



OKLAHOMA STATE DEPARTMENT OF EDUCATION
SPECIAL EDUCATION SERVICES
**CYCLICAL MONITORING
MANUAL**

2025



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Overview

States have a responsibility under federal law to have a system of general supervision to monitor the implementation of the Individuals with Disabilities Education Act (IDEA) of 2004 IDEA 34 C.F.R § 300.600. The purpose of Oklahoma's general supervision system is to supervise the implementation of IDEA by local education agencies (LEAs). Using this system, states are accountable for enforcing compliance and ensuring continuous improvement. This system is designed to: a) ensure compliance with federal and state regulations and b) improve services and results for students with disabilities. These correspond to the monitoring and results-based accountability elements of the General Supervision System in Oklahoma.

The Oklahoma General Supervision System (GSS) consists of eight components focused on improved outcomes for students with disabilities.

- State Performance Plan and Annual Performance Report
- Policies, Procedures & Effective Instruction
- Fiscal Management
- Effective Dispute Resolution
- Data on Processes and Results
- Integrated Monitoring Activities
- Targeted Technical Assistance and Professional Development
- Improvement, Corrections, Incentives & Sanctions

This graphic from the Office of Special Education Programs (OSEP) emphasizes the importance of improved outcomes for students as the center of our work. Improved student outcomes is the single priority of the OSDE-SES.



Integrated Monitoring Activities

The primary purpose of integrated monitoring activities is two-fold; investigation related to program improvement and investigation related to non-compliance. Integrated means that information is collected from all parts of the general supervision system (e.g., fiscal management, data on processes and results, effective dispute resolution), using multiple methods to identify strengths and areas of needed support for the improvement of the LEAs special education program. This informs the State of general and specific technical assistance and professional development needs that are designed to ultimately lead to program improvement.

The Oklahoma State Department of Education, Office of Special Education Services (OSDE-SES) provides a Differentiated Monitoring Cycle (DMC) to districts as part of its Results Driven Accountability (RDA) system for Individuals with Disabilities Education Act (IDEA), Part B. Under RDA, the State Education Agency (SEA) monitors for both compliance with IDEA requirements and improving results for children and youth with disabilities served under IDEA. OSDE-SES differentiates its approach for each district based on the district's unique strengths, challenges, and needs. Beginning in school year 25-26, districts will be monitored by OSDE-SES on a six-year cycle. In this cycle, the OSDE-SES will monitor all districts on their implementation of the IDEA. Throughout this monitoring cycle, the OSDE-SES will provide support and technical assistance that is differentiated based on the district's unique strengths, challenges, and needs.

The overarching goal of IDEA is to provide a free appropriate public education (FAPE) to all students with disabilities. The primary role of the OSDE-SES is to assist in building capacity at the district level to ensure compliance with appropriate and consistent implementation of the IDEA in every LEA in Oklahoma. Every effort must support improved student outcomes for students with disabilities. The Differentiated Monitoring Cycle Framework below will guide districts in the evaluation of special education programs and support the improvement of student outcomes.

Differentiated Monitoring Cycle (DMC) Framework to Support Improved Outcomes

If A District Has	Then	Then	Then	Intended Outcomes
An Effective System to Collect and Report Timely and Accurate Data	The District Collects and Reports Valid and Reliable Data That Are Timely Submitted to the OSDE	The District Analyzes Its Data for Strategic Planning and Allocation of Resources to Effect Change	The District Uses Data to Support Implementation of Strategies That Are Most Closely Aligned to Improved Outcomes	An Effective System to Collect and Report Timely and Accurate Data Will Contribute to Improved Outcomes for Children and Youth with Disabilities
An Effective Fiscal Management System	The District Has a Thorough Understanding of the IDEA Fiscal Requirements	The District Will Have Internal Controls in Place to Ensure Compliance with the IDEA Fiscal Requirements	The LEA Will Use IDEA Funds for Their Intended Purposes in a Manner that is Reasonable, Necessary, and Allocable to the IDEA	An Effective Fiscal Management System Will Contribute to Improved Outcomes for Children and Youth with Disabilities
An Effective Dispute Resolution System	Parents and Other Stakeholders Will Be Informed of Their Rights Under IDEA	District Programs Provide FAPE in the LRE to Eligible Children and Youth with Disabilities	The District Resolves Disputes About IDEA Procedures and the Provision of FAPE in the LRE at the Earliest and Lowest Level of Dispute Resolution	An Effective Dispute Resolution System Will Contribute to Improved Outcomes for Children and Youth with Disabilities
An Effective Compliance System	The District Effectively Implements the IDEA and the Oklahoma Special Education Policies and Procedures That Ensure the Provision of FAPE in the LRE	The District Develops and Relies on Its Written Procedures to Ensure IDEA Compliance	The District Develops and Implements Improvement Activities to Address Areas In need of Improvement and Noncompliance	An Effective Compliance System Will Contribute to Improved Outcomes for Children and Youth with Disabilities

An Effective Improvement System	The District Uses Data to Prioritize Areas Which Need Improvement	The District Provides Professional Development Offerings That Are Aligned To Those Areas In Need of Improvement	The District Prioritizes the Use and Implementation of Effective Instruction Including Evidence-Based Practices	An Effective Improvement System Will Contribute to Improved Outcomes for Children and Youth with Disabilities
An Effective Self-Monitoring System	The District Continuously Examines and Analyzes Data Across Multiple Sources to Evaluate Its Performance for Improved Results and Compliance	The District Identifies Noncompliance with Procedural and Programmatic Requirements and Makes Performance Improvements	The District Identifies Root Causes and Makes Programmatic Changes that Result in Positive Systemic Improvement	An Effective Self-Monitoring System Will Contribute to Improved Outcomes for Children and Youth with Disabilities

While the OSDE-SES also uses other methods of supervision, this manual focuses on the Differentiated Monitoring Cycle (DMC) process. The intent is to provide clarity to the local educational agencies (LEAs) as they prepare for the (DMC).

Understand the “Why”

Office of Special Education Programs (OSEP) issued an OSEP QA 23-01 document to assist states in meeting the general supervision responsibilities under Part B of the IDEA. According to the OSEP QA 23-01, Oklahoma’s Differentiated Monitoring Cycle aligns with the required Cyclical Monitoring process.

A11: How frequently should a State monitor its LEA providers?

Answer: A State should monitor all LEA providers within a reasonable period of time and at least once within a six-year period. However, where LEA provider data or other available information indicates an area of concern, a State should consider whether more frequent or targeted monitoring (i.e., a monitoring activity that occurs outside of the State’s normal cycle to address emerging or new issues and typically is limited in scope) is necessary. (See Selective Review and the [Differentiated Monitoring Results in the General Supervision Manual](#) for more information regarding how Oklahoma addresses areas of concern outside of the cyclical monitoring process.)

The Differentiated Monitoring Cyclical is designed to ensure each LEA, charter, inter-locals and co-ops, other public agencies (e.g., state schools for students with deafness and blindness and state and local juvenile and adult correctional facilities), and accredited private schools and facilities are afforded the opportunity to showcase the excellence in their special education

services and to work with the Oklahoma State Department of Education (OSDE), Special Education Services (SES) staff to develop and implement areas of needed improvement to ensure all students with disabilities are afforded a Free Appropriate Public Education (FAPE) to meet their unique individualized needs. All entities, listed above, that receive IDEA funds to support students with disabilities are placed into the differentiated monitoring cyclical process to receive a monitoring once in a six-year cycle. Due to the sheer number of entities that fall in a single cycle, each cycle will be divided into annual cohorts and quarters. The quarters align with the school calendar (i.e., July - September will be Quarter 1 of Cohort 1, October - December will be Quarter 2 of Cohort 1, etc...).

Phased Differentiated Monitoring Cycle

The Differentiated Monitoring Cycle will be divided into phases. The sections are Phase 1: Self-Monitoring Protocol and Procedure Templates, Phase 2: Document Submission, Phase 3: Monitoring & Engagement, Phase 4: Monitoring Report, and Phase 5: Follow up and Close Out. Each December the OSDE-SES will announce the next list of entities that fall within the announced cohort as well as which of the four quarters they will begin their cyclical monitoring process. The following January, the OSDE-SES will provide in-person professional development (PD). During this required PD, the OSDE-SES will provide the self-assessments/protocols, procedure templates, relevant tools, recommendations on managing the monitoring process, and information regarding the documents to be submitted.

Beginning in January, districts should review the provided protocol to engage in conversations regarding district self-monitoring. The district will also review the required district Policies and develop the required Procedure Templates. Two months prior to engagement, the entities will submit their required district Policies and Procedures. The OSDE-SES will use a rubric to review the document submissions and relevant data to identify the type of monitoring and supports. Within four weeks of the document submission, the entities will be notified of the district's assigned monitoring type and next steps.

Districts will be assigned to one of two types of monitoring, comprehensive or targeted. The comprehensive will be a review of the entire special education program. The comprehensive monitoring will review the following:

- Policies and procedures
- Fiscal to include (MOE, Excess Cost, Time and Effort, timely LEA Agreements and Assurances, budgets and claims, equipment disposition logs, IDEA purchased equipment marked)
- Student confidential record review (RED, parent consent if needed, MEEGS, IEP, written notices, meeting invitations, met eligibility and IEP timelines, IEP implementation, ECO Entry and Exits, secondary transition program, Sooner Start transitions, Child Find, etc...
- Discipline
- Seclusion and physical restraint

- Child Find
- Secondary transition
- Early Childhood Transition from SoonerStart
- Assessment (including Alternative Assessment)

The targeted monitoring will consist of one or more of the above items.

Notification and Monitoring Training

In December of each year, the OSDE-SES will announce the new cohort, and the quarter assigned for that cohort. The notification will be through a formal letter of notification. The letter of notification will also provide the date, time, location, and registration information for the required Kick Off Training.

The chart below provides a visual of one cohort year with the quarters and the activities.

Cohort 1:	Cohort/Quarter Announcement	Monitoring Training	Self-Monitoring Protocols	Document Submission
Quarter 1	December 2024	January 2025	January – May 2025	May 2025
Quarter 2	December 2024	January 2025	January – August 2025	August 2025
Quarter 3	December 2024	January 2025	January– November 2025	November 2025
Quarter 4	December 2024	January 2025	January 2025 – February 2026	February 2026
Cohort 1:	July-September 2025	October – December 2025	January – March 2026	April – June 2026
Quarter 1	Engagement	Correction Window Close Out		
Quarter 2	Document Submission	Engagement	Correction Window Close Out	
Quarter 3	Self-Monitoring Protocols	Document Submission	Engagement	Correction Window Close Out
Quarter 4	Self-Monitoring Protocols	Self-Monitoring Protocols	Document Submission	Engagement

Phase 1: Self-Monitoring Protocol & Procedure Templates

The Office of Special Education Services will provide initial training which will include information, tools, and guidance to assist districts in their preparation for monitoring. One such tool is the Self-Monitoring Protocol. The protocol is designed to facilitate the district team's review of a its strengths and identify areas for improvement. The protocol lays out a framework of applicable statutory and regulatory requirements along with questions for districts to consider regarding their implementation of the requirements. The protocol is neither intended as a questionnaire nor a form for districts to complete and submit. Rather, the protocol is intended to spark conversations whereby districts purposefully and systematically consider their implementation of IDEA and its regulations.

The protocol calls on districts to consider questions related to data, finance, dispute resolution, compliance, improvement, and monitoring. Districts should discuss each question and what implementation looks like in the district. It will be important for the team to take notes as they discuss the processes and practices of the district. These notes will be used to create the district's procedures that will be submitted in Phase 2.

Through this review process, it is vital the district recognize areas of strong policies and procedures and the areas the district needs to develop or update any policies and procedures.

Phase 2: Document Submission

Under 34 C.F.R. § 300.201, "The LEA, in providing for the education of children with disabilities within its jurisdiction, must have in effect policies, procedures, and programs that are consistent with the State policies and procedures established under §§ 300.101 through 300.163, and §§ 300.165 through 300.174". Policies are defined as local school board approved district policies that are required under IDEA or related to its implementation. Procedures are defined as a series of described actions a district will take to demonstrate how the district implements specific areas of IDEA and the Oklahoma State Policies and Procedures

Procedures ensure that districts know what is expected under IDEA and the Oklahoma Policies & Procedures and that it has a method to appropriately implement the IDEA. Procedures are crucial for consistent implementation across the district and as staff come and go from the district. OSDE-SES has created a series of procedure templates in alignment with the protocol from Phase 1 for districts to document their procedures on specific IDEA and State requirements in the areas of data, fiscal, dispute resolution, compliance, improvement, and monitoring. The compilation of these templates will result in the district's written procedures that will be submitted in this phase.

Two months prior to monitoring (based on the district's designated Cohort and Quarter), the district will submit the following documents:

District Policies (local board approved)

- Child Find
- Extended School Year
- Transfer
- FERPA
- Discipline

District Procedures (templates provided)

- Data (5)
- Fiscal (9)
- Dispute Resolution (5)
- Compliance (13)
- Improvement (5)
- Monitoring (8)

Gather all of the documents to be submitted and divide them into the seven categories: Policies, Data Procedures, Finance Procedures, Dispute Resolution Procedures, Compliance Procedures, Improvement Procedures, Monitoring Procedures. Scan all of the “policies” into a single document titled “policies” and upload them to the online IEP system, EdPlan, EdPlan>Tools>LEA Document Library>DMC. Next scan all the “data procedures” into a single document titled “data procedures” and upload it. Continue for all of the other categories. When all required documents have been uploaded, email the assigned DMC team specialist notifying the document submission is completed.

OSDE-SES will review the district’s submitted policies and procedures using a rubric (See Appendix 1 sample policy rubric and Appendix 2 sample procedure rubric) to score each one. Policies and Procedures receiving a score of 0 is indicative of a policy or procedure that is sufficient or serves as an exemplar. Policies and Procedures receiving a score of 1 is indicative of a policy or procedure that is insufficient and may indicate a need for further monitoring.

Using a rubric (see Appendix 3 sample trend data rubric), the OSDE-SES will review trends from 3 years of historical data in the areas of data, fiscal, dispute resolution, compliance, improvement, and monitoring to identify areas of district strengths and areas that may require additional monitoring. A score of 0 is indicative of meets targets/no concerns, a score of 1 indicates a decreasing concern, a score of 2 indicates in increasing concern. The results of high scoring areas of the rubric may indicate a need for further monitoring. Finally, information from the above three rubrics will flow to the Monitoring Determination Rubric which will be used to determine the strengths and needs of the LEA. The identified areas of needed support will be the focal point of the monitoring, resulting in either a Comprehensive or Targeted monitoring as described in the Differentiated Monitoring Cycle on page 6.

The LEAs will be notified, by letter, the date of engagement and the type of monitoring within 4 weeks after the document submission. The letter of notification will provide the type and/or targeted areas of monitoring for the district. The district will also be provided guidance regarding the next steps in the process.

Phase 3: Monitoring & Engagement

Monitoring & Engagement may occur in-person, virtual, or in combination. The engagement activities may occur over several days to ensure a complete understanding of the district's special education program. Monitoring & Engagement will include some level of student file monitoring most closely related to any areas of identified challenge or need. It may include interviews with staff and/or parents, IEP implementation/tracking, and a comprehensive review of the entire special education program or a specifically targeted area(s) of the program.

Confidential Student Record Audit

Districts will use two levels of staff to conduct an audit of confidential student special education records. The special education director will have access to the randomly selected and assigned student records through the online IEP system, EdPlan. The director will then assign the IEP teacher of record or coordinator monitoring access to these student records. The IEP teacher of record or coordinator will review the file and attach the most current documents requested in the focus area. The documents that may be requested as attachments include the IEP, review of existing data (RED), parent consent if appropriate, MEEGS, as well as the meeting invitations and written notices for both the eligibility process and the annual IEP meeting. Make sure to also include all signature pages as well as the documentation with parent initials for providing procedural safeguards. The teacher will then answer all of the questions from the audit tool for all assigned student records. Upon completion, the same set of records will be reviewed by the special education director. Should the director be the only special education teacher, this person will complete both steps except for students with a primary disability of speech. The special education director will review the attached documents and the answers to the questions. Should the director question any of the teacher's responses, the director can send the file back to the teacher for clarification. Once the director has completed a review of all student records, the director will submit all records at once to the OSDE-SES. For additional information and guidance in using this student file monitoring program, a guide is located on the [OSDE-SES website](#).

IEP Implementation Tracking

IEP Implementation Tracking monitoring is meant to ensure that the district is providing the services outlined in the IEP. This review also ensures district IEPs are developed meaningfully and are calculated to enable a student with a disability to make appropriate academic, social/emotional, and behavior growth. This will be accomplished by reviewing confidential documents and tracking some students to ensure the IEP is implemented as written and progress data demonstrates growth. A list of students will be provided on the day of engagement.

Staff and/or Parent Interviews

Staff and/or parent interviews assist in reviewing district practices and determine if any gaps in policies and procedures exist in the district operations. Staff and parent interviews will align to the type of monitoring identified in the Letter of Notification - Phase 2 letter. Staff may include special education director, special education coordinators, building principals, counselors, special education teachers, general education teachers, related service staff, health plan coordinator or nurse, contract staff, paraprofessionals, and school psychologists.

Special Education Program or Specific Targeted Program Reviews

Special education program review is intended to identify strengths to celebrate and areas in need of additional support for program improvement. The comprehensive monitoring will consist of a review of all policies, procedures, district data, fiscal, and evidence of compliance and improvement, as well as the implementation of special education and related services for students with disabilities. Targeted monitoring will consist of a focus on one or more areas identified as needing further understanding.

Phase 4: Monitoring Report

Upon completion of the monitoring and engagement, the OSDE-SES will prepare a report within 60 days of the end of the engagement period.

Monitoring Report

The Differentiated Monitoring Cycle (DMC) Report will provide a summary of the monitoring results which will include the following determinations: Meets Requirements with Commendations, Meets Requirements, Meets Requirements with Recommendations, Noncompliant with Action Required.

Corrective Action Plan (CAP)

For any areas with written findings of noncompliance, the OSDE-SES will issue a Corrective Action Plan (CAP). The CAP will include directives with specified timelines for correction. All corrections must include student-level file corrections (Prong I) and subsequent random sampling of newly created documents to ensure systemic level corrections (Prong II) have been made.

The CAP will be monitored for correction and completion by the DMC team specialist. Under 34 C.F.R. § 300.600(e) all corrections must be made as soon as possible, and in no case later than one year. Any noncompliance not corrected within one year may be subject to further corrective action and sanctions and will be found in long-standing noncompliance which will affect the district's next determination.

Phase 5: Follow Up & Close Out

Under 34 C.F.R. § 300.600(e) the State must ensure that when it identifies noncompliance with the requirements of IDEA by LEAs, the noncompliance is corrected as soon as possible and in no case later than one year after the State's identification of the noncompliance. The final steps of the Differentiated Monitoring Cycle (DMC) include completion of the Corrective Action Plan (CAP) (Prong I), systemic compliance review (Prong II), and notification of completion.

Corrective Action Plan Monitoring and Completion

The CAP will be monitored for the timely completion of the directives outlined in the CAP by the DMC team specialist. The district should assign one staff person who will be responsible for ensuring the district meets the requirements and timelines for student-level corrections (Prong I) and any other directives of the CAP.

Prior to the one-year anniversary date of the letter of findings, the OSDE-SES will select new student level records aligned to the identified noncompliance to ensure the records demonstrate systemic compliance (Prong II).

Under 34 C.F.R. § 300.600(e) all corrections must be made as soon as possible, and in no case later than one year. Any noncompliance (Prong I and Prong II) not corrected within one year may be subject to further corrective action and sanctions and will be issued in long-standing noncompliance which will affect the district's next determination.

Differentiated Monitoring Cycle Closure

At the end of the Differentiated Monitoring Cycle when the district has satisfactorily met the requirements of the CAP and systemic compliance review, the district will be notified by letter that the DMC is complete and is officially closed.

Appendix:

I: Policy rubric

Policy Rubric		Insufficient = 1 Does not have a written policy, or has not been updated since the last reauthorization of IDEA (2004), or is discriminatory against students with disabilities, or is not in alignment with IDEA and Oklahoma Policies and Procedures	Sufficient = 0 Has a written policy, and has been updated since the last reauthorization of IDEA (2004), and is not discriminatory against students with disabilities, and is in alignment with IDEA and Oklahoma Policies and Procedures	Exemplar = 0 Has a written policy, has been updated in the last 5 or 10 years, is especially supportive of students with disabilities and is in alignment with IDEA and Oklahoma Policies and Procedures.
1	Child find			
2	ESY			
3	Discipline			
4	Transfer			
5	FERPA			

II: Procedure rubric

Procedures Rubric		Insufficient = 1 Does not sufficiently describe the district's procedure and/or does not describe how and who is responsible and/or is not in alignment with IDEA and Oklahoma Policies and Procedures	Sufficient = 0 Sufficiently describes the district's procedure including how and who is responsible and is in alignment with IDEA and Oklahoma Policies and Procedures	Exemplar = 0 Describes the district's procedure in great detail or provides additional links describing when, how, and who is responsible, and is in alignment with IDEA and Oklahoma Policies and Procedures	Score
Data					
1	Collected & Reported				
2	Accurate & Timely				
3	Validation				
4	Review of Data				
5	Use of Reports				
Total					0
Finance					
1a	Assurances & LEA Agreement				
1					
b	Budget & Close Out				
1c	Claims Submission				
1					
d	Contracts				
2a	Equipment Management				
2					
b	Labeling & Disposal				
3	Time & Effort				
4	MOE				
5	Excess Cost				
6	Proportionate Share				
7	Annual Audit				
Total					0
Dispute Resolution					
1	Effective Communication				
2	Procedural Safeguards				
3	Informing Parents of DR Options				
4	Communication with SERC/SES				

5	Corrective Action Plan				
Total					0

Compliance					
1	Child find				
2	Caseload/Class Size				
3	OAAP Participation				
4	MD				
5	IEE				
6	ESY				
7	Restraint & Seclusion				
8	Shortened Day/Week				
9	Surrogate Parents				
10	Private School Consultation				
11	Discipline				
12	Noncompliance cause/prevention				
Total					0
Improvement					
1	Data to Improve				
2	Self-Monitoring				
3	MTSS				
4	EBP				
5	PD				
Total					0
Monitoring					
1	Internal Monitoring				
2	Eligibility				
3	IEP				
4	Services Provided				
5	Written Notice				
6	Correction of Noncompliance				
7	New Staff				
8	Identifying Trends				
Total					0

III: Trend Data rubric

Implementation Area	21-22	22-23	23-24	Target	Increasing Concern =2 Decreasing Concern =1 Met Target/No Concern =0
Data Management					
Child Count Timely				Y	0
End of Year Timely				Y	2
Fiscal Management					
Fiscal MOE				Met	0
Fiscal Excess Cost				Met	0
Fiscal Budget Application Timely				Y	
Assurances & LEA Agreements Timely				Y	0
State Aid Special Education Weights				minimal change <10%	
Dispute Resolution					
IEP Facilitation				%	
Mediation				%	
State Complaint with Findings				0-2	
Due Process with Findings				0-2	
Sustaining Compliance					
Discipline (Removals)				No Target? Increasing or decreasing	
Corporal Punishment				0	
Indicator 4b Discipline				State	
Indicator 9 SigDis Placement				State	
Indicator 10 SigDis Identification				State	
Indicator 11 Child Find				State	
Indicator 12 EC Transition				State	
Indicator 13 Secondary Transition				State	
Sustaining Improvement					
Indicator 1 Graduation				State	
Indicator 2 Drop Out				State	

Indicator 3 Assessment - Reading 3				State	
Indicator 3 Assessment - Reading 4				State	
Indicator 3 Assessment - Reading 5				State	
Indicator 3 Assessment - Reading 6				State	
Indicator 3 Assessment - Reading 7				State	
Indicator 3 Assessment - Reading 8				State	
Indicator 3 Assessment - Reading 11				State	
Indicator 3 Assessment-Math 3				State	
Indicator 3 Assessment-Math 4				State	
Indicator 3 Assessment-Math 5				State	
Indicator 3 Assessment-Math 6				State	
Indicator 3 Assessment-Math 7				State	
Indicator 3 Assessment-Math 8				State	
Indicator 3 Assessment-Math 11				State	
Indicator 7 ECO A1				State	
Indicator 7 ECO B1				State	
Indicator 7 ECO C1				State	
Integrated Monitoring					
DMR Status				1	
Prong 1 Timely				Y	
Prong 2 Timely				Y	
Significant Disproportionality (identified only, not at risk)				N	
1% OAAP Participation				1%	
Caseload Class Size Exceptions				0	

Indicator 5a Educational Environments					
Indicator 5b Educational Environments					
Indicator 5c Educational Environments				State	
Selective Reviews with Findings				0-2	
Seclusion & Restraint				0	