



Supporting and Reporting Coordinated Early Intervening Services (CEIS)

CASE NASDSE CONFERENCE – MILWAUKEE, WI
TUESDAY, SEPTEMBER 27, 2016

Chris Thacker, IDC

Jana Rosborough, NCSI

Rachel Zellmer, WI Department of Public Instruction

Agenda

- Introductions
- Objectives
 - *How to implement CEIS as part of Multi-Tier System of Support (MTSS) and Research to Intervention (RTI)*
 - *Impact of CEIS on Disproportionality*
- Defining CEIS
- Review Program Requirements
- Impact of the New Proposed Rule Making (NPRM) on CEIS
- State Presentation (Wisconsin)
- Questions

Defining Coordinated Early Intervening Services (CEIS)

- CEIS is the coordination of interventions and services provided to students who need additional academic or behavioral support to succeed in general education.
- CEIS are services that are scientifically based and supported through IDEA funds.

Currently, CEIS may only be provided to students without a disability who are in grades K through 12. However, the NPRM would remove these restrictions.

CEIS IS...	CEIS is NOT...
... described as various services provided to students at risk of being identified for special education in hopes of overcoming the need to refer or identify them with a disability.	... the same thing as <i>early intervention services</i> as described in <i>Part C</i> of <i>IDEA</i> for infants and toddlers from birth through age 2.
... a funding source.	... a specific program or curriculum defined by <i>IDEA</i> .

Program Requirements for CEIS

- CEIS may be required or implemented voluntarily.
 - LEAs with significant disproportionality are required.
 - Other LEAs may implement voluntarily.
- Amount of IDEA funds reserved for CEIS
 - If required, an LEA **must** set aside 15 percent of its combined IDEA Sections 611 and 619 allocations.
 - If voluntary, an LEA **may** use up to 15 percent of IDEA 611 and 619 allocations.
- Use of funds
 - Professional development to enable personnel to deliver scientifically based academic and behavioral interventions
 - Providing educational and behavioral evaluations, services, and supports

CEIS: Key Concept



Funds provided to LEAs under Part B of the IDEA must be used to supplement state, local, and other federal funds and not to supplant those funds.

Program Requirements for CEIS *(Continued)*

- States may require
 - Program narratives describing how the LEA plans to operate its CEIS program
 - Budgets detailing how the LEA plans to spend the funds
 - Financial reporting tracking expenditures for life of funds
- Tracking of students/services
 - LEAs must report annually the number of students who received services.
 - Students must be tracked over the following 2 school years to determine if the student was identified under IDEA.

CEIS: Key Concept



Accounting requirements:

- Identify % and \$ set aside for CEIS
- Identify # of student participants
- Identify # of participants who later qualified for special education
- Report due annually

Program Requirements for CEIS *(Continued)*

- Are the allowable costs different for an LEA that is required to implement CEIS compared to an LEA that voluntarily implements CEIS?
 - **Yes.** An LEA with significant disproportionality is required to provide CEIS to serve children, particularly, but not exclusively, in those groups that were significantly over identified.
 - An LEA that voluntarily decides to spend a portion of its IDEA allocation to implement CEIS does not have this requirement as there are no children who were significantly over identified.

Impact of the New Proposed Rule Making (NPRM) on CEIS

The NPRM proposes that:

- States must use a Risk Ratio method for calculating Significant Disproportionality.
- States must use a minimum N size of 10 when calculating Significant Disproportionality.
- CEIS funds may be used for all students, including students with and without disabilities.
- CEIS funds may be used for pre-school students in addition to children in grades K through 12.

CEIS: Maximizing Opportunities

Four Strategies

- Strategy 1: Clear Guidance Aligned to Activities
- Strategy 2: Eliminate Barrier to Opportunities
- Strategy 3: Focus on Aligning Spending to Needs
- Strategy 4: Compliance to Incentivize Positive Child Outcomes

Junge, M., & Krvaric, S. (2016). *Using federal education formula funds for school turnaround initiatives: Opportunities for state education agencies*. San Francisco: WestEd.

CEIS: Maximizing Opportunities *(Continued)*

Key Points to Maximize Opportunity:

- Guidance should be aligned to action.
- Districts have access to guidance on many requirements that apply to federal formula programs, but there is surprisingly little information about what districts can spend federal funding money on.
 - **Pro:** *This lack of direction on expenditure of funds allows for district flexibility in determining how to best meet the needs of its students aligned with the program's intent.*
 - **Con:** *This lack of direction makes districts, and SEAs, very reluctant to take advantage of potential flexibilities in use of funds. Auditor fear.*

Junge, M., & Krvaric, S. (2016). *Using federal education formula funds for school turnaround initiatives: Opportunities for state education agencies.* San Francisco: WestEd.

CEIS: Maximizing Opportunities *(Continued)*

Key Points When You Encounter Opportunities:

- **Is it prohibited?** Often, the way things are done is grounded in the belief things are not permitted by federal law, rather than the law itself.
- **Where does this program fit?** Often, initiatives are administered on a federal funding stream (program by program) basis, rather than by outcome.
- **What is required?** Significant time, money, and people are devoted to federal compliance requirements at every level (state, district, local) without evaluation of where opportunities for consolidation may exist.

Council of Chief State School Officers and Federal Education Law Group, PLLC. (2013, November). *Maximizing federal education funds for student achievement: A toolkit for state seeking to enhance flexibility and reduce burden*. <http://www.ccsso.org/Documents/2013/CCSSO%20Toolkit%20on%20Maximizing%20Funds.pdf>.

CEIS: Maximizing Opportunities *(Continued)*

Key Points When You Identify a Need:

- Federal grant programs promote alignment between needs and spending in two primary ways:
 - (1) needs assessments (not all programs require this); and
 - (2) by requiring funds to be spent in a “necessary and reasonable” way (all programs require this).

Junge, M., & Krvaric, S. (2016). *Using federal education formula funds for school turnaround initiatives: Opportunities for state education agencies*. San Francisco: WestEd.

- Leveraging opportunities

CEIS: Maximizing Opportunities *(Continued)*

Key Points in Leveraging Compliance for Child Outcomes:

- Ensuring compliance with federal requirements is a critical SEA responsibility.
- Compliance is also a way to begin a dialogue with districts and schools about student performance.
- Receipt of federal funds provides cross-program leveraging to move beyond asking if money was expended according to the federal allocation rules to was money expended according to the federal allocation rules resulting in improved child outcomes (e.g., giving money to build a battleship and keep building a sailboat).

Wisconsin Implementation of CEIS

Rachel Zellmer

Federal Fiscal Monitoring Consultant

Special Education Team

WI - Dept of Public Instruction

Wisconsin CEIS Initial Stages

Full Implementation in 2008–09

- Viewed this as an opportunity to support best practice for all LEAs, not just **LEAs** identified as significantly disproportionate
- Updated our application software to accommodate a set aside for CEIS
- Created and disseminated technical assistance on how the funds under CEIS could be spent
- Focused on a positive message that funding these activities would affect success for **all** students

440 LEAs in Wisconsin

Fiscal Year	Voluntarily Set Aside 15% for CEIS Activities	Required to Set Aside 15% for CEIS Activities
2008–09	77	31
2009–10	70	2
2010–11	67	5
2011–12	92	5
2012–13	95	6
2013–14	103	8
2014–15	104	8
2015–16	108	6






Messaging Beyond the Regulations

- Multi-level systems of support is designed for all students with a focus on achieving higher levels of academic and behavioral success through high-quality instruction, continuous review of student progress, and collaboration.
- CEIS is a funding source to support pieces of this system with a caveat that it cannot be spent on activities for students with disabilities.

Major Components of RtI

Universal Screening	Interventions	Progress Monitoring	Professional Development
<ul style="list-style-type: none"> • Not random selection - must be “data-based” • Students may be at risk academically or because of behavior • No CEIS 	<ul style="list-style-type: none"> • Additional services & supports ABOVE the core • Not differentiated instruction • Fidelity • Yes CEIS 	<ul style="list-style-type: none"> • Data collected on student response to intervention • Monitoring is frequent • Data drives future support • Yes CEIS 	<ul style="list-style-type: none"> • Staff need training to implement properly • Some CEIS **

CEIS “Allowables”

Allowed	Not Allowed	Budget Item / Activity
		AFTER SCHOOL / SUMMER PROGRAMMING: CEIS funds may be used to provide academic and behavioral interventions after school and during the summer. CEIS funds may not be used for after school or summer school programming open to all students. CEIS is intended for students determined to need additional academic and behavioral supports to succeed in general education but who have not been identified as students with disabilities.
		ALTERNATIVE EDUCATION: CEIS funds may not be used for alternative or at-risk programming that <i>replaces</i> universal/core programming. CEIS funds may be used only in programming that provides interventions in <i>addition</i> to universal/core programming.
		AT-RISK PROGRAMMING: CEIS funds may not be used for alternative or at-risk programming that <i>replaces</i> universal/core programming. CEIS funds may be used only in programming that provides interventions in <i>addition</i> to universal/core programming.
		BUS, VAN or OTHER STUDENT TRANSPORTATION COSTS: Not allowed.
		COACHES: A district may hire or contract with individuals or organizations for mentoring / coaching services to help carry out activities funded by CEIS. A mentor or coach, unless appropriately licensed, may not provide instruction to students. Mentors and coaches may support, reinforce, or follow-up on instruction provided by and under the supervision of an appropriately licensed general education teacher. See also “Supervision” in the Information section.

Wisconsin LEAs have the option to reserve up to 15% of their Part B funds in the application.

CEIS

Calculation	Maximum	CEIS Reservation
2016-2017: Not Significantly Disproportionate		
2015-2016: Not Significantly Disproportionate		
\$677,533.00 * 15 % =	\$101,629.95	<input type="text" value="\$73,500.00"/>
CEIS Carryover Available =	\$0.30	<input type="text" value="\$0.00"/>

Save

If the LEA was identified as significantly disproportionate, the set-aside amount would default to the required 15%.

Budgeting CEIS Funds in Wisconsin

- Amount reserved for CEIS is budgeted and claimed separately from the IDEA flow-through or preschool funds.

Personnel

Program Type:	Public School				
Position:	Teacher			Area:	Academic Support- Teachers
Position Activity:	Instructional Coach for Staff				
Function:	110000 - Undifferentiated Curriculum			Object:	200 - Employee Benefits
Salary:	\$40,000.00			Benefits:	\$25,000.00
General Ledger Account:					
Staff Name or Detailed Description:	Kayla Bowar				
Activity:	Activities to support the provision of Behavioral Interventions				

- Each expenditure is tied to an Activity Type: Reading, Math, Behavior, or Other Academic.

Wisconsin CEIS Narrative

- Answers based on Activity Types
- Questions cover:
 - Grade Focus
 - Projected Number of Students
 - Student Data Reporting
 - Screening
 - Interventions
 - Progress Monitoring

Student Reporting – What We Learned

CEIS only funds parts of an RtI system, and often there are not enough funds available to even fund a full FTE position.

Example: The LEA hires a reading specialist whose salary and benefits equal \$90,000. The maximum amount the LEA can set-aside under CEIS is \$45,000.

Question	Response
Identify the grades that will be directly affected by the use of CEIS funds under this activity (Behavior Interventions).	K-5
What is the projected number of students who will receive services and supports funded with CEIS under this activity?	25
Describe how students who will receive services and supports funded by CEIS will be tracked and how this information will be accurately reported in ISES (Wisconsin's individual student data collection system).	Students identified as needing behavioral intervention and/or supports will be supported by our behavior intervention specialist. She will conduct functional behavioral assessments and put behavior interventions into place for these students who are struggling. Their daily progress will be monitored through office discipline referral data, which are entered into and tracked via the Educlimber software.

Universal Screener

Question	Response
Although CEIS funds may not be used for universal screening, the LEA must have a process in place to identify the students who are struggling in order to provide them with services funded by CEIS. How will students be screened to determine if they need the services and supports under this activity?	Student behavioral progress will be monitored through daily office discipline referrals. Students who receive three or more major incident referrals will be targeted for tier 2 or 3 behavior intervention support.

If the LEA could not identify how the students will be screened for academic or behavioral interventions, we knew that they were not ready to use CEIS funds.

Universal Screening & Identified Districts

- For those LEAs that voluntarily chose to access CEIS set-aside funds, allowable costs were based on having a universal screening process in place.
- For LEAs identified as significantly disproportionate and required to set aside and spend CEIS funds, not having a universal screener in place posed logistical problems.
 - *This will be resolved with the proposed rules.*

Interventions

Question	Response
What supports and services, under this activity (behavioral interventions), will be provided directly to students identified? Supports and services must be provided 'above and beyond' the core curriculum received by all students.	Students struggling behaviorally will have a behavior intervention plan in place. These students may also participate in individual social skills/behavioral lessons and/or small SAIG groups.

Students who receive these interventions, in the grades identified, should be reported as having received services funded by CEIS.

Student Reporting – What We Learned

CEIS funds are only used for professional development
– *which students get counted?*

We have made it clear in our guidance that CEIS funds can be used solely for professional development, but as a ***support*** to academic or behavioral interventions being provided to students identified as struggling.

Progress Monitoring

Question	Response
What progress monitoring measures will be used to monitor students' response to the services and supports under this activity?	Daily office discipline referrals will be monitored through Educlimber.
How often will progress monitoring take place for these students?	Daily
How will results from progress monitoring be used to make decisions about a student's continued participation?	Once students reached their goal of achieving 80% or better on their behavior intervention plan for 4 consistent weeks, students will be gradually faded from their behavior intervention plan.

Student Progress – Reporting

- Wisconsin limits the student CEIS data collection to a simple “Yes” or “No” – we do not collect any information on what type of intervention, duration of intervention, or results of intervention.
- In the post-year student data submission, LEAs that spent CEIS funds are required to identify at least one student who received CEIS funded services.
- The SEA tracks those students through our own system to determine if the student is found eligible for special education in future years.

The Evolution of CEIS Funding in Wisconsin

- Strong, positive messaging about the flexibility of the CEIS set-aside option brought general education and special education administrators to the same table.
- The clear technical assistance and guided process (which is updated regularly) helps ensure compliance is met but also made it a well-known funding option for LEAs planning system changes.
- The quality of the CEIS budgets and narratives has increased dramatically with the growth of our Rtl Center and Multi-Level Systems of Support initiatives.

Impact of Notice of Proposed Rule Making

- Wisconsin's number of districts identified as significantly disproportionate will increase from 6 to approximately 200.
- Currently, all LEAs have the option of budgeting for any activity type (reading, math, etc.) and complete the same narrative. Based on the proposed rule, we are considering having identified LEAs complete a different CEIS narrative. We will also build any new monitoring requirements into the application system.

For More Information



Visit the IDC website

<http://ideadata.org/>



Contact the NCSI Fiscal Support Team

jrosbor@wested.org



Follow us on Twitter

<https://twitter.com/ideadatacenter>

The contents of this presentation were developed under grants from the U.S. Department of Education, #H373Y130002 and #H326R140006. However, the contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government.

Project Officers: Richelle Davis and Meredith Miceli

Project Officers: Perry Williams and Shedeh Hajghassemali

