 34 CFR §§ 300.600 through 300.608 [State enforcement]	
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**Critical Element IV – Monitoring Priority Areas: Does the LEA/ESA have in effect policies, procedures, and practices that are consistently implemented in accordance with state policies and procedures established in WAC 392-172A subject to state monitoring as described in WAC 392-172A-07010?**

**Related Questions**

**Child Find**

A. How does the LEA/ESA ensure that all children ages three to 21, with suspected disabilities who reside within its jurisdiction and who may be eligible for special education services are identified, located, and evaluated in accordance with WAC 392-172A-02040?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>

**Least Restrictive Environment**

B. How does the LEA/ESA ensure that a student’s placement is individually determined, based on the student’s least restrictive environment, and enables the student to participate in the general education program to the maximum extent possible consistent with WAC 392-172A-02060?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>

**Discipline**

C. How does the LEA/ESA ensure that students eligible for special education services are not improperly excluded	<b>District Response:</b>
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from school for disciplinary reasons and are provided services in accordance with WAC 392-172A-05145?	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
System of Transition Services	
D. Describe the LEA/ESA procedures for ensuring that children participating in early intervention services through Part C, and who will participate in preschool program services through Part B, experience a smooth and effective transition in accordance with WAC 392-172A-02080.	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
E. How does the LEA/ESA ensure that students eligible for special education services who are or will be turning 16 years of age have measurable post-secondary goals in the areas of training, education, employment, and where appropriate, independent living skills based on age-appropriate assessments, including transition services and courses of study in accordance with WAC 392-172A-03090?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
Disproportionality	
F. How does the LEA/ESA ensure that assessments and other evaluation materials are selected and administrated so as not to be discriminatory on a racial/cultural basis in accordance with WAC 392-172A-03020(3)(a)(i)?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>

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G. Is there clear guidance for consideration of cultural factors and the inclusion of parents in the eligibility and placement process (WAC 392-172A-06000(1) (a))?	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
<b>Document Review</b>	<b>Post-Review Requests:</b>
<ul style="list-style-type: none"> <li>• Pre-visit documentation submitted by district</li> <li>• Federal Fund Application – iGrants Form Package 267</li> <li>• District’s written procedures</li> <li>• Suspension/expulsion report</li> <li>• November 1, child count report</li> <li>• District Performance Data profiles</li> <li>• District website</li> <li>• District’s <a href="#">Program Risk-Based Self-Assessment</a></li> </ul>	
<b>Interview Info.</b>	<b>Interview Summary:</b>
<b>Related Requirements</b>	
IDEA 2004 REQUIREMENTS: 34 CFR §300.134 Child Find 34 CFR §300.114 – 300.120 Least Restrictive Environment 34 CFR §300.530 – 300.536 Discipline 34 CFR §300.646 Disproportionality	WASHINGTON ADMINISTRATIVE CODE 392-172A-02040 Child Find 392-172A-02050-02070 Least Restrictive Environment 392-172A-05140-05175 Discipline Procedures 392-172A-07040 Significant Disproportionality

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Critical Element V – Individualized Education Program (A) Implementation: Based on the student records reviewed, does the LEA/ESA provide enrolled students eligible for special education, ages 3-21, a free appropriate public education (FAPE) consisting of individualized specially designed instruction and any necessary related services consistent with WAC 392-172A-02000?	
Related Questions	
A. How does the LEA/ESA ensure evaluations are sufficient in scope to develop an appropriate IEP and that IEPs and services are consistent with evaluation recommendations?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
B. Does the LEA/ESA ensure that students are receiving specially designed instruction and related services as reflected in the evaluation report and identified in the IEP at no cost to the parents?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
Critical Element V – Individualized Education Program (B) Procedural: Does the LEA/ESA have policies and procedures that are consistently implemented to ensure the development and implementation of the IEP program? Do IEPs and evaluations contain the required components?	
Related Questions	
A. How does the LEA/ESA ensure that present levels of academic achievement and functional performance include evidence or data to support the student’s current level	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>

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of functioning and that annual goals are written in measurable terms?	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
B. Are evaluations and IEPs completed within the required timelines?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
C. Do IEPs indicate frequency, location, and duration of specially designed instruction, related services, modifications, and accommodations?	<b>District Response:</b>
	<b>Reviewer Notes/Observations:</b>
	<b>Actions Required:</b>
	<b>Actions Recommended:</b>
Document Review	Post-Review Requests:
<ul style="list-style-type: none"> <li>• Student Records Review</li> <li>• Student Class Schedules (As requested)</li> </ul>	
Interview Info.	Interview Summary:
<ul style="list-style-type: none"> <li>• School Building Personnel</li> </ul>	

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<b>Related Requirements</b>	
IDEA 2004 REQUIREMENTS: 34 CFR §300.101- 103 FAPE 34 CFR §300.301- 311 Eligibility and Timelines 34 CFR §300.320- 324 Individualized Education Programs	WASHINGTON ADMINISTRATIVE CODE 392-172A-02000 - 02045 FAPE Requirements 392-172A-03090 - 03115 Individualized Education Programs 392-172A-03005 - 03080 Evaluations and Reevaluations