

**Vermont Part C:
Early Intervention Program of the
Individuals with Disabilities Education Act (IDEA)**

**Annual Performance Report
Federal Fiscal Year 2009
(July 1, 2009 through June 30, 2010)**

Revised April 14, 2011

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2009

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Part C State Annual Performance Report (APR) for FFY 2009**Overview of the Annual Performance Report Development:**

Vermont's Part C Program, known as the Family, Infant and Toddler Program (FITP), changed its name to "Children's Integrated Services-Early Intervention (CIS-EI)" in FFY 2009. Children's Integrated Services is Vermont's unique model for integrating early childhood health, mental health, early intervention (Part C), and specialized child care services for pregnant women and children from birth to six. The model is designed to improve child and family outcomes by providing family-centered, holistic, prevention, early intervention, and health promotion services, effective service coordination, and flexible funding to address gaps in services. This 2009 APR, and the revised State Performance Plan (SPP) submitted February 1, 2011, reflect this name change and the full integration of Part C early intervention services, early childhood health and mental health, and specialized child care services into one child development and family support services system that makes services available statewide. At the November 2009 meeting of the Vermont Interagency Coordinating Council (VICC), the Deputy Commissioner of the Vermont Department for Children and Families, Agency of Human Services, requested that the VICC function in an "advise and assist" role for Children's Integrated Services.

Discussion of and input into Vermont's Part C Annual Performance Report continued to be on the agenda of every quarterly Vermont Interagency Coordinating Council (VICC) meeting and during the VICC's annual retreat, on the agenda for the two annual statewide meetings and monthly conference calls with the regional Children's Integrated Services (CIS)-Early Intervention Program (EIP) Directors and staff, and integrated into the weekly meetings of the Children's Integrated Services (CIS) State Team. Following submission of the 2008 APR in February 2010, VICC members, regional CIS-EIP Directors and staff, and CIS State Team members reviewed the 2008 APR during their respective meetings and discussed with State Part C CIS-EI staff specific improvement activities and areas to target in preparation for submitting this 2009 APR. For this 2009 APR, VICC members, regional CIS-EIP Directors/staff, and/or CIS State Team members provided specific input related to: 1) revisions to the Annual Determination Process, 2) the ECO Family Outcomes Survey sent to families in May 2010 and process for distributing, 3) strategies for maintaining Vermont CIS-EI's substantial compliance in meeting the timely statutory/regulatory requirements under the IDEA and fulfillment of the requirements of OSEP Memo 09-02; 4) Child Outcomes and collection of data; and 5) maintenance of Vermont Part C's FFY 2010 "Meets Requirements" status based on Vermont's 2008 APR.

As in past years, state CIS-EI staff received input into the development of this 2009 APR from its Office of Special Education Programs (OSEP) State Contact, Northeast Regional Resource (NERRC) staff, staff from the Early Childhood Outcomes (ECO) Center and Data Accountability Center (DAC), and from state/regional/national colleagues administering their states' Parts B and C Programs. State CIS-EI staff participated in multiple regional and national webinars and iLinc/teleconference sessions addressing the APR and/or SPP, attended the 2009 OSEP National Early Childhood and Data Meeting conferences, and continued to access the Regional Resource Center Website for information and materials. The VICC reviewed a draft of this 2009 APR prior to submission.

The Agency of Human Services/Vermont Part C CIS-EI will report to the public in spring 2011 on Vermont's and each of the 12 regional CIS-EIP's progress or slippage in meeting FFY 2009 targets in the State Performance Plan. Data from the 2009 APR will be posted to the Agency of Human Services/Child Development Division's website at http://dcf.vermont.gov/cdd/reports/IDEA_Part_C, the Vermont Department of Education's and Vermont Family Network's web sites, and disseminated statewide via listservs, in newspapers, during meetings and teleconferences, and through other media.

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
2009 (7/1/09-6/30/10)	100%

Actual Target Data for FFY 2009:

98.7%

Data Method/Source: Desk audit of 2009 Child Count Database, 12/2/08 to 12/1/09

Infants and Toddlers with IFSPs who receive Early Intervention Services in a Timely Manner:

a. Number of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	544
b. Total number of infants and toddlers with IFSPs	551
Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner (Percent = [(a) divided by (b)] times 100)	98.7%

Of the 551 children with new services on both initial and subsequent IFSPs, 500 children received all the services on their IFSPs within 30 days of signed parental consent (Vermont’s criteria). 44 children did not receive all their services in a timely manner due to documented exceptional family circumstances. These 44 children are included in the numerator as well as the denominator. These exceptional family circumstances included family requests to reschedule, illness and/or hospitalization of children, deployment of a parent, and extreme weather conditions.

There were seven children for whom delays were attributable to circumstances other than documented exceptional family circumstances. State Part C CIS-EI staff verified that these seven children ultimately received their services. All services were initiated within the following number of days beyond the 30-day timeline for these seven children: 8, 12, 13, 16, 19, 30 and 83. Delays for two of the children were caused by the unavailability of the speech-language pathologist, delays for two children caused by the unavailability of an occupational therapist, delays for one child by the unavailability of a physical therapist,

and delays for two children occurred during the child's/family's transition to a newly-hired early interventionist.

Vermont Part C made **no new findings of noncompliance in FFY 2009** in Indicator 1.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2009:

Vermont CIS-EI demonstrated slight progress in FFY 2009, going from 98% compliance in FFY 2008 to 98.7% compliance in FFY 2009. During FFY 2009, Vermont's Part C Coordinator continued to dedicate resources to enhance the efficacy and efficiency of CIS-EI's current manual data management system. State CIS-EI staff regularly reviewed and entered into an ACCESS database child count data submitted by regional CIS-EIP staff. At least every other month (and often more frequently), state staff communicated with specific CIS-EIPs if data were incomplete and/or there was need for clarification. State CIS-EI staff continued providing ongoing support to all regional CIS-EIPs to reinforce the 100% compliance requirement for Indicator 1 and ensure timely submission of and accurate documentation on child count forms. Support included: 1) onsite visits to assist regional CIS-EIPs in developing more effective data collection and procedures for verifying accuracy of data prior to submission, 2) monthly phone calls, and 3) regular email communication.

The comprehensive instructions and forms for the 2009 Child Count submitted by the regional CIS-EIP staff to the CIS-EI state office continued to require CIS-EIP staff to document for each child and each service the date of signed parental consent, projected and actual initiation date, whether services were "timely/not timely," and family or other reasons for delays. This procedure enabled state CIS-EI staff reviewing the child count forms to determine immediately, for the majority of children, compliance or noncompliance, and to determine actual number of days beyond the 30-day period of time from signed parental consent that services were initiated. If dates for initiation of services were not documented for any reason, e.g., forms were submitted prior to the projected date of initiation of services, CIS-EI staff followed up by telephone and/or email to obtain the initiation date(s). Regional CIS-EIP staff continued to mark themselves "compliant" or "noncompliant" on the forms prior to submitting to the state office.

Vermont Part C CIS-EI transitioned to an electronic statewide billing system, Hewlett Packard Enterprise System (HPES), in FFY 2009. This contributed substantially to improving the process for verifying that data were complete and accurate. CIS-EI state staff compared on a weekly basis the data entered into the ACCESS database with data entered into the HPES system to check for accuracy and query for any duplicate data. This has provided Part C CIS-EI with an enhanced level of "checks and balances," e.g., prior authorizations (PAs) cannot be made for children who are not active in the CIS-EI system, and PA requests must match the frequency of services as stated on the current service grid. As of January 1, 2010, forms for children who were active (as well as for children who exited CIS-EI) that were submitted to the state CIS-EI office had to be timely and accurate in order for CIS-EI providers to receive payment.

Other specific activities contributed to VT Part C's substantial compliance in Indicator 1. During FFY 2009, state CIS-EI staff established a collaborative relationship with a new agency in the region that provides early intervention services for approximately 20% of the children and families who receive services statewide. The collaboration of this provider agency with the regional CIS-EIP resulted in children receiving expanded and timelier physical and occupational therapy services. This regional CIS-EIP increased its level of compliance for Indicator 1 in FFY 2009, moving from 93% compliance in FFY 2008 to 98.5% compliance in FFY 2009. This CIS-EIP also enhanced its data tracking system and communicated regularly with their local schools that provide early intervention services to ensure that services began in a timely manner. Staff within this particular CIS-EIP systematically communicated with their director to let her know of any potential noncompliance in meeting timelines so that she could follow up with the relevant school personnel. The CIS-EIP director also conducted regular file reviews and required staff to conduct self-assessments of their files to ensure accurate and complete documentation.

Two state CIS-EI staff provided extensive and targeted technical assistance to a regional CIS-EIP that went from 100% compliance in FFY 2008 to 92% compliance in FFY 2009. The lack of staff capacity to provide adequate and systematic supervision, as well as a change in program leadership, contributed to

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this regional CIS-EIP experiencing challenges in multiple areas of service provision. The state CIS-EI staff incorporated a root cause analysis into their onsite technical assistance to assist in identifying issues contributing to the challenges in this regional CIS-EIP. Please see discussion under “Verification of Correction of FFY 2009 Noncompliance Reported in this 2009 APR” that describes this CIS-EIP’s correction of its FFY 2009 noncompliance.

Correction of FFY 2008 Findings of Noncompliance:

Level of compliance (actual target data) State reported for FFY 2008 for this indicator: **98%**

1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009)	1
2. Number of FFY 2008 findings the State verified as timely corrected (verified as corrected within one year from the date of notification to the EIS program of the finding)	1
3. Number of FFY 2008 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Verification of Timely Correction of FFY 2008 Finding:

The one finding identified in FFY 2008 was **timely corrected**. Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of updated data from the first quarter of the 2009 Child Count Database (December 2008 to February 2009), CIS-EIP 4 achieved 100% compliance for 60 consecutive days, indicating that the program is correctly implementing the timely service provision requirements in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1); and 2) Part C state staff verified immediately upon review of the 2008 Child Count forms (the data source for identifying the finding) that, although late, all services were initiated for the nine children for whom services were not initiated in a timely manner. The number of days services were initiated beyond the 30-day timeline from signed parental consent for these nine children ranged from 19 to 134. The delays were due to the lack of availability of speech language pathologists and occupational and physical therapists who could provide the services in a timely way.

Additional updated data further indicated that this CIS-EIP is correctly implementing the timely service provision requirements for Indicator 1. In a desk audit of updated data from the first quarter of the 2010 Child Count Database (December 2009 to February 2010), CIS-EIP 4 achieved 100% compliance for 60 consecutive days (please see discussion under “Verification of Correction of FFY 2009 Noncompliance Reported in this 2009 APR”). During FFY 2010 (August), all regional CIS-EIPs conducted annual self-assessments of files and submitted these to the state CIS-EI office for review and verification. Regional CIS-EIP 4 demonstrated 100% compliance (32/32 files).

Verification of Correction of FFY 2008 Noncompliance Reported in the 2008 APR:

Two regional CIS-EIPs demonstrated noncompliance during FFY 2008. CIS-EIP 6 was at 97% compliance (32/33), and CIS-EIP 7 was at 95% compliance (40/42). This noncompliance was corrected prior to issuing written findings of noncompliance. Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of updated data from the first quarter of the 2009 Child Count Database (December 2008 to February 2009), CIS-EIPs 6 and 7 achieved 100% compliance for 60 consecutive days, indicating that the programs are correctly implementing the timely service provision requirements in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1); and 2) Part C state staff verified immediately upon review of the 2008 Child Count forms (the data source for identifying the finding) that, although late, all services were initiated for the three children for whom services were not initiated in a timely manner. All services were initiated for the one child in EIP 6 12 days beyond the 30-

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day timeline from signed parental consent, and for the two children in EIP 7, 10 and 16 days beyond the 30-day timeline. The delay in CIS-EIP 6 was due to the occupational and physical therapists' inability to schedule in a timely way, and in CIS-EIP 7, the speech-language pathologist and physical therapist experienced scheduling conflicts.

CIS-EIPs 6 and 7 ultimately achieved 100% compliance (40/40 and 50/50 compliant, respectively) in a desk audit of the entire 2009 Child Count Database, further indicating that these programs are correctly implementing the timely service provision requirements in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1).

Verification of Correction of FFY 2009 Noncompliance Reported in this 2009 APR:

Three regional CIS-EIPs demonstrated noncompliance based on analysis of the entire 2009 Child Count Database used for reporting statewide data for Indicator 1 in this FFY 2009 APR. CIS-EIP 4 was at 98.5% compliance (137/139), CIS-EIP 8 was at 92% compliance (24/26), and CIS-EIP 9 was at 92% compliance (35/38). This noncompliance was corrected prior to issuing written findings of noncompliance.

Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of updated data from the first quarter of the 2010 Child Count Database (December 2009 to February 2010), CIS-EIPs 4, 8 and 9 achieved 100% compliance for 60 consecutive days, indicating that these three programs are correctly implementing the timely service provision requirements in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1); and 2) Part C staff reviewed the 2010 Child Count forms submitted during the first quarter by these regional CIS-EIPs and were immediately able to verify that, although late, all services were initiated for the seven children for whom services were not initiated in a timely manner. The number of days services were initiated beyond the 30-day timeline from signed parental consent for the two children in CIS-EIP 4 were 16 and 30 days; for the two children in CIS-EIP 8 19 and 93 days; and for the three children in CIS-EIP 9, 12 and 13 days. The delays were due to the lack of availability of speech language pathologists and occupational and physical therapists who could provide the services in a timely way. As reported earlier, Regional EIP 4 demonstrated 100% compliance (32/32 files) for Indicator 1 in its FFY 2010 self-assessment, as did regional CIS-EIPs 8 (15/15) and 9 (16/16), providing additional and more current data indicating that these CIS-EIPs are correctly implementing the timely service provision requirements for Indicator 1.

Additional Information Required by the OSEP APR Response Table for this Indicator:

Statement from the Response Table	State's Response
If the State does not report 100% compliance in the FFY 2009 APR, the State must review its improvement activities and revise them, if necessary.	During FFYs 2009 and 2010, State Part C CIS-EI staff, in collaboration with other state CIS staff, CIS-EIP regional staff, and members of the VICC, reviewed and discussed revisions to Indicators 1-9 and 14 during meetings and teleconferences. Staff from the Northeast Regional Resource Center provided specific technical assistance to facilitate the final review and revision process conducted by members of the VICC and state CIS-EI staff prior to submission of this 2009 APR. Revisions to Indicator 1 are documented below and are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: http://dcf.vermont.gov/cdd/reports/IDEA_Part_C .

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Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 1 to: 1) extend targets and timelines through FFY 2012; 2) delete activities no longer relevant and add new activities; 3) specify annual revisions to current manual data collection tools and the ongoing refinement of the process for the timely and accurate collection, verification, and reporting of data; 4) specify revisions to the annual determination process; 5) highlight FFY 2009 implementation of a new electronic billing system for Part C; and 6) reflect the revised timeline and new resources for the development/implementation of the electronic data management system. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: http://dcf.vermont.gov/cdd/reports/IDEA_Part_C.

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

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
2009 7/1/09-6/30/10)	95%

Actual Target Data for FFY 2009: 98%

Data Source: Child Count Database 12/1/09, 12/2/08 to 12/1/09. These Indicator 2 data are consistent with Vermont's 618 data reported in Table 2 and submitted 1/28/10.

Data Analysis for Indicator 2, FFY 2009:

	# Active Children 12/1/09	# Children in Home or Community-Based Settings	# Children in Service Provider Location	# and % Children in Home or Community-Based Settings	State Target
State Totals	776	763	13	763/776 = 98%	95%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2009: Vermont Part C CIS-EI maintained the same actual target data of 98% in FFY 2009 as it achieved in FFY 2008, and exceeded its target for FFY 2009. State CIS-EI staff continued to verify in regular desk audits of child count data forms submitted to the state office, during onsite file reviews, and in verification of regional CIS-EIP self-assessments that staff had written documentation in children's files justifying placement in a setting other than a child's home and/or community-based setting. Along with documenting on the monthly child count 12/1/09 forms the settings in which children were receiving services, regional CIS-EIP staff submitted with their monthly child count forms copies of the written justification contained in a child's file so that state CIS-EI staff could continue to ensure that IFSP teams were making service setting decisions on an individualized basis consistent with 34 CFR §§303.12, 303.18, and 303.344(d)(1)(ii). State CIS-EI staff continued to follow up with regional CIS-EIPs if they had questions and/or need for clarification about the data. A standardized form

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developed during FFY 2010 and disseminated to the regional CIS-EIPs will further reinforce the requirements and ensure statewide consistency in documenting service setting decisions.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 2 to: 1) extend targets and timelines through FFY 2012, 2) add two improvement activities related to a new standardized form for collecting data and the annual determination process, and 3) revise timelines and resources for the development/implementation of an electronic data management system. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: http://dcf.vermont.gov/cdd/reports/IDEA_Part_C.

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

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);
- B. 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 = $[(\# \text{ of infants and toddlers who did not improve functioning}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.
- b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = $[(\# \text{ of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.
- c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it = $[(\# \text{ of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.
- d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers = $[(\# \text{ of infants and toddlers who improved functioning to reach a level comparable to same-aged peers}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.
- e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers = $[(\# \text{ of infants and toddlers who maintained functioning at a level comparable to same-aged peers}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.

Summary Statements for Each of the Three Outcomes (use for FFY 2009-2010 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.

Target Data and Actual Target Data for FFY 2009:

Targets and Actual Data for Part C Children Exiting in FFY 2009 (2009-10)

Summary Statements	Targets FFY 2009 (% of children)	Actual FFY 2009 (% of children)
Outcome A: Positive social-emotional skills (including social relationships)		
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 exited the program	71.4%	60.8%
2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program	66.3%	59.4%
Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)		
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 exited the program	79.2%	67.9%
2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	58.2%	53.4%
Outcome C: Use of appropriate behaviors to meet their needs		
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 exited the program	77.6%	72.9%
2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program	65.9%	60.6%

Progress Data for Part C CIS-EI Children FFY 2009

A. Positive social-emotional skills (including social relationships):	Number of children	% of children
a. Percent of children who did not improve functioning	8	1.5%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	125	23.8%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach it	80	15.2%

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d. Percent of children who improved functioning to reach a level comparable to same-aged peers	126	24.0%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	186	35.4%
Total	N= 525	100%
B. Acquisition and use of knowledge and skills (including early language/communication):	Number of children	% of children
a. Percent of children who did not improve functioning	3	0.6%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	136	26.0%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	105	20.0%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	189	36.1%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	91	17.4%
Total	N= 524	100%
C. Use of appropriate behaviors to meet their needs:	Number of children	% of children
a. Percent of children who did not improve functioning	3	0.6%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	106	20.2%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	98	18.7%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	195	37.1%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	123	23.4%
Total	N= 525	100%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2009:

Quality of Data:

The focus in FFY 2009 was to improve the accuracy and completeness of the data. As a result of our efforts, there was a substantial increase in the number of completed ratings for child outcomes in FFY 2009. In FFY 2008, data were available on at least one outcome for 315 children, while data were available for 302 children on all three outcomes. In FFY 2009, data were available for 524 children for all 3 outcomes and 525 children for 2 out of 3 outcomes. This is an increase in return of approximately 73%. In addition, missing data in regions for FFY 2008 ranged from 5 to 45%; for FFY 2009, only 4 regions were missing data with the range of incomplete data between 2 and 5%. Statewide, data were completed on 96% of children identified as exiting the programs during the reporting period. Of the 23 exits with missing data, a rationale (including staff related and moved with no program status resulting) was given for all but 7 of the exits.

Several strategies were implemented at the state level during FFY 2009 to address missing/inaccurate data.

- The Child Outcome data base was drawn from the monthly regional reports of children who had exited the Part C program, therefore accounting for majority of children who had exited the program during the reporting period (7/1/09 – 6/30/10). Using exit data as a basis for identifying children who should have outcome ratings helped to insure most children were identified.
- Quarterly reports were sent to regions identifying missing or inaccurate data and regions were asked to complete/correct data or identify rationale for missing data within 30 days.
- End-of-year report sent to regions with regional/state percentages for complete data and accompanied by final request to complete/correct outcome data.
- Statewide conference in 12/09 with NECTAC presenters served as a 'kick-off' to focus regional attention on the significance of collecting Child Outcomes data for Part C and B. The morning addressed the national picture and benefits while in the afternoon, practitioners from each region were guided through a review of the ECO rating system and an examination of their raw data with accompanying charts from the ECO conversion tables. This strategy had a major impact on many of the regions, helping them to experience the impact of incomplete and inaccurate data on their region's outcomes.

It is expected that the new data system (FFY 2011) will have multiple benefits for child outcomes data collection, including allowing a check on whether all appropriate children receive outcome ratings and giving more autonomy to the regions in reporting and checking their own data. In the meantime, the state will continue to send regions quarterly updates on the status of their data as well as regional reports with raw data and charts indicating outcome results.

In addition, practitioners were asked to complete a self-assessment in June, 2010 regarding their knowledge of and expertise in conducting COSF ratings. As a result, assessment training will be offered and CIS: EI will look into having COSF as part of a CIS: EI orientation.

Quality of Programs:

Outcomes for FFY 2009 were significantly lower than the baseline and targets established in FFY 2008. It is believed that a broader range of children are represented in the data this year as a result of the dramatic increase in the response rate. State CIS: EI staff and the VICC believe FFY 2009 findings more accurately reflect child progress than the baseline established in FFY 2008.

During FFY 2009, VT Foundations for Early Learning (FEL) conducted its second Train-the Trainer for the second out of three planned cohorts. FEL represents two national TA grants, CSEFEL and CELL. Part C providers from the second region were participated in the training. It is expected that over the long run, these efforts will have a positive impact on Outcomes 3A and 3B.

The state will continue to examine Child Outcome results for individual regions as compared to each other and the state as well as nationally. Regional analyses are shared with regions annually and the state will examine data for trends in regions that are outliers.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

The VICC has approved the improvement activities with the revisions and the revised baseline and proposed targets. Because of the significant increase in number of children represented by the FFY 2009 data (73% increase over FFY 2008), it is believed that FFY 2009 data better reflects child progress. The VICC recommends that FFY 2009 results serve as the new baseline and targets were revised for FFY 2010 and extended through FFYs 2011 and 2012 as follow and are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website at http://dcf.vermont.gov/cdd/reports/IDEA_Part_C:

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Revised Baseline:

Summary Statements	% of children
Outcome A: Positive social-emotional skills (including social relationships)	
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 exited the program	60.8%
2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program	59.4%
Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)	
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 exited the program	67.9%
2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	53.4%
Outcome C: Use of appropriate behaviors to meet their needs	
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 exited the program	72.9%
2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program	60.6%

Revised Targets:

Summary Statements	Targets FFY 2010 (% of children)	Targets FFY 2011 (% of children)	Targets FFY 2012 (% of children)
Outcome A: Positive social-emotional skills (including social relationships)			
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	61%	61.2%	61.4%
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	59.6%	59.8%	60%
Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)			
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	68.1%	68.3%	68.5%
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	53.6%	53.8%	54%
Outcome C: Use of appropriate behaviors to meet their needs			

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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	73.1%	73.3%	73.5%
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	60.8%	61%	61.2%

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

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 USC 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.

Target Data and Actual Target Data for FFY 2009:

Target Data and Actual Target Data	FFY 2009 Target	FFY 2009 Actual	
<i>A. Know their rights</i>	<i>80%</i>	215/255	84.3%
<i>B. Effectively communicate their children's needs</i>	<i>85%</i>	233/257	90.7%
<i>C. Help their children develop and learn</i>	<i>85%</i>	241/258	93.4%

The return rate for FFY 2009 Family Outcome survey was 34%, which exceeded the target of 30% for FFY 2009. Out of the 768 surveys mailed to families, 261 surveys were returned. Protocols for mailing and accepting returned surveys were the same as last year. The ECO Family Outcomes surveys were mailed to families in spring 2010. Families were given the option of responding through mailing a SASE to Part C State Annual Performance Report for FFY 2009 (OMB NO: 1820-0578/Expiration Date: 11/30/2012) Re-Submitted April 2011

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state office, handing the sealed envelope to their service provider or through phone interview with a state representative. There was slight slippage in this year's return rate of 34% over last year's rate of 39%.

Data on gender and race/ethnicity from demographic sheet attached to the Family survey were compared with Vermont's 618 exit report (12/08 – 12/09) to examine representativeness of the survey data. The comparisons indicate that the data were similar. The following table shows a comparison of race/ethnicity between the two data sets. In terms of gender, the 618 report shows 61% of exits were male and 39% were female, while the surveys indicated 63% were male and 37%, female.

Race/Ethnicity of families who responded to the survey as compared with 618n data						
Data Source	Hispanic /Latino	American Indian or Alaska native	Asian	Black or African American	White	2 or more
618 report (08)	2%	0%	1%	2%	93%	2.5%
Family survey (09)	2%	.8%	.4%	3.2%	92.8%	.8%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2009:

Return Rate: Although the return rate was above the state target for FFY 2009, there was slippage when compared to last year's rate of return. This may be the result of the late timing of the mailed survey. In an effort to reduce costs associated with printing the survey, a new vendor was chosen. This delayed the printing over a month as compared to previous years. In FFY 2010, Vermont will send the survey out earlier and in addition, will be using the revised ECO Family Outcomes survey which has substantially fewer pages thereby saving on printing costs. Vermont's ICC believes that the brevity of the survey as well as the clarity in how to respond to the survey will also increase the return rate.

To further check the representativeness of the data, Vermont plans to compare returned surveys against total mailed surveys on demographic variables (e.g., gender, ethnicity) when the new data system is in place.

Results: Vermont met all targets set for Family Outcomes 4 A, B and C for FFY 2009. Vermont continues to make progress over the original baseline (see table below). There was a slight decrease in 4A this year (84.3%) over last year's results (86%); there was an increase in 4B this year (91%) over last year (89%) and 4C was slightly higher this year (93.4%) than last year (92.5%).

Percentage of families who reported early intervention services helped their family ¹ (FFY 2005 – FFY 2009)					
Family Outcome	FFY 2005	FFY 2006	FFY 2007	FFY 2008	FFY 2009
4A	80%	83%	80%	86%	84%
4B	84%	85%	85%	89%	91%

¹ Criterion for defining "Families who report that early intervention services have helped their family": The rating scale for ECO's Family Outcome Survey ranges from 1 to 7. For the ratings of OSEP questions, 1 to 3 represent a 'poor' to 'fair' job by the early intervention program and ratings of 5 to 7 represent a 'good' to 'excellent' job by the early intervention program. Responses of 5 or above were defined as 'families who report that early intervention services helped their families'.

Percentage of families who reported early intervention services helped their family (FFY 2005 – FFY 2009)					
4C	88%	87%	89%	92.5%	93.4%

Each year, the survey is accompanied by a page requesting demographic information (e.g., child gender, time in program and race/ethnicity). Survey results for 4A, B and C were examined to see if there were differences related to the demographic factors. 'Time in program' did not affect the results for Outcomes A, B or C. The lack of notable differences in results according to family's 'time in program' is important for 4 A. In the past, families who were in the program under a year tended to rate this question lower than families in the program longer. This issue has been addressed in a concerted effort by regions to address parental rights and safeguards during a family's introduction to and initial time in program. 'Level of service' refers to the amount of service a family receives ranging from once a month to 2 or more times a week. This factor did not distinguish results for A or B but did show a slight difference for C with slightly more families with less intense service (98%) than families with a higher level of services (94%) agreeing that EI had helped them 'help their child develop and learn'. Surprisingly, child's gender did show differences for outcomes A and B. Families of girls were slightly more likely to report that early intervention helped their families know their rights and communicate their child's needs. The difference in findings for A was 89% for girls and 82.4% for boys and the difference for B was 97% for girls and 88% for boys. As this finding has not occurred in the past, it does warrant watching. Finally, race/ethnicity showed a difference for outcome A only. Findings for 4A were 77% for respondents with children from minority groups and 86% for families with a child identified as white. This is the first time gender and ethnicity were linked with differences in findings for outcomes. A difficulty in interpreting findings regarding race/ethnicity is the low numbers in minority groups. As a result, Vermont will need to continue to watch this area for possible trends in the findings over time.

Although state targets for 4A were met, there was a slight decrease in results this year (84.3%) when compared with last year (86%). Regions that fall below the state target are asked to address this in their Program Improvement Plan (PIP). In discussions with the ICC, concerns were raised as to how to interpret the results, including concerns about the phrasing in some of the survey questions. In addition, each year there are comments that indicate a respondent has misinterpreted the question. The VICC has recommended that Vermont change surveys to the revised ECO Family Outcomes survey to be implemented in FFY 2010. The ICC agreed that the revised survey offers more specific information regarding each of the OSEP outcomes as each outcome has 5 or 6 sub-questions focused on the components of that outcome. This additional and specific information will support the state in their TA efforts and also help regions to focus their improvement plans on specific goals related to Outcome 4A (as well as B and C) with more confidence. The VICC recommended that regions low in this outcome continue to work on this outcome as identified in their PIP.

This will be the third year that a regional profile is developed for each region. The profile includes the region's de-identified raw data, a comparison between the region and state on the survey's demographic data, return rate and Outcome results, as well as an analysis of any de-identified family comments received. Regions use this information to inform the creation of their PIP. This year, focused TA was begun in one region whose outcome scores fell below the state target in 4C for a couple of years which is unusual for this outcome.

Several efforts provide positive support for Outcomes A, B and C. The Vermont Foundations for Early Learning (FEL) which is comprised of two federally funded TA grants (CSEFEL and CELL) completed the second year of a planned three year statewide Training of Trainers during FFY 2009. During this second year, FEL introduced two trainings - Working with Families and the CSEFEL parent training modules. The third and final year includes a module on Home Visiting and facilitating parent-infant/toddler groups. There are two infant/toddler demonstration sites and they are required to implement parent trainings around social-emotional development and early literacy learning. By the end of fiscal year FFY 2010, all regional EI programs will have staff that had participated in the training and it is expected that this training will impact both 4B and C.

Children's Integrated Services has used Part C regulations and best practices in defining how services will be implemented across services in its programs. During FFY 2009, the development of a family integrated service plan was completed. This document will offer support and guidance around Family-

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guided assessment, and developing child and family outcomes to Early Intervention practitioners and their colleagues in regional Children’s Integrated Services (CIS). In addition, informed consent for evaluation and services will be an expectation for all families who receive services through CIS regardless of whether they receive Part C services. Finally, the state CIS team is examining the feasibility of using the revised ECO Family Outcomes survey for all services in CIS, not just early intervention. These initiatives will support a well-informed practitioner community on practices in line with all the Family Outcomes.

Target Data for FFY 2010-2012:

FFY 2010 (2010-2011)	Rate of return for revised ECO family survey at or above 31%
	81 % percent of families in Part C report that early intervention services have helped the family: <i>A. Know their rights</i>
	86% percent of families in Part C report that early intervention services have helped the family: <i>B. Effectively communicate their children’s needs</i>
	88.1 percent of families in Part C report that early intervention services have helped the family: <i>C. Help their children develop and learn</i>
FFY 2011 (2011-2012)	Rate of return for revised ECO family survey at or above 32%
	81.5 percent of families in Part C report that early intervention services have helped the family: <i>A. Know their rights</i>
	86.5 percent of families in Part C report that early intervention services have helped the family: <i>B. Effectively communicate their children’s needs</i>
	88.5 percent of families in Part C report that early intervention services have helped the family: <i>C. Help their children develop and learn</i>
FFY 2012 (2012-2013)	Rate of return for revised ECO family survey at or above 33%
	82% percent of families in Part C report that early intervention services have helped the family: <i>A. Know their rights</i>
	87% percent of families in Part C report that early intervention services have helped the family: <i>B. Effectively communicate their children’s needs</i>
	89% percent of families in Part C report that early intervention services have helped the family: <i>C. Help their children develop and learn</i>

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines /

Resources for FFY 2010: The VICC has approved changes to the improvement activities, to reflect extending activities to FFY 2012, name change from FITP to CIS: EI, and the development of the electronic data management system. Otherwise activities remain the same. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website:

[http://dcf.vermont.gov/cdd/reports/IDEA Part C.](http://dcf.vermont.gov/cdd/reports/IDEA_Part_C)

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

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
2009 (7/1/09-6/30/10)	.96%

Actual Target Data for FFY 2009: 1.12%

Data Source: Child Count Database 12/1/09, 12/2/08 to 12/1/09. These Indicator 5 data are consistent with Vermont’s 618 data reported in Table 1 and submitted 1/28/10.

Data Analysis for Indicator 5, Child Find Infants Birth to One, FFY 2009:

FFY 2009	# Infants Served in Part C	Total # VT Infants Birth to 1	# and % VT Infants Birth to 1 Served in Part C	2009 SPP State Target
Infants Birth to 1	73	6509	73/6509 = 1.12%	.96%

In FFY 2009, Vermont exceeded by .16% its target figure of serving .96% of its infants born in the most recent year of census figures. For FFY 2009, Vermont also exceeded by .1% the national baseline figure of 1.03% (50 states and District of Columbia). Vermont Part C also exceeded its targets and the national baseline data in APR reporting years 2005, 2006, 2007, and 2008.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2009:

Vermont demonstrated a slight decrease (.2%) in its FFY 2009 actual target data from its actual target data of 1.34% in FFY 2008. Regional Part C CIS-EIPs and the Local Education Agencies within their respective regions continued to ensure a particular focus on child find birth to one in their written agreements developed to fulfill the Interagency Agreement between Part C and Part B. Vermont’s Part C Coordinator continued to collaborate with state education agency staff to track statewide child find efforts as part of Maintenance of Effort.

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Regional CIS-EIP staff, their regional CIS Administrative and Intake and Referral Teams (CIS-EI staff are members of both), and the dedicated CIS Regional Intake Coordinators continued to prioritize child find activities in their written outreach plans, with a particular emphasis on birth to one and the “special populations” required by IDEA. The Department of Health dedicated staff, including medical social workers, nurses, and physicians, to either the regional CIS Administrative or Clinical Teams to ensure the availability of expertise and systematic outreach. The VICC, in its role to “advise and assist” CIS, engaged in several discussions related to child find to ensure broad-based outreach and a systematic and timely child find and referral process.

As part of CIS implementation statewide, members of the state CIS Team provided training and extensive ongoing and targeted technical assistance to regional CIS providers and partners. During FFY 2009, statewide CIS staff held orientation teleconferences for the regional CIS Intake Coordinators on specific topics, prioritizing child find, and held monthly technical assistance calls for all CIS regional providers. Members of the state CIS Team, in their role as technical assistance liaisons to specific regions, were onsite regularly during FFY 2009 to provide targeted technical assistance. In addition, state Part C CIS-EI staff, as designated liaisons to specific regions, provided additional support as necessary. Regionally, CIS-EIP staff and their partners from the other CIS services provided training and technical assistance for providers from services outside CIS. It is anticipated that a statewide conference held in December 2010 – “Moving CIS Forward” – will further ensure that regional CIS providers have the necessary knowledge to engage in effective and collaborative child find activities.

The regional CIS-EIP staff continue to submit monthly child count data to the state office. Additionally, regional CIS Intake Coordinators collect cumulative data on referrals and submit monthly reports to the state Child Development Division. The Part C CIS-EI Coordinator, along with administrators from the other CIS services, regularly tracks the referrals and “flags” regions that demonstrate a decrease in referrals. In addition, as reported in Indicator 1, VT’s implementation of a new electronic billing system in FFY 2009 ensured the collection of accurate and comprehensive information and another way to track child find. During a staff meeting, the state CIS-EI staff discussed conducting a root cause analysis if there is a significant downward trend in child find, and revised improvement activities in the SPP submitted February 2011 to further enhance child find efforts statewide.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 5 to: 1) extend targets and timelines through FFY 2012, 2) delete activities no longer relevant, 3) highlight the specific and enhanced role/activities of VT’s CIS system of services and the Part C-B IAA, 4) reflect the revised timeline and new resources for the development/implementation of the electronic data management system, and 5) specify revisions to the annual determination process. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: http://dcf.vermont.gov/cdd/reports/IDEA_Part_C.

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

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
2009 (7/1/09-6/30/10)	3.4%

Actual Target Data for FFY 2009: 3.93%

Data Source: Child Count Database 12/1/09, 12/2/08 to 12/1/09. These Indicator 6 data are consistent with Vermont’s 618 data reported in Table 1 and submitted 1/28/10.

Data Analysis for Indicator 6, Child Find Infants and Toddlers Birth to Three, FFY 2009:

FFY 2009	# VT Birth to 3 Served in Part C	# Total VT Birth to 3	# and % VT Birth to 3 Served in Part C	2009 SPP State Target
Infants and Toddlers Birth to 3	776	19768	776/19768 = 3.93%	3.4%

In FFY 2009, Vermont exceeded by .5% its target figure of serving 3.4% of its birth to three population born in the most recent year of census figures. For FFY 2009, Vermont also exceeded by 1.23% the national baseline figure of 2.67% (50 states and District of Columbia). Vermont Part C also exceeded its targets and the national baseline data in APR reporting years 2005, 2006, 2007 and 2008.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2009:

Vermont demonstrated a slight increase (.03%) in its FFY 2009 actual target data from its actual target data of 3.90% in FFY 2008. The discussion in Indicator 5 under Improvement Activities applies as well to Indicator 6 for Child Find birth to three. Data collected during FFY 2009 indicated that Vermont’s Children’s Integrated Services, for children birth to six and their families, received the majority of its referrals for children ages birth to three.

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Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 6 to: 1) extend targets and timelines through FFY 2012, 2) delete activities no longer relevant, 3) highlight the specific and enhanced role/activities of VT's CIS system of services and the Part C-B IAA, 4) reflect the revised timeline and new resources for the development/implementation of the electronic data management system, and 5) specify revisions to the annual determination process. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: http://dcf.vermont.gov/cdd/reports/IDEA_Part_C.

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

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
2009 7/1/09-6/30/10)	100%

Actual Target Data for FFY 2009:

97%

Data Method/Source: Desk audit of 2009 Child Count Database, 12/2/08 to 12/1/09

Infants Evaluated and Assessed and provided an Initial IFSP meeting Within Part C’s 45-day timeline:

a. Number 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	537
b. Number of infants and toddlers with IFSPs evaluated and assessed for whom an initial IFSP meeting was required to be conducted	551
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 (Percent = [(a) divided by (b)] times 100)	97%

Of the 551 children with new IFSPs who were evaluated and assessed and for whom an initial IFSP meeting was required to be conducted, 372 children received an evaluation and assessment and initial IFSP meeting within Part C's 45-day timeline. 161 children did not receive these services in a timely manner due to documented exceptional family circumstances; 4 children did not receive these services in a timely manner due to documented exceptional circumstances beyond the control of the lead agency and regional early intervention programs. These 165 children are included in the numerator as well as the denominator. Documented exceptional family circumstances included family cancellations of scheduled meetings; issues related to custody of a child and a family experiencing homelessness; birth of a new child in the family; a family moving; specific family requests to schedule beyond the timeline; illness and/or hospitalization of children and family vacations. Documented exceptional circumstances beyond the control of the lead agency and regional early intervention programs that resulted in delays were safety issues in the home of one child's family (resulting in a delay of 3 days beyond the 45-day timeline); extreme weather conditions that closed the region's schools and prevented access to the home of one child (resulting in a delay of 18 days beyond the 45-day timeline); and a death in a provider's family that delayed services for two children (resulting in a delay of 3 and 8 days beyond the 45-day timeline). Both of these families chose, however, to wait for this specific provider to return rather than have the "interim" provider offered by the regional early intervention program.

14 children did not receive an evaluation and assessment and initial IFSP meeting within Part C's 45-day timeline due to delays attributable to circumstances other than documented exceptional family circumstances. State Part C CIS-EI staff verified that these 14 children ultimately received their services. All services were initiated within the following number of days beyond the 45-day timeline for these 14 children: 4 (2 children), 5, 6, 9, 10, 14, 18 (2 children), 22, 26, 35, 37, and 39. Delays for 11 of the children were due to scheduling issues on the part of the LEAs that provide services in the largest region of the state. The delay for one child was caused by the unavailability of the physical therapist. For two other children, the IFSP Teams' scheduling difficulties resulted in exceeding the 45-day timeline.

Data analysis specific to timeliness of evaluations and assessments demonstrated that evaluations and assessments were completed within Part C's 45-day timeline for 99% of the children (546/551). The 546 included 82 for whom exceptional family circumstances caused a delay. These data demonstrate that the majority of noncompliance in children receiving timely services occurred primarily between completion of the evaluation and assessment and the initial IFSP meeting, i.e., for 9 of 14 children.

Vermont Part C made **no new findings of noncompliance in FFY 2009** in Indicator 7.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2009:

Vermont Part C's FFY 2009 compliance of 97% for Indicator 7 is the same as that achieved in FFY 2008. As in FFY 2008, the majority of children in FFY 2009 who did not receive a timely evaluation and assessment and initial IFSP meeting (12 of 14 children) received their services in the regional CIS-EIP that provides services for approximately 20% of Vermont's Part C population. This regional CIS-EIP did, however, significantly decrease in FFY 2009 the number of days that it exceeded the 45-day timeline for children and their families. During FFY 2008, the range by which the CIS-EIP exceeded the 45-day timeline was 52 to 80 days; in FFY 2009, it was four to 39 days. As described in the FFY 2008 APR and in Indicator 1 in this 2009 APR, the LEAs in this particular region also provide early intervention services, including conducting the evaluation and assessment. Coordinating two different service systems and personnel continued to present unique challenges. Part C/B state staff continued to provide guidance to regional CIS-EIPs and their partner 619 Coordinators to clarify CIS-EIP and LEA roles and responsibilities, particularly related to conducting the evaluation and assessment. Several regional EIPs and their partner LEAs that conduct evaluations and assessments continued to fulfill collaboratively developed written agreements that specify strategies for, e.g., addressing scheduling conflicts of LEA personnel and/or personnel shortages that potentially can impact the LEA's ability to meet the 45-day timeline.

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Although this regional CIS-EIP maintained the same level of compliance for Indicator 7 in FFY 2009 as it demonstrated in FFY 2008 (91%), state CIS-EI staff were encouraged by this CIS-EIP's increased timeliness in providing evaluations and assessments and conducting the initial IFSP meetings for children and their families, and by the fact that the number of children and families for whom the services were late (12) remained the same as in FFY 2008. As discussed in Indicator 1, this CIS-EIP enhanced its data tracking system and communicated regularly with their local schools that provide early intervention services to reinforce the 45-day timeline requirement. Staff within this particular CIS-EIP systematically communicated with their director to let her know of any potential noncompliance in meeting timelines so that she could follow up with the relevant school personnel. The CIS-EIP director also conducted regular file reviews and required staff to conduct self-assessments of their files to ensure accurate and complete documentation. The addition of the new provider agency in this region noted in Indicator 1 significantly contributed to ensuring necessary physical and occupational evaluations and assessments occurred within the 45-day timeline.

As discussed under Indicator 1, Vermont's Part C Coordinator continued to dedicate resources to enhance the efficacy and efficiency of CIS-EI's current manual data management system. State CIS-EI staff regularly reviewed and entered into an ACCESS database child count data submitted by regional CIS-EIP staff. At least every other month (and often more frequently), state staff communicated with specific CIS-EIPs if data were incomplete and/or there was need for clarification. State CIS-EI staff continued providing ongoing support to all regional CIS-EIPs to reinforce the 100% compliance requirement for Indicator 7 and ensure timely submission of and accurate documentation on child count forms. Support included: 1) onsite visits to assist regional CIS-EIPs in developing more effective data collection and procedures for verifying accuracy of data prior to submission, 2) monthly phone calls, and 3) regular email communication.

The comprehensive instructions and forms for the 2009 Child Count submitted by the regional CIS-EIP staff to the CIS-EI state office required CIS-EIP staff to document for each child and each service the dates of the referral, evaluation and assessment, and initial IFSP meeting. Regional CIS-EIP staff documented family or other reasons for delays. This procedure enabled state CIS-EI staff reviewing the child count forms to determine immediately, for the majority of children, compliance or noncompliance and to determine actual number of days children received their services beyond the 45-day time period. Regional CIS-EIP staff marked themselves "compliant" or "noncompliant" on the forms prior to submitting to the state office.

The transition to the electronic statewide billing system in FFY 2009 substantially improved the process for verifying that data were complete and accurate for Indicator 7. CIS-EI state staff compared on a weekly basis the data entered into the ACCESS database with data entered into the HPES system to check for accuracy and query for any duplicate data. This has provided Part C CIS-EI with an enhanced level of "checks and balances," e.g., prior authorizations (PAs) cannot be made for children who are not active in the CIS-EI system. As of January 1, 2010, forms for children who were active that were submitted to the state CIS-EI office had to be timely and accurate in order for CIS-EI providers to receive payment.

Correction of FFY 2008 Findings of Noncompliance:

Level of compliance (actual target data) State reported for FFY 2008 for this indicator: **97%**

1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009)	2
2. Number of FFY 2008 findings the State verified as timely corrected (verified as corrected within one year from the date of notification to the EIS program of the finding)	2
3. Number of FFY 2008 findings <u>not</u> verified as corrected within one year [(1) minus	

(2)]

0

Verification of Timely Correction of FFY 2008 Findings:

The two findings identified in FFY 2008 were **timely corrected**. Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of updated data from the first quarter of the 2009 Child Count Database (December 2008 to February 2009), CIS-EIPs 1 and 9 achieved 100% compliance for 60 consecutive days, indicating that the programs are correctly implementing the 45-day timeline requirements in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a); and 2) Part C state staff verified immediately upon review of the 2008 Child Count forms (the data source for identifying the findings) that, although late, the two children from CIS-EIP 1 and the three children from CIS-EIP 9 ultimately received their evaluation, assessment, and initial IFSP meeting. Four children received their services between 46 and 85 days following referral, and one child received her services 118 days following referral. Scheduling conflicts of LEA personnel and a speech-language pathologist resulted in untimely services for the five children in these two programs.

CIS-EIPs 1 and 9 ultimately achieved 100% compliance (25/25 and 38/38 compliant, respectively) in a desk audit of the entire 2009 Child Count Database, further indicating that these programs are correctly implementing the timely service provision requirements in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a).

Verification of Correction of FFY 2008 Noncompliance Reported in the 2008 APR:

Three regional CIS-EIPs demonstrated noncompliance during FFY 2008. CIS-EIP 4 was at 91% compliance (117/129), CIS-EIP 6 was at 97% compliance (32/33), and CIS-EIP 11 was at 98% compliance (49/50). This noncompliance was corrected prior to issuing written findings of noncompliance. Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of updated data from the first quarter of the 2009 Child Count Database (December 2008 to February 2009), CIS-EIPs 4, 6 and 11 achieved 100% compliance for 60 consecutive days, indicating that the programs are correctly implementing the 45-day timeline requirements in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a); and 2) Part C state staff verified immediately upon review of the 2008 Child Count forms (the data source for identifying the noncompliance) that, although late, the 12 children from CIS-EIP 4, the one child from CIS-EIP 6, and the one child from CIS-EIP 11 ultimately received their services. The number of days services were initiated beyond the 45-day timeline for these 14 children ranged from 7 to 86. The delays in CIS-EIP 4 for the 11 of the 12 children were attributed to LEA scheduling difficulties and for one child, a delay in insurance authorization. Delays for the other two children were caused by a staff scheduling conflict and a holiday break.

Verification of Correction of FFY 2009 Noncompliance Reported in this 2009 APR:

Three regional CIS-EIPs demonstrated noncompliance based on analysis of the entire 2009 Child Count Database used for reporting statewide data for Indicator 7 in this FFY 2009 APR. CIS-EIP 4 was at 91% compliance (127/139), CIS-EIP 11 was at 98% compliance (45/46), and CIS-EIP 12 was at 96% compliance (27/28). This noncompliance was corrected prior to issuing written findings of noncompliance.

Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of updated data from the first quarter of the 2010 Child Count Database (December 2009 to February 2010), CIS-EIPs 11 and 12 achieved 100% compliance for 60 consecutive days, and in a desk audit of updated data from the second quarter of the 2010 Child Count Database (March to May 2010) CIS-EIP 4 achieved 100% compliance for 60 consecutive days, indicating that these three programs are correctly implementing the timely service provision requirements in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a); and 2) Part C staff verified immediately upon review of the 2009 Child Count forms (the data source for identifying the noncompliance) that, although late, all services ultimately

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were initiated for the 14 children for whom services were not initiated in a timely manner. The number of days children received their services beyond the 45-day timeline for the 12 children in CIS-EIP 4 ranged from four to 39 days; for the one child in CIS-EIP, services were delayed one day beyond the 45 day timeline; and for the one child in CIS-EIP 12, services were delayed 14 days beyond the 45-day timeline. In CIS-EIP 4, delays for 10 of the 12 children were attributed to LEA scheduling difficulties; for one child, the physical therapist's scheduling conflict; and for the other child, the IFSP Team's scheduling conflict. In CIS-EIP 11, the IFSP Team for the one child experienced scheduling difficulties, and for the one child in CIS-EIP 12, the LEA providing the services had a scheduling conflict.

State Part C CIS-EI staff were encouraged that the range of delay in providing timely evaluations and assessments and initial IFSP meetings for children in FFY 2009 was significantly decreased from FFY 2008 in Indicator 7.

Additional Information Required by the OSEP APR Response Table for this Indicator:

Statement from the Response Table	State's Response
If the State does not report 100% compliance in the FFY 2009 APR, the State must review its improvement activities and revise them, if necessary.	During FFYs 2009 and 2010, State Part C CIS-EI staff, in collaboration with other state CIS staff, CIS-EIP regional staff, and members of the VICC, reviewed and discussed revisions to Indicators 1-9 and 14 during meetings and teleconferences. Staff from the Northeast Regional Resource Center provided specific technical assistance to facilitate the final review and revision process conducted by members of the VICC and state CIS-EI staff prior to submission of this 2009 APR. Revisions to Indicator 7 are documented below and are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: http://dcf.vermont.gov/cdd/reports/IDEA Part C .

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 7 to: 1) extend targets and timelines through FFY 2012; 2) delete activities no longer relevant and add new activities; 3) specify annual revisions to current manual data collection tools and the ongoing refinement of the process for the timely and accurate collection, verification, and reporting of data; 4) specify revisions to the annual determination process; 5) highlight FFY 2009 implementation of a new electronic billing system for Part C; and 6) reflect the revised timeline and new resources for the development/implementation of the electronic data management system. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: <http://dcf.vermont.gov/cdd/reports/IDEA Part C>.

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Indicator 8A: 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

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

Measurement:

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.

FFY	Measurable and Rigorous Target
2009 (7/1/09- 6/30/10)	100%

Actual Target Data for FFY 2009:

99%

Data Method/Source: Desk audit of 2009 Child Count Database, 12/2/08 to 12/1/09

Children Exiting Part C who Received Timely Transition Planning:

a. Number of children exiting Part C who have an IFSP with transition steps and services	767
b. Number of children exiting Part C	774

<p>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 (Percent = [(a) divided by (b)] times 100)</p>	<p>99%</p>
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767 children of the 774 children had written transition plans in place upon exiting Part C. The seven children who did not have a written transition plan in place exited Part C prior to their third birthdays. State CIS-EI verified during an onsite visit that transition planning did occur for the seven children, but there were no written transition plans in their files. All seven children received their services from the regional CIS-EIP in which LEAs provide early intervention services, including service coordination. Discussions in Indicators 1 and 7 highlighted ongoing challenges in coordinating the two different service systems and personnel in this particular region.

Vermont Part C made **no new findings of noncompliance in FFY 2009** in Indicator 8A.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2009:

Vermont Part C demonstrated 99% compliance for Indicator 8A in FFY 2009, the same level of compliance achieved in FFY 2008. Since the noncompliance identified in FFY 2009 occurred in the region where LEAs provide early intervention services, the regional CIS-EIP Director directed specific technical assistance to the two LEAs in which the noncompliance occurred. This included clarifying the requirements in 34 CFR §303.148(b)(4) and 303.344(h) for school staff who were service coordinators for families receiving early intervention services. The regional CIS-EIP Director also held meetings with personnel in all schools/LEAs that provide Part C service coordination in this particular region to clarify the regulations and reinforce the fact that all children require a written transition plan, not just children moving into Part B. As discussed in Indicator 1, the CIS-EIP director also conducted regular file reviews and required staff to conduct self-assessments of their files to ensure accurate and complete documentation. This regional CIS-EIP also developed a local data system to more effectively track its data until the statewide CIS data management system is in place.

State CIS-EI staff, in their ongoing review of data submitted by this regional CIS-EIP during FFY 2009, specifically focused on 8A to identify potential data anomalies and follow up with the regional staff immediately if the data indicated potential issues and/or there was need for clarification. State CIS-EI staff responsible for data management conducted onsite visits with the regional CIS-EIP staff to reinforce compliance and discuss any issues that the CIS-EIP was experiencing in all areas of transition. As part of the annual Determination process, this particular CIS-EIP targeted Indicator 8A in its Wellness Plan.

The state CIS-EI staff member who is part of the Part C/B Transition Team had ongoing email and phone communication with administrative staff in this region and followed up with onsite visits. State CIS-EI staff conducted an onsite visit in FFY 2010 specifically to address Indicator 8A, and discuss with the CIS-EIP administrative staff strategies implemented to date and others that potentially will contribute to enhanced understanding and correct implementation of this requirement and the timely notification and transition conference requirements. During FFY 2009, state CIS-EI and Part B staff finalized the development of online transition training modules for parents and “launched” these in FFY 2010. These modules, which also are resources for providers in guiding the transition planning process with families, will contribute significantly to increasing understanding of all transition requirements and “best” transition practices. These modules can be found at: <http://www.vermontfamilyetwork.org/training/online-trainings/>.

Verification of Correction of FFY 2008 Noncompliance Reported in the 2008 APR:

Two regional CIS-EIPs demonstrated noncompliance during FFY 2008. CIS-EIP 4 was at 97% compliance (200/209) and CIS-EIP 6 also was at 97% compliance (37/38). **This noncompliance was corrected prior to issuing written findings of noncompliance.** Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of updated data from the second quarter

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of the 2009 Child Count Database (March 2009 to May 2009), CIS-EIPs 4 and 6 achieved 100% compliance for 60 consecutive days, indicating that the programs are correctly implementing the transition requirements in 34 CFR §303.148(b)(4) and 303.344(h); and 2) Part C state staff verified in following up with the CIS-EIP 4 administrative staff that, although there were no written transition plans, transition planning did occur for the 9 children in their program. The one child receiving services from regional CIS-EIP 6 exited prior to her third birthday and transition planning did not occur. State CIS-EI staff clarified with this child's service coordinator that all children needed a written transition plan, and this region's designated state CIS-EI technical assistance liaison communicated monthly via email and phone to address questions from the region. CIS-EIP 6 ultimately achieved 100% compliance in a desk audit of the entire 2009 Child Count Database, indicating that this program is correctly implementing the transition requirements in 34 CFR §303.148(b)(4) and 303.344(h).

Verification of Correction of FFY 2009 Noncompliance Reported in this 2009 APR:

One regional CIS-EIP demonstrated noncompliance based on analysis of the entire 2009 Child Count Database used for reporting statewide data for Indicator 8A in this FFY 2009 APR. Regional CIS-EIP 4 was at 96% compliance (187/194). This noncompliance was corrected prior to issuing a written finding of noncompliance.

Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of updated data from the second quarter of the 2010 Child Count Database (March to May 2010), CIS-EIP 4 achieved 100% compliance for 60 consecutive days, indicating that this program is correctly implementing the transition requirements in 34 CFR §303.148(b)(4) and 303.344(h); and 2) Part C state staff verified in an onsite visit with the CIS-EIP 4 administrative staff that, although there were no written transition plans, transition planning did occur for the seven children.

Additional and updated data gathered during the third quarter of FFY 2010 further indicated that this CIS-EIP is correctly implementing the transition requirements for Indicator 8A. During August 2010, all regional CIS-EIPs conducted annual self-assessments of files and submitted these to the state CIS-EI office for review and verification. Regional CIS-EIP 4 demonstrated 100% compliance (21/21 files).

Additional Information Required by the OSEP APR Response Table for this Indicator:

Statement from the Response Table	State's Response
If the State does not report 100% compliance in the FFY 2009 APR, the State must review its improvement activities and revise them, if necessary.	During FFYs 2009 and 2010, State Part C CIS-EI staff, in collaboration with other state CIS staff, CIS-EIP regional staff, and members of the VICC, reviewed and discussed revisions to Indicators 1-9 and 14 during meetings and teleconferences. Staff from the Northeast Regional Resource Center provided specific technical assistance to facilitate the final review and revision process conducted by members of the VICC and state CIS-EI staff prior to submission of this 2009 APR. Revisions to Indicator 8A are documented below and are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: http://dcf.vermont.gov/cdd/reports/IDEA_Part_C .

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Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 8A to: 1) extend targets and timelines through FFY 2012; 2) delete activities no longer relevant and add new activities; 3) highlight the upcoming revision process for and submission of the Part C-B IAA; 4) specify annual revisions to current manual data collection tools and the ongoing refinement of the process for the timely and accurate collection, verification, and reporting of data; 5) specify revisions to the annual determination process; 6) highlight FFY 2009 implementation of a new electronic billing system for Part C; 6) reflect the revised timeline and new resources for the development/implementation of the electronic data management system; and 7) highlight the recent development/launch of online transition modules and pending interactive self-guided web resources. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: <http://dcf.vermont.gov/cdd/reports/IDEA Part C>.

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Indicator 8B: 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 Notification to LEA, if child potentially eligible for Part B;

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

Measurement:

Percent = [(# of children exiting Part C and potentially eligible for Part B where the notification to the LEA occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.

FFY	Measurable and Rigorous Target
2009 (7/1/09-6/30/10)	100%

Actual Target Data for FFY 2009:

99%

Data Method/Source: Desk audit of 2009 Child Count Database, 12/2/08 to 12/1/09

Children Exiting Part C who Received Timely Transition Planning (Notification to LEA):

a. Number of children exiting Part C and potentially eligible for Part B where the notification to the LEA occurred	495
b. Number of children exiting Part C who were potentially eligible for Part B	500

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 (Notification to LEA) (Percent = [(a) divided by (b)] times 100)	99%
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In Vermont, children exiting Part C who received special instruction, developmental therapy services or speech services through an IFSP are (automatically) eligible for Part B, Essential Early Education (EEE-VT’s Early Childhood Special Education) without the need for additional evaluation. Children who did not receive special instruction, developmental therapy or speech services through an IFSP, may be potentially eligible for EEE services if the Evaluation and Planning Team determines that the child has a medical condition which may result in significant delays by the time of the child’s sixth birthday. Vermont rules state that Part C’s timely notification to Part B is at least six months prior to the child’s third birthday.

The local education agencies (LEAs) received timely notification from Part C CIS-EI for 495 of 500 children potentially eligible for Part B. 115 of the 500 children potentially eligible for Part B were referred seven months or sooner prior to their third birthday. State CIS-EI staff verified with all relevant CIS-EIP that a written notification occurred upon determination of Part C eligibility for all 115 children. These 115 children are in the numerator and denominator. Staff error in two regional CIS-EIPs resulted in noncompliance in meeting the notification timeline for the five children. Notification, although late, did occur for these five children. Four of the five children received their services from the regional CIS-EIP in which LEAs provide early intervention services. Since staff from the LEA were the service coordinators for these children, they were aware of these children but failed to “notify themselves” in writing, i.e., there was no written documentation in the child’s file. Staff in the regional CIS-EIP providing services for the other child mistakenly understood that the child’s family could “opt out” - Vermont does not have an opt-out policy.

Vermont Part C made **no new findings of noncompliance in FFY 2009** for Indicator 8B.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2009:

Vermont Part C demonstrated 99% compliance during FFY 2009, a slight decrease from FFY 2008’s 99.6% compliance.

Similar to Indicator 8A, noncompliance was identified in the region where LEAs provide early intervention services, including service coordination. As noted above, LEA personnel who are service coordinators know about the potentially eligible children but may not ensure written notification is in a child’s file. State CIS-EI staff continued to reinforce the written notification requirement. The CIS-EIP Director continued her efforts to provide information and support related to transition for all Part C and B staff involved in providing early intervention services. Previous discussions under Indicators 1 and 7 highlighted specific strategies that this director implemented to ensure compliance in all service areas, e.g., self-assessments, her own review of files, meetings with LEA personnel, Wellness Plans targeting areas of noncompliance, and developing a local data tracking system. All regional CIS-EIPs received transition profiles from the state CIS-EI staff so that they could analyze their data and target necessary areas for improvement.

The State Part C/B Transition Team continued to provide joint communications, training, and technical assistance to Part C and B providers to ensure shared understanding of the notification requirement and other transition requirements. This team continued to refine guidance to the field based on OSEP’s Transition FAQ document, including clarification around late referrals. This state team disseminated additional information and resources from the National Early Childhood Transition Center (NECTC) and National Early Childhood Technical Assistance Center (NECTAC) in multiple ways, including via the Children’s Integrated Services listserv and blog and the Essential Early Education provider listserv. Posting transition resources on the Children’s Integrated Services website provided ongoing, timelier and

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greater access for families and providers to these resources. All regional CIS-EIPs received Regional Transition Profiles containing transition data for their programs.

As discussed in Indicator 8A, state CIS-EI and Part B staff finalized the development of online transition training modules for parents and “launched” these in FFY 2010. These modules incorporate both required and “best” practices for transition. Regional CIS-EIP staff also are utilizing these modules and supporting resources and materials to assist families throughout the transition process. Families with limited internet access have access to DVDs of the modules, and the modules were transported into written documents for families who do not have computer access. Vermont Family Network (VFN) partners with CIS-EI to provide parent trainings on request and through scheduled webinars and onsite workshops.

Verification of Correction of FFY 2008 Noncompliance Reported in the 2008 APR:

Two regional CIS-EIPs demonstrated noncompliance during FFY 2008. CIS-EIP 1 was at 97% compliance (31/32) and CIS-EIP 4 was at 99% compliance (130/131). **This noncompliance was corrected prior to issuing written findings of noncompliance.** Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of updated data from the second quarter of the 2009 Child Count Database (March to May 2009), CIS-EIPs 1 and 4 achieved 100% compliance for 60 consecutive days, indicating that the programs are correctly implementing the transition requirements in 34 CFR

§303.148(b)(1); and 2) Part C state staff verified immediately upon review of the 2008 Child Count forms (the data source for identifying the noncompliance) and in following up with the staff in CIS-EIPs 1 and 4 that, although notification was late, it did occur for the two children in these programs.

Verification of Correction of FFY 2009 Noncompliance Reported in this 2009 APR:

Two regional CIS-EIPs demonstrated noncompliance based on analysis of the entire 2009 Child Count Database used for reporting statewide data for Indicator 8B in this FFY 2009 APR. This noncompliance was corrected prior to issuing written findings of noncompliance. CIS-EIP 4 was at 97% compliance (125/129) and CIS-EIP 7 was at 97% compliance (37/38). This noncompliance was **subsequently corrected.** Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of data from the first quarter of the 2010 Child Count Database (December 2009 to February 2010), CIS-EIPs 1 and 7 achieved 100% compliance for 60 consecutive days, indicating that the programs are correctly implementing the transition requirements in 34 CFR

§303.148(b)(1); and 2) Part C state staff verified immediately upon review of the 2009 Child Count forms (the data source for identifying the noncompliance) and in following up with the staff in CIS-EIPs 1 and 7 that, although notification was late, it did occur for the five children in these programs (please see “Discussion of Improvement Activities Completed...”).

Additional Information Required by the OSEP APR Response Table for this Indicator:

Statement from the Response Table	State’s Response
If the State does not report 100% compliance in the FFY 2009 APR, the State must review its improvement activities and revise them, if necessary.	During FFYs 2009 and 2010, State Part C CIS-EI staff, in collaboration with other state CIS staff, CIS-EIP regional staff, and members of the VICC, reviewed and discussed revisions to Indicators 1-9 and 14 during meetings and teleconferences. Staff from the Northeast Regional Resource Center provided specific technical assistance to facilitate the final review and revision process conducted by members of the VICC and state CIS-EI staff prior to

	submission of this 2009 APR. Revisions to Indicator 8B are documented below and are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: http://dcf.vermont.gov/cdd/reports/IDEA_Part_C .
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Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 8B to: 1) extend targets and timelines through FFY 2012; 2) delete activities no longer relevant and add new activities; 3) highlight the upcoming revision process for and submission of the Part C-B IAA; 4) specify annual revisions to current manual data collection tools and the ongoing refinement of the process for the timely and accurate collection, verification, and reporting of data; 5) specify revisions to the annual determination process; 6) highlight FFY 2009 implementation of a new electronic billing system for Part C; 6) reflect the revised timeline and new resources for the development/implementation of the electronic data management system; and 7) highlight the recent development/launch of online transition modules and pending interactive self-guided web resources. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: http://dcf.vermont.gov/cdd/reports/IDEA_Part_C.

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Indicator 8C: 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:

C. Transition conference, if child potentially eligible for Part B.

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

Measurement:

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 Rigorous Target
2009 (7/1/09-6/30/10)	100%

Actual Target Data for FFY 2009:

98%

Data Method/Source: Desk audit of 2009 Child Count Database, 12/2/08 to 12/1/09

Children Exiting Part C who Received Timely Transition Planning (Transition Conference):

a. Number of children exiting Part C and potentially eligible for Part B where the transition conference occurred	478
b. Number of children exiting Part C who were potentially eligible for Part B	488
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 (Transition Conference) (Percent = [(a) divided by (b)] times 100)	98%

The transition conference was timely for 323 of 488 children potentially eligible for Part B services. There were 101 children for whom the transition conference did not occur in a timely way due to exceptional family circumstances, which included cancellations, requests to delay, family illness, and child hospitalization. State CIS-EI staff confirmed that these transition conferences, although late, did occur. These 101 children are included in the numerator as well as the denominator, along with 54 children whose referral to Part C occurred fewer than 120 days prior to their third birthday.

12 children whose parents declined to have a transition conference are not included in the numerator and denominator. Timely transition conferences did not occur for 10 children in two regional CIS-EIPs due to scheduling conflicts for LEA personnel and a service coordinator's unavailability for the conference. State Part C staff verified that transition conferences ultimately did occur for these 10 children between 85 and 8 days prior to the children's third birthdays. In some instances, the child's IEP meeting was combined with the transition conference.

Vermont Part C made **no new findings of noncompliance in FFY 2009** for Indicator 8C.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2009:

Vermont Part C demonstrated 98% compliance in FFY 2009, the same as in FFY 2008.

Nine of the 10 instances of noncompliance occurred in the region in which nine partner LEAs provide early intervention services. The regional CIS-EIP in this region experienced slippage in compliance during FFY 2009, going from 95% compliance in FFY 2008 to 93% compliance in FFY 2009. Discussions in Indicators 8A, 8B and in other indicators highlighted continuing efforts to address noncompliance in this region. This region provides services for approximately 20% of the children statewide receiving early intervention services. During FFY 2009, State CIS-EI staff met with the CIS-EIP Director and Assistant Director to identify root causes of the noncompliance in Indicator 8C. Untimely conferences for three children were due to scheduling conflicts of the school and EI provider. The necessity of a CIS-EIP service coordinator to go from a full-time to half-time work schedule due to illness and the delay in finding additional coverage for her caseload resulted in untimely conferences for the other six children.

All of the activities discussed in Indicators 8A and 8B under the section "Discussion of Improvement Activities..." also target Indicator 8C both regionally and statewide.

Verification of Correction of FFY 2008 Noncompliance Reported in the 2008 APR:

Four regional CIS-EIPs demonstrated noncompliance during FFY 2008. CIS-EIP 4 was at 95% compliance (125/131), CIS-EIP 5 was at 98% compliance (57/58), CIS-EIP 7 was at 97% compliance (36/37), and CIS-EIP 10 was at 98% compliance (59/60). **This noncompliance was corrected prior to issuing written findings of noncompliance.** Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of updated data from the second quarter of the 2009 Child Count Database (March to May 2009), CIS-EIPs 4, 5, 7 and 10 achieved 100% compliance for 60 consecutive days, indicating that the programs are correctly implementing the transition requirements in 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)); and 2) Part C state staff verified immediately upon review of the 2008 Child Count forms (the data source for identifying the noncompliance) and in following up with the staff in CIS-EIPs 4, 5, 7 and 10 that, although late, the transition conferences occurred for all nine children between 82 and 9 days prior to their third birthdays. The majority of delays in conducting timely transition conferences were due to LEA personnel scheduling conflicts. State CIS-EI staff continued to reinforce the fact that, if staff from the LEA are unable to attend the conference, the conference can still occur and relevant information from the staff member be obtained and shared at the meeting. In some instances, the family may choose not to go ahead without the LEA representative present at the meeting, resulting in family choice to reschedule the meeting.

Additional and updated data gathered during the third quarter of FFY 2010 (June to July 2010) further indicated that these four CIS-EIPs are correctly implementing the transition requirements for Indicator 8C.

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During August 2010, all regional CIS-EIPs conducted annual self-assessments of files and submitted these to the state CIS-EI office for review and verification. All four regional CIS-EIPs achieved 100% compliance.

Verification of Correction of FFY 2009 Noncompliance Reported in this 2009 APR:

Two regional CIS-EIPs demonstrated noncompliance based on analysis of the entire 2009 Child Count Database used for reporting statewide data for Indicator 8C in this FFY 2009 APR. CIS-EIP 4 was at 93% (120/129) and CIS-EIP 9 was at 97% (36/37). This noncompliance was corrected prior to issuing written findings of noncompliance. Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of data from the first quarter of the 2010 Child Count Database (December 2009 to February 2010), CIS-EIPs 4 and 9 achieved 100% compliance for 60 consecutive days, indicating that the programs are correctly implementing the transition requirements in 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)); and 2) Part C state staff verified immediately upon review of the 2009 Child Count forms (the data source for identifying the noncompliance) and in following up with the staff in CIS-EIPs 4 and 9 that, although late, the transition conferences occurred for all 10 children between 85 and 8 days prior to their third birthdays. As noted previously, personnel scheduling conflicts and the unavoidable delay in hiring another service coordinator to share a staff member's workload resulted in noncompliance.

Additional Information Required by the OSEP APR Response Table for this Indicator:

Statement from the Response Table	State's Response
If the State does not report 100% compliance in the FFY 2009 APR, the State must review its improvement activities and revise them, if necessary.	During FFYs 2009 and 2010, State Part C CIS-EI staff, in collaboration with other state CIS staff, CIS-EIP regional staff, and members of the VICC, reviewed and discussed revisions to Indicators 1-9 and 14 during meetings and teleconferences. Staff from the Northeast Regional Resource Center provided specific technical assistance to facilitate the final review and revision process conducted by members of the VICC and state CIS-EI staff prior to submission of this 2009 APR. Revisions to Indicator 8C are documented below and are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: http://dcf.vermont.gov/cdd/reports/IDEA Part C .

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 8C to: 1) extend targets and timelines through FFY 2012; 2) delete activities no longer relevant and add new activities; 3) highlight upcoming revision process for and submission of Part C-B IAA; 4) specify annual revisions to current manual data collection tools and the ongoing refinement of the process for the timely and accurate collection, verification, and reporting of data; 5) specify revisions to the annual determination process; 6) highlight FFY 2009 implementation of a new electronic billing system for Part C; 6) reflect the revised timeline and new resources for the development/implementation of the electronic data management system; and 7) highlight the recent development/launch of online transition modules and pending interactive self-guided web resources. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: <http://dcf.vermont.gov/cdd/reports/IDEA Part C>.

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

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 C 9 Worksheet” to report data for this indicator (see Attachment A).

FFY	Measurable and Rigorous Target
FFY 2009 (7/1/09-6/30/10)	100%

Actual Target Data for FFY 2009:

100%

See Attachment A: Part C INDICATOR C-9 WORKSHEET – 3 Timely Corrections of 3 Findings

Data Sources: 2008 Child Count Database, 12/2/07 to 12/1/08; ECO Family Survey FFY 2009; 2009 Child Count Database, 12/2/08 to 12/1/09; 2010 Child Count Database, 12/2/09 to 12/1/10; Regional CIS-EIP Self-Assessments FFY 2010.

Describe the process for selecting EIS programs for Monitoring: Vermont Part C monitored all 12 CIS-EIPs during FFY 2008 by: 1) conducting a comprehensive desk audit of the entire 2008 Child Count Database, and 2) analyzing results of the ECO Family Survey conducted in all 12 CIS-EI regions in spring 2009. The 2008 Child Count Database was the data source for the 3 findings identified in FFY 2008 (1 finding in Indicator 1, 2 findings in Indicator 7).

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that Occurred for FFY 2009:

Vermont Part C demonstrated 100% compliance for Indicator 9 in FFY 2009, maintaining its FFY 2008 level of compliance. Since Vermont Part C continued to use a manual data management system for identifying findings/other instances of noncompliance and to verify correction (for the majority of identified noncompliance), Vermont's Part C Coordinator in FFY 2009 continued to commit resources to enhance the efficacy and efficiency of the manual data management system. This resulted in more systematic and timelier procedures for: 1) obtaining and analyzing data, 2) verifying correction of FFY 2008 findings and other FFY 2008 noncompliance, 2) tracking data trends and "checking the temperature" (as an OSEP staff member remarked during a webinar), 3) conducting root cause analyses with regional CIS-EIPs and identifying technical assistance needs, and 4) conducting the Annual Determination process. Indicators 1 and 14 contain a specific discussion related to the improved data collection and verification procedures. Self-assessments conducted annually by regional CIS-EIPs also provided additional and updated data to verify correction.

As described in Indicator 1, Vermont Part C CIS-EI transitioned to an electronic statewide billing system, Hewlett Packard Enterprise System (HPES), in FFY 2009. This contributed substantially to improving the process for verifying that data were complete and accurate and provided Part C CIS-EI with an enhanced level of "checks and balances" between it and the manual data management system.

A significant accomplishment during FFY 2009 was the development of a request for proposal (RFP) for the Children's Integrated Services electronic data management system and the awarding of a contract to BDMP to develop the business requirements. Although the planned development/implementation of an electronic data management system specific to Part C has been delayed due to a number of factors, the successful integration of services under Children's Integrated Services and the availability of ARRA funds resulted in "fast tracking" the development and implementation of a data management system that will meet the data requirements for all CIS services. Past work on the specific Part C data management system provided a foundation for this CIS data management system. Along with state CIS staff, field-based CIS staff had significant opportunities to review and provide input into the business and data elements. BDMP also consulted with two states regarding the recent development of their Early Intervention data system. An RFP process and the awarding of a contract to YahaSoft in FFY 2010 to develop the data management system and its planned phase-in during FFY 2011 will substantially enhance Part C CIS-EI's ability to collect, analyze and report data. Since this system will be actively used by practitioners and eventually by families, the data entered into it will be much more functional and effective as an off-site tool/process for assessing compliance and/or performance on an ongoing basis for Indicators 1 through 9 and 14. The revised State Performance Plan submitted February 1, 2011 documents the development/implementation of this database in the "Overview of Issue/Description of System or Process" and in revisions to the "Improvement Activities/Timelines/Resources" in the relevant indicators.

During a staff meeting in FFY 2009, State CIS-EI staff discussed factors contributing to Vermont's substantial compliance on Indicators 1, 7, 8A, 8B, 8C and 9. Along with the implementation of specific improvement activities, state CIS-EI staff feel overall, since the inception of annual performance reporting, the fact that there is ongoing assessment has provided intrinsic motivation for the regional CIS-EIPs to improve/maintain their individual program performance. As one CIS-EI staff member said, "assessment IS intervention." Vermont Part C's enhanced ability to regularly review data and provide follow-up to the CIS-EIPs, the CIS-EIPs' increased self-monitoring/self-assessment, targeted technical assistance to the CIS-EIPs, the focus on the critical importance of systematic and regular supervision in the regional CIS-EIPs, and the ongoing refinements to the annual Determination process and shared motivation among the regional CIS-EIPs to "meet compliance" each year all have contributed substantially to the CIS-EIPs identifying their strengths and those areas they need to address. The implementation of Children's Integrated Services will strengthen Vermont CIS-EI's ability to meet the Part C federal requirements, maintain its "Meets Requirements" status, and provide quality and timely services for Vermont's youngest children and their families.

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Vermont Part C CIS-EI staff continued to access multiple technical assistance sources during FFY 2009. Staff held monthly TA calls with its OSEP State Contact, participated in NERRC-sponsored monthly teleconferences and webinars on General Supervision and accessed its NERRC state contact; frequently accessed the RRC's SPP/APR calendar; and participated in several national meetings, including the OSEP Early Childhood Conference, ITCA annual meeting; and DAC Data Managers and ECO Center meetings.

Timely Correction of FFY 2008 Findings of Noncompliance (corrected within one year from identification of the noncompliance):

1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009) (Sum of Column a on the Indicator C 9 Worksheet)	3
2. Number of findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS programs of the finding) (Sum of Column b on the Indicator C 9 Worksheet)	3
3. Number of findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Verification of Timely Correction in FFY 2008 or 2009 of FFY 2008 findings:

Indicator 1 – 1 Finding

Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of updated data from the first quarter of the 2009 Child Count Database (December 2008 to February 2009), CIS-EIP 4 achieved 100% compliance for 60 consecutive days, indicating that the program is correctly implementing the timely service provision requirements in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1); and 2) Part C state staff verified immediately upon review of the 2008 Child Count forms (the data source for identifying the finding) that, although late, all services were initiated for the nine children for whom services were not initiated in a timely manner. The number of days services were initiated beyond the 30-day timeline from signed parental consent for these nine children ranged from 19 to 134. The delays were due to the lack of availability of speech language pathologists and occupational and physical therapists who could provide the services in a timely way.

Additional updated data further indicated that this CIS-EIP is correctly implementing the timely service provision requirements for Indicator 1. In a desk audit of updated data from the first quarter of the 2010 Child Count Database (December 2009 to February 2010), CIS-EIP 4 achieved 100% compliance for 60 consecutive days. During FFY 2010 (August), all regional CIS-EIPs conducted annual self-assessments of files and submitted these to the state CIS-EI office for review and verification. Regional CIS-EIP 4 demonstrated 100% compliance (32/32 files).

As discussed in Indicator 1 in this APR, during FFY 2009 state CIS-EI staff established a collaborative relationship with a new agency in this region that provides early intervention services for approximately 20% of the children and families who receive services statewide. The collaboration of this provider agency with the regional CIS-EIP resulted in children receiving expanded and timelier physical and occupational therapy services. This CIS-EIP also enhanced its data tracking system and communicated regularly with their local schools that provide early intervention services to ensure that services began in a timely manner. Staff within this particular CIS-EIP systematically communicated with their director to let her know of any potential noncompliance in meeting timelines so that she could follow up with the relevant school personnel. The CIS-EIP director also conducted regular file reviews and required staff to conduct self-assessments of their files to ensure accurate and complete documentation.

Indicator 7 – 2 Findings

Consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02): 1) In a desk audit of updated data from the first quarter of the 2009 Child Count Database (December 2008 to February 2009), CIS-EIPs 1 and 9 achieved 100% compliance for 60 consecutive days, indicating that the programs are correctly implementing the 45-day timeline requirements in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a); and 2) Part C state staff verified immediately upon review of the 2008 Child Count forms (the data source for identifying the findings) that, although late, the two children from CIS-EIP 1 and the three children from CIS-EIP 9 ultimately received their evaluation, assessment, and initial IFSP meeting. Four children received their services between 46 and 85 days following referral, and one child received her services 118 days following referral. Scheduling conflicts of LEA personnel and a speech-language pathologist resulted in untimely services for the five children in these two programs.

CIS-EIPs 1 and 9 ultimately achieved 100% compliance (25/25 and 38/38 compliant, respectively) in a desk audit of the entire 2009 Child Count Database, further indicating that these programs are correctly implementing the timely service provision requirements in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a).

Although these two regional CIS-EIPs did not demonstrate substantial noncompliance during FFY 2008, state CIS-EI staff made findings based on a trend of noncompliance for FFYs 2006, 2007 and 2008. The state CIS-EI technical assistance liaisons for these two regions discussed these data trends with the CIS-EIP Directors and Supervisors, and the state data management staff closely tracked the programs' data that were submitted post-findings. The regions targeted Indicator 7 in their corrective action plans and continued to focus on Indicator 7 post-correction in their Wellness Plans developed during the FFY 2009 Determination process.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 9 to: 1) extend targets and timelines through FFY 2012; 2) delete activities no longer relevant and add new activities; 3) highlight the upcoming revision process for and submission of the Part C-B IAA; 4) specify annual revisions to current manual data collection tools and the ongoing refinement of the process for the timely and accurate collection, verification, and reporting of data; 5) specify revisions to the annual determination process; 6) highlight FFY 2009 implementation of a new electronic billing system for Part C; 6) reflect the revised timeline and new resources for the development/implementation of the electronic data management system; and 7) revise the timeline for the development of the General Supervision Manual. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website:

[http://dcf.vermont.gov/cdd/reports/IDEA Part C.](http://dcf.vermont.gov/cdd/reports/IDEA_Part_C)

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

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
2009 (7/1/09-6/30/10)	100%

Actual Target Data for FFY 2009: There were no signed written complaints for the Part C program during this reporting period. This is consistent with Vermont’s 618 data reported in Table 4 and submitted 10/25/10.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2009:

Part C continued to collaborate with Part B to support Part B’s improvement activities. Statewide data reported in this 2009 APR gathered from the FFY 2009 ECO Family Outcomes Survey for Outcome 4A, *Percent of Families participating in Part C who report that early intervention services have helped the family know their rights*, demonstrated that Vermont Part C exceeded its state target. State Part C CIS-EI staff, however, continued to prioritize this area and, based on the FFY 2008 ECO Family Outcomes survey data and as part of the FFY 2009 Determination process, required regional CIS-EIPs below the state target to address Outcome 4A in their Wellness Plans.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 10 to extend targets and timelines through FFY 2012. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website:

http://dcf.vermont.gov/cdd/reports/IDEA_Part_C.

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

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
2009 (7/1/09-6/30/10)	100%

Actual Target Data for FFY 2009: There were no hearing requests and no adjudications during this time period for the Part C program. This is consistent with Vermont’s 618 data reported in Table 4 and submitted 10/25/10.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2009:

Part C continued to collaborate with Part B to support Part B’s improvement activities. Statewide data reported in this 2009 APR gathered from the FFY 2009 ECO Family Outcomes Survey for Outcome 4A, *Percent of Families participating in Part C who report that early intervention services have helped the family know their rights*, demonstrated that Vermont Part C exceeded its state target. State Part C CIS-EI staff, however, continued to prioritize this area and, based on the FFY 2008 ECO Family Outcomes survey data and as part of the FFY 2009 Determination process, required regional CIS-EIPs below the state target to address Outcome 4A in their Wellness Plans.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 11 to extend targets and timelines through FFY 2012. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website:

http://dcf.vermont.gov/cdd/reports/IDEA_Part_C.

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

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
2009 (7/1/09-6/30/10)	Coordinate with and support Part B targets

Actual Target Data for FFY 2009: There were no Part C requests for hearings that went to resolution sessions that were resolved through resolution settlement agreements.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2009:

Part C continued to collaborate with Part B to support Part B's improvement activities. Statewide data reported in this 2009 APR gathered from the FFY 2009 ECO Family Outcomes Survey for Outcome 4A, *Percent of Families participating in Part C who report that early intervention services have helped the family know their rights*, demonstrated that Vermont Part C exceeded its state target. State Part C CIS-EI staff, however, continued to prioritize this area and, based on the FFY 2008 ECO Family Outcomes survey data and as part of the FFY 2009 Determination process, required regional CIS-EIPs below the state target to address Outcome 4A in their Wellness Plans.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 12 to extend targets and timelines through FFY 2012. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website:

http://dcf.vermont.gov/cdd/reports/IDEA_Part_C.

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

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
2009 (7/1/09-6/30/10)	Assist Part B in promoting mediation and in reaching Part B targets

Actual Target Data for FFY 2009: There were no mediation requests for Part C that resulted in mediation agreements. These Indicator 13 data are consistent with Vermont’s 618 data reported in Table 4 and submitted 10/25/10.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2009:

Part C continued to collaborate with Part B to support Part B’s improvement activities. Statewide data reported in this 2009 APR gathered from the FFY 2009 ECO Family Outcomes Survey for Outcome 4A, *Percent of Families participating in Part C who report that early intervention services have helped the family know their rights*, demonstrated that Vermont Part C exceeded its state target. State Part C CIS-EI staff, however, continued to prioritize this area and, based on the FFY 2008 ECO Family Outcomes survey data and as part of the FFY 2009 Determination process, required regional CIS-EIPs below the state target to address Outcome 4A in their Wellness Plans.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 13 to extend targets and timelines through FFY 2012. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website:

http://dcf.vermont.gov/cdd/reports/IDEA_Part_C.

Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development: Please see description on page 3, Indicator 1.

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
2009 (7/1/09-6/30/10)	100%

Actual Target Data for FFY 2009: 100% See Attachment B: Part C Indicator 14 Data Rubric

Data Sources: 2009 Child Count Database, 12/2/08 to 12/1/09, that produces data for the “618” reports and for the SPP and the APR.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2009:

Tables 1, 2, 3 and 4 of the 618 report were timely and accurate, and Vermont Part C maintained 100% compliance during FFY 2009. Two of Vermont Part C’s data management team attended the FFY 2009 Data Managers meeting in preparation for submitting the 618 and APR reports.

Vermont Part C continued to use a manual data management system in FFY 2009 and implemented an enhanced system of checks and balances to continue to ensure that data submitted to DAC and OSEP are timely, valid and reliable. These checks and balances include having dedicated state CIS-EI data management staff:

- Communicate regularly with regional CIS-EIP staff via email and phone to reinforce data submission deadlines and monthly reporting expectations, and to follow up to, e.g., clarify inaccurate and/or “questionable” data, obtain missing data;
- Run frequent data queries and review for accuracy;
- Validate queries against paper documentation housed at the state office (Active and Exit child count forms, monthly regional data reports, Child Outcomes data forms);
- Cross reference data with other reports;
- Have a system of regular checks and balances among themselves; and

- Submit final reports to lead administrative staff to validate prior to submission.

State CIS-EI data management staff entered data from the regional CIS-EIPs immediately upon receipt into an ACCESS database and conducted weekly queries to validate data accuracy. As noted earlier in Indicator 1, Vermont Part C CIS-EI transitioned to the electronic HPES statewide billing system for POLR in FFY 2009. On a weekly basis, staff cross-checked the data entered into the ACCESS database with data entered into the HPES system, and received an extract report that identified errors and duplicate data. This provided a substantially enhanced level of “checks and balances.” Prior authorizations (PAs) were not approved for children who were not active in the CIS-EI system, and PA requests had to match the frequency of services stated on the current service grid. CIS-EI staff could track frequency and appropriateness of services and follow up with regional CIS-EIP staff if data were “questionable,” e.g., the frequency of services appeared to be inappropriate for the child’s documented area/s of need. As of January 1, 2010, forms for children who were active (as well as for children who exited CIS-EI) that were submitted to the state CIS-EI office had to be timely and accurate in order for CIS-EI providers to receive payment.

Regionally, data management staff provided specific technical assistance during FFY 2009 to two CIS-EIPs that have experienced ongoing challenges in submitting data that are accurate and complete. Along with regular phone and email communication, staff were onsite to assist regional administrative staff in setting up more effective data tracking and reporting procedures. As noted previously, one of these regions developed its own local database for collecting and reporting data until the CIS statewide electronic data management system is in place. This region, which partners with 9 LEAs to provide early intervention services, implemented its own “checks and balances” system to ensure all the Part C and LEA staff documented accurate and complete information in each child’s file, and were timely and accurate in submitting their data to the regional CIS-EIP staff who entered, verified and submitted the data to the state data management team. The Part C and LEA providers conducted self-assessments of their files, and the regional CIS-EIP Director also conducted regular file reviews.

BDMP’s development of the business requirements for the statewide CIS Data Management System in FFY 2009 and the subsequent awarding of a contract to YahaSoft in FFY 2010 to develop the data management system and phase it in during FFY 2011 will substantially enhance Part C CIS-EI’s ability to collect, analyze and report accurate and timely data for the 618 and Annual Performance Reports.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:

Revisions were made to Indicator 14 to: 1) extend targets and timelines through FFY 2012; 2) delete activities no longer relevant and add new activities; 3) specify annual revisions to current manual data collection tools and the ongoing refinement of the process for the timely and accurate collection, verification, and reporting of data; 4) specify revisions to the annual determination process; 5) highlight FFY 2009 implementation of a new electronic billing system for Part C; and 6) reflect the revised timeline and new resources for the development/implementation of the electronic data management system. These revisions are in the February 1, 2011 revised version of the SPP posted on the Vermont Part C website: http://dcf.vermont.gov/cdd/reports/IDEA_Part_C.