

Section B: Federally Required General Supervision and Monitoring Components

Eight (8) federally required components comprise Virginia's general supervision and monitoring framework ("GSM framework"), with each component linked to and informed by the others—thereby supporting a coordinated and effective system of supervision and monitoring. Together, these components provide a more complete picture of state and local compliance, performance, and outcomes, which then supports continuous improvement.

The eight federally required components include:

- Fiscal Management
- Integrated Monitoring
- Sustaining Compliance and Improvement
- Dispute Resolution
- Technical Assistance and Professional Development
- Data
- State Performance Plan/Annual Performance Report (SPP/APR)
- Implementation of Policies and Procedures

Required Component 1: Fiscal Management

In addition to oversight of programmatic requirements, Virginia's GSM framework includes fiscal monitoring and accountability. Adherence to Part C fiscal requirements is required through the Part C local contract between the SLA and each LLA. Compliance with Part C fiscal requirements is monitored through multiple mechanisms.

- Initial LEIS budgets are required to be submitted by LLAs annually and are reviewed by the SLA.
- Expenditure reports are required from LLAs twice each year and must include revenues by source—including, but not limited to, federal Part C dollars, state Part C dollars, Medicaid and private insurance revenues, and family fees—and expenditures by service and system component from the LLA and all private providers. These reports are reviewed by the SLA.
- The Part C local contract requires LLAs to notify the SLA of anticipated budget shortfalls—including supporting documentation of need, specific reasons for need and efforts to secure other available funding—upon the identification of the potential financial need. Not only does this assist in oversight of federal and state Part C dollars, but it also ensures the SLA becomes aware of any reduction in other state funding (state developmental services dollars, for example) or local funding that occurs at the local system level.

- The Part C local contract specifies the option for the SLA to conduct on-site visits for the purpose of fiscal monitoring and the requirement for the LLA to make financial records available to the SLA upon request.
- Community Services Boards (CSBs) serving as early intervention LLAs undergo independent single audits annually. Audit reports go to the SLA's Office of Budget and Finance, which then completes monitoring desk audits. The Part C Office receives a copy of the report if any identified issues are related to Part C. The Part C Office can also request audits as needed. All local lead agencies are required by the local Part C contract to submit to DBHDS any fiscal findings related to the local Part C early intervention system from an audit conducted by an entity other than DBHDS.
- Virginia's periodic oversight of systems and methods (POSM)—one of five core integrated monitoring activities within Virginia's GSM framework—includes a review of records to further examine and determine compliance with payor of last resort (POLR) and system of payment (SOP) requirements at the child level.

Any noncompliance discovered through these processes is identified and must be corrected in a timely manner in accordance with the same procedures used for identifying and correcting findings made through other monitoring activities.

Required Component 2: Integrated Monitoring

Five (5) core integrated monitoring activities govern and guide the day-to-day work of Virginia's Part C monitoring team ("M-Team") and are described in greater detail in Section C: Core Integrated Monitoring Activities of this manual and accompanying appendices. To summarize:

- Each LEIS is monitored on all SPP/APR indicators annually.
- Each LEIS is monitored more rigorously on a 5-year cycle. This process is called periodic oversight of systems and methods (POSM).
- Additional monitoring or more extensive (drill-down) monitoring may be triggered at any time through the dispute resolution process, LEIS performance on a Part C indicator, or a local system's determination status.
- Ongoing monitoring for compliance with related Part C requirements occurs through all interactions with local systems (technical assistance, self-reporting by local systems, requests for additional funds, etc.)
- SLA staff members monitor local systems using a variety of data sources including, but not limited to data from the statewide early intervention data system; family survey data; on-site monitoring; desk audits; dispute resolution findings; and tracking of timely submission of local data.

Required Component 3: Sustaining Compliance and Improvement

In accordance with [OSEP QA 23-01 \(State General Supervision Responsibilities Under Parts B and C of the IDEA: Monitoring, Technical Assistance and Enforcement; July 2023\)](#), Virginia promptly conducts proper due diligence when made aware of one or more areas of concern through any of its core integrated monitoring activities, data reviews, dispute resolution, informal reports, media reports, etc. If that due diligence confirms noncompliance (any compliance level below 100%), a written finding is issued to the LEIS within sixty (60) days of concluding, within a reasonable amount of time, the LEIS has violated a Part C requirement, unless the SLA is able to verify (prior to issuing the finding) that the program or provider has corrected the noncompliance.

Whether verifying pre-finding correction or correction following a written finding of noncompliance, the SLA reviews updated (current) data and information to verify that the LEIS is now correctly implementing the Part C requirement (100% compliance) and has corrected each individual case of child-specific noncompliance, unless the child is no longer within the jurisdiction of the LEIS.

Correction of noncompliance and improved results for children and families are facilitated by individualized improvement planning with the local system and may include a written improvement plan with prescribed status checks to ensure expected progress. Targeted technical assistance is required for all local systems that do not correct areas of noncompliance in a timely manner. The focus of targeted technical assistance is on capacity building and overcoming barriers to achieve compliance.

Required Component 4: Dispute Resolution

DBHDS, as the SLA for Part C of IDEA in Virginia, ensures that impartial procedures are in place and followed for the timely resolution of complaints through mediation, administrative complaint procedures, and due process hearing procedures. These procedures are specified in state early intervention regulations, the Practice Manual, Virginia's *Notice of Child and Family Rights and Safeguards Including Facts About Family Cost Share*, and on the [state early intervention website](#) (using materials developed by CADRE). State procedures include requirements to provide and explain dispute resolution options to families throughout the early intervention process.

Any noncompliance discovered through the dispute resolution process is cited and must be corrected in a timely manner in accordance with the same procedures used for identifying and correcting noncompliance identified through any other monitoring activity.

All requests to the SLA for informal problem-solving and formal dispute resolution are tracked (including issue, local program/provider involved, resolution, etc.) to identify any patterns or trends. Dispute resolution findings inform technical assistance and training and may trigger further monitoring with one or more early intervention programs or providers.

Required Component 5: Technical Assistance and Professional Development

Targeted technical assistance is required for all local systems that do not correct areas of noncompliance in a timely manner. The focus of targeted technical assistance is on capacity building and overcoming barriers to achieve compliance. Targeted technical assistance and/or professional development may also be required as an enforcement action. State TACs, MCs and professional development staff meet twice a month in order to share information and plan together to support local programs and providers in complying with Part C requirements and improving outcomes for children and families served by ITCVA.

Required Component 6: Data

Virginia's statewide early intervention data system, TRAC-IT¹, launched in June 2022 and entered full implementation in December 2023. Unlike its predecessor (ITOTS²), TRAC-IT is a comprehensive case management system designed to support practitioners in their day-to-day work with children and families as well as local system managers (LSMs) in their day-to-day local oversight and monitoring.

By design, TRAC-IT enforces compliance with Part C requirements. Further, the system includes not only data needed for federal reporting under Section 618 and through the SPP/APR, but also a full range of process and outcome data from referral through transition and discharge. TRAC-IT also allows for the ongoing monitoring of whether services are delivered in accordance with each child and family's IFSP.

Monitoring practices have been revised to ensure the state examines data collected through TRAC-IT at regular intervals to determine local program and provider compliance with Part C requirements. Now that it is fully implemented, TRAC-IT is being used in all phases of monitoring (for both compliance and outcomes), for verification of correction of noncompliance, and to identify activities to improve outcomes.

Required Component 7: State Performance Plan/Annual Performance Report (SPP/APR)

Virginia uses data gathered through all monitoring activities and the state data system to develop its state performance plan/annual performance report (SPP/APR) that evaluates the State's efforts to implement the requirements and purposes of Part C. Stakeholders are actively involved in the development of the SPP/APR and evaluating progress on planned improvements.

¹ Tracking + Reporting + Coordinating for Infants & Toddlers

² Infant & Toddler Online Tracking System

Required Component 8: Implementation of Policies and Procedures

Implementation of federal and state Part C requirements and evidence-based practices is supported by state regulations, the Practice Manual, and the annual Part C local contract between the SLA and each LLA. Technical assistance and professional development are in place to ensure local administrators, LSMs and providers are aware of and understand all requirements and expectations.

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