NCLB Monitoring System
2016-2017

Initial Compliance Analysis

Purpose: An ongoing self-analysis process focused on improving implementation and coordination of NCLB programs that facilitates continuous feedback and the use of information to support student performance, program improvement, and data accuracy.

Applicability: The completion of the Initial Compliance Analysis (ICA) workbook is required of all districts staged in interventions due to noncompliance identified on the NCLB Initial Compliance Review (ICR) report.

Scope of Review: The district must review each ICR indicator that did not meet standard (Code 1) and complete the **appropriate Initial Compliance Analysis worksheet(s)**.

ESC Technical Assistance

You may contact your ESC NCLB Monitoring Specialists for technical assistance with implementation of the NCLB monitoring process.

A list of **ESC NCLB Monitoring Specialists** can be found at:
http://tea.texas.gov/schoolimprovement

A list of ESC PBM contacts can be found at:-http://tea.texas.gov/schoolimprovement.

Step 1 **Assemble the Initial Compliance Analysis Team**

Your initial compliance analysis team must have a minimum of **three** participants. Individuals selected should be knowledgeable of the program areas(s) to be reviewed and the data included in the ICR indicators. If the district's analysis and planning team is to review indicators from multiple program areas, the district's team should be expanded to ensure that the participants have appropriate program knowledge.

The initial compliance analysis is expected to be a systems-level review, which should limit potential confidentiality concerns. However, personally identifiable information must be protected in compliance with the confidentiality requirements of the Family Educational Rights and Privacy Act (FERPA), and districts must take steps to ensure that confidentiality requirements are met.

Step 2 **Download the Initial Compliance Analysis workbook**

The Initial Compliance Analysis workbook is available on the district's resources page of the *Intervention Stage and Activity Manager* (ISAM) application within the Texas Education Agency Secure Environment (TEASE) and is also available on the Program Monitoring and Interventions webpage at: http://tea.texas.gov/schoolimprovement and selecting *Intervention Guidance and Resources* under Intervention Activities. The Initial Compliance Analysis workbook is titled, *Initial Compliance Analysis*, located under Resource Documents.

Step 3   **Conduct the Initial Compliance Analysis (ICA)**

Complete the initial compliance analysis for each ICR indicator missed using the appropriate worksheet(s) within the **Initial Compliance Analysis workbook.** The review is designed to assist districts in a comprehensive, systemic examination of the NCLB program(s) and related ICR indicators. Review each missed ICR indicator and determine if the district's policies, guidelines, and practices document accurate data and accurate data reporting.

The review process will provide an opportunity for districts to build upon identified strengths and address areas for improvement, as well as create alignment between current practices and what it will take to increase program effectiveness or data accuracy. The team must consider how any issues or findings can be remedied in the future. In addition to the identification of issues related to systemic improvement or data reporting, if noncompliance is found through the NCLB **Initial Compliance Analysis,** those findings must be reported, and the proposed process for correcting the noncompliance must be addressed in the **ICA workbook only**.

In conducting the initial compliance analysis, the review team needs to consider the data reviewed by the TEA for each ICR indicator. Use the most current data from the **2015-2016** grant year that aligns to the data reviewed by the TEA. The district is to determine if the ICR indicator was missed due to program compliance or data reporting issues.

Consider procedures and practices used by the district to ensure collection and reporting of accurate and reliable data. The district is responsible for maintaining, at the local level, documentation that describes how the analysis process was conducted, who participated, and whether the review and data analysis team determined that the data were valid.

If inaccurate data or inaccurate data reporting is identified as a contributing factor to the district's missing the ICR indicator(s), the team must report how accurate data were collected for the team review, provide any new data, and detail the impact of the accurate data on the review. Additionally, the team must consider how data quality issues can be remedied in the future and include the process for correction in the ICA. **Note:** When inaccurate data submissions are determined to be a contributing factor, the DISTRICT may be subject to additional TEA interventions related to data quality and/or accountability ratings.

Step 4   **Complete the Initial Compliance Analysis Workbook**

Complete the appropriate **Initial Compliance Analysis workbook** and address each indicator missed on the appropriate worksheet(s). After reviewing each indicator missed on the district's ICR Report the review team should use the appropriate worksheet within the workbook to indicate its findings and the corrective actions it will implement.

Enter the **County-District Number** and **District or Charter School Name**.

In the "**Indicator(s) Addressed**' column, identify which indicator(s) is/are being addressed. The district may use one row per indicator missed. All indicators that were out of compliance in the ICR must be listed on the correct worksheet, and all missed indicators must be addressed in the "Actions to be Taken to Correct Issues and Findings" column.

In the "**Identified Issues or Findings**" column, explain whether the analysis reveals issues of noncompliance and/or data reporting issues. Describe the reasons for and/or causes contributing to the missed ICR indicator.

In the "**Data Source Reviewed**" column, list all data sources reviewed in the analysis process. Include any new data sources reviewed other than the sources used by the TEA to calculate the missed ICR indicator.

In the "**Actions to be Taken to Correct Issues and Findings**" column, the district <u>must</u> concisely identify and explain the proposed process for improvement or correction of the noncompliance and/or data reporting issues.

Step 5   **Required Material Submissions to the Agency**

The district must complete the document(s) and retain at the district. All documents are subject to a request for submission to the TEA.

Website: http://tea.texas.gov/schoolimprovement

Completion Date: December 9, 2016

Important Note: *Information documenting implementation of the review process must be maintained by the district. Appropriate implementation of the system, as well as integrity of the data reflected in the system, are subject to future random verification by the TEA.*