### **Overview of the Annual Performance Report Development:**

The District of Columbia Office of the State Superintendent of Education (OSSE), Department of Special Education, Infants and Toddlers with Disabilities Division, hereinafter referred to as the District, is the office in the District of Columbia designated as the Lead Agency for administering Part C of the Individuals with Disabilities Education Act of 2004 (IDEA). The Part C Division was transferred from the District of Columbia Department of Human Services (DHS) to the OSSE in the last quarter of the Federal Fiscal Year (FFY) 2007 reporting period (July 1, 2007 through June 30, 2008).

In the last quarter of FFY 2008, the Department of Special Education (DSE) and the Infants and Toddlers with Disabilities Division (ITDD) underwent both significant transition and growth. The DSE has developed a strategic plan aligned with agency performance goals that is designed to fully support Part C lead agency functions, and the ITDD, which had struggled with changing leadership for more than year, is now under new management. The ITDD also has taken the steps necessary to ensure that its state and local functions are distinct though a revised organizational structure.

The Interagency Coordinating Council (ICC) provided input into the development of this APR. ITDD provided an overview of the process to the ICC via quarterly meetings held in July 2009 and October 2009. Data were presented at the January 2010 meeting and the feedback was incorporated into the final document.

For the purpose of this Annual Performance Report (APR), the District has complied with Federal requirements and is utilizing the accepted Federal Fiscal Year for the FFY 2008 (7/1/08 - 6/30/09) APR reporting period. As such, data and activities in this report reflect work performed between July 1, 2008 and June 30, 2009.

#### Data Collection and Analysis

ITDD utilized the District of Columbia Part C database, known as the Management Information System (MIS), to fulfill the reporting requirements in this APR. ITDD checked the data generated for this report for accuracy in every category by desk-audit and file review.

Upon its inception, OSSE recognized that in order to effectively measure progress toward its goals and objectives, sound systems for data collection needed to be developed and utilized across both Part C and Part B program areas. OSSE is in its second year of development and implementation of a state Special Education Data System (SEDS).

The SEDS system is a comprehensive data system designed to support high quality, seamless service delivery for children with disabilities within the District. SEDS has been made available

to all local educational agencies (LEAS), including the District of Columbia Public Schools (DCPS), to support the goal of optimizing the District of Columbia's delivery of special education services to all students. As articulated in the FFY 2007 APR, through utilization of SEDS, OSSE continues to make significant progress toward meeting the following objectives:

1. To automate and streamline the Individualized Education Program (IEP) development, management, and historical record keeping for local districts and school sites;

2) To improve service delivery by reducing the burden of paperwork and allowing staff to focus on delivering quality instruction and services to students with disabilities;

3) To support best practice in special education management by providing real-time district wide reporting, accurate and reliable state and federal reporting;

4) To facilitate compliance and quality assurance through improved data accuracy, auditing, and timeline management; and

5) To support seamless transitions for students via an improved process for student special education records transfer between schools and districts.

The District continues to assess its data needs and determine the best design to systematically meet these needs. In order to address critical data issues immediately, the OSSE developed a Part C Early Steps and Stages QuickBase application. The Part C QuickBase application, in use as of July 1, 2009, is designed to ensure:

- 1) A seamless transition of information between Part C and Part B; and
- 2) The ability to collect all data needed for federal reporting requirements.

Challenges and successes related to the use of this application are being documented in order to inform the design of future data systems moving forward.

## Technical Assistance with APR Development

Throughout, and subsequent to, the reporting period, this office benefited from on-site technical assistance provided by the Mid South Regional Resource Center (MSRRC/ Mid South). MSRRC staff provided intensive technical assistance (TA) to ITDD in the development of this APR for one to three days each month during the reporting period. The National Early Childhood Technical Assistance Center (NECTAC) and the Data Accountability Center (DAC), a Westat Technical Assistance project for the U.S Department of Education (DOE), Office of Special Education Programs (OSEP), also provided assistance onsite, via webinar, and by conference calls.

ITDD staff participated in all conferences targeting Part C that OSEP sponsored, including the 2008 and 2009 OSEP Early Childhood Conference, the National Accountability Conference and the Child and Family Outcomes Conference, and monthly technical assistance conference calls offered by OSEP. Staff used this new knowledge to monitor Division and vendor progress on indicators throughout the FFY. Technical Assistance providers also participated in assisting

contracted service providers in understanding the need for accurate and timely reporting on the nature of services delivered to children and families.

Staff continued to fine tune their understanding of the indicators for which they had primary responsibility, as well as the way in which each indicator linked with other indicators. This increased knowledge of best practices related to service delivery, data collection, and reporting has contributed to notable improvement in key areas this year and a forecast of continued improvement in the overall quality of ITDD service delivery in years to come.

#### Specific Technical Assistance Provided

Internal professional development and policy interpretation sessions occurred with ITDD supervisory staff and MSRRC during focused staff meetings, data reviews and verification sessions over the course of the reporting period.

Training and technical assistance has further reinforced staff skill development goals, outlined in the FFY 2007 APR and reiterated below as follows:

- Establish and maintain ownership and responsibility for all indicators by permanently assigning staff to each indicator or clustered indicators;
- Engage in ongoing staff training on OSEP indicators, data collection and data entry, and clarify procedures and the use of data;
- Reinforce with staff, and provide training on, methods to ensure the accuracy and reliability of data collection and data entry;
- Gain a better understanding of which policies and procedures need ongoing clarification; and
- Create a culture of shared ownership.

A focus on these goals has resulted in a staff determined to enhance their own performance to enable ITDD to engage in a process of continuous quality improvement. It has also produced a strong sense of shared ownership in all Division decisions related to policy and practice.

#### **Barriers to Compliance**

The following factors have contributed to areas of noncompliance:

- Previous lack of targeted staff development and training;
- Ongoing challenges with securing adequate numbers of service providers;
- Inadequate data management skills or inexperience using the database; and
- Unclear or outdated policies, procedures and practices.

In the last quarter of FFY 2008 (7/1/08- 6/30/09), ITDD corrected several of these factors and is on track to improve compliance in the next reporting period. Training for staff is now occurring on a monthly basis to improve job performance. Policies are being updated and procedures and practices are being standardized and documented.

The FFY 2008 (7/1/08- 6/30/09) APR presents a picture of significant accomplishments and additional challenges. The District continues to address and reduce barriers to compliance.

Although vendor retention problems continue to impact the Division, ITDD has found a new strategy to address the long standing barrier of securing a sufficient number of contracted service providers to deliver timely services to children- the use of directly procured Human Care Agreements (HCAs). The Division initiated the use of a procurement system for securing HCAs, in which providers bid to provide therapeutic and other direct Part C services through the District of Columbia's Office of Contracting and Procurement (OCP), in FFY 2008. The use of HCAs should improve and streamline the recruitment and payment of service providers and should allow the District to have a wide selection of Part C vendors in a fee for service system on an as needed basis. As the HCAs were not implemented until after the reporting period, the ITDD will study the recruitment, invoicing and payment procedures within this system over the course of the next reporting period to see if significant gains can be made in the attraction and retention of high quality service providers.

Another systematic improvement occurred via the development and implementation of a Part C monitoring framework, designed in conjunction with OSEP technical assistance providers. A complete redesign of the general supervision system is underway, as outlined in the OSSE's Part C Corrective Action Plan (CAP). This redesign provides a framework for identifying and timely correcting noncompliance.

While this APR reports some slippage for this reporting period, it also reports significant improvements in monitoring and the overall general supervision system. The overall level of understanding as to OSEP's requirements for a well run, effective Part C system has increased, and staff members are committed to addressing any areas that remain deficient.

#### **Public Reporting**

- The District will ensure compliance with public reporting requirements as follows:
  - ITDD consistently monitors, and if necessary terminates, any contract or agreement with Part C providers to ensure quality service delivery. ITDD is in the process of clarifying its policies and procedures for posting the names of those service providers who are out of compliance in their service provision or reporting obligations. Such providers will be listed on the OSSE website in compliance with IDEA public reporting requirements; and

<sup>o</sup> ITDD will make the FFY 2008 (7/1/08- 6/30/09) APR available to the public by publishing the report, including dissemination to the public through the Interagency Coordinating Council and the OSSE website.

#### State Performance Plan

The District of Columbia's Part C State Performance Plan (SPP) has been updated and can be found on the OSSE website: <u>http://osse.dc.gov/seo/frames.asp?doc=/seo/lib/seo/dc\_6-year\_spp-2.1.06\_approved\_by\_osep.pdf</u>.

#### Monitoring Priority: Early Intervention Services In Natural Environments

**Indicator 1:** Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.

(20 U.S.C. 1416(a) (3) (A) and 1442)

#### Measurement:

Percent = [(# of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner) divided by the (total # of infants and toddlers with IFSPs)] times 100.

Account for untimely receipt of services, including the reasons for delays.

FFY	Measurable and Rigorous Target
2008	100%

#### Actual Target Data for FFY 2008: 81%

Measurement Categories	Number of Children
Number of children with timely IFSP services	112
Reasons for Delay	
Number of children for whom services were not timely due to exceptional family circumstances (sick child or family member, missed or canceled appointments, etc.)	27
Medicaid delays	29
ITDD delay	4
Total number of records	172

In FFY 2008 (7/1/08 - 6/30/09), 81% of infants and toddlers with Individualized Family Service Plans (IFSPs) received early intervention services in a timely manner. Timely services are

reported for 139 children, 27 of which are not counted as delayed because the delay was due to exceptional family circumstances. Nineteen percent (19%), or 33 of the 172 infants and toddlers with IFSPs, did not get their services in a timely manner because of Medicaid and ITDD delays. Medicaid accounted for 29 of the 33 children with delayed services. The remaining 4 are due to ITDD delay.

The following process was used to complete data collection and analysis for timely service delivery:

- Data were collected via a report embedded in the MIS that produces an excel spreadsheet. This report can be developed for a specific timeframe. The MIS was used to identify all children who had a service listed on an IFSP and was then reviewed for all children with active IFSPs within the fourth quarter (4/1/09 – 6/30/09) of FFY 2008;
- The database is capable of calculating the number of days from the date of the IFSP to the "start date" of services; and
- For any child identified for whom the data system indicated services were started late, ITDD staff reviewed the MIS Specialist's module, which contains case notes, as well as the paper case file, to determine the reason for delay.

# Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

The target of 100% was not reached; there was slippage in our performance rate in FFY 2008 (81%) as compared to FFY 2007 (86%). One possible reason is the delay in service provisions for children who are Medicaid recipients in the District's Part C system. Seventy percent (70%) of Part C eligible children in the District of Columbia have Medicaid, which is responsible for providing the early intervention services on the IFSP. In FFY 2008, Medicaid had twice as many delays with 77 fewer children, as compared to FFY 2007.

The Managed Care Organizations (MCOs), per their contract with Department of Health Care Finance, must ensure service delivery 15 days after the IFSP is signed. Due to a lack of service providers in their network, this timeline is often missed.

ITDD is working closely with Medicaid to improve their ability to provide services to children within the required timeline. Monthly meetings are being held between Medicaid and ITDD to improve communication and information sharing. This ongoing collaboration has increased the timeliness of service delivery. The MCOs are pursuing contracts with many of the same providers that are linked to ITDD, thus making for a smoother transition into services. A Memorandum of Understanding between the Department and OSSE that outlines key responsibilities of each agency is close to completion.

In order to address additional reasons for delay in FFY 2008, ITDD has engaged in the following improvement activities:

- Determined reasons for noncompliance through a drill-down of data;
- Assured that all 33 children for whom services were not provided timely received the services on their IFSP, even though late;
- Updated internal ITDD procedures to ensure correct implementation of the specific regulatory requirements; and
- Documented failure to meet timeline requirements on in-house service coordinator staff annual performance reviews.

	Improvement Activities	Timelines & Resources	Status
1.	Technical assistance and training on timely service delivery for sub-grantees and contractors	Ongoing, 2007-2010 Part C Coordinator and staff, Comprehensive System of Professional Development (CSPD), NCSEAM, (now the Data Accountability Center (DAC)), MSRRC, NECTAC, OSSE, and Additional Key Stakeholders	FFY 2008: IFSP trainings for service coordinators and evaluation/direct service providers were provided in February and March 2009 and included a section on timely services. Also, monthly meetings were held for all providers and in-house staff to ensure consistency with procedures and to identify TA needs.
2.	Re-examine the definition for timely receipt of service to ensure that the definition reflects OSEP's definition of timely receipt of service and parental right to prior informed written consent.	June 2008 – August 2008 Part C Coordinator and staff, and Stakeholders.	<b>FFY 2008:</b> This activity was postponed due to leadership changes and is on track to be completed in Spring of FFY 2010 via regulation and policy issuance.
3.	Explore the use of the Human Care Agreement as mechanism to offer contracts for services and shorten the time needed to identify additional service providers.	September 2007 Part C Coordinator and staff, OSSE Grants Management Specialist, and OSSE OCP.	<b>FFY 2008:</b> This activity occurred in FFY 2008, and evaluation providers signed their agreements beginning in July 2009. Direct service providers signed their agreements beginning in November 2009.

	Improvement Activities	Timelines & Resources	Status
4.	Collaborate with the Department of Health (DOH), Medical Assistance Administration's (effective 10/1/08, this entity was reorganized as the Department of Health Care Finance) Medicaid Managed Care organizations to develop a formal intake, referral and case management process to monitor and ensure timely receipt of services for eligible families.	Ongoing, 2007-2010 Part C Coordinator and staff, and Medical Assistance Administration, Medicaid Managed Care Director.	FFY 2008: Meetings occurred monthly throughout FFY 2008 with care coordinators and their management.
5.	Collaborate with area universities to increase student awareness of early intervention as a career option and to identify interns and new graduates who may be interested in working in the field.	Ongoing, 2006-2010 Part C Coordinator and staff, Interagency Coordinating Council (ICC), CSPD, and other appropriate community stakeholders	FFY 2008: No activity occurred in FFY 2008. ITDD is currently developing a public awareness campaign and partnering with Institutes of Higher Education stakeholders to identify and implement strategies to increase recruitment and retention of quality service providers. Activities include: -special education career awareness campaigns, and - career academies for high school dual enrollment programs.
6.	Implement an electronic distribution of flyers as a marketing campaign to locate and identify additional service providers.	Ongoing, 2007-2008 Part C Coordinator and staff, and OSSE Office of the Chief of Staff	FFY 2008: OSSE determined late in 2008 that an updated marketing campaign was needed to reflect new OSSE leadership, ITDD's move to Department

	Improvement Activities	Timelines & Resources	Status
			of Special Education (DSE) and the current needs of the program. ITDD is working with the DC OCP on solicitation for a vendor to complete this work.
7.	Identify and utilize	Ongoing, 2007-2010	FFY 2008:
	additional funding opportunities to provide additional financial support for the DC Part C Program	Part C Coordinator and staff; OSSE Administrators, and Department of Health	Various activities in FFY 2008 related to enhancement of Medicaid as a payor for Part C took place. Monthly meetings were held throughout the year. During FFY 2009, the Part C Finance Systems Committee of the ICC began reviewing additional sources of funding for Part C and will prepare a set of recommendations for submission to OSSE leadership.
8.	Review and revise policies	February 2008-2010	FFY 2008:
	and procedures related to service coordination and timely initiation of services to improve service delivery	Part C Coordinator and staff, NECTAC, MSRRC, and CSPD.	Part C Coordinator and staff completed first round of reviews. This activity is on track to be completed in Spring of FFY 2010 via updated regulation and policy issuance.
9.	Access technical	February 2008-2010	FFY 2008:
	assistance from NECTAC and MSRRC regarding timely provision of services	Part Coordinator and staff, NECTAC, and MSRRC	Ongoing technical assistance was provided both by MSRRC and DAC during FFY 2008, including on-site meetings and numerous conference calls to review all data for all indicators and programming implications. Timely service delivery was part of all

	Improvement Activities	Timelines & Resources	Status
			discussions. NECTAC provided assistance on Indicator 3 and 4.
10.	Explore the feasibility and	August 2008-2010	FFY 2008:
	effectiveness of primary provider coaching model of service delivery	Part C Coordinator and staff, Community Service Providers, and families	No activity occurred in FFY 2008. Discussions and a review of data related to the effectiveness of other service delivery models are currently underway, but a decision related to changes has not been made to date.
11.	DC Part C will utilize DC	October 2008-June 2010	FFY 2008:
	Part B's "Easy IEP" system and replicate it for Part C by developing the "Easy IFSP" system with appropriate training and mentoring for staff and	DC Part C Coordinator and staff, OSSE OIS, MSRRC, NECTAC, sub-grantees	This activity is pending completion of the Phase II of work on the Special Education Data System (SEDS) that began in the Fall 2009.
	providers to insure timely data collection		In the interim, ITDD is using the new Early Steps and Stages Tracker QuickBase database to ensure real time data to track and facilitate timelines and monitor compliance.
12.	Revise Provider monthly	October 2008-February	FFY 2008: Completed
	report form to clearly identify all new services from each IFSP and start dates of services.	2009 DC Part C Coordinator and staff, MSRRC, and sub- grantees	The Provider monthly report form has been modified and is currently in use by providers.

Revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2009: No changes to targets, improvement activities, timelines and resources are proposed.

## Correction of Noncompliance on FFY 2007 data reported in the APR submitted February 1, 2009:

ITDD reported 86% for Indicator 1. During FFY 2007, outside vendors did not have the responsibility for meeting timely services requirements. The responsibility solely belonged to ITDD. Therefore, during FFY 2007, noncompliance was found, but no findings of noncompliance were issued because vendors were considered a part of ITDD rather than external programs. As of April 1, 2009, the responsibility for meeting requirements under this indicator was enforced with three outside vendors. Specifically, pursuant to 34 CFR §303.23(a) and (b), service coordinators are required to assist families in obtaining needed early intervention services, facilitating the timely delivery of available services, linking the family to other available resources, and continuously reviewing and seeking out appropriate services to benefit the development of each child.

While findings of noncompliance were not issued in FFY 2007, ITDD engaged in the following improvement activities in order to address the noncompliance in FFY 2007:

- Determined reasons for noncompliance through a drill-down of data;
- Assured that all children for whom data showed services not provided timely did receive the services in their IFSP, although late;
- Revised and implemented internal ITDD procedures to ensure compliance;
- Conducted monthly trainings with service coordinator vendors;
- Established monitoring procedures with the District of Columbia's Department of Health Care Finance to ensure that each MCO that is responsible for coordination of care for Part C eligible children understands IDEA regulations, OSSE Part C program policy, and expectations for service delivery;
- Convened meetings, as needed, of an early intervention work group comprised of MCO medical directors, case managers, and staff from ITDD and the Department of Health Care Finance to track the timelines for each individual Part C eligible child; and
- Made current dedicated service coordination vendors responsible for all service coordination responsibilities as of April 1, 2009, as described above.
- Verified that all early intervention programs are correctly implementing the specific regulatory requirements.

ITDD began monitoring the outside vendors responsible for the provision of timely services as of April 1, 2009. Findings under this indicator's requirements are being issued as appropriate, and timely corrections will be ensured.

#### Monitoring Priority: Early Intervention Services In Natural Environments

**Indicator 2:** Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings.

(20 U.S.C. 1416(a)(3)(A) and 1442)

**Measurement:** Percent = [(# of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings) divided by the (total # of infants and toddlers with IFSPs)] times 100.

FFY	Measurable and Rigorous Target
2008	94.5%

#### Actual Target Data for FFY 2008: 81.9%

FFY 2008	Dec 01, 2008 618 & Settings Report	Home	Community-Based Setting	Total in Natural Environment
Number	309	119	134	253
Percent		38.5%	43.4%	81.9%

The following process was used to complete data collection and analysis for settings:

- Data were collected via a report embedded in the MIS that produces an excel spreadsheet. This report can be developed for a specific timeframe. The MIS is capable of identifying all children who had a service on an IFSP and the setting in which each service is being provided. A determination was made regarding the primary setting for service delivery for each child; and
- All information obtained was cross-checked with the Early Intervention Specialist tracking sheets and child case file as needed.

These data were reported on Table 2 in accordance with Section 618 of IDEA and submitted timely on February 1, 2009.

# Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

The District is reporting slippage for this indicator in the FFY 2008 data as compared to FFY 2007 data (89%) and did not meet the projected target of 94.5% for FFY 2008. Of the 309 children reported in the December 1, 2008 Child Count Data Settings Table, 253 (81.9%) were receiving services primarily in their home or community based setting for typically developing children. Fifty-six (56) children (18.1%) received services in other settings.

Some of the reasons for services being provided in settings other than a natural environment included the need for specialized services and limitations placed on the location of service provision by insurance companies and Medicaid. Since 70% of children in ITDD are Medicaid eligible, and Medicaid is responsible for the provision of early intervention services, the provision of services in natural environments continues to be a challenge due to challenges with adequate service delivery in high- need areas of the city.

In addition, in FFY 2008, OSSE offered families who have infants and toddlers with disabilities access to child care at no cost to the family, allowing for more services to be delivered in a community-based setting.

ITDD has policies and procedures in place to assure that eligible children and families receive early intervention services in natural environments in accordance with the requirements of the Individuals with Disabilities Education Act. ITDD is committed to increasing performance in this area. Data analysis and drill down activities are underway in FFY 2009 to develop strategies to address slippage and to ensure improvement.

	Improvement Activities	Timelines & Resources	Status
1.	Technical assistance and educational activities to promote natural environments and inclusion to families, Part C staff, service providers and service coordinators	Ongoing, 2009 – 2010 Part C Coordinator and staff, CSPD, stakeholders	FFY 2008: The newly revised IFSP training package (completed in summer of 2009) highlights and emphasizing the importance of the natural environment requirements.
			This training is provided to all service coordinators, evaluation providers and Medicaid care coordinators.
2.	Participate in the Early Care and Education Administration's child care	September 2008 – June 2009	<b>FFY 2008:</b> This activity was delayed due to changes in management of the

	Improvement Activities	Timelines & Resources	Status
	subsidy task force to analyze disability rates for special needs child care (Proposed reimbursement model approved by the Mayor's Advisory Committee on Early Childhood Development (MACECD) in November 2008)	Part C Coordinator and staff, Stakeholders, and MACECD task force	ITDD.
3.	Participate in the MACECD task force to develop strategies to increase the capacity of Child Care Providers to offer inclusive child care settings and provide on-site therapeutic services to children with disabilities and special health care needs.	June - September 2009 (Strategies for public review and approval) Part C Coordinator and staff, and MACECD task force.	FFY 2008: The work of this committee has concluded. The ARC of DC has convened an early childhood workgroup of all relevant stakeholders including ITDD, ARC, Medicaid, CFSA, Early Childhood and Education Administration, Children's Law Center and community child care providers. The workgroup's initial focus is on the Part C system in DC.
4.	Complete pilot testing of capacity building strategies including professional development workshops to train early care and education providers for receiving Part C children.	September 2009 Part C Coordinator and staff, CSPD, and MACECD task force	FFY 2008: The work of MACECD has concluded. ITDD is in the process of developing strategies for professional development with the child care community through the workgroup described in the previous activity. In FFY 2009, ITDD is also beginning work with the OSSE's contracted Parent Center to develop a plan for outreach and education.

Revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2009: No changes to targets, improvement activities, timelines and resources are proposed.

#### Monitoring Priority: Early Intervention Services In Natural Environments

Indicator 3: Percent of infants and toddlers with IFSPs who demonstrate improved:

- A. Positive social-emotional skills (including social relationships);
- B. Acquisition and use of knowledge and skills (including early language/ communication); and
- C. Use of appropriate behaviors to meet their needs.
- (20 U.S.C. 1416(a)(3)(A) and 1442)

#### Measurement:

Outcomes:

- A. Positive social-emotional skills (including social relationships);
- Acquisition and use of knowledge and skills (including early language/communication); and
- C. Use of appropriate behaviors to meet their needs.

Progress categories for A, B and C:

- a. Percent of infants and toddlers who did not improve functioning = [(# of infants and toddlers who did not improve functioning) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
- b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = [(# of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
- c. Percent of infants and toddlers who improved functioning to a level nearer to sameaged peers but did not reach it = [(# of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
- d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers = [(# of infants and toddlers who improved functioning to reach a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
- e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers = [(# of infants and toddlers who maintained functioning at a level

comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

### Summary Statements for Each of the Three Outcomes (use for FFY 2008-2009 reporting):

**Summary Statement 1:** Of those infants and toddlers who entered or exited early intervention below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program.

### Measurement for Summary Statement 1:

Percent = # of infants and toddlers reported in progress category (c) plus # of infants and toddlers reported in category (d) divided by [# of infants and toddlers reported in progress category (a) plus # of infants and toddlers reported in progress category (b) plus # of infants and toddlers reported in progress category (c) plus # of infants and toddlers reported in progress category (d)] times 100.

**Summary Statement 2:** The percent of infants and toddlers who were functioning within age expectations in each Outcome by the time they turned 3 years of age or exited the program.

**Measurement for Summary Statement 2:** Percent = # of infants and toddlers reported in progress category (d) plus [# of infants and toddlers reported in progress category (e) divided by the total # of infants and toddlers reported in progress categories (a) + (b) + (c) + (d) + (e)] times 100.

Measurement:		
A. Positive social-emotional skills (including social relationships):	Number of children	% of children
a. Percent of infants and toddlers who did not improve functioning	2	3%
<ul> <li>b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers</li> </ul>	14	20%
c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach	32	46%
<ul> <li>d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers</li> </ul>	16	23%
e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers	6	9%
Total	70	100%

B. Acquisition and use of knowledge and skills (including early language/communication):	Number of children	% of children
a. Percent of infants and toddlers who did not improve functioning	1	1%
<ul> <li>b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers</li> </ul>	17	24%
<ul> <li>c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach</li> </ul>	27	39%
<ul> <li>d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers</li> </ul>	18	26%
e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers	7	10%
Total	70	100%
C. Use of appropriate behaviors to meet their needs:	Number of children	% of children
<ul> <li>C. Use of appropriate behaviors to meet their needs:</li> <li>a. Percent of infants and toddlers who did not improve functioning</li> </ul>		% of children
a. Percent of infants and toddlers who did not improve	children	
<ul> <li>a. Percent of infants and toddlers who did not improve functioning</li> <li>b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to</li> </ul>	children 0	0%
<ul> <li>a. Percent of infants and toddlers who did not improve functioning</li> <li>b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers</li> <li>c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did</li> </ul>	children       0       12	0%
<ul> <li>a. Percent of infants and toddlers who did not improve functioning</li> <li>b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers</li> <li>c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach</li> <li>d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged</li> </ul>	children       0       12       27	0% 17% 39%

#### Baseline Data for Infants and Toddlers Exiting 2008-2009:

	SUMMARY STATEMENTS			
Ou	Itcome A: Positive social-emotional skills (including social relationships)	% of children		
1.	Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	75%		
2.	The percent of children who were functioning within age expectations in Outcome A by the time they turned 3 years of age or exited the program	31%		
Ou	Itcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)	% of children		
1.	Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	71%		
2.	The percent of children who were functioning within age expectations in Outcome B by the time they turned 3 years of age or exited the program	36%		
Οι	atcome C: Use of appropriate behaviors to meet their needs	% of children		
1.	Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	80%		
2.	The percent of children who were functioning within age expectations in Outcome C by the time they turned 3 years of age or exited the program	44%		

#### **Discussion of Baseline Data:**

Calculations within each outcome category are made independently; therefore, total percentages do not equate to 100, as a child may appear in both categories dependent upon the amount of demonstrated progress.

#### Outcome A:

Summary Statement 1: 75% [48 (32+16) / 64 (2+14+32+16)]\*100 Summary Statement 2: 31% [22 (16+6) / 70 (2+14+32+16+6)\*100

### Outcome B:

Summary Statement 1: 71% [45 (27+18) / 63 (1+17+27+18)]\*100 Summary Statement 2: 36% [25 (18+7) / 70 (1+17+27+18+7)]\*100

#### **Outcome C:**

Summary Statement 1: 80% [48 (27+21) / 60 (0+12+27+21)]\*100 Summary Statement 2: 44% [31 (21+10) / 70 (0+12+27+21+10)]\*100

ITDD utilized assistance from NECTAC and the Early Childhood Outcomes (ECO) Center to redesign our child outcomes measurement system. The District utilized the Child Outcomes Summary Form (COSF) and ECO's procedures for using the form to collect data for this indicator; the data were recorded in the COSF to OSEP Categories Calculator.

The District began collecting entry data on eligible children in May 2007. From that date, data on all infants and toddlers who entered ITDD (before 2 years, 6 months of age) have been collected. The entry COSF is completed at the initial IFSP meetings. Data sources include: data from evaluations and assessments; observations; and input of the IFSP team, which includes the parent. Within ten days of collection, entry data are entered into the ECO calculator spreadsheet.

The exit data were collected no more than 60 days prior to the child's exit from the program. Children usually exit the program for one of the following reasons: (a) the child completed IFSP requirements prior to the third birthday; (b) the child moved out of state; or (c) the child was ready to transition at three years to Part B services. For children who unexpectedly exited Part C services, the District utilized the most recent data available for the child to complete the COSF.

Data were collected on all children who were served for at least six months. Child outcomes exit data were collected on 70 children for FFY 2008. This represents 30.4% of all children who exited the program. Entry data was not available for the majority of children who exited the program in FFY 2008, as they entered prior to the date that the COSF was implemented.

MEASURABLE AND RIGOROUS TARGET Infants and Toddlers Exiting in FFY 2009 (2009-10) and FFY 2010 (2010-2011) and Reported in Feb 2011 and Feb 2012				
Summary Statements				
Outcome A:Positive social-emotional skills (including social relationships)FFY 2009FFY 2010% of children% of children% of children				
<ol> <li>Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program</li> </ol>	75.0%	75.0%		

<ol> <li>The percent of children who were functioning within age expectations in Outcome A by the time they turned 3 years of age or exited the program</li> </ol>	31.4%	31.4%
Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)	FFY 2009 % of children	FFY 2010 % of children
<ol> <li>Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program</li> </ol>	71.4%	71.4%
<ol> <li>The percent of children who were functioning within age expectations in Outcome B by the time they turned 3 years of age or exited the program</li> </ol>	35.7%	35.7%
Outcome C: Use of appropriate behaviors to meet their needs	FFY 2009 % of children	FFY 2010 % of children
<ol> <li>Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program</li> </ol>	80.0%	80.0%
2. The percent of children who were functioning within age expectations in Outcome C by the time they turned 3 years of age or exited the program	44.3%	44.3%

## Actual Target Data for FFY 2008: No targets were required.

Targets for FFY 2009 and FFY 2010 were set in consultation with OSEP technical assistance providers and key stakeholders, including the ICC, and the SPP is being updated to reflect these changes. The stakeholders concluded that an additional year of data will provide a more complete picture of the program related to child outcomes; therefore, the recommendation was to be conservative in setting the initial targets. The current data show that services provided have resulted in a substantial increase in the rate of growth by the time children turned three or exited the program. This result is consistent across all outcomes.

# Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

The Battelle Developmental Inventory is the primary assessment tool utilized by the District. ITDD began utilizing the Battelle as the primary tool during this reporting period. All contracted evaluation sites have the instrument and have been trained. Other approved evaluation tools include:

o The Bayley Scales of Infant and Toddler Development,

o Brigance Inventory of Early Development of Infants, o The Infant-Toddler Developmental Assessment, o The Ounce Scale, o The Mullen Scales of Early Learning, o The Preschool Language Scale – 4, o The Peabody Development Motor Scales -2, and

o Creative Curriculum Developmental Continuum for Infants, Toddlers & Twos.

The District continued to provide technical assistance and training on child outcomes at monthly meetings attended by service coordinators, evaluation sites, and direct service provider sites. ITDD has also participated in all local conferences, trainings and conference calls related to this indicator.

ITDD worked with early intervention providers to increase awareness of this indicator and provide technical assistance and training to improve the quality of the data. The training and technical assistance included increasing understanding about the three outcomes, helping the providers understand how to complete the ratings, and ensuring that providers understand the procedures for collecting and reporting the data.

	Improvement Activities	Timeline/Resources	Status
1.	Implement the COSF for measuring child outcomes.	January 2008 – Feb 2010	<b>Completed</b> – The District began using the COSF on May 1, 2007.
2.	Collaborate with OSSE Special Education 619 Part B Coordinator, to align policies, procedures and practices for measuring child outcomes to ensure a smooth transition from Part C to Part B.	June 2008 – February 2010 District Part C, OSSE, Mid South, NECTAC, ECO	<b>FFY 2008:</b> Collaborated with DCPS Early Stages and the Part B 619 Coordinator to align OSSE and DCPS policies and procedures for child outcomes.
3.	Narrow the selection of approved evaluation tools.	June 2008 DC Part C, ECO, NECTAC, OSSE	<b>Completed</b> – The Battelle Developmental Inventory is the primary assessment tool for the District. Part C and Part B staff have been trained in the use of this tool, as well as the administration of the COSF.

	Improvement Activities	Timeline/Resources	Status
4.	Technical assistance/training and professional development for service coordinators and evaluation providers on use of the COSF.	Effective April 2008, this activity will be ongoing for FFY 2008-2010 NECTAC; ECO; CSPD; DC Part C Staff, service providers	FFY 2008: ITDD provided training and TA to service coordinators, evaluation providers, and direct service providers on a monthly basis. ECO and NECTAC provided training in February 2009.
5.	Develop policies and procedures on measuring outcomes (data collection for entry and exit) to improve systems administration and monitoring.	April 1, 2008 – Feb. 2010 NECTAC; ECO; Mid South; DC Part C Staff, contractors, sub-grantees	<b>Completed –</b> Policies and Procedures have been developed and implemented.
6.	Train DC Part C staff in procedures for reviewing completed COSFs to identify the need for additional training and TA.	July 2008 – Feb. 2010 NECTAC; ECO; Mid South; DC Part C Staff, contractors, sub-grantees	FFY 2008: DC Part C staff have been trained and have identified areas where additional technical assistance and training was needed. Ongoing guidance is provided at monthly meeting with service coordinators and providers.
7.	Incorporate monitoring improvement activities from Indicator C9.	February 2008 – 2010 NECTAC; ECO; Mid South; DC Part C Staff; OSSE Office of the Chief Information Officer	<b>FFY 2008:</b> Service Coordinators have been trained to make bi- monthly contact with parents to discuss outcomes.

**Revisions,** <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / **Resources for FFY 2009:** Proposed targets are described above. No changes to improvement activities, timelines and resources are proposed.

#### Monitoring Priority: Early Intervention Services In Natural Environments

**Indicator 4:** Percent of families participating in Part C who report that early intervention services have helped the family:

- A. Know their rights;
- B. Effectively communicate their children's needs; and
- C. Help their children develop and learn.

#### (20 U.S.C. 1416(a)(3)(A) and 1442)

#### Measurement:

- A. Percent = [(# of respondent families participating in Part C who report that early intervention services have helped the family know their rights) divided by the (# of respondent families participating in Part C)] times 100.
- B. Percent = [(# of respondent families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs) divided by the (# of respondent families participating in Part C)] times 100.
- C. Percent = [(# of respondent families participating in Part C who report that early intervention services have helped the family help their children develop and learn) divided by the (# of respondent families participating in Part C)] times 100.

FFY		Measurable and Rigorous Targe	et
2008	a. 89%	b. 85%	c. 79%

#### Actual Target Data for FFY 2008:

- A) 93% (82/88\*100) reported that early intervention services have helped the family know their rights.
- B) 91% (80/88\*100) reported that early intervention services have helped the family effectively communicate their infant and toddlers' needs.
- C) 81% (71/88\*100) reported that early intervention services have helped the family help their infant and toddler develop and learn.

ITDD continues to utilize the ITDD Family Outcomes Survey to collect the family outcomes data. Three hundred (300) surveys were distributed to families who participated in the program for 6 months or more. Surveys were given to families at the 6 month or annual IFSP meeting. A follow-up call was made to families to remind them to return the survey. Of the 300 surveys distributed, 50 were disseminated in Spanish. Service Coordinators and families were informed that surveys could be translated in other languages upon request. Families returned 88 (29%) surveys. ITDD will continue to implement strategies for increasing the return rates, as described in the improvement activities.

The FFY 2008 data are representative of the diverse populations served by the District. Families returned surveys from every Ward in the city and from every contracted program that provides services. Families represented the ethnic population of the city. The surveys returned were also reflective of families receiving services funded by Medicaid, private insurance, and sliding fee scale/self payment.

# Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

The District of Columbia exceeded all projected Family Outcome targets for FFY 2008 (7/1/08-6/30/09). ITDD provided training to its service coordinators and service providers on Family Outcomes. Scheduled monthly meetings are held for service coordinators and providers; these meetings provided an opportunity for ITDD to provide training and to receive stakeholder input into the process. It is believed that these trainings resulted in improved outcomes for families and allowed ITDD to exceed the targets set for the reporting period. The District improved performance from FFY 2007 in 4B and 4C, while noting slight slippage in 4A.

ITDD recognizes that the response rate needs to be improved. Families should have multiple opportunities to complete the survey. ITDD is working to increase the parent survey return rate and representation through the use of an online web-based survey tool. The use of an online survey tool will improve response rates and streamline the process for analysis. ITDD also has taken steps to provide parents with tools needed to support their child's growth at home by providing a series of parent trainings in FFY 2009. It is believed that this additional training and outreach will positively impact outcomes for indicator 4C in the FFY2009 reporting period.

	IMPROVEMENT ACTIVITIES	TIMELINES / RESOURCES	STATUS
1.	ITDD will develop and implement strategies to address program needs identified through analysis of the family outcomes survey.	Ongoing, through FFY 2010	<b>FFY 2008:</b> This activity was delayed as the Program's initial focus was to improve the response rate to ensure meaningful data collection. Initial

IMPROVEMENT ACTIVITIES	TIMELINES / RESOURCES	STATUS
		analysis of survey results
		began during FFY 2009 to
		identify and address program
		needs and areas for
		improvement.

**Revisions,** <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / **Resources for FFY 2009:** An additional improvement activity to increase outcomes for this indicator, along with the necessary timeline and resources, is proposed as follows:

	IMPROVEMENT ACTIVITIES	TIMELINES / RESOURCES	STATUS
2.	Addition: Expand parent outreach and trainings via ongoing sessions sponsored by ITDD and in collaboration with the ICC and Parent Training and Information Center Justification: Improve family outcomes through parent/family centered trainings and support provided by with Parent Training and Information Center and Parent Training Resource Center (PTRC).	Ongoing, through FFY 2010 OSEP TA Providers, ICC, Advocates for Justice and Education, Parent Training and Information Center (PTI), Multicultural Resources, PTRC, Part C Providers	Proposed Activity Trainings and collaboration currently underway in FFY 2009

## Monitoring Priority: Effective General Supervision Part C / Child Find

**Indicator 5:** Percent of infants and toddlers birth to 1 with IFSPs compared to national data.

(20 U.S.C. 1416(a)(3)(B) and 1442)

**Measurement:** Percent = [(# of infants and toddler birth to 1 with IFSPs) divided by the (population of infants and toddlers birth to 1)] times 100 compared to national data.

FFY	Measurable and Rigorous Target
2008	1.30%

### Actual Target Data for FFY 2008: 0.36%

The total number of infants with IFSPs on December 1, 2008 who were receiving early intervention services was 28 infants (based on the 618 child count data). This number reflected 0.36% of the District's population under age one (28/7886 x 100) as compared to national percentage served of 1.04% (U.S. Department of Education, Office of Special Education Programs, Data Analysis system (DANS), OMV #1820-0557: "Infants and Toddlers Receiving Early Intervention Services in Accordance with Part C," 2008).

The December 1, 2008 618 data were collected from the database and verified using a desk review.

# Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

The 618 data from December 1, 2008 reflects a modest improvement in performance from the previous year in the number and percentage of infants and toddlers under one year of age in the District of Columbia identified as eligible for, and in receipt of early intervention services. However, the District failed to meet its target for FFY 2008 of 1.30%.

The District recorded 1141 intake referrals to ITDD in FFY 2008. This is an increase over 996 referrals in FFY 2007. Of these referrals, 45% were from the Child and Family Services Administration (CFSA), fulfilling Child Abuse Prevention and Treatment Act requirements; 36% of referrals came from hospitals, clinics and physicians; 3% from child care centers and early intervention therapists; and 12% from parents. The aggregate total from all other referral

sources was 2.6%. Of those referred, 26% were found eligible for early intervention services.

In FFY 2009, several additional steps have been taken to increase referrals to the Part C system:

- The Child Find Coordinator has conducted on-site monitoring visits to Child Find subgrantees;
- Quarterly training meetings were held with to provide technical assistance to Child Find grantees;
- In the current program year, the Child Find Coordinator position has been converted to a full time position;
- Additional evaluation sites have been added through the use of Human Care Agreements; and
- A comprehensive Part C Child Find Plan was developed and implementation of new initiatives has begun. These include the launch of the Early Steps and Stages Tracker (ESST) database, the development of a plan, and allocation of funds, to support a contracted public awareness campaign, and the development of a universal screening system in cooperation other stakeholders in the citywide child find system.

ITDD is invested in increasing referral rates. In addition to taking the above steps to increase rates of referral, ITDD is currently reviewing Child Find targets with key stakeholders, including the ICC. All approved changes will be reflected in the FFY 2009 APR and SPP.

	Improvement Activities	Timelines/Resources	Status
1.	Continue collaboration and implementation of activities with DCPS, Charter Schools, and OSSE for Child Find, including meeting at least twice a year with representatives from various outreach initiatives throughout the District.	Ongoing throughout 2005 – 2010 ITDD, OSSE, DCPS, and Charter Schools	FFY 2008: Regular meetings were held with DCPS to coordinate Child Find and transition activities. ITDD participated in COSF training offered by OSSE, in collaboration with NECTAC, to DCPS personnel in May 2009.

	Improvement Activities	Timelines/Resources	Status
2.	Maintain linkages with programs that screen infants and toddlers for established risks or conditions including the DOH Community Health Administration (formerly Maternal and Primary Care Administration's (MPCA)) screening programs for	Ongoing throughout 2005 - 2010; ITDD and MPCA staff	<b>FFY 2008:</b> ITDD partnered with the DOH and the Department of Health Care Finance (DHCF)'s project, "Assuring Better Child Health and Development Screening", to train all primary referral sources.
	Newborn Hearing and Metabolic Disorders, and the DC Birth Defects Registry		The Ages and Stages Questionnaire 2 (ASQ2) and Ages and Stages - Social Emotional Questionnaire (ASQ-SE) were selected to be used as a universal screening form in the District of Columbia across Part C and B programs to create a universal referral and monitoring system.
			In FFY 2009, ITTD established and filled the position of a dedicated Part C Child Find Coordinator.
			The Child Find Coordinator has begun engaging in targeted, personalized outreach to hospitals to develop the key relationships necessary for improved referral rates.

	Improvement Activities	Timelines/Resources	Status
3.	Continue to participate on advisory boards at the DOH/Community Health Administration (formerly Maternal and Family Health Administration), the CFSA and the Child Care Services Division within OSSE Early Childhood Education (ECE) (formerly Early Care and Education Administration).	Ongoing throughout 2005 – 2010; ITDD staff	FFY 2008: ITDD representatives participate on: - Children with Special Health Care Needs Advisory Board; - Early Childhood Comprehensive Systems Steering Committee (DOH); and - DC HEARS (Universal
			Newborn Hearing Screening Program) Advisory Committee. In addition, ITDD meets monthly with CFSA and the Child Care Services Division within OSSE ECE.
4.	Provide targeted outreach in Wards of the city that have generated the most children eligible for ITDD services. Increase technical assistance and training to child find sub-grantees, community referral sources, and interagency partners to ensure that poor and language minority families are fully represented and participating in Child Find activities.	January 2008 – 2010	FY 2008: In FFY 2008, ITDD entered into a partnership with a community organization in Ward 8 to increase community awareness of early intervention services there. The Part C Coordinator visited Early Head Start programs and several large child care centers in Ward 8 (an area of the city with low socioeconomic status) with outreach and referral information.

	Improvement Activities	Timelines/Resources	Status
5.	Review, revise and widely distribute outreach materials to target populations least likely to access early childhood services (English language learners and families impacted by low socioeconomic circumstances)	FFY 2007-2010	FY 2008: All Part C public awareness materials were made available online at the OSSE website. Work began on a new public awareness campaign in summer 2009. It will include translated documents, flyers and brochures.
6.	Utilize the Human Care Agreement and Request of Application provider procurement processes to increase the number of available providers for all aspects of service provision to ensure eligible children remain active in the ITDD system; includes evaluations, therapy services, service coordination and child find tasks.	FFY 2008-2010: ITDD Part C coordinator and Staff, DC OCP and OSSE Grants and Management Office.	<b>FY 2008:</b> The review and selection process for the first round of Human Care Agreements was satisfied during the reporting period.

Revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2009: No changes to targets, improvement activities, timelines and resources are proposed.

#### Monitoring Priority: Effective General Supervision Part C / Child Find

**Indicator 6:** Percent of infants and toddlers birth to 3 with IFSPs compared to national data.

(20 U.S.C. 1416(a)(3)(B) and 1442)

**Measurement:** Percent = [(# of infants and toddler birth to 3 with IFSPs) divided by the (population of infants and toddlers birth to 3)] times 100 compared to national data.

FFY	Measurable and Rigorous Target
2008	2.25%

#### Actual Target Data for FFY 2008: 1.37%

On December 1, 2008, 309 infants, birth to age 36 months, had an IFSP and were receiving early intervention services. This number reflected 1.37% of the District's population ages birth to 36 months (309/22,612 x 100) as compared to the national data of 2.66%. (U.S. Department of Education, Office of Special Education Programs, Data Analysis system (DANS), OMV #1820-0557: "Infants and Toddlers Receiving Early Intervention Services in Accordance with Part C," 2008.)

The December 1, 2008 618 data were collected from the database and verified using a desk review.

## Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

The 618 data from December 1, 2008 reflects modest improvement in performance from the previous year in the number (271) and percentage (1.19%) of infants and toddlers birth to three in the District of Columbia identified as eligible for, and in receipt of early intervention services. However, the District did not meet its target of 2.25 % for FFY 2008.

In FFY 2009, several additional steps have been taken to increase referrals to the Part C system:

• The Child Find Coordinator has conducted on-site monitoring visits to Child Find sub-

grantees;

- Quarterly training meetings were held with to provide technical assistance to Child Find grantees;
- In the current program year, the Child Find Coordinator position has been converted to a full time position;
- Additional evaluation sites have been added through the use of Human Care Agreements; and
- A comprehensive Part C Child Find Plan was developed and implementation of new initiatives has begun. These include the launch of the Early Steps and Stages Tracker (ESST) database, and development of a universal screening system in cooperation other stakeholders in the citywide child find system.

	Improvement Activities	Timelines/Resources	Status
1.	Continue collaboration and implementation of activities with DCPS, Charter Schools, and OSSE for Child Find, including meeting at least twice a year with representatives from various outreach initiatives throughout the District.	Ongoing throughout 2005 – 2010 ITDD, OSSE, DCPS, and Charter Schools	<b>FFY 2008:</b> Regular meetings were held with DCPS to coordinate Child Find and transition activities. ITDD participated in COSF training offered by OSSE to DCPS personnel in May 2009.
2.	Maintain linkages with programs that screen infants and toddlers for established risks or conditions including the DOH Community Health Administration screening programs for Newborn Hearing and Metabolic Disorders, and the DC Birth Defects Registry	Ongoing throughout 2005 - 2010; ITDD and MPCA staff	FFY 2008: ITDD partnered with DOH and DHCF's project, "Assuring Better Child Health and Development Screening", to train all primary referral sources. The Ages and Stages Questionnaire 2 (ASQ2) and Ages and Stages - Social Emotional Questionnaire (ASQ-SE) were selected to be used as a universal screening form in the District of Columbia across C and B programs to create a universal referral and monitoring system.

	Improvement Activities	Timelines/Resources	Status
			In FFY 2009, ITTD established and filled the position of a dedicated Part C Child Find Coordinator.
			The Child Find Coordinator has begun engaging in targeted, personalized outreach to hospitals, to develop the key relationships necessary for improved referral rates.
3.	Continue to participate on	Ongoing throughout	FFY 2008:
	advisory boards at the DOH/Community Health Administration (formerly	2005 – 2010; ITDD staff	ITDD representatives participate on:
	Administration (formerly Maternal and Family Health Administration), the CFSA		<ul> <li>Children with Special Health</li> <li>Care Needs Advisory Board;</li> </ul>
	and the Child Care Services Division within ECE.		- Early Childhood Comprehensive Systems Steering Committee (DOH); and
			- DC HEARS (Universal Newborn Hearing Screening Program) Advisory Committee.
			In addition, ITDD meets monthly with CFSA and the Child Care Services Division within ECE.

	Improvement Activities	Timelines/Resources	Status
4.	Provide targeted outreach in Wards of the city that have generated the most children eligible for ITDD services. Increase technical assistance and training to child find sub-grantees, community referral sources, and interagency partners to ensure that poor and language minority families are fully represented and participating in Child Find activities.	January 2008 – 2010	FY 2008: In FFY 2008, ITDD entered into a partnership with a community organization in Ward 8, to increase community awareness of early intervention services there. The Part C Coordinator visited Early Head Start programs and several large child care centers in Ward 8 (an area of the city with low socioeconomic status) with outreach and referral information.
5.	Review, revise and widely distribute outreach materials to target populations least likely to access early childhood services (English language learners and families impacted by low socioeconomic circumstances)	FFY 2007-2010	FY 2008: All Part C public awareness materials were made available online at the OSSE website. Work began on a new public awareness campaign in summer 2009. It will include translated documents, flyers and brochures.
6.	Utilize the Human Care Agreement and Request of Application provider procurement processes to increase the number of available providers for all aspects of service provision to ensure eligible children remain active in the ITDD system; includes	FFY 2008-2010: ITDD Part C coordinator and Staff, DC OCP and OSSE Grants and Management Office.	<b>FY 2008:</b> The review and selection process for the first round of Human Care Agreements was satisfied during the reporting period.

Improvement Activities	Timelines/Resources	Status
evaluations, therapy services, service coordination and child find tasks.		

Revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2009: No changes to targets, improvement activities, timelines and resources are proposed.
#### Monitoring Priority: Effective General Supervision Part C / Child Find

**Indicator 7:** Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.

(20 U.S.C. 1416(a)(3)(B) and 1442)

#### Measurement:

Percent = [(# of infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline) divided by the (# of infants and toddlers with IFSPs evaluated and assessed for whom an initial IFSP meeting was required to be conducted)] times 100.

Account for untimely evaluations, assessments, and initial IFSP meetings, including the reasons for delays.

FFY	Measurable and Rigorous Target
2008	100%

#### Actual Target Data for FFY 2008: 87%

Measurement Categories	Number of Children
Number of children with timely IFSP services	60
Reason for Delay	
Number of children for whom services were not timely due to exceptional family circumstances (sick child or family member, missed or canceled appointments, etc.)	5
Medicaid delays	1
Provider delay	5
ITDD delay	4
Total number of records	75

Timely evaluation and initial IFSP meeting is defined as within 45 days of the date of referral to DC Part C. For FFY 2008, 65 children (60 timely plus 5 with documented family reasons), or 65/75\*100 = 87%, were counted as having timely evaluation and IFSP meetings.

Data for this indicator were primarily collected from the management information system (MIS) with additional drill-down information obtained from file reviews. The District chose the fourth  $(4^{th})$  quarter (4/1/09-6/30/09) of FFY 2008 to complete a compliance review for this indicator.

The following steps were taken to complete data collection and analysis for the 45-day timeline:

- The MIS was used as the foundation tool for identifying all children who completed the intake process during the fourth (4<sup>th</sup>) quarter of the reporting period;
- The MIS was utilized to identify all children who met the criteria for having an initial IFSP during the fourth (4<sup>th</sup>) quarter (The MIS is able to produce an Excel spreadsheet that identifies all children in intake who were found eligible. The spreadsheet contains information about each child based on referral date and then identifies the date of the initial IFSP meeting along with the number of days that have passed from referral date to the date of the initial IFSP. The database is able to calculate the number of days between the referral date and the date of the initial IFSP meeting). These data are tracked until the day the IFSP meeting was held;
- The MIS 'Specialists' module, which allows for collection of the notes for a child's case, was reviewed to determine the reason for a missed timeline;
- The paper case file was also pulled for any child where the 45-day timeline was not met per the MIS. The file notes, referral form and any email correspondence was reviewed to confirm reasons for delay;
- Validation of the data was completed through a review of process and timeline as well as a review of the IFSP document; and
- A chart was developed to document information identifying the reasons for delay so that findings of noncompliance can be issued to responsible providers, who will also be notified of the need for corrective action.

Although the database has a drop-down feature to collect the reason for delay, it is not capable of disaggregating documented reasons. As a result, individual records were pulled to confirm the reason for the delay for any case that missed the 45-day timeline.

# Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

The District demonstrated significant progress for this indicator from FFY 2007 (74%) to 87% in FFY 2008. Much of this progress is due to its continued work with its Medicaid partners. Only one of the delayed IFSP meetings was attributable to Medicaid.

In order to address the noncompliance in FFY 2008, ITDD completed the following improvement activities:

- Determined reasons for noncompliance through a drill-down of data;
- Assured that the IFSP meeting was held, even though late, for all 10 children for whom evaluations and IFSPs were not provided timely;
- Updated internal ITDD procedures to ensure correct implementation of the specific regulatory requirements; and
- Documented the failure to meet IFSP timeline requirements in annual performance reviews of related ITDD in-house intake staff and reviewed necessary steps for improvement.

ITDD has developed an effective working relationship with DHCF's liaison to its MCOs. Monthly meetings are held with the DCHF and its contracted MCOs. These regular meetings allow ITDD to address the trends and challenges identified. ITDD may contact either the MCOs' Care Managers or the DHCF oversight offices for assistance with addressing general concerns or challenges with specific cases.

ITDD continues to see improvements in the quality of both the documents received from, and the services provided by, the sub-grantees and Medicaid MCOs' Care Managers. ITDD has revised and is finalizing Memoranda of Understanding with DHCF and their MCOs.

The District utilizes an "Interim Service Coordination" model with eligibility evaluation site personnel serving in that role. Noncompliance in FFY 2008 was analyzed, resulting in one provider under contract being issued a finding of noncompliance with the requirement of a Corrective Action Plan. This provider was responsible for the five (5) instances of delay that were directly linked to outside providers. A staff member has been assigned to verify timely correction of this noncompliance as soon as possible, but no later than one (1) year following the date the finding was issued.

	Improvement Activity	Timelines & Resources	Status
1.	Populate the management information system, once operational, to better track referrals.	Ongoing 2005-2010 ITDD staff and consultants	<b>Completed</b> - MIS in use as of April 2008. In FFY 2009, ITDD began using the Early Steps and Stages Database, a QuickBase application that has significantly improved the ability to produce reports and manage timelines. It also includes a module to

	Improvement Activity	Timelines & Resources	Status
			for the Child Find Coordinator to track referrals.
2.	Provide technical assistance and training for families, evaluation contractors and sub-grantees regarding Part C requirements related to eligibility determination and the 45-day timeline.	January 2008 – 2010	FFY 2008:
		Part C Coordinator and staff	Conducted monthly meetings throughout the year and completed training for all providers, in house staff and evaluation sites in February 2009.
3.	ITDD is partnering with	Ongoing 2007-2010	FFY 2008:
	NCSEAM (now DAC), NECTAC, and MSRRC to analyze the current general supervision model. Based upon these findings, ITDD general supervision system will be considered for redesign.	ITDD, NECTAC, DAC, and MSRRC	During this fiscal year, ITDD began revising the general supervision system with assistance from TA. This work continues in FFY 2009 and is expected to continue throughout the remainder of the SPP.
4.	Collaborate with the DOH MAA	January 2008 – 2010	FFY 2008:
	(now Department of Health Care Finance) to improve interagency procedures to facilitate timely evaluations.	Part C Coordinator and staff; DOH MAA Administration and staff; MCO staff	Monthly meetings continued in FFY 2008 and in FFY 2009, quarterly meetings with MCOs Chief Executive Officers began and a plan to utilize the same outside providers has been developed and is being implemented.
5.	Part C Coordinator will meet	February 2008 – 2010	FFY 2008:
	with staff to conduct ongoing reviews of state data for this indicator.	Part C Coordinator and staff	Data were reviewed on an ongoing basis and meetings held as needed. In FFY 2009, a new database was established and bi-monthly meetings

	Improvement Activity	Timelines & Resources	Status
			are occurring with staff and providers to track performance.
6.	Review to clarify, revise and streamline eligibility and evaluations policies, procedures, forms and practices.	February 2008 – 2010	FFY 2008:
		Part C Coordinator and staff; NECTAC and MSRRC	This activity did not occur until FFY 2009. A draft manual for general policies has been completed and is being reviewed.
7.	Access technical assistance	April 2008 – 2010	FFY 2008:
	from NECTAC to improve 45- day timeline and explore what other states are doing.	Part C Coordinator and staff; NECTAC; MSRRC	Completed. TA meetings and calls with NECTAC were completed and trainings/ workshops for contractors were held in February 2009.
8.	Explore offering incentive to evaluation providers for consistently providing timely evaluations.	June 2008 – 2010	FFY 2008:
		Part C Coordinator and staff; ECE; NECTAC	Use of incentives has been explored and viable options are being reviewed.
9.	Temporarily suspend	February 2008 – 2010	FFY 2008:
	penalizing providers 1% of their invoice until clear internal policies and procedures are in	DC Part C office invoice reviewers	This sanction is not currently being applied.
	place and consistent technical assistance can be provided to providers.		The development of clear policies and procedures has occurred and ongoing technical assistance provision is being provided.
10.	Review existing monitoring	April 2008 – 2010	FFY 2008:
	policies and procedures for possible implementation while policies and procedures are under revision.	Part C Coordinator and staff	Completed. In accordance with the OSSE CAP with OSEP, some new monitoring procedures are being implemented.

	Improvement Activity	Timelines & Resources	Status
			This work began in FFY 2008 and continues in FFY 2009. Additional revisions are underway and will be implemented in FFY 2009 and FFY 2010.
11.	The Part C Coordinator will be actively engaged in meetings	March 2008 – 2010	FFY 2008:
	with evaluation providers for technical assistance and training on timely completion of 45-day timeline requirements.	Part C Coordinator and staff	Completed. TA meetings with evaluation providers were completed and trainings for contractors were held monthly in FFY 2008.
12.	The Part C Office (ITDD) will convene a task force to	May 2008 – September 2008	FFY 2008:
	identify and address barriers to timely completion of the 45- day timeline requirements.	Part C Coordinator and staff; MSRRC; NECTAC; stakeholders	Activity completed in September 2008.
13.	Consult with OSEP to clarify	March 2008	FFY 2008: Completed.
	the definition of referral.	Part C Coordinator, OSEP	Interim Program Manager consulted with OSEP representative.
14.	Part C Coordinator will meet	February 2008 – 2010	FFY 2008:
	with staff to conduct weekly reviews of state data.		Data were reviewed on an ongoing basis and meetings held as needed. In FFY 2009, a new database was established and bi-monthly meetings are occurring with staff and providers to track performance.

# Correction of Noncompliance on FFY 2007 data reported in the APR submitted February 1, 2009:

ITDD reported a 74% rate of compliance for Indicator 7. ITDD drilled-down into the data reflecting noncompliance to determine which programs were responsible for the delays and the reasons for the delays. In FFY 2007, four ITDD outside providers were responsible for delays in evaluation, including a lack of adherence to the 45-day timeline requirement. ITDD issued findings to three of these outside providers on April 30, 2009. One outside provider was no longer providing services to the ITDD.

The letters of findings detailed the data used to determine the findings, the extent of the noncompliance, and the IDEA citations related to the noncompliance. ITDD required that CAPs be completed and signed within 30 days. The CAPs mandated evidence of change with required submission of improvement and correction data. These letters of findings and CAPs were provided in the ITDD May 15, 2009 Special Conditions Report.

ITDD ensures that for the three outside providers with identified noncompliance in FFY 2007 for this indicator, correction of noncompliance was verified within twelve months of the findings issued in FFY 2008. Furthermore, ITDD has verified that each outside provider with noncompliance reported under this indicator in the FFY 2007 APR: (1) is correctly implementing the specific regulatory requirements; and (2) has initiated services for each child, although late.

**Revisions**, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / **Resources for FFY 2009**: No changes to targets, improvement activities, timelines and resources are proposed.

#### Monitoring Priority: Effective General Supervision Part C / Effective Transition

**Indicator 8:** Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including:

- A. IFSPs with transition steps and services;
- B. Notification to LEA, if child potentially eligible for Part B; and
- C. Transition conference, if child potentially eligible for Part B.

(20 U.S.C. 1416(a)(3)(B) and 1442)

#### Measurement:

- A. Percent = [(# of children exiting Part C who have an IFSP with transition steps and services) divided by the (# of children exiting Part C)] times 100.
- B. Percent = [(# of children exiting Part C and potentially eligible for Part B where notification to the LEA occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.
- C. Percent = [(# of children exiting Part C and potentially eligible for Part B where the transition conference occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.

Account for untimely transition conferences, including reasons for delays.

FFY		Measurable and Rigorou	s Target
2008	a. 100%	b. 100%	c. 100%

#### Actual Target Data for FFY 2008:

- A) **91%** (43/47\*100) of children exiting Part C had an IFSP with transition steps and services.
- B) 100% of children exiting Part C, who were potentially eligible for Part B had LEA notification.
- C) **95%** (37/39\*100) of children exiting Part C received a timely transition conference.

#### **Indicator 8A**

8A - Measurement Categories	Number of Children
Number of children with transition steps and services	43
Number of children without transition steps and services	4
Total number of records	47

#### Indicator 8C

8C - Measurement Categories	Number of Children
Number of children with timely transition conference	29
Reason for Delay	
Number of children for whom transition conference was not timely due to exceptional family circumstances (sick child or family member, missed or canceled appointments, etc.)	8
ITDD delay	2
Total number of records	39

The District assumes that all children eligible for Part C are potentially eligible for Part B. Data for this indicator were collected primarily from the ITDD MIS. The District chose the fourth (4<sup>th</sup>) quarter of FFY 2008 to complete a compliance review for this indicator. The MIS was used as the foundation tool for identifying all children who turned three (3) during the fourth (4<sup>th</sup>) quarter of the reporting period.

APR development for indicator 8A (IFSPs with Steps and Services) includes all Part C eligible children who exited the system during the fourth (4<sup>th</sup>) quarter of the reporting period (turned three (3) years of age in the 4<sup>th</sup> quarter). All children who were active at that time were included in the monitoring activity. IFSPs were reviewed for all children to determine if steps and services were included in their IFSP.

APR development for 8B (LEA Notification) was accomplished through faxing a monthly report produced by the MIS. This report identifies all eligible children who are between two (2) and three (3) years of age whose case is identified in the MIS as open.

For Indicator 8C, the District reviewed all transition requirements for children who exited the Part C system during the fourth (4<sup>th</sup>) quarter of the reporting period. The following activities were completed:

• The MIS was utilized to identify the date of each child's transition conference. The MIS displays the dates of all IFSP meetings on the child's screen in the database. Each child's database file must be opened to obtain this information;

- Paper case files were pulled for any child where no conference date was recorded in the MIS, as well as for any child whose conference was not held timely [at least 90 days before the third (3<sup>rd</sup>) birthday];
- The paper case file was also utilized to determine the reason for any conference held that missed the required timeline or where no conference was held; and
- Validation of the data was completed through a review of each transition conference plan document to confirm date accuracy.

## Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

The District is reporting slippage for 8A for this reporting period from 100% in FFY 2007 to 91% in FFY 2008. In FFY 2008, a decision was made to require additional documentation of all required specific steps and services in the IFSP. Four IFSPs were identified as having inadequate steps and services. This increased standard resulted in slippage for this year. Steps have been taken to address this slippage through technical assistance and supervision of in-house staff.

The District is able to report 100% compliance for LEA notification.

The District performance showed sight slippage from FFY 2007 (96%) to FFY 2008 (95%) for 8C.

In order to address the noncompliance in FFY 2008, ITDD completed as the following improvement activities:

- Determined reasons for noncompliance through a drill-down of data;
- Assured that, for the two children for whom the transition conference was not provided timely, the conference was held, although late. The children who had inadequate steps and services aged out prior to the monitoring;
- Updated internal ITDD procedures to ensure correct implementation of the specific regulatory requirements; and
- Attributed the failure to meet transition requirements to ITDD in-house intake staff, and documented that failure in annual performance reviews of staff;

Transition procedures include:

- An exit planning process which begins with the identification of children to the LEA at age two or upon entry into the system if the child is over two years of age. This is accomplished through a MIS Transition Report;
- Collaboration between the Part C Dedicated Service Coordinator, identified Part B liaisons, and the parent to coordinate the date, time and location of the IFSP Transition conference;
- ITDD issuance of a formal written prior notice in the form of an invitation to the parent and the Part B liaison three to four weeks prior to the conference (fax or email is utilized to ensure delivery and confirm receipt by Part B);

- A IFSP Transition conference held six months before the child's third birthday to ensure sufficient planning time;
- Utilization of the Part C IFSP form, which includes a section for a formal transition plan with steps and services outlined for completion (this form combines both checklists and narrative components for parents to identify each child's specific needs and tasks for completion, as well as for identifying the parent's interest in future programs);
- Standardization of a note-taking process for conferencing that captures the main discussion of the conference, options shared, documents released to Part B, and the family's preferences about how they would like to proceed; and
- A follow-up IFSP transition conference held two to three months before the child's third birthday to ensure all assignments/tasks are completed (Dedicated Service Coordinators are responsible for ensuring that those identified as providing support and/or services to the child and/or family complete tasks prior to the child's exit from the Part C system).

	Improvement Activity	Timelines & Resources	Status
1.	The Part C Transition team and Coordinator will work with the OSSE Office of Information Technology (OIT) to upgrade Part C's MIS to ensure the data reports necessary to effectively monitor transition timelines and report on compliance requirements are available.	2008-2010 Part C Coordinator and Transition team, MSRRC, DAC, NECTAC, OSSE and its OSSE OIT	FFY 2008: The new Early Steps and Stages Tracker implemented July 1, 2009 has made this activity unnecessary. This new database improves the ITDD's ability to monitor transition timelines and report on compliance requirements.

# Correction of Noncompliance on FFY 2007 data reported in the APR submitted February 1, 2009:

In FFY 2007, for Indicator 8A and 8B, ITDD reported 100 % performance for FFY 2007. Therefore, ITDD issued no findings for that time period.

For Indicator 8C, ITDD reported performance of 96% of children having timely transition conferences. The noncompliance was analyzed to determine responsibility and the reason for delay. Of the 36 records reviewed, 25 conferences were timely, seven were delayed for family reasons, and the remaining four were the responsibility of ITDD. This failure was reflected in

annual performance reviews. During this time period, there were no outside vendors responsible for service coordination.

ITDD has verified that it is correctly implementing the specific regulatory requirements and has completed a transition conference for each child, although late.

**Revisions**, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2009: No changes to targets, improvement activities, timelines and resources are proposed.

### Monitoring Priority: Effective General Supervision Part C / General Supervision

**Indicator 9:** General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification.

(20 U.S.C. 1416(a)(3)(B) and 1442)

#### Measurement:

Percent of noncompliance corrected within one year of identification:

- a. # of findings of noncompliance.
- b. # of corrections completed as soon as possible but in no case later than one year from identification.

Percent = [(b) divided by (a)] times 100.

States are required to use the "Indicator 9 Worksheet" to report data for this indicator (see Attachment A).

FFY	Measurable and Rigorous Target
2008	100%

#### Actual Target Data for FFY 2008: No findings were issued.

ITDD issued no findings of noncompliance in FFY 2007. An analysis of the data revealed that the primary responsibility for the noncompliance rested with Medicaid and in-house staff. ITDD has been and continues to address this noncompliance with continued collaboration with Medicaid, necessary revisions to internal procedures, and enhanced supervision.

In accordance with current special conditions and the OSSE CAP with OSEP, ITDD has been and continues to revise and implement changes to the General Supervision System (GSS). As a part of this revised process, findings were issued in the last quarter of FFY 2008 for noncompliance on data from FFY 2007. Therefore, worksheets for two fiscal years are included in this response

to Indicator 9 to demonstrate ITDD's understanding of the requirement to identify and timely correct noncompliance.

In FFY 2007, four ITDD outside providers were responsible for delays in evaluation, including a lack of adherence to the 45-day timeline requirement. ITDD issued findings to three of these outside providers on April 30, 2009. One outside provider was no longer providing services to the ITDD.

The letters of findings detailed the data used to determine the findings, the extent of the noncompliance, and the IDEA citations related to the noncompliance. ITDD required that CAPs be completed and signed within 30 days. The CAPs mandated evidence of change with required submission of improvement and correction data. These letters of findings and CAPs were provided in the ITDD May 15, 2009 Special Conditions Report.

ITDD ensures that for the three outside providers with identified noncompliance in FFY 2007 for this indicator, correction of noncompliance was verified within twelve months of the findings issued in FFY 2008. Furthermore, ITDD has verified that each outside provider with noncompliance reported under this indicator in the FFY 2007 APR: (1) is correctly implementing the specific regulatory requirements; and (2) has initiated services for each child, although late.

## FFY 2008 C-9 Worksheet

	ndicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2007 (7/1/07 through 6/30/08)	(a) # of Findings of noncomplianc e identified in FFY 2007 (7/1/07 through 6/30/08)	(b) # of Findings of noncomplianc e from (a) for which correction was verified no later than one year from identification
1.	Percent of infants and toddlers with IFSPs who receive the early intervention services on their	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	IFSPs in a timely manner	Dispute Resolution: Complaints, Hearings	0	0	0
2.	Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
		Dispute Resolution: Complaints, Hearings	0	0	0
3.	Percent of infants and toddlers with IFSPs who demonstrate improved outcomes	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
		Dispute Resolution: Complaints, Hearings	0	0	0
4.	Percent of families participating in Part C who report that early intervention services have helped the family	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0

Indicator/Indicator Clusters		General Supervision System Components	# of EIS Programs Issued Findings in FFY 2007 (7/1/07 through 6/30/08)	(a) # of Findings of noncomplianc e identified in FFY 2007 (7/1/07 through 6/30/08)	(b) # of Findings of noncomplianc e from (a) for which correction was verified no later than one year from identification
		Dispute Resolution: Complaints, Hearings	0	0	0
a to 6. P	Percent of infants and toddlers birth o 1 with IFSPs Percent of infants and toddlers birth	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
t	to 3 with IFSPs Dispute Resolution: Complaints, Hearings		0	0	0
ir w w e	7. Percent of eligible infants and toddlers with IFSPs for evaluation and initial IFSP meeting were conducted within Part C's 45- day timeline.Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other		0	0	0
N N			0	0	0
8. Percent of allMonitoring Activities:children exiting PartSelf-Assessment/C who receivedLocal APR, Datatimely transitionReview, Desk Audit,planning to supportOn-Site Visits, orthe child'sOther		0	0	0	

Indicator/Indicator Clusters		General Supervision System Components	# of EIS Programs Issued Findings in FFY 2007 (7/1/07 through 6/30/08)	(a) # of Findings of noncomplianc e identified in FFY 2007 (7/1/07 through 6/30/08)	(b) # of Findings of noncomplianc e from (a) for which correction was verified no later than one year from identification
А.	transition to preschool and other appropriate community services by their third birthday including: IFSPs with transition steps and services;	Dispute Resolution: Complaints, Hearings	0	0	0
8.	<ul> <li>8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including:</li> <li>B. Notification to LEA, if child potentially eligible for Part B; and</li> </ul>	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
В.		Dispute Resolution: Complaints, Hearings	0	0	0
8.	Percent of all children exiting Part C who received timely transition planning to support the child's	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2007 (7/1/07 through 6/30/08)	(a) # of Findings of noncomplianc e identified in FFY 2007 (7/1/07 through 6/30/08)	(b) # of Findings of noncomplianc e from (a) for which correction was verified no later than one year from identification
<ul> <li>transition to preschool and other appropriate community services by their third birthday including:</li> <li>C. Transition conference, if child potentially eligible for Part B.</li> </ul>	Dispute Resolution: Complaints, Hearings	0	0	0
OTHER AREAS OF NONCOMPLIANCE: Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other Dispute Resolution:				
Complaints, HearingsOTHER AREAS OFMonitoring Activities:NONCOMPLIANCE:Self-Assessment/Local APR, DataReview, Desk Audit,On-Site Visits, orOtherDispute Resolution:Dispute Resolution:				

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2007 (7/1/07 through 6/30/08)	(a) # of Findings of noncomplianc e identified in FFY 2007 (7/1/07 through 6/30/08)	(b) # of Findings of noncomplianc e from (a) for which correction was verified no later than one year from identification
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other Dispute Resolution:			
Complaints, Hearings           Sum the numbers down Column a and Column b			0	0

Percent of noncompliance corrected within one year of identification = **No findings were issued** (column (b) sum divided by column (a) sum) times 100).

## FFY 2009 C-9 Worksheet

Indicator/Indicator Clusters		General Supervision System Components	# of EIS Programs Issued Findings in FFY 2008 (7/1/08 through 6/30/09)	(a) # of Findings of noncomplianc e identified in FFY 2008 (7/1/08 through 6/30/09)	(b) # of Findings of noncomplianc e from (a) for which correction was verified no later than one year from identification
1.	Percent of infants and toddlers with IFSPs who receive the early intervention services on their	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	IFSPs in a timely manner	Dispute Resolution: Complaints, Hearings	0	0	0
2.	Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
con	home or community-based settings	Dispute Resolution: Complaints, Hearings	0	0	0
3.	Percent of infants and toddlers with IFSPs who demonstrate improved outcomes	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
		Dispute Resolution: Complaints, Hearings	0	0	0

1	ndicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2008 (7/1/08 through 6/30/09)	(a) # of Findings of noncomplianc e identified in FFY 2008 (7/1/08 through 6/30/09)	(b) # of Findings of noncomplianc e from (a) for which correction was verified no later than one year from identification
4.	Percent of families participating in Part C who report that early intervention services have helped the family	Monitoring Activities: t Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other		0	0
	Dispute Resolution: Complaints, Hearings		0	0	0
	<ul> <li>5. Percent of infants and toddlers birth to 1 with IFSPs</li> <li>6. Percent of infants and toddlers birth</li> <li>7. Percent of infants and toddlers birth</li> <li>8. Percent of infants Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other</li> </ul>		0	0	0
	to 3 with IFSPs	Dispute Resolution: Complaints, Hearings	0	0	0
7.	7. Percent of eligible infants and toddlersMonitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, evaluation and assessment and an0On-Site Visits, or Other		3	3	3
	initial IFSP meeting were conducted Dispute Resolution: within Part C's 45- day timeline.		0	0	0
8.	day timeline.Monitoring Activities:8. Percent of all children exiting Part C who receivedSelf-Assessment/ Local APR, DataC who received timely transition planning to support the child'sOn-Site Visits, or Other		0	0	0

Indicator/Indicator Clusters		General Supervision System Components	# of EIS Programs Issued Findings in FFY 2008 (7/1/08 through 6/30/09)	(a) # of Findings of noncomplianc e identified in FFY 2008 (7/1/08 through 6/30/09)	(b) # of Findings of noncomplianc e from (a) for which correction was verified no later than one year from identification
А.	transition to preschool and other appropriate community services by their third birthday including: IFSPs with transition steps and services;	Dispute Resolution: Complaints, Hearings	0	0	0
8.	Percent of all children exiting Part C who received timely transition planning to support the child's	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
В.	transition to preschool and other appropriate community services by their third birthday including: Notification to LEA, if child potentially eligible for Part B; and	Dispute Resolution: Complaints, Hearings	0	0	0

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2008 (7/1/08 through 6/30/09)	(a) # of Findings of noncomplianc e identified in FFY 2008 (7/1/08 through 6/30/09)	(b) # of Findings of noncomplianc e from (a) for which correction was verified no later than one year from identification
<ol> <li>Percent of all children exiting Part C who received timely transition planning to support the child's transition to</li> </ol>	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
<ul> <li>preschool and other appropriate community services by their third birthday including:</li> <li>C. Transition conference, if child potentially eligible for Part B.</li> </ul>	Dispute Resolution: Complaints, Hearings	0	0	0
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
Dispute Resolution Complaints, Hearin				
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2008 (7/1/08 through 6/30/09)	(a) # of Findings of noncomplianc e identified in FFY 2008 (7/1/08 through 6/30/09)	(b) # of Findings of noncomplianc e from (a) for which correction was verified no later than one year from identification
	Dispute Resolution: Complaints, Hearings			
OTHER AREAS OF NONCOMPLIANCE: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other				
	Dispute Resolution: Complaints, Hearings			
Sum the numbers down	Column a and Column b		3	3

Percent of noncompliance corrected within one year of identification = **100% (3/3\*100)** (column (b) sum divided by column (a) sum) times 100)

# Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

The District did not issue findings in FFY 2007, and therefore, cannot report correction. ITDD's grant is under special conditions due to lack of progress related to this indicator and has submitted a CAP that addresses lack of an effective monitoring system. ITDD will submit a report on progress on its CAP on February 1, 2010. In addition, ITDD is demonstrating progress by submitting the C-9 worksheet for FFY 2009.

While the District continues to perform both state and local functions, ITDD recognizes the need to more efficiently perform its monitoring functions in order identify and timely correct noncompliance. In FFY 2009, the state function of monitoring is being managed by the OSSE, Department of Special Education, Monitoring and Compliance Unit. This change will provide for more specialized level of monitoring than has been demonstrated in recent years. In addition, the separation of functions will clarify the structure of the Part C system to partners and sister agencies.

The District continued to receive monthly technical assistance from MSRRC Regional Resource Center (MRRSC), the National Early Childhood Technical Assistance Center (NECTAC) and the Data Accountability Center (DAC). The technical assistance received involved all of ITDD staff and supervisors. ITDD spent a significant amount of time examining monitoring procedures already in place to determine what practices needed to change in order to improve the system of monitoring.

In FFY 2009, the Department of Special Education has worked with Part C technical assistance providers to develop and finalize a Part C monitoring manual and related Part C monitoring tools for utilization with all Part C providers. These tools are being used beginning in FFY 2009 and annually thereafter for purposes of provider self assessment and onsite monitoring.

	Improvement Activity	Timelines & Resources	Status
1.	Early Intervention (EI) Specialists make bi-monthly phone calls to families to ensure services are being received and that families are satisfied with the outcomes	Ongoing 2005 – 2010 Part C staff	<b>FFY 2008:</b> EI Specialists were trained and are documenting contact on a weekly basis.
2.	EI Specialists facilitate IFSP meetings for children on their service coordination caseload to ensure compliance with Part C requirements	Ongoing 2005 – 2010 Part C staff	<b>FFY 2008:</b> EI Specialists were trained and are documenting contact on a weekly basis.

	Improvement Activity	Timelines & Resources	Status
3.	Review and certification of provider invoices	Ongoing 2005 – 2010 Part C staff	<b>FFY 2008:</b> Part C Staff are responsible for reviewing and certifying provider invoices. This activity is being monitored and improvements are made to the process as necessary.
4.	Partner with NCSEAM, NECTAC and MSRRC to analyze the current general supervision model	Ongoing 2007 – 2010 Part C Coordinator and staff; NECTAC, DAC and MSRRC	FFY 2008: This activity was not completed in FFY 2008. ITDD partnered with DAC, MSRRC, and NECTAC in Fall 2009 to complete this activity.

# Revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2009:

5.	Partner with NECTAC, DAC	FFY 2009	FFY 2009:
	and MSRRC to develop and finalize Part C monitoring manual and tools	Director, Monitoring and Compliance; NECTAC, DAC and MSRRC	Completed

#### Monitoring Priority: Effective General Supervision Part C / General Supervision

**Indicator 10:** Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.

(20 U.S.C. 1416(a)(3)(B) and 1442)

**Measurement:** Percent = [(1.1(b) + 1.1(c)) divided by 1.1] times 100.

FFY	Measurable and Rigorous Target	
2008	100%	

#### Actual Target Data for FFY 2008: No signed written complaints were received.

The District did not receive any formal complaints in FFY 2007.

## Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

DC Part C utilizes the following strategies to ensure that family procedural rights information is consistently shared with families:

- The IFSP form requires written acknowledgement that family rights were reviewed with families during the meeting;
- Rights are reviewed with the families during any conversation;
- All Part C sponsored trainings and meetings provide an opportunity for feedback from providers to determine how disagreements with families are handled; and
- Part C requires and receives copies of signed informed consent for services that also include information about family rights.

**Revisions**, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / **Resources for FFY 2009:** No changes to targets, improvement activities, timelines and resources are proposed.

#### Monitoring Priority: Effective General Supervision Part C / General Supervision

**Indicator 11:** Percent of fully adjudicated due process hearing requests that were fully adjudicated within the applicable timeline.

(20 U.S.C. 1416(a)(3)(B) and 1442)

**Measurement:** Percent = [(3.2(a) + 3.2(b)) divided by 3.2] times 100.

FFY	Measurable and Rigorous Target
2008	100%

#### Actual Target Data for FFY 2008: 100%

The District is reporting 100% (1+0/1\*100) for this indicator. ITDD received one (1) due process hearing request which was fully adjudicated within the applicable timeline in FFY 2008. The District utilizes Part B procedures for due process hearings.

## Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

ITDD recognizes the importance of ensuring that families know how to file a complaint or grievance, and how to access mediation and the due process hearing system. ITDD further recognizes that families may not want mediation assistance and, instead, may want to immediately request a due process hearing. While ITDD strives to provide the level of service to children and families with a goal of ensuring that there would be no need for a complaint, it also is committed to sharing information regarding due process and ensuring access to the system.

Due process information is included in the "Families Have Rights" brochure that is shared with all families verbally and in writing. Information is consistently provided to all service providers at every meeting and/or training regarding their responsibility to assist families with this course of action. The "Families Have Rights" brochure directs families to request an administrative hearing for the resolution of individual child complaints through an impartial decision maker by filing a written complaint with the OSSE Student Hearing Office. Contact phone and fax numbers are included on the brochure, which is readily available in both English and Spanish. The OSSE website is also a resource that families can use to learn about their rights and access information regarding due process complaints.

**Revisions**, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / **Resources for FFY 2009:** No changes to targets, improvement activities, timelines and resources are proposed.

#### Monitoring Priority: Effective General Supervision Part C / General Supervision

**Indicator 12:** Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements (applicable if Part B due process procedures are adopted).

#### (20 U.S.C. 1416(a)(3)(B) and 1442)

**Measurement:** Percent = (3.1(a) divided by 3.1) times 100.

FFY	Measurable and Rigorous Target
2008	100%

#### Actual Target Data for FFY 2008: 100%

The District is reporting 100% (1/1\*100) for this indicator. During this reporting period, there was one (1) Part C resolution session, which resulted in a settlement agreement. The District utilizes Part B procedures for due process hearings.

# Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

ITDD recognizes the importance of ensuring that families know how to file a complaint or grievance, and how to access mediation and the due process hearing system. ITDD further recognizes that families may not want mediation assistance and, instead, may want to immediately request a due process hearing. While ITDD strives to provide the level of service to children and families with a goal of ensuring there would be no complaints, it is necessary to share information regarding due process and ensure access to the system.

Due process information is included in the "Families Have Rights" brochure that is shared with all families verbally and in writing. Information is consistently provided to all service providers at every meeting and/or training regarding their responsibility to assist families this course of action. The "Families Have Rights" brochure directs families to request an administrative hearing for the resolution of individual child complaints through an impartial decision maker by filing a written complaint with the OSSE Student Hearing Office. Contact phone and fax numbers are included on the brochure which is readily available in both English and Spanish. The OSSE website is also a resource that families can use to find out their rights and get information regarding due process complaints.

Revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2009: No changes to targets, improvement activities, timelines and resources are proposed.

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 13: Percent of mediations held that resulted in mediation agreements.

(20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement: Percent = [(2.1(a)(i) + 2.1(b)(i)) divided by 2.1] times 100.

FFY	Measurable and Rigorous Target	
2008	100%	

#### Actual Target Data for FFY 2008: 100%

The District is reporting 100% (0+1/1\*100) for this indicator. During this reporting period, there was one (1) mediation held that resulted in a mediation agreement.

# Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

The Part C Office recognizes the importance of ensuring that families know how to file a complaint or grievance and how to access mediation and the due process hearing system. Information on mediation is included in the "Families Have Rights" brochure that is shared with all families verbally and in writing. Information is consistently provided to all service providers at every meeting and/or training regarding their responsibility to assist families to access the mediation. The "Families Have Rights" brochure directs families to request an administrative hearing for the resolution of individual child complaints through an impartial decision maker by filing a written complaint with the OSSE Student Hearing Office. A contact phone number as well as fax number is also included on the brochure. The "Families Have Rights" brochure is readily available in both English and Spanish. The OSSE website is also a resource that families can use to find out their rights and get information regarding due process complaints.

**Revisions**, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / **Resources for FFY 2009:** No changes to targets, improvement activities, timelines and resources are proposed.

#### Monitoring Priority: Effective General Supervision Part C / General Supervision

**Indicator 14:** State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate. (20 U.S.C. 1416(a)(3)(B) and 1442)

**Measurement:** State reported data, including 618 data, State performance plan, and annual performance reports, are:

- a. Submitted on or before due dates (February 1 for child count and settings and November 1 for exiting and dispute resolution); and
- b. Accurate, including covering the correct year and following the correct measurement.

States are required to use the "Indicator 14 Data Rubric" for reporting data for this indicator (see Attachment B).

FFY	Measurable and Rigorous Target	
2008	100%	

#### Actual Target Data for FFY 2008: 97.1%

Reports were submitted according to the prescribed schedule; however, ITDD did not correctly respond to Indicator C-9. Performance on this indicator resulted in the special conditions placed on the program. The following mechanisms for ensuring error-free, consistent, valid and reliable data have been put in place to address and correct this issue:

- ITDD Revised the C9 monitoring requirements to ensure that:
  - o Data collected are both comprehensive and eliminate duplications;
  - Data collected are gathered using a uniform coding system, with clear definitions for items to be collected to maintain consistency;
  - o Data collection methods ensure that privacy will be maintained;
  - Data are collected using a procedure that incorporates checking and correcting data entry errors;
  - Data will be collected with a clear process for collection eliminating collecting unnecessary data;

- o Data undergoes ongoing review; and
- Clear roles and expectations have been established for those collecting the data.

## Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2008:

The District reports improvement in the collection, analysis and verification of its data to inform all components of its general supervision system. The District Management Information System (MIS) continues to be utilized as the primary tool for managing data. All staff are involved in the collection and analysis of data needed to address the various compliance requirements of IDEA.

The District is reporting progress for this indicator for FFY 2008 over the reported compliance of 90% for FFY 2007. The District has achieved 100% compliance on this indicator. This is significant progress over the past two years. Steps being taken to improve compliance for all reporting requirements include regular review of the OSEP calendar for deadlines and changes in reporting requirements.

Indicator 14 - SPP/APR Data				
APR Indicator	Valid and Reliable Correct Calculation		Total	
1	1	1	2	
2	1	1	2	
3	1	1	2	
4	1	1	2	
5	1	1	2	
6	1	1	2	
7	1	1	2	
8A	1	1	2	
8B	1	1	2	
8C	1	1	2	
9	0	0	0	
10	1	1	2	
11	1	1	2	
12	1	1	2	
13	1	1	2	
		Subtotal	28	
APR Score Calculation	<b>Timely Submission Points</b> (5 pts for submission of APR/SPP by February 1, 2010)		5	
Calculation	Grand Total	33		

#### Part C Indicator 14 Data Rubric

Indicator 14 - 618	Data				
Table	Timely	Complete Data	Passed Edit Check	Responded to Date Note Requests	Total
Table 1 – Child					
Count					
Due Date:	1	1	1	1	4
2/1/09					
Table 2 –					
Settings					
Due Date:	1	1	1	1	4
2/1/09					
Table 3 –					
Exiting					
Due Date:	1	1	1	NA	3
11/1/09					
Table 4 –					
Dispute					
Resolution					
Due Date:	1	1	1	N/A	3
11/1/09					
				Subtotal	14
			Weighted Total (subtotal X 2.5; round $\leq$ .49 down and $\geq$ .50 up to whole number)		
					35
Indicator # 14 Cal	culation				
			A. APR Total	33	33
			B. 618 Total	35	35
			C. Grand	68	68
			Total	00	00
Percent of timely and accurate data = (C divided by 70 times 100)			68 / (70) X 100 =		97.1

**Revisions**, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / **Resources for FFY 2009:** No changes to targets, improvement activities, timelines and resources are proposed. FFY 2008 (JULY 1, 2008 – JUNE 30, 2009)

## **ATTACHMENT**

#### **RESPONSE TO FFY 2007 APR SPECIAL CONDITIONS**