



Exceptional Student Services

Programmatic Monitoring Manual

School Year 2025-26

Revised July 2025



ARIZONA DEPARTMENT OF
EDUCATION

Contents

Introduction	3
ESS Programmatic Monitoring Model	5
ESS Fiscal Support for Programmatic Monitoring	8
Programmatic Monitoring Incentives	8
Programmatic Monitoring Enforcement Actions	9
Calls, Findings, and Corrective Action Plans	10
Instructions for Corrective Action Close-Out	11
Data Review Programmatic Monitoring.....	12
Data Review Required Forms	14
Data Review Monitoring File Selection	15
Self-Assessment Programmatic Monitoring	16
Self-Assessment Required Forms	18
Self-Assessment Monitoring File Selection	19
On-Site Programmatic Monitoring.....	19
Instructions for On-Site Calls and Summary Documentation	22
On-Site Programmatic Monitoring File Selection	23
State Systemic Improvement Plan (SSIP).....	24
SSIP Identification and Purpose	24
SSIP Participation	25
SSIP Activity Timeline	25
SSIP Activities and Resources	26

Introduction

States have a responsibility under federal law to have a system of general supervision that is reasonably calculated to ensure that Part B requirements are implemented and that each educational program for children with disabilities meets the State Education Agency's (SEA) educational standards. The system's main purpose is to monitor the implementation of the Individuals with Disabilities Education Act (IDEA). The U.S. Department of Education's Office of Special Education Programs (OSEP) has identified several components related to general supervision: Policies, Procedures, and Implementation (compliance); State Systemic Improvement Plan (SSIP); Outcomes for Results-Driven Accountability (RDA); Fiscal Management; and Targeted Technical Assistance (TA) and Professional Development (PD).

For the State to have an effective system of general supervision, that system must support practices that improve educational results by utilizing multiple methods to identify and correct noncompliance and by encouraging and supporting improvement while enforcing compliance. The Arizona Department of Education, Exceptional Student Services (ADE/ESS) views effectiveness as correctly implementing the specific regulatory requirements of the statutes and ensuring quality learning and life outcomes for students.

Programmatic monitoring is a major component of the SEA's comprehensive general supervision system. Through programmatic monitoring, targeted technical assistance and professional development are ongoing activities. Technical assistance is designed to link directly to indicators in the State Performance Plan/Annual Performance Report (SPP/APR) to improve student outcomes and procedural compliance in Arizona public education agencies (PEAs). Throughout the six-year monitoring cycle, PEAs can access and request targeted technical assistance to improve compliance systems and student outcomes. Technical assistance ranges from on-site staff training to webinars and statewide conferences. Technical assistance documents are also available online or through the Program Support and Monitoring (PSM) specialist assigned to each PEA.

Programmatic Monitoring Component of General Supervision—The ADE/ESS programmatic monitoring system is based upon OSEP requirements. The components of this system are aligned to the Part B SPP/APR Related Requirements. The [Related Requirements](#) document includes a list of monitoring priorities and indicators, and the requirements from the statutes and regulations related to each priority and indicator.

The programmatic general supervision system is structured around technical assistance and programmatic monitoring activities that occur over a six-year period, as shown in Table 1:

Table 1: Six-year programmatic monitoring activities

Activity	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Provide Technical Assistance	√	√	√	√	√	√
Review PEA Data	√	√	√	√	√	√
Referral to Best Practice Supports to Aid in Improving Outcomes	√	√	√	√	√	√
Annual Site Visit (Review for TA purposes)	√	√	√		√	√
Review PEA Comprehensive Special Education Policies and Procedures	√	√	√	√	√	√
PEA Collects Student Exit Form Data	√	√	√	√	√	√
PEA Collects Post School Outcomes	√	√	√	√	√	√
PEA Completes Indicator 8 Parent Survey	√	√	√	√	√	√
Prepare for Monitoring			√			
Conduct Monitoring Activities				√		
Complete Corrective Action (if required and which includes individual correction of noncompliance and systemic correction through subsequent file review)					√	
State Systemic Improvement Plan (if targeted)				√	√	√

ADE/ESS uses methods and procedures to implement the programmatic monitoring system that are consistent but flexible in order to adapt to the varying needs of children, educational settings, and administrative realities. A PEA's programmatic monitoring year may be adjusted and programmatic monitoring activities assigned anytime data indicates broad issues across systems and in

collaboration across units within ADE/ESS. Specific components for each programmatic monitoring activity are detailed in this document.

ESS Programmatic Monitoring Model

[IDEA § 300.149](#), [A.A.C. § 7-2-401](#), [OSEP QA 23-01](#)

The programmatic monitoring system combines compliance and results in the review of PEA policies, procedures, and practices. Components of the six-year programmatic monitoring cycle include a yearly review of OSEP’s compliance and results Indicators 1–17. Student-level indicator data is reviewed for every PEA each year, capacity permitting. This data collection is for TA purposes and to aid the SEA in determining statewide trends to plan professional learning and drive best practice projects.

The Program Support and Monitoring (PSM) specialist assigned to the school district or charter school will meet with the PEA director in the spring of PEA programmatic monitoring cycle Year 3 to discuss the PEA data and plan for the upcoming programmatic monitoring activities. This data is explained in [the Risk Analysis source tool](#).

Arizona has a six-year cycle for programmatic monitoring, with assigned programmatic monitoring activities always occurring in Year 4 of the cycle. However, ESS can adjust a PEA’s programmatic monitoring year any time systemic concerns arise, including when there is evidence that the PEA does not employ a certificated special education teacher. Conversely, PEAs that maintain exceptional data may have less intensive programmatic monitoring activities assigned because the data indicates that they meet state targets. Regardless of the assigned programmatic monitoring year or programmatic monitoring type, PEAs must comply with all requirements under IDEA.

There are three programmatic monitoring types: Data Review, Self-Assessment, and On-Site. For each monitoring type, various activities are assigned. For all programmatic monitoring types and their associated activities, the procedural requirements of IDEA have been tied to the SPP/APR compliance and results indicators shown in the following list. The possible areas of focus for student outcome analysis (Results-driven accountability [RDA]) are shown in Table 2:

Table 2: Results-driven accountability areas of focus

Graduation	Least Restrictive Environment (LRE)
Dropout	Suspension/Expulsion
Reading Proficiency	Child Find—Initial Evaluation Timeline
Math Proficiency	Early Childhood Transition (In by 3)
Disproportionality	Secondary Transition

For all assigned programmatic monitoring types, ongoing technical assistance plays a significant role in the general supervision of PEAs in Arizona. PSM specialists conduct annual visits with each assigned PEA to review the PEA’s data, including data related to Indicators 11 (Child Find), 12 (Part C to Part B Transition), and 13 (Secondary Transition). When a PEA is not achieving 100% compliance on these three indicators, specialists give feedback and technical assistance. Program specialists also provide ongoing technical assistance related to any other issues and questions that may arise. Targeted training is provided when files and data indicate a need. This data is used at the SEA to determine professional learning needs statewide and to drive the SEA best practice projects.

Data Review: Determined by a score of more than one standard deviation above the state average on the risk analysis tool, Data Review is assigned to PEAs whose data consistently reflects outstanding student outcomes and practices that support ongoing compliance with federal and state laws, including procedural compliance. ESS believes that such programs show compliance sustainability. Such PEAs will be required to review Indicators 11 (Child Find—initial evaluation timeline), 12 (Part C to Part B transition—Preschool transition), and 13 (Secondary Transition) as part of the collection of APR data.

Self-Assessment: Determined by a score falling between one standard deviation below the state average and one standard deviation above the state average on the risk analysis tool, Self-Assessment is assigned when a PEA shows evidence of strong programs but has inconsistency in a few areas in which data does not meet the state target. The self-assessment allows the PEA to analyze issues in depth and to find solutions for improvement and sustainability. The targeted review of student files will include an examination of indicators 11, 12, and 13. Self-Assessment will include

SSIP participation and activities, if the PEA meets the following criteria: 1) The PEA services seven or more special education students in third grade. 2) Third grade special education proficiency is either (a) below the state-wide special education average proficiency on the ELA state assessment, and/or (b) above the state-wide average ELA proficiency gap between general education and special education.

If SSIP criteria do not apply, PEAs will choose an area to focus in which they may not meet a state target. The PEA will complete activities to determine the root causes of poor student performance, as measured by the SPP/APR results indicators. Each outcome focus area analysis (RDA) is driven by (but not restricted to) the ESS-provided analysis tool.

On-Site: Determined by a score of more than one standard deviation below the state average on the risk analysis tool; On-Site is assigned when a PEA shows evidence of broad issues across systems and/or outcomes. On-site monitoring includes a thorough review of procedural requirements as well as a review of student performance data. PEAs participating in this type of programmatic monitoring, in conjunction with their PSM specialist, will choose an outcome focus area in which they do not meet a state target to complete an analysis and action plan.

Procedural compliance is only one element involved in improving positive outcomes for students; improved student performance is the ultimate goal. Therefore, a PEA participating in on-site monitoring is required to determine the root causes of student performance below state target levels, as measured by the SPP/APR results indicators. Each outcome focus area analysis (RDA) is driven by (but not restricted to) the ESS-provided analysis tool.

Arizona has found it beneficial to include PEA staff as active partners with ADE/ESS staff when examining PEA data, especially when examining all components of the on-site monitoring. The PEA and PSM teams work together during on-site monitoring. **The PEA must have an agency team, including PEA employee(s), as active participants.** Additionally, to ensure the accuracy of compliance calls and determination of trend data, the on-site monitoring **cannot** be completed via electronic file review utilizing a PEA software system.

ESS Fiscal Support for Programmatic Monitoring

[IDEA § 300.149](#), [A.A.C. § 7-2-401](#), [OSEP QA 23-01](#)

Limited fiscal support for programmatic monitoring activities will be made available for PEAs in self-assessment and on-site monitoring. Support will be provided through individually developed contracts between the PEA and ADE. Each PEA will be able to utilize a maximum of \$3000 to aid in the completion of the required monitoring activities. **A PEA must complete the contract and have it approved *prior* to the monitoring start date. Contracts that are not approved by the monitoring start date may not be funded.**

Programmatic Monitoring Incentives

Programmatic monitoring incentives are earned when a PEA successfully completes the data review or self-assessment monitoring.

Table 3: Year 4—Data Review or Self-Assessment

Status	Outcome
Data Review —100% compliance on Indicators 11, 12 and 13	Two entries into a lottery for a paid registration to Arizona’s IDEA Conference
Self-Assessment —Successful and timely completion of performance tasks with all supporting documentation demonstrating compliance	One entry into a lottery for a paid registration to Arizona’s IDEA Conference

Table 4: Year 5—Corrective Action Plan Closeout

Status	Outcome
Closed within one year	Congratulatory letter and certificate
Not closed within one year	Enforcement actions until compliance is achieved, which may include the assignment of a special monitor

Programmatic Monitoring Enforcement Actions

[IDEA § 300.149](#), [A.A.C. § 7-2-401](#), [OSEP QA 23-01](#)

If a PEA does not complete monitoring activities within the associated timelines, a funding hold for IDEA funds may be temporarily enacted to compel completion of these activities. Additionally, if a PEA is unable to complete a Corrective Action Plan (CAP), which includes correction of all identified noncompliance and evidence of systemic correction through subsequent file reviews, within a year after the date of the Written Notification of Findings letter, one or more of the following enforcement actions may be taken, based upon the severity of the remaining noncompliance:

- ESS development of a prescribed CAP with required activities and timelines to address the continuing noncompliance
- Enforcement of CAP activities as outlined in the CAP
- Review and revision of the current CAP to develop targeted activities that address the continuing noncompliance
- Special monitor assigned to PEA to assist in developing systems
- Interruption of IDEA payments until adequate compliance is achieved. For charter schools not receiving IDEA funds, a request for withholding of 10% of state funds.
- For charter schools, a request to the appropriate board for a notice of intent to revoke the charter
- With Arizona State Board of Education approval, interruption of Group B weighted state aid or redirection of funds, pursuant to 34 C.F.R § 300.227(a)
- Request to the attorney general for assistance in law enforcement

PEAs are entitled to request a hearing if they wish to challenge the withholding of funds.

Calls, Findings, and Corrective Action Plans

IDEA §§ 300.600–602, A.A.C. § 7-2-401, OSEP QA 23-01

PSM specialists will review findings to collect data for OSEP indicator 18 requirements. This is an additional OSEP data collection compliance requirement. This does not change the monitoring process, nor require correction for the PEA.

A “**call**” related to a PEA’s compliance status is made for every line item in the programmatic monitoring. Line items are those programmatic monitoring items included on all forms (student forms, worksheets, agency forms, and interviews) associated with the programmatic monitoring activities. Each line item is composed of multiple components. Any one component within a line item that is found to be noncompliant generates a call of noncompliance for that line item. When multiple components within the line item are found to be noncompliant, a single **finding** for that line item will be generated (i.e., the line item will be found noncompliant), as opposed to a finding being generated for each single component. PEAs completing self-review activities for programmatic monitoring are subject to verification from ADE/ESS to finalize findings.

At the conclusion of all programmatic monitoring activities, teams review data that is compiled into a report called the draft Summary of Findings (SOF). A finding occurs when a PEA is found to be **less than 100%** compliant for any line item. The formal notification of findings resulting from the programmatic monitoring (which starts the one-year, corrective-action timeline) is done in the form of a letter, the written notification of findings (WNOF), emailed no later than 30 days following the completion of all monitoring activities. The citation related to the area of noncompliance, along with a description of the qualitative and/or quantitative data, is included in the WNOF.

The PEA develops a Corrective Action Plan (CAP) with guidance from the ESS team to address the correction of findings of noncompliance. The development of a CAP, which includes activities for improvement, is required for all line items that are less than 90% compliant. For those line items that are 90–99% compliant, corrective action activities are not required; however, individual student-specific files involved require correction, and subsequent file reviews will occur during the corrective

action year to ensure that 100% compliance and sustainability have been achieved for all items that were noncompliant.

Corrective action is not complete, and the monitoring cannot be closed until all findings are verified as being corrected in accordance with the OSEP QA 23-01. The following are required:

- correction of all individual instances of noncompliance, including student-specific noncompliance
- verification that the PEA is correctly implementing the specific regulatory requirements. Verification will be based on the review of updated data, specifically subsequent file reviews.

Instructions for Corrective Action Close-Out

[IDEA § 300.149](#), [IDEA §§ 300.600–602](#), [A.A.C. § 7-2-401](#), [OSEP QA 23-01](#)

All line items found to be non-compliant at the conclusion of programmatic monitoring require correction. Line items that are considered to be Free and Appropriate Public Education (FAPE)-prohibitive (indicated as “60-day” on the student form) require that a PEA correct the student file within **60 calendar days** of the Written Notification of Findings letter.

The Individual Report of Noncompliance (IRON) will be generated for all student-specific items found to be non-compliant at the conclusion of the programmatic monitoring. A PEA will develop a CAP, with CAP activities, for all line items that are less than 90% compliant. A PEA also will be required to show compliance and sustainability for all items that are between 90 and 99% compliant at the conclusion of the monitoring, even though a specific corrective action plan is not required. The ADE/ESS specialist will review student-specific and subsequent files during the corrective action year for evidence of 100% compliance and sustainability.

A PEA must correct all noncompliance as soon as possible but no later than one calendar year from the date of the WNOF. For non-compliant items involving timelines that cannot be corrected, the PEA must still complete the required action (e.g., evaluation) even though it is late. PSM specialists will review subsequent files for compliance and to ensure a PEA’s understanding of the issues.

A PEA designates activities to complete in order to implement systems that ensure compliance. These CAP activities will be monitored and verified through the corrective action year. Completion of

activities and verification of activities is required to close out the corrective action. The PEA and the assigned PSM specialist will work together to verify these activities.

The ESS program specialist and PEA special education director or designee will schedule a minimum of three programmatic monitoring follow-up visits/desk reviews to review documentation, provide technical assistance, and update the compliance status during the year of the CAP. Additional visits will be scheduled as needed based on the PEA's level of progress toward CAP completion.

- The PEA must ensure that all items found to be out of compliance during the monitoring are brought into compliance, **including all items that were less than 100% compliant.**
- CAP follow-ups will include:
 - review of the correction of student-specific items from the monitoring
 - verification of completion of PEA-developed CAP activities outlined in the PEA's CAP
 - review a representative selection of subsequent files to ensure that there has been systemic change and sustainability in compliant practices
- The programmatic monitoring will be closed once a PEA has evidenced compliance and sustainability related to all findings (**student-specific and systemic**) that were less than 100% compliant during the monitoring.

[Return to Table of Contents](#)

Data Review Programmatic Monitoring

PEAs are expected to conduct genuine, thorough reviews of documentation and to provide evidence of the correction of self-identified noncompliance. The focus of the reviews will be Child Find (Indicators 11 & 12) and Secondary Transition (Indicator 13), as applicable.

For the Data Review student form and worksheets, the PEA and PSM specialist will use the calls of "I" for **In Compliance**, "O" for **Out of Compliance**, and "U" for those items that are **Unreported** or do not apply. See [Student Form Explained](#) for additional information on how to complete the student form.

- The Data Review monitoring is assigned when the PEA Risk Analysis Tool comprehensive score is more than one standard deviation above the state average.
 - [Required Data Review Monitoring forms](#) can be located online.
 - PSM specialists can be contacted for required forms and additional guidance as needed.
 - The Data Review timeline begins on **August 4, 2025**.
- No later than **September 15, 2025**, the PEA to be monitored will select student files to be reviewed that are a representative selection of the district/charter. The PEA will submit the Student File List to the PSM specialist.
- It is highly recommended that PEAs select files that reflect the current systems that are in place.
- No later than **September 22, 2025**, the PSM specialists will review the Student File List to verify that it reflects a representative selection.
- The PEA will conduct student file reviews using the Data Review student file form provided by the PSM specialist.
- Throughout the programmatic monitoring process, the PEA will consult with the PSM specialist about using the [Guide Steps](#) to ensure that accurate calls are made on the student forms.
- The week of October 27, 2025, the PSM specialists will meet with the PEA (virtually or in person) to discuss the status of the monitoring activities.
- The PEA will submit the completed Data Review student file forms, Agency Form, and the Child Find and In-by-3 Worksheets to the PSM specialist no later than **December 19, 2025**.
- Information on the student forms must be specific enough to determine the reasons for each “out” call on the line item of the Data Review student forms. Note that each instance of PEA-identified noncompliance will require evidence of correction before the monitoring process is complete. The evidence of correction will be reviewed during the weeks of May 11 and 18, 2026.
- No later than January 16, 2026, the PSM specialist will meet with the PEA (virtually or in-person) to:
 - discuss trends seen on the PEA submitted forms
 - review statewide trends to provide technical assistance on areas the PEA may want to revisit before completion of the process

- discuss the student file selection to be submitted by the PEA on or before January 30, 2026
- The PEA will provide the requested documents no later than January 30, 2026.
- The PSM specialists will complete the verification process by February 27, 2026, and communicate any necessary next steps to the PEA. If the verification process evidences 100% compliance, the monitoring will be closed, and the PEA will receive written notification of monitoring-activity completion. Any necessary review of individual student-level correction and subsequently completed files will take place during the weeks of May 11 and May 18, 2026.
- The PSM specialist will coordinate the follow-up visit with the PEA to take place during the weeks of May 11 and May 18, 2026. The purpose of this visit is to follow up on any PEA- and/or SEA-identified noncompliance through the verification process. This visit will also include a selected review of subsequently completed student files for those areas where noncompliance was identified (PEA and/or SEA). This visit ensures the SEA's due diligence regarding any possible PEA violations of the Individuals with Disabilities Education Act (IDEA).
- If there is no evidence of noncompliance after the follow-up visit, ESS will issue a letter of successful completion to the PEA.
- If there is evidence of noncompliance, ESS will issue a written notification of findings (WNOF) to the PEA on or before **June 5, 2026**.
 - The PSM specialist, in collaboration with the PEA, will discuss the Summary of Findings (SOF) and determine strengths and concerns **prior to June 5, 2026**.
 - The PEA and PSM specialist will develop and finalize the PEA's CAP **within 30 calendar days**.
- Items that are considered detrimental to the PEA's ability to provide FAPE to students require that a PEA correct the student file within **60 calendar days** of the WNOF; enforcement activities will apply if the timeline is not met.
- There is a one-year timeline for correcting all individual instances of noncompliance and completion of the CAP; enforcement actions will apply if the timeline is not met (OSEP QA 23-01 & DMS 2.0).

Data Review Required Forms

Agency Form—required for all PEAs in monitoring. Reviews policies and procedures as well as child find processes.

Child Find Worksheet—required for all PEAs in monitoring. Reviews the 45-day screening process of the PEA.

In by 3 Worksheet—required for all district PEAs in monitoring. Reviews the In-by-3 process (Arizona Early Intervention Program referral(s)) of the PEA.

Data Review Student Form—required Data Review form for file review.

Student File List and Monitoring Selection Matrix—required forms used to establish the number of files to be reviewed during the Data Review process; using these two forms will also assist the PEA in ensuring a representative selection of student files.

Data Review Monitoring File Selection

ADE/ESS will use a [statistical calculator](#) to determine the total number of student files to be selected. This total number will then be used in a representativeness tool to ensure a representative selection of student files.

Note: Total files reviewed may increase based on the number of eligible students/representativeness. File selection should include students who have been exited from special education and/or students initially evaluated and found to be not eligible.

Select representative student files based on the PEA student population. **This selection should include the following, as applicable:**

- Each school site, when possible
- Initial evaluations (Indicator 11)
- All disability categories
- All service delivery models within the PEA
- English learners (ELs)
- Students who are 16 years of age or older (Indicator 13)
- Students in dropout recovery programs
- Out-of-district placements (private day school and residential placement)
- Students phased out of special education services
- Students who have been suspended, have been expelled, or have moved to an Interim Alternative Educational Setting (IAES) for longer than 10 days
- Students initially evaluated and found to be not eligible (Indicator 11)

- Preschool students, including those referred from early intervention (Indicator 12)

[Return to Table of Contents](#)

Self-Assessment Programmatic Monitoring

PEAs are expected to conduct genuine, thorough reviews of documentation and to provide evidence of the correction of self-identified noncompliance.

For all Self-Assessment student forms and worksheets, the PEA and PSM specialist will use the calls of “I” for **In Compliance**, “O” for **Out of Compliance**, and “U” for those items that are **Unreported** or do not apply. See [Student Form Explained](#) for additional information about how to complete the student form.

- Each outcome focus area has specific required forms. [Required Self-Assessment Monitoring forms](#) can be located online.
- PSM Specialist can be contacted for required forms and additional guidance as needed. The Self-Assessment programmatic monitoring process begins on **August 4, 2025**.
- **Only for SSIP**, the PEA will submit the outcome area action plan and analysis (Success Gaps Rubric and Action Plan) no later than **August 25, 2025**.
- No later than **September 15, 2025**, the PEA to be monitored will select student files to be reviewed that are a representative selection of the district/charter. The PEA will submit the Student File List to the PSM specialist.
- It is highly recommended that PEAs select files that are reflective of the current systems that are in place.
- No later than **September 22, 2025**, the PSM specialist will review the Student File List to verify that it reflects a representative selection.
- The PEA will conduct student file reviews using the Self-Assessment student file form provided by the PSM specialist.
- Throughout the programmatic monitoring process, the PEA will consult with the PSM specialist on using the [Guide Steps](#) to ensure that accurate calls are made on the student forms.

- The week of October 27, 2025, the PSM specialist will meet with the PEA (virtually or in person) to discuss the status of the monitoring activities.
- The PEA will submit the completed Self-Assessment student file forms, Agency Form, completed Outcome Focus Area Action Analysis, and the Child Find and In-by-3 Worksheets to the PSM specialist no later than **December 19, 2025**. * Summary of performance worksheets apply to specific focus areas. See the Self-Assessment required forms below for more information.
- Information on the student forms must be specific enough to determine the reasons for each “out” call on the line item of the Self-Assessment student forms. Note that each instance of PEA-identified noncompliance will require evidence of correction before the monitoring process is complete. The evidence of correction will be reviewed during the weeks of May 11 and May 18, 2026.
- No later than January 16, 2026, the PSM specialist will meet with the PEA (virtually or in person) to:
 - discuss trends seen on the PEA submitted forms
 - review statewide trends to provide technical assistance on areas the PEA may want to revisit before completion of the process
 - discuss the student file selection to be submitted by the PEA on or before January 30, 2026
- The PEA will provide the requested documents no later than January 30, 2026.
- The PSM specialists will complete the verification process by February 27, 2026 and communicate any necessary next steps to the PEA. If the verification process evidences 100% compliance, the monitoring will be closed, and the PEA will receive written notification of monitoring-activity completion. Any necessary review of individual student-level correction and subsequently completed files will take place during the weeks of May 11 and May 18, 2026.
- The PSM specialist will coordinate the follow-up visit with the PEA to take place during the weeks of May 11 and May 18, 2026. The purpose of this visit is to follow up on any PEA- and/or SEA-identified noncompliance through the verification process. This visit will also include a selected review of subsequently completed student files for those areas where noncompliance was identified (SEA and PEA). This visit ensures the SEA’s due diligence regarding any possible PEA violations of the Individuals with Disabilities Education Act (IDEA).
- **Only for SSIP**—the PEA will submit the outcome area action plan and analysis update (Success Gaps Rubric and Action Plan) no later than **April 27, 2026**.

- If there is no evidence of noncompliance after the follow-up visit, ESS will issue a letter of successful completion to the PEA.
- If there is evidence of noncompliance, ESS will issue a written notification of findings (WNOF) to the PEA on or before **June 5, 2026**.
 - The PSM specialist, in collaboration with the PEA, will discuss the Summary of Findings (SOF) and determine strengths and concerns **prior to June 5, 2026**.
 - The PEA and PSM specialist will develop and finalize the PEA's CAP **within 30 calendar days**.
- Items that are considered detrimental to the PEA's ability to provide FAPE to students require that a PEA correct the student file within **60 calendar days** of the WNOF; enforcement activities will apply if the timeline is not met.
- There is a one-year timeline for correcting all individual instances of noncompliance and completion of the CAP; enforcement activities will apply if the timeline is not met (OSEP QA 23-01 & DMS 2.0).

Self-Assessment Required Forms

Agency Form—required for all PEAs in monitoring; reviews policies and procedures as well as child find processes

Child Find Worksheet—required for all PEAs in monitoring; reviews the 45-day screening process of the PEA

In-by-3 Worksheet—required for all district PEAs in monitoring; reviews the In-by-3 (AzEIP referral) process of the PEA

Outcome Focus Area Analysis—required for each of the outcome focus areas to include SSIP (initial rubric, action plan, and any needed updates)

Self-Assessment Student Form—required for each outcome focus area. The forms contain line items that are tied to the Self-Assessment outcome focus areas. The Student Form is required for both the initial file reviews and any required subsequent file reviews.

Summary of Performance Worksheet—required for the following outcome focus areas: graduation rate, dropout rate, and postsecondary transition.

Student File List and Monitoring Selection Matrix—required forms used to establish the number of files to be reviewed during the Self-Assessment process; using these two forms will also assist the PEA in ensuring a representative selection of student files.

Self-Assessment Monitoring File Selection

ADE/ESS will use a [statistical calculator](#) to determine the total number of student files to be selected. This total number will then be used in a representativeness tool to ensure a representative selection of student files.

Note: Total files will increase based on the number of eligible students/representativeness. File selection should include students who have been exited from special education and/or students initially evaluated and found to be not eligible.

Select representative student files based on the PEA student population. **This selection should include the following, as applicable:**

- Each school site, when possible
- Initial evaluations (Indicator 11)
- All disability categories
- All service delivery models within the PEA
- English learners (ELs)
- Students who are 16 years of age or older (Indicator 13)
- Students in dropout recovery programs
- Out-of-district placements (private day school and residential placement)
- Students phased out of special education services
- Students who have been suspended, have been expelled, or have moved to an IAES for longer than 10 days
- Students initially evaluated and found to be not eligible (Indicator 11)
- Preschool students, including those referred from early intervention (Indicator 12)

[Return to Table of Contents](#)

On-Site Programmatic Monitoring

The on-site monitoring process includes:

- PEA locating [documents to be used for the monitoring activities](#) online.
- PSM specialist contacting PEA with additional guidance and discuss agenda.
 - Discuss PEA-contracted work hours
 - The PEA and the PSM specialist will review and finalize the agenda for the on-site programmatic monitoring prior to the start of the on-site programmatic monitoring.
- PEA selects a team to participate in the monitoring activities. The maximum number of PEA team participants will be provided by the PSM specialist and will be based on the PSM team size available.
- PEA will provide a secure room **with wi-fi access**, large enough for the on-site monitoring team to conduct the programmatic monitoring activities.
- PEA will utilize the Monitoring Selection Matrix and the Student File List to ensure student file representativeness. PEA will submit the Student File List to the PSM specialist at a designated time prior to the monitoring.
- PEA and PSM teams complete a review of PEA documentation to include a representative selection of student files, policies and procedures, child find processes, etc.
 - Student files must be printed as hard copies for security reasons, for the ability to establish trends, and to ensure a collaborative training opportunity. Reviewing files within software programs is a liability for both ADE/ESS and the PEA.
 - Student File List should be available at the time of the monitoring to track files reviewed.
 - PEA will need to ensure access to original source documentation for home language such as Home Language Survey (HLS).
 - PEA will need to ensure access to original source documentation for any qualified professional requirements associated with specific student files.
 - PEA will need to ensure that all PEA team members have access to the current copy of the [Guide Steps](#).
 - A current copy of the SPED 72 report should be available to all PEA team members, either electronic or hard copy.
 - Access to current progress reports should be available to all team members.
 - The PEA and PSM teams will complete classroom observations.
- PEA and PSM team collect data for Indicators 11 (Child Find—Initial Evaluations), 12 (Part C to Part B Transition/Preschool Transition), and 13 (Secondary Transition).

- PSM team inputs data and generates a draft Summary of Findings (SOF).
- PEA and PSM team review the draft SOF report.
- PEA and PSM teams determine the PEA's overall implementation of systems (End of Section Calls) in the areas of Child Find, Evaluation/Reevaluation, Individualized Education Program, and Procedural Safeguards/Parental Participation.

The PEA and PSM teams develop a Corrective Action Plan (CAP), as applicable.

- The PEA and PSM specialist will schedule multiple follow-up visits/desk reviews (minimum of 3) during the corrective action year.
- PSM sends written notification of findings (WNOF) no later than 30 days from the completion of the Summary of Findings discussion.
- The PEA has one calendar year from the WNOF to correct all individual instances of noncompliance. The PSM specialist verifies correction in accordance with the OSEP QA 23-01.
- The PSM specialist reviews a representative selection of subsequent files to ensure systemic correction and sustainability over the course of the corrective action year in accordance with OSEP QA 23-01.
- The PSM specialist will review documents to evidence the completion of CAP activities. In order to evidence CAP activities, the PEA may be required to produce evidence of training(s) provided, training materials, agendas, etc.
- The PEA completes the Supplemental CAP activities (compliance-related outcome focus areas rubrics and action plans) as determined by the outcome of the documentation review. Supplemental CAP activities apply to Indicators 11, 12, and 13.
- The PEA submits a completed and/or updated outcome focus area action plan. Updated/complete outcome focus area action plan should include activities completed through the course of the corrective action year.

Instructions for On-Site Calls and Summary Documentation

[IDEA § 300.149](#), [IDEA §§ 300.600–602](#), [A.A.C. § 7-2-401](#), [OSEP QA 23-01](#)

For all on-site file review forms and worksheets, the PEA and PSM team will use the calls of “**I**” for **In Compliance**, “**O**” for **Out of Compliance**, and “**U**” for those items that are **Unreported** or do not apply. See [Student Form Explained](#) for additional information on how to complete the student form.

The steps for developing the final reports are listed below:

A compliance call is made for each line item reviewed using the Guide Steps. Enter an *I*, *O*, or *U* on the corresponding line for each item on the form.

1. Once the forms and worksheets have been completed, the data is entered into the ADE/ESS monitoring application by PSM specialists. The application automatically calculates the compliance level of each line item by summarizing the data that was collected from all sources and transfers the data into the draft Summary of Findings (SOF).
2. Together, the PEA and PSM team members review each of the four sections (Child Find, Evaluation/Reevaluation, IEP, and Procedural Safeguards/Parental Participation) in the draft Summary of Findings (SOF) report.
3. Based on the review of all data, the team determines the overall implementation of systems of the PEA for each of the four sections. There are four options for each section: Substantial Evidence of Effective Systems, Inconsistent Evidence of Effective Systems, Minimal Evidence of Effective Systems, or No Evidence of Effective Systems. (See [End of Section Calls](#) for additional information)
4. The PEA and PSM teams reach an agreement on the areas of PEA strengths and concerns based on all data gathered. The strengths and concerns related to the special education program will be documented in the Written Notification of Findings (WNOF) letter sent to the PEA after the programmatic monitoring. The level of performance for the four sections in the draft SOF will also be noted in this letter.
5. The ADE/ESS monitoring application will generate a Corrective Action Plan (CAP) framework, where applicable. The PEA team, in collaboration with the PSM specialist, will develop a CAP that is unique to the PEA and that clearly outlines the activities and requirements necessary for the correction of noncompliance and the attainment of sustainability of systems. Discussion for

the CAP should clearly identify the systemic root cause leading to the noncompliance, solutions for the PEA to correct the systems issue(s) that led to the noncompliance, and internal verification that the PEA can implement to ensure the sustainability of systems.

On-Site Programmatic Monitoring File Selection

ADE/ESS will use a [statistical calculator](#) to determine the total number of student files to be selected. This total number will then be used in a representativeness tool to ensure a representative selection of student files.

Note: Total files reviewed may increase based on the number of eligible students/representativeness. File selection should include students who have been exited from special education and/or students initially evaluated and found to be not eligible.

Select representative student files based on the PEA student population. **This selection should include the following, as applicable:**

- Each school site, when possible
- Initial evaluations (Indicator 11)
- All disability categories
- All service delivery models within the PEA
- English learners (ELs)
- Students who are 16 years of age or older (Indicator 13)
- Students in dropout recovery programs
- Out-of-district placements (private day school and residential placement)
- Students phased out of special education services
- Students who have been suspended, have been expelled, or have moved to an IAES for longer than 10 days
- Students initially evaluated and found to be not eligible (Indicator 11)
- Preschool students, including those referred from early intervention (Indicator 12)

For [transportation-only districts](#), additional documentation can be found online.

[Return to Table of Contents](#)

State Systemic Improvement Plan (SSIP)

SSIP Identification and Purpose

Each PEA's risk analysis will be reviewed annually to provide recognition of improvements as well as further growth opportunities. During Year 3 of the 6-year monitoring cycle, each PEA's risk analysis results will be used to identify PEAs that have met the criteria for SSIP participation in monitoring years 4–6. Criteria for SSIP participation are as follows:

- PEA monitoring type of Self-Assessment
- PEA n-size for grade 3 is seven or more students in special education
- Grade 3 special education proficiency that meet either of the following criteria:
- PEA is below the grade 3 state-wide special education ELA proficiency average on the statewide assessment
- PEA is above the state-wide proficiency achievement gap average between general education proficiency and special education proficiency for the statewide ELA assessment

Regardless of their assigned monitoring year, PEAs that meet the SSIP criteria may be placed in year four and required to participate. The movement to year four of the monitoring cycle is based on a myriad of data, including, but not limited to, fluctuations in the Risk Analysis score, changes in student performance, specialist recommendation, identification and recommendation by other ADE units, and PEA request.

First, the results of the Risk Analysis must indicate that the PEA has risk along with a need in the area of English Language Arts (ELA) proficiency. Risk is determined using standard deviations from the average on the PEA Risk Analysis score. While the exact numbers should vary slightly from year to year, the formula used will remain the same. If the PEA's risk analysis score places them in the self-assessment monitoring type, and the PEA meets the SSIP criteria for grade levels and n-size, then English Language Arts (ELA) state assessment proficiency will be reviewed. PEAs that demonstrate reading proficiency below the state average for students with disabilities in grade 3 or demonstrate a gap in reading proficiency between special education and general education students that is above the state average, will be identified for SSP participation.

The purpose of the SSIP is to improve outcomes for students, specifically in ELA proficiency, targeting grades K–3. The State-Identified Measurable Result (SiMR) for Arizona is: By FFY 2025, targeted Public Education Agencies (PEAs) will increase the performance of SSIP students with disabilities in grade 3 on the English Language Arts (ELA) state assessment from 9.58% to 12.23%.

SSIP Participation

SSIP activities are implemented over three years with activities as follows:

Year 1 Participation

PEAs submit a needs assessment, action plan, literacy screener data, and survey data. PEAs are provided with feedback and technical assistance throughout the process by Program Support and Monitoring.

Year 2 Participation

PEAs update the needs assessment and action plan. PEAs submit literacy screener data, EBP walkthrough data, and survey data. PEAs are provided feedback and technical assistance on their SSIP plans as well as professional learning in the EBP process.

Year 3 Participation

PEAs update the needs assessment and action plan. PEAs submit literacy screener data, data analysis, and survey data. PEAs are provided with feedback and technical assistance throughout the process by Program Support and Monitoring.

PEAs identified for participation in the SSIP are also eligible to enter into a contract with the SEA to receive financial assistance with the implementation of activities outlined in the PEA SSIP action plan. PEAs must complete the contract and obtain approval prior to expending any funds they would expect to be reimbursed. Utilizing contract funds may accelerate the PEA's timelines for submission as outlined in the next section.

SSIP Activity Timeline

- SSIP is a three-year process that is part of the PEA's programmatic monitoring activities. As all SSIP PEAs are in Self-Assessment when they begin SSIP Year 1, the activity timeline for Year 1 SSIP PEAs has been embedded within the following resources:
 - The [Self-Assessment Timeline](#)
 - The [Self-Assessment Tracking Form](#)

- In Year 2 and Year 3, SSIP PEAs receive their own tracking forms to guide submission of activities:
 - [SSIP Year 2 Tracking Form](#)
 - [SSIP Year 3 Tracking Form](#)

SSIP Activities and Resources

Below, links have been provided directly to SSIP Activities. While SSIP PEAs use the blank forms on the first submission, that same form is then used for all subsequent SSIP submissions. Doing so allows for fewer documents throughout the process, and for both the PEA and SEA to see the data through a lens of progress. A link to the SSIP web page has been provided for general access to all activity support materials.

[SSIP Web page](#)

[Return to Table of Contents](#)
