

ESEA Program Monitoring

Process and Protocols

Unit of Federal Programs

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INTRODUCTION

Monitoring the use of funds and program implementation under the Elementary and Secondary Education Act (ESEA) is an essential function of the Colorado Department of Education's (CDE) Unit of Federal Programs Administration (UFPA). ESEA has tremendous potential to improve the public education of historically underserved students through the following programs:

- Title I, Part A, Improving the Academic Achievement of the Disadvantaged
- Title I, Part D, Prevention and Intervention Programs for Children and Youth Who are Neglected, Delinquent
- Title II, Part A, Supporting Effective Instruction
- Title III, Part A, English Language Acquisition, Language Enhancement, and Academic Achievement Act
- Title IV, Part A, Student Support and Academic Enrichment Grants
- Title V, Part B, Rural Education Initiative

ESEA was reauthorized as the Every Student Succeeds Act (ESSA) in December 2015, replacing the No Child Left Behind (NCLB) Act and allowing State Educational Agencies (SEAs) and Local Educational Agencies (LEAs) more flexibility and discretion in designing and implementing programs that have been shown to improve student outcomes. ESSA requires that SEAs and LEAs monitor and evaluate these programs' impact to ensure that all students, particularly those from historically underserved groups, have equitable access to a high quality education.

PURPOSE

Monitoring of ESEA programs is conducted in order to ensure:

- (1) All children have a fair, equitable, and significant opportunity to obtain a high-quality education, with a focus on access and opportunity for historically underserved students;
- (2) Compliance with ESEA requirements and open opportunities to increase ESEA program impacts on improving student outcomes; and
- (3) Taxpayer dollars are administered and used in accordance with how Congress and the United States Department of Education (ED) intended.

A fundamental purpose of monitoring is to assess the extent to which LEAs lead and guide their schools in implementing policies and procedures that comply with Titles IA, ID, IIA, IIIA, IVA, and VB statutes and regulations.

The non-Federal entity must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved. 2 CFR Part 200.328

Monitoring also formalizes the integral relationship between CDE and Colorado LEAs in implementing ESEA programs. It emphasizes, first and foremost, accountability for using resources to educate and prepare the nation's students. A set of clear monitoring indicators clarifies for LEAs and CDE monitoring personnel the critical components of this accountability and provides a standard against which LEA policies and procedures can be measured. Monitoring enables CDE to gather accurate data about LEA and local needs, and use that data to design technical assistance initiatives and leadership activities. Thus, monitoring serves as a vehicle to help LEAs achieve high-quality implementation of educational programs and enable CDE to better advise and partner with LEAs in that effort.

CDE's vision for monitoring is to help build school district and BOCES awareness of the requirements associated with accepting federal funds, capacity to self-assess against the requirements of the grants, and understanding of how they can best utilize grant funding to improve services for students. Monitoring is an opportunity to identify LEAs' technical assistance and support needs and leverage Federal funds in support of better outcomes for all students.

With this in mind, CDE has designed the ESEA monitoring system to accomplish the following objectives:

- Focus on What Matters by ensuring LEAs are making progress toward increased student achievement and improved quality of instruction for all students through implementation of Federal programs;
- **Reduce Burden on LEAs** by combining and streamlining monitoring protocols for all ESEA programs and prioritizing LEAs selected to participate in the process based on a set of performance, fiscal, programmatic, and administrative selection criteria;
- Improve Communication with LEAs by strengthening their constructive partnerships with CDE through continuous feedback and assessment of the CDE monitoring resources, process, and system;
- Differentiate and Customize Support for LEAs by using the monitoring system to identify technical assistance to support LEA needs as well as areas in which LEAs are making progress and can serve as a model or resource for other LEAs; and
- **Determine Whether Basic ESEA Requirements Are Met** by reviewing program and fiscal requirements, to safeguard public funds from waste, fraud, and abuse.

PROTOCOL

The responsibility for monitoring resides with CDE, mandated by ESEA statute and Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards regulations, primarily to assess program implementation. CDE has worked with the ESSA Monitoring Stakeholders Workgroup, the ESSA Committee of Practitioners (CoP), and Regional Network Meeting attendees to synthesize ESSA program requirements into a meaningful and manageable collection of requirements. Based on work with these stakeholders, ESSA program requirements have been divided into four main categories:

- Fiscal requirements (reviews to be conducted collaboratively by CDE's Federal Programs and Exceptional Student Services Units¹)
- Meaningful Stakeholder Engagement and Partnership
- Identification and Delivery of Services
- Evaluation of Program Impact

In addition to the ESSA program requirements and the indicators that will determine compliance with those requirements, CDE, in collaboration with stakeholders, created a tool for evaluating compliance, which includes examples of evidence that LEAs may use to demonstrate compliance with each requirement. The list of acceptable evidence is not exhaustive; LEAs may choose to demonstrate compliance based on other processes or documents that specifically pertain to them. Also worth noting, some evidence may be used to demonstrate compliance with more than one requirement. Indicators that have been prioritized based on stakeholder input, and examples of acceptable evidence, have been delineated in the ESSA Program Requirements Rubric (see tab 1).

Performance criteria determine the LEA's level of review, which in turn guides monitoring activities. All reviews include universal activities and some include targeted and intensive monitoring activities. Monitoring begins with the consolidated application review process and provides an opportunity to support, collect, and evaluate information LEAs provide to show compliance with program requirements. The following sections describe review levels and review elements associated with each level.

Tier 1 (Universal) Reviews

Universal activities include standard procedures required of all LEAs operating ESEA programs and additional evidence submitted through the online data management system (see System section in this document). Oversight activities include data collections, review of the ESEA Consolidated Application for funds, tracking of ESEA funds drawdowns, fiscal

¹ Due to the overlap in federal fiscal requirements, ESSA, IDEA and Grants Fiscal will use the same indicators and evidence to determine compliance whenever possible. In order to reduce burden on LEAs and align monitoring practices, these CDE units will be jointly collecting, reviewing, and assessing compliance on crosscutting uniform fiscal requirements. LEAs will submit fiscal evidence only once to meet corresponding ESSA and IDEA requirements.

requirements checks, and HR documentation and reports. Technical assistance opportunities include the program evaluation webinar series, ESEA Regional and Virtual Network Meetings, Consolidated Application trainings, an annual conference for all ESEA practitioners, and responses to specific LEA inquiries.

Universal program review and support activities provide a basic level of oversight of all LEAs receiving Federal funds, to determine compliance with basic program requirements and build understanding of ESEA program requirements. Providing this universal oversight through standard procedures and existing technical assistance opportunities facilitates the provision of necessary oversight and support, while reducing unnecessary burden of comprehensive program and fiscal audits that took place in the past.

As specified in Colorado's ESSA State Plan and approved by ED, all LEAs will participate in universal monitoring, which relies upon existing CDE processes and systems (e.g., Consolidated Application, Unified Improvement Plans, data collections) to determine compliance on a selection of indicators from each indicator category. Some indicators will require submission of additional evidence/information via an online system (see Process section of this document) as part of the desk review. When there is sufficient evidence to determine LEA compliance on universal indicators, LEAs will receive notice of such compliance. However, if existing processes do not comply with ESSA requirements, CDE will follow up with the LEA to obtain additional information/evidence and clarification or request a follow-up monitoring visit the subsequent year, depending on the results of the desk review. If further evidence of compliance in future reviews. In an effort to continue to build capacity to ensure implementation of effective programs under ESSA, results of universal reviews will inform guidance and training development and delivery in subsequent years. CDE will identify and disseminate any exemplary practices noted during the universal review process.

Selection Criteria for Universal Review

All LEAs that accept ESEA funds will be part of the universal review of information, data, and evidence submitted to CDE via various CDE processes and systems (e.g., the Consolidated Application, Unified Improvement Plan, data collections) and desk monitoring over a six year period.

Tier 2 Reviews

Tier 2 reviews support LEAs with potential risks or non-compliance issues identified during universal review to prevent or mitigate non-compliance. At the start of each school year, a limited number of LEAs will be selected for targeted review and follow-up, based on selection criteria below. CDE will notify LEAs selected for Tier 2 monitoring, which consists of desk and onsite review. CDE will desk review all evidence and information submitted through universal processes, and any additional evidence provided prior to the site visit. CDE will collaborate with LEAs to schedule and plan onsite visits to ensure efficient and effective monitoring processes. For additional information about onsite planning, see Process section below. If either further evidence of compliance or corrective action are necessary, CDE will build the timeline and plans for LEA follow-up and follow-through with the LEA and provide technical support until compliance can be achieved.

Tier 2 reviews, which involve in-person monitoring, allow more direct assessment of the degree to which districts have met and implemented ESEA requirements than desk reviews. Onsite monitoring is important; no other process allows program consultants to assess the fidelity of implementation of approved plans and procedures directly. Onsite reviews, while an important information-gathering method, also are more labor- and time-intensive for both the LEA and CDE. However, through the use of the selection criteria, and desk reviews, CDE works to reduce this burden. Every effort is made to collect the necessary compliance evidence through desk review prior to the onsite visit.

Selection Criteria for Tier 2 Review

CDE has developed selection criteria to inform the level of participation and support LEAs will receive throughout the monitoring process. These selection criteria are informed by data currently available to CDE. The selection criteria will be applied to all LEAs each summer to determine which LEAs will undergo Tier 2 reviews during the subsequent school year. CDE will notify selected LEAs and collaborate with them to develop a schedule and plans. Selection criteria include:

- Fiscal:
 - o Date of last monitoring visit
 - o Turnover in district personnel
 - o Maintenance of Effort
 - o Audits and Corrective Actions
 - \ominus Size of the Award
 - o Reverting Funds/Excess Carryover
 - o Suspended/Terminated Grants
 - o Comparability
 - o Late Fiscal Reporting
- Accountability and program:
 - o Number and percentage of LEA's schools identified for support and improvement under ESSA
 - o Non-compliance with equitable distribution of services to non-public schools
 - o Inequitable distribution of teachers, based on CDE analyses
 - Non-compliance with supplement, not supplant provisions of Title I, Part A
 - Unauthorized delay in submittal of LEA's Consolidated Application (excludes late submissions based on system delays/deadline extensions awarded by CDE) and other required documents
 - Non-compliance with corrective action requests from universal indicators from the prior year desk review (first identification to occur in 2019-2020 based on spring 2019 desk review results)

Additionally, universal or desk monitoring results may warrant onsite visits to LEAs not identified using the selection criteria. LEAs identified as a result of desk reviews will be notified as soon as concerns have been identified, and CDE will collaborate with LEAs to schedule and plan onsite visits within six months of identification.

Tier 3 Reviews

Tier 3 reviews assist CDE in determining whether ESSA requirements are being implemented with fidelity and in a manner that will improve outcomes for students. CDE's focus is to support LEAs and schools in ensuring that the reasons school(s) were identified for support and improvement are being addressed, particularly schools that continue to be re-identified for three or more consecutive years, and that school(s) are making progress toward exiting improvement status. LEAs selected for Tier 3 review will partner with CDE to ensure that identified schools have the necessary tools, resources, and support to address the reasons for ESSA identification and that the LEA has appropriate processes in place to support implementation of selected evidence-based interventions (EBIs), strategies, and programs, and to monitor and evaluate their impact to determine if desired outcomes are being achieved.

LEAs that have high proportions of schools identified for ESSA support and improvement (visit CDE's website for <u>methods and criteria for ESSA identification</u>) will participate in a Tier 3 review. As part of the Tier 3 review process, CDE and LEAs will analyze data trends and root causes that contributed to school identification, the LEA's guidance and support to identified schools around improvement planning (visit CDE's website for <u>ESSA improvement planning</u> requirements), supports and services offered to identified schools, and how ESEA formula and competitive funds are used to improve outcomes for students in identified schools. One focus of Tier 3 reviews will be equitable distribution of resources to identified schools and ensuring that LEAs and schools with inequities are, or have a plan for, addressing identified resource inequities. How LEAs and schools have used local evaluation results to inform and adjust how evidence-based programs, services, strategies, or interventions are implemented to ameliorate the reasons for identification are also of interest.

At the beginning of each school year, 3-5 LEAs will be selected for Tier 3 review and follow-up during that school year, based on selection criteria delineated below. CDE will notify LEAs selected for Tier 3 reviews, which will consist of both desk and onsite monitoring. CDE will desk review all evidence and information submitted through universal processes, as well as any additional evidence provided prior to the site visit. Additionally, CDE will review the supports, interventions, or programs implemented at the school(s) or by the LEA. CDE will work collaboratively with the selected LEAs to schedule and plan onsite visits to ensure an efficient and effective process. For additional information about the onsite planning, see Process section below. If either further evidence of compliance or corrective action are necessary,

CDE will build the timeline and plans for follow-up and follow-through with the LEA and provide technical support until compliance can be achieved and schools progress towards exiting ESSA improvement status.

Selection Criteria for Tier 3 Review

LEAs that have more than three (3) schools and more than 10 percent of their schools identified for comprehensive (CS) or targeted (TS) support and improvement that have not participated in a Tier 3 review during the previous five years will participate in Tier 3 reviews.

PROCESS

CDE intends to collaborate with LEAs to customize the following processes to best meet the needs of LEAs that have been identified for participation in each type of review process. Therefore, this document outlines and describes the basic process that will be used to tailor and implement in consultation with the participating LEA(s).

Tier 1 (Universal) Reviews

A selection of indicators will be monitored annually; however, ESSA requirements related to *evaluation of impact* will be incorporated into the review process in 2020-2021. In 2019-2020, CDE will review all submitted materials to determine compliance with fiscal, stakeholder engagement and partnership, and identification and delivery of services requirements. Any concerns with compliance may trigger a Tier 2 review in the subsequent year(s).

In some cases, when a large number of LEA schools meet the criteria for monitoring related to a specific indicator, CDE may identify a sampling process and notify the district accordingly. An example of this relates to compliance with school-level parent involvement policies for Title I, Part A. Rather than collecting policies from all Title I schools in a large district, the district would submit the policies from a subset of schools identified by CDE. Another example would be submitting a few school-level reports to demonstrate how several notification requirements are met, instead of submitting copies of all parent notifications.

Finally, desk reviews may include phone conferences. This provides CDE with opportunities to clarify previously submitted evidence or discuss an LEA process, such as stakeholder engagement in developing the ESEA Consolidated Application. Information gathered in a phone conference may be considered as additional evidence in meeting compliance.

Examples of existing processes and systems that may be used in **2019-2020** and each subsequent year² for universal reviews:

- ESEA Consolidated Application including LEA plans, response to reviewer comments, and post-award revision documentation.
- Forms submitted to CDE, such as non-public school equitable services and supplement, not supplant forms.
- Data collections, such as EDFacts, Consolidated State Performance Report, data pipeline collections (Student October, End-of-Year, and HR collections), maintenance of effort, expenditure reports, and end-of-year grant reports.
- Data analyzed by CDE, such as accountability results (Performance Frameworks and ESSA identification), comparability, set-aside calculations.
- Unified Improvement Plans (UIPs), inclusive of CS improvement plans.

Additional evidence to be submitted as part of universal reviews in **2019-2020** and subsequent years³:

² On an annual basis, CDE will reflect upon and seek stakeholder input regarding the effectiveness and validity of using these systems and processes for monitoring purposes. As appropriate and when necessary, this document and the monitoring practices will be updated based on stakeholder input and evaluation of CDE's ability to determine compliance with the selected indicators and create pathways for implementation of effective practices.

³ These items may be adjusted or updated annually based upon evaluation of CDE's monitoring work and stakeholder input.

- LEA and school parent, family, and/or stakeholder engagement policies, including any communication plans and policies that describe how the LEA informs parents/communities of required elements and activities (see Meaningful Stakeholder Engagement and Partnership indicators (see tab 3).
- Parent notification letters.
- Link to LEA and school report cards.
- Link to LEA and school website where ESSA required information is posted.

Timeline ~ 2019-2020

At the beginning of each school year, all LEAs selected for Tier 1 review will receive notification of plans to review materials previously collected by CDE as part of the universal review, including the request for submittal of the above-referenced evidence to demonstrate compliance with fiscal and stakeholder engagement and partnership requirements. For **2019-2020**, notification of Tier 1 review plans and requests for information to be uploaded into the online system will be sent in September.

CDE will review submitted items and provide feedback on reviewed materials and status of compliance on each indicator within 45 days of review. CDE will collaborate with LEAs to build plans and timelines to make corrections or take corrective actions before an agreed upon deadline. Results of desk review may trigger an onsite review, in-person support, or ongoing consultation during subsequent year(s). CDE will disseminate any exemplary practices noted as part of the desk review during the subsequent year.

Tier 2 Reviews

CDE will work with identified LEAs to schedule and plan onsite visits in a manner that is efficient and effective for both. Planning processes will begin with a notification that outlines the number of CDE staff participants, the types of monitoring activities (onsite document reviews, interviews, focus groups, or school visits) requested, the number of days (or hours) needed for the site visit, and monitoring indicators that will be the focus. During initial conference calls and prior to the anticipated visit, CDE will work with LEAs to develop a schedule that outlines proposed times, needs, and other specifics. When applicable, CDE will work with LEAs to identify a primary contact, who will help coordinate and schedule the visit. LEA contacts and site visit teams will work together throughout the monitoring process. The LEA primary contact will draft the onsite agenda, including the schedule, content, and participating staff for all requested monitoring events and submit it to CDE four weeks prior to the visit. CDE will review and finalize the agenda in consultation with the LEA primary contact and share back with the LEA via Google Docs. All CDE and LEA participants will collaboratively design the agenda two weeks prior to the site visit. Any subsequent changes must be approved by both the LEA and CDE.

The duration of the onsite visit is proportional to the programs under review, number of indicators being monitored, and LEA size. In most cases, a CDE team of 5-6 will conduct the onsite visit in accordance with the collaboratively-developed agenda, during the agreed upon date(s). The visit may include onsite document reviews, interviews with key personnel, focus groups with families/parents, as well as district or school personnel, and visits to select schools. Full-scale site monitoring typically lasts 1-3 days. In some cases, a scaled down version might be appropriate and agreed upon by CDE and the LEA. Smaller scale visits may require only a half-day or one day for an integrated review. Smaller scale onsite reviews may involve a single CDE staff person, who may conduct a review of a small subset of indicators or focus on one area in need of review. In this case, the monitoring visit may require a minimal amount of time and a reduced interview, focus group, or school visit schedule. When smaller-scale monitoring can meet LEA needs, CDE will work with the LEA to scale back the time (days/hours) and effort (number of LEA participants in monitoring events). LEAs identified for smaller-scale onsite visits will receive full follow-up support and follow-through training and guidance.

During site visits, CDE staff will review documentation that was not available prior to the visit and interview LEA and school staff, principals, teachers, parents, and other stakeholders, individually or in groups, as needed. This multi-level interview strategy allows CDE program consultants to gather information from a variety of perspectives and better understand the administration and implementation of Federal programs at the LEA and school levels. School visits may include observations and walk-throughs to see practices in action. At the conclusion of an onsite review, the monitoring

team provides an oral debriefing to LEA leaders, providing the LEA an opportunity to get initial, immediate feedback from the monitoring team and identify any additional evidence in response to any concerns in a timely manner.

Sample Onsite Visit Schedule

Day 1	9:00-9:30 am	Entrance meeting
	9:30 - Noon	Meetings with ESEA Director and program staff
		Break for Lunch
	1:00 - 4:00	Continue meetings with ESEA Director and program staff
	4:00 - 5:00	CDE staff meets to organize data, debrief, and identify information gaps for follow-up the next
		day
Day 2	8:00 - 10:00	CDE Group A visits School A
		CDE Group B meets with fiscal grants management personnel responsible for oversight of ESEA
		grant
	12:00 - 2:00	CDE Group A visits School B
		CDE Group B continues meetings with fiscal grants management personnel responsible for
		oversight of ESEA grant
	2:00-3:00	CDE staff meets to develop content for exit meeting
	3:00 - 4:00	Exit meeting with LEA leadership

Tier 3 Reviews

Intensive reviews may consist of program effectiveness meetings with LEA/school personnel, review of additional evidence by desk or onsite monitoring, and request that LEA staff participate in trainings or supports offered by various CDE units (e.g., training offered by ESSU pertaining to services for students with disabilities) depending on reasons the LEA was selected for intensive review. CDE will work with LEAs to schedule and plan monitoring events such as onsite visits efficiently and effectively for both. The purpose of the monitoring event will be communicated to the LEA at least four weeks prior to the event. CDE and LEA staff will collaborate to build the plans and timeline for intensive monitoring events. An effort will be made to conduct intensive monitoring events in collaboration with other CDE offices and units in order to minimize burden on the LEA and coordinate CDE's visits, requests, and engagement with LEA staff.

Online System and Process for Submitting Requested Documents

In an effort to align processes and capitalize on the capacity of the LEAs to use existing CDE systems, UFPA will be collecting monitoring evidence in ESSU's online platform, the Data Management System (DMS). CDE has uploaded indicators into the DMS, created portals for submitting evidence, and developed training on how to use the DMS. DMS is a user-friendly system that allows collection, review, and provision of feedback on indicators within the system. DMS will also be used to generate and track monitoring-related communications. LEAs will have DMS access to upload evidence, review compliance status and feedback from CDE, and respond to requests for any additional information or evidence. DMS trainings will be provided prior to submission of any desk review items beyond those already submitted to CDE via other processes (e.g., Consolidated Application).

SEA Monitoring report

At all levels of review, CDE will provide a comprehensive LEA monitoring report to delineate LEA compliance, describe recommended next steps or effective practices based on best or promising practices implemented by other LEAs, and detail any findings and required actions that together provide an analysis of the implementation of Federal requirements. The report will be compiled, with input from the LEA, within 45 days of monitoring. A point contact from CDE will work with the LEA primary contact to seek input on the report. The report draft will be shared with the LEA after 30 days and the LEA will have five days to provide feedback or request any additional details. CDE will take LEA feedback into consideration when finalizing the report.

LEA Corrective Action Plan

Corrective action can vary based on the results of monitoring activities. When corrective action is required, CDE will partner with LEAs to design an action plan that is reasonable for the LEA to implement within an agreed upon timeline.

Upon receipt of the report, the LEA will have 45 days to respond to any required actions, unless otherwise noted, or request support from CDE to develop the action plan. LEAs that do not require additional support or time to develop the action plan will submit the corrective action plan to CDE 45 days after receipt of the monitoring report. If support is requested, the LEA and CDE will develop a timeline and action steps for finalizing the LEA Corrective Action Plan, not to exceed 60 days post-monitoring.

The corrective action plan must provide the timeline within which all actions will be completed. LEAs may work with CDE to establish a timeline that is reasonable for implementation and follow-through.

CDE will send a plan approval letter to the LEA within 30 business days of receipt of the finalized corrective action plan if the monitoring team determines the LEA's corrective action plan adequately addresses the required actions. If CDE determines the LEA's plan is not sufficient for compliance, the LEA will be notified of the consequences for failure to take corrective action and asked to provide additional corrective actions. Consequences for failure to take required actions may include CDE authority to apply conditions to current or future grant awards.

Follow-up to the Corrective Action Plan

CDE program consultants will monitor LEA progress toward fulfilling the identified corrective action plan, within the timeline stipulated. Program consultants will update the LEA's CDE-maintained monitoring portfolio to demonstrate compliance status, and include documents, memoranda, a copy of the monitoring report, and other supporting materials as needed. If necessary, CDE will follow-up during the next school year.

Report Analyses and Evaluation of the Monitoring Process

CDE analyzes the findings and recommendations from each monitoring function to more completely understand implementation trends statewide. These analyses help inform efforts to provide state and regional leadership activities and technical assistance to LEAs. Analyses also may be used to inform ED staff of local implementation efforts and share future policy decisions.

The compliance and implementation review process achieves CDE's monitoring objectives by focusing on indicators that matter, reducing the burden on LEAs to engage in lengthy monitoring processes, improving communication and resources between CDE and LEAs, differentiating and customizing LEA support, and ensuring that basic ESEA requirements are met. CDE will reflect on, seek stakeholder input regarding, and collect evidence to ensure effectiveness of the monitoring process annually. As areas needing improvement are identified based on evaluation results, stakeholders will be engaged to improve monitoring protocols and processes.

Monitoring Protocol Summary

CDE believes this differentiated monitoring structure will help both LEAs and CDE accomplish their goals. Compliance and implementation reviews will enable CDE to better understand LEA goals and challenges, as well as areas of success that can serve as exemplars or resources for others. The cross-program compliance and implementation review system will facilitate LEA discussions about how to better leverage resources to accomplish their goals and improve student achievement. CDE also expects to relieve LEA burden by identifying Federal requirements, regulations, and guidelines that currently obstruct efforts to support schools. CDE anticipates these new monitoring protocols will produce more efficient and productive conversations between LEAs and CDE and, in reducing unnecessary LEA burden, enable LEA staff to focus primarily on increasing student achievement and improving the quality of instruction for all students.