

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

**Annual Performance Report
Federal Fiscal Year 2011
(July 1, 2011 through June 30, 2012)**

Revised May 16, 2013

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2011

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Part C State Annual Performance Report (APR) for FFY 2011**Overview of the Annual Performance Report Development:**

Vermont's Part C Program is known as Children's Integrated Services-Early Intervention (CIS-EI). Children's Integrated Services (CIS) is Vermont's unique model for integrating early intervention (Part C), nursing, family support, early childhood and family mental health, and specialized child care services for pregnant women and children prenatal to six years old and their families. 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. The Vermont Interagency Coordinating Council (VICC) functions in an "advise and assist" role for Children's Integrated Services.

Vermont Part C's FFY 2009 APR reported that YahaSoft was awarded a contract in FFY 2010 to develop Vermont Part C's electronic data management system known as VFACTS (Vermont Family and Child Tracking System), a system for all Children's Integrated Services, with a planned implementation of the system in FFY 2011. As reported in VT Part C's FFY 2010 APR, however, Tropical Storm Irene in August 2011 had a significant impact on forward progress when the storm damaged the state agency building. CIS state and vendor staff continued to work on the CIS electronic data management system, but Agency of Human Services Information Technology staff had to devote their entire efforts to restoring core IT functions for the different locations throughout Vermont to which AHS staff were relocated (and remain located). As reported in the 2010 APR and the State Performance Plan-Revised submitted 2/1/12, the timeline for full implementation of VFACTS therefore was revised to September 15, 2012 (FFY 2012).

In anticipation of the 9/15/12 'go live' timeline, VFACTS User Acceptance Testing occurred statewide in June 2012, during which the vendor made immediate refinements to the system based on UAT testing. During August and September 2012, CIS state staff provided 'hands on' training at nine venues statewide to more than 200 providers in Vermont's 12 CIS regions and conducted additional trainings upon request. Providers completed User Enrollment Forms and interacted with the VFACTS system during these trainings. During the September 2012 quarterly meeting of the Vermont Interagency Coordinating Council (VICC), CIS-EI staff provided an in-depth orientation to the VFACTS system. The targeted timeline of 9/15/12 for full implementation, however, subsequently was delayed. The state CIS Director sent a memo in early September to all providers informing them that, because of the sensitive nature of the data housed in VFACTS, the state of Vermont was taking extra precautions to ensure the system met all HIPAA and other national standards for data security. Work continued throughout the fall of 2012 to address the Vermont Department of Information and Innovation's (DII's) concerns related to national security standards around client information. **The vendor was not able to resolve the concerns to Vermont's satisfaction and the contract was terminated in January 2013.** The Agency of Human Services' Department for Children and Families (DCF) remains fully committed to developing VFACTS to ensure that Children's Integrated Service's needs for information sharing, client management, and accountability for results are addressed. The DCF is working with State Information Technology to develop a plan and timeline for completion and implementation of the project.

Vermont Part C continued to collect data with a manual data management system during FFY 2011. The data source and time period for the data reported in this 2011 APR is the entire Part C State Database, July 1, 2011 to June 30, 2012. Vermont Part C had planned to collect its FFY 2012 data using the new VFACTS data management system, but due to the delays and finally the termination of the vendor contract, VT Part C continues to collect data using its 'paper and pencil' system. As reported in the FFY 2010 APR, technically Vermont Part C's eight findings of noncompliance identified during a desk audit of the Part C State Database 7/1/10 to 6/30/11 should have been issued in FFY 2010, but having a manual data management system prevented Part C CIS-EI staff from analyzing the data in a timely way to issue the findings in FFY 2010. Therefore the written notification of findings identified from the FFY 2010 data occurred in FFY 2011 and are reported in this APR as FFY 2011 findings under Indicators 1, 7, 8A, 8B and 8C. Verification of correction of these FFY 2011 findings of noncompliance and the specific actions Vermont Part C took/is taking to verify correction will be reported under Indicators 1, 7, 8A, 8B, 8C and 9 in the FFY 2012 Annual Performance Report to be submitted February 2014.

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This FFY 2011 APR, along with accounting for FFY 2010 noncompliance in Indicators 1, 7, 8A, 8B and 8C that was corrected prior to issuing findings (as required by Vermont's Part C FFY 2010 SPP/APR Response Table), also accounts for FFY 2011 noncompliance in those regional CIS-Early Intervention Programs (CIS-EIPs) that corrected the noncompliance prior to being issued written findings of noncompliance. Along with this noncompliance, there were three new findings of noncompliance in Indicators 1, 7 and 8B based on a desk audit of the Part C State Database 7/1/11 to 6/30/12 that also had an impact on VT Part C's FFY 2011 statewide compliance in these three indicators. Again, due to VT Part C having to use a manual data management system, it was impossible for state CIS-EI staff to issue written findings in FFY 2011. Therefore the written notification of these three findings identified from the FFY 2011 data occurred in FFY 2012 and will be reported on as FFY 2012 findings in the FFY 2012 APR submitted February 2014.

During FFY 2011, the VICC continued to discuss and provide input into the development of this Annual Performance Report at each of its quarterly meetings and during meetings of the VICC Executive Council. Given that new members regularly join the VICC, CIS-EI staff ensure that there is a general orientation to the SPP/APR as well as specific discussion of particular indicators/practices. During one of the FFY 2011 meetings, ICC members and state CIS staff devoted significant time to discussing birth to one child find, which the FFY 2010 APR reported as having a slight downward trend and for which CIS-EI state staff requested and received technical assistance from the Northeast Regional Resource Center in FFY 2010. VICC members continue to be particularly important in examining results from the Family Outcomes survey, especially now there are multiple years of data. The VICC and regional CIS-EIP Director meetings continued to be combined in FFY 2011 to enhance communication and information-sharing between and among the VICC members and staff from the regional CIS-Early Intervention Programs. Vermont's CIS Director is committed to attend these meetings and provide information about CIS statewide. The state CIS Team continued to integrate discussion of the APR into its weekly meetings.

Vermont Part C continued to receive input into, and technical assistance related to, the development of this 2011 APR from its Office of Special Education Programs (OSEP) State Contact, Northeast Regional Resource (NERRC) and National Early Childhood Technical Assistance Center (NECTAC – now Early Childhood Technical Assistance Center - ECTAC) 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 and other CIS staff continued to participate in OSEP SPP/APR technical assistance calls; other multiple regional and national webinars and teleconferences addressing the APR and/or SPP, including the NERRC-sponsored State to Local General Supervision and Monitoring Workgroup monthly conference calls/webinars; attended the summer 2011 OSEP Leadership Mega Conference that incorporated the annual Data Accountability Center Meeting and the Early Childhood Outcomes Conference in September 2011; and accessed the "Right IDEA" web site for technical assistance, resources and materials. The VICC reviewed this 2011 APR.

A complete copy of VT Part C's State Performance Plan-revised 2-13 will be posted to the Agency of Human Services/Child Development Division's website at http://dcf.vermont.gov/cdd/reports/IDEA_Part_C. Data from the 2011 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 Agency of Education's and Vermont Family Network's web sites, and disseminated statewide via listservs, including on the CIS blog maintained and used regularly statewide; in newspapers; during meetings and teleconferences; and through other media. The Agency of Human Services/Vermont Part C CIS-EI will report to the public in spring 2013 on Vermont's and each of the 12 regional CIS-EIP's progress or slippage in meeting FFY 2011 targets in the State Performance Plan at http://dcf.vermont.gov/cdd/reports/IDEA_Part_C/public_reports.

Please note that Vermont chose to implement the IDEA Part C Final Regulations July 1, 2012. This FFY 2011 APR therefore **reports data for Indicators 8A and 8B using measurements for these indicators included in the prior Indicator Measurement Table.**

Part C State Annual Performance Report (APR) for FFY 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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
2011 (7/1/11-6/30/12)	100%

Actual Target Data for FFY 2011:

97.4%

Data Method/Source: Desk audit of entire Part C State Database, July 1, 2011 to June 30, 2012

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	763
b. Total number of infants and toddlers with IFSPs	783
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)	97.4%

Of the 783 children with new services on both initial and subsequent IFSPs, all services were initiated for 714 children within 30 days of signed parental consent (Vermont’s criteria). Services for 49 children were not initiated in a timely manner due to exceptional family circumstances. These 49 children are included in the numerator as well as the denominator. Exceptional family circumstances included families cancelling or failing to attend scheduled meetings, providers being unable to contact families to schedule meetings after repeated efforts, families needing to reschedule meetings, family vacation schedules, surgeries, inclement weather, and hospitalization.

Vermont made **two new findings of noncompliance in FFY 2011** in Indicator 1.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011:

Vermont CIS-EI demonstrated slight slippage in FFY 2011, going from 97.7% compliance in FFY 2010 to 97.4% compliance in this reporting year. During FFY 2011, the number of children with IFSPs upon which the percentage of compliance is based increased by 58 (783 in FFY 2011, 725 in FFY 2010). There were 20 children for whom delays in initiating services were attributable to circumstances other than documented exceptional family circumstances. State Part C CIS-EI staff verified that services ultimately were initiated for these 20 children. The number of days services were initiated beyond the 30-day timeline for these 20 children ranged from 4 to 84; the average number of days beyond the 30-day timeline was 34. Delays in timely initiation of services for all 20 children were attributable to scheduling conflicts/provider unavailability: occupational and physical therapists (6 children), speech-language pathologists (12 children), service coordinator and early interventionist (1 child), and delay in physician authorization of services for one child. The lack of a sufficient number of speech-language pathologists continued to present challenges related to timely service provision.

As discussed in Vermont's FFY 2010 APR, all CIS service providers, not just Part C CIS-EI providers, are required to use an integrated family service plan (i.e., One Plan) that is based on the IFSP and to adhere to Part C timeline requirements for timely service provision. Consistent use of the One Plan/IFSP by all CIS providers reinforces the timeline regulations for initiating services. During FFY 2011, state CIS staff developed and disseminated an online technical assistance and training module outlining Part C timeline requirements for all regional CIS Intake Coordinators, administrators and providers. The SFY 2014 contracts beginning July 1, 2013 will require all CIS providers to complete, with 100% accuracy, this module and send documentation of completion to the state CIS office. State CIS team regional technical assistance liaisons continued to provide intensive onsite and distance support during FFY 2011 and, among other areas, addressed the timeline requirements based on information provided by the state data management team. Although as discussed in the overview on page 3 final implementation of the electronic data management system is delayed, the VFACCTS User Acceptance Testing that occurred statewide in June 2012 and the trainings provided in August and September 2012 to more than 200 providers statewide had a significant impact on reinforcing the Part C timeline requirements across the CIS services.

State CIS-EI data management staff continued to follow up regularly by telephone and/or email with regional CIS-EIP staff to request missing/clarify information on the monthly child count forms. The child count instructions and forms continued to require CIS-EIP staff to document for each child and family on each initial and subsequent One Plan/IFSP for 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 enables state CIS-EI data management staff reviewing the data 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.

During FFY 2011, state data management staff further refined a rubric to evaluate the quality of data submissions (Indicator 14) during VT Part C's annual determination process in spring 2012 following submission of the 2010 APR in February 2012. State CIS data management staff use this rubric to track quality of data throughout the year and determine necessary follow-up and technical assistance to regional CIS-EIPs. The rubric contains criteria for determining if required data that the regional CIS-EIPs submit to the state CIS office are: 1) timely, i.e., consistently submitted on time; 2) valid, i.e., consistently complete/submitted with all required information; and 3) reliable, i.e., consistently accurate/submitted with minimal errors and/or need for clarification. There also are criteria for determining a program's response rate that factor into the 'Timely' and 'Accurate' scores. Regional CIS-EIPs may receive up to three points for the quality of their data, one point each for timeliness, validity and reliability. A score of '3' on Indicator 14 indicates that all data the regional CIS-EIPs submit to the state office for Indicators 1, 2, 3, 5, 6, 7, 8A, 8B and 8C in a year are consistently timely, valid and reliable. A score less than a '3' automatically results in a regional CIS-EIP having to develop a plan to address quality of its data submissions and receive technical assistance. Having Indicator 14 factor into a program's annual determination provides added

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incentive for regional staff to ensure quality data submissions for Indicator 1, as well as for indicators 2, 3, 5, 6, 7, 8A, 8B and 8C, for reporting in this FFY 2011 Annual Performance Report.

The FFY 2009 transition to an electronic statewide billing system (Hewlett Packard Enterprise System-HPES), discussed in the 2009 APR, continued to provide a mechanism in FFY 2011 for verifying that data were complete and accurate. Given the unforeseen delay in the planned implementation of the electronic data management system, it is especially critical that the state CIS-EI staff can compare on a weekly basis the data entered into the Early Intervention ACCESS database with data entered into the HPES system to check for accuracy and query for any duplicate data. Prior authorizations (PAs) continue to help regions keep up with paperwork in order to inform state data management staff of changes to services.

As reported in past APRs, several regional CIS-EIPs have developed their own internal databases to collect, verify and report data prior to full implementation of the electronic data management system. It is anticipated that additional regions will develop internal databases and seek support from the CIS state office as well as peer regions that have these systems in place. Regional CIS-EIP Directors continue to conduct regular internal file reviews to monitor timeliness of services, and require staff to do systematic self-assessments of their files to ensure accurate and complete documentation and to flag areas of concern. Regional CIS-EIP staff continue to regularly share information about and reinforce Part C timeline requirements with partner providers (e.g., schools, home health agencies) to ensure timely service provision.

During FFY 2011, state CIS-EI staff provided extensive and targeted technical assistance to the two regional CIS-EIPs that had FFY 2011 findings of noncompliance in Indicator 1. These regional CIS-EIPs developed Corrective Action Plans (CAPs) to address their findings of noncompliance. To support the development and implementation of these CAPs, State CIS-EI staff provided these regions with copies of the document *Local Contributing Factor Tool for SPP/APR Compliance Indicators C-1, C-7, C-9/15, B-11 and B-12: Collecting and Using Valid and Reliable Data to Determine Underlying Factors Impacting Local Performance and Develop Meaningful Corrective Action Plans*. This resource provides a foundation for Vermont Part C's Corrective Action Plan template. The two programs with findings in Indicator 1 identified strategies to address, e.g., infrastructure and staffing, collection of valid and reliable data, development/revisions to program policies and procedures, changes to supervision, provision of training and technical assistance, and changes to provider practices. Some specific strategies included filling vacant staff positions (i.e., inability to fill in timely way had impact on meeting timelines); assessing workload vs. caseloads among staff and shifting responsibilities accordingly; devising a master 'tickler' system that anticipated timeline deadlines and incorporating status updates into weekly staff meetings; providing specific orientation/training to partner providers on timeline requirements; and establishing regular meetings with partner providers to reinforce timeline requirements as well as discuss other relevant areas related to practice. State CIS-EI staff, including data management staff, provided onsite and distance technical assistance throughout FFY 2011 to support these two regions in achieving 100% compliance in Indicator 1. The FFY 2012 APR submitted in February 2014 will report on correction of these two findings of noncompliance and the specific actions Vermont Part C took/is taking to verify the correction.

The Interagency Agreement with Vermont Agency of Human Services and Vermont Department of Education (now Vermont Agency of Education) was revised and finalized in FFY 2011. This agreement supports collaboration between the two agencies to ensure the statewide early intervention system is coordinated and provided in the manner required by Part C of the Individuals with Disabilities Education Improvement Act of 2004.

Correction of FFY 2010 Findings of Noncompliance: As discussed in the Overview on page 3 and in the FFY 2010 APR, there were no findings made of noncompliance in FFY 2010 in Indicator 1.

Level of compliance Vermont Part C reported for FFY 2010 for Indicator 1: **97.7%**

Verification of Correction of FFY 2010 Noncompliance Reported in the 2010 APR:

As reported in the 2010 APR and discussed in the overview on page 3 of this FFY 2011 APR, a desk audit of the entire Part C FFY 2010 State Database resulted in state CIS-EI staff issuing two findings of noncompliance in Indicator 1 for CIS-EIP 5 and CIS-EIP 9. Due to the use of a manual data management system, however, the two findings were issued in FFY 2011. Please note that state Part C staff did, however, review the 2010 Child Count forms for the 8 children for whom services were not initiated in a timely manner and were immediately able to verify that, although late, all services ultimately were initiated. Correction of these two findings of noncompliance and specific actions Vermont Part C took/is taking to verify the correction will be reported on under Indicators 1 and 9 in the 2012 APR submitted in February 2014. The noncompliance in FFY2010 that resulted in two FFY 2011 findings,(CIS-EIP 5 and CIS-EIP 9) along with noncompliance corrected prior (CIS-EIP 4 and CIS-EIP 6) to issuing written findings (discussed above), had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 1 during the FFY2010 reporting year

As reported in the 2010 APR, two regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2010 to June 30, 2011) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 4 was at 96% compliance (191/198) and CIS-EIP 6 at 96% compliance (45/47).

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 1) In a desk audit of updated data from the first and second quarters of the 2011 Part C State Database (July 2011 to November 2011), CIS-EIPs 4 and 6 achieved 100% compliance for 60 consecutive days, indicating that these two programs are correctly implementing the timely service provision requirements in 34 CFR §303.342(e) and 303.344(f)(1); and 2) Part C staff reviewed the 2010 Child Count forms submitted by the CIS-EIPs for the 9 children for whom services were not initiated in a timely manner and were immediately able to verify that, although late, all services ultimately were initiated. The number of days services were initiated beyond the 30-day timeline ranged from 4 to 54 for the 9 children. The reason for the majority of the delays in these two regions was lack of the availability of speech language pathologists who could provide the services in a timely way. Other delays were attributable to scheduling conflicts of the early interventionists.

The two FFY 2011 findings based on FFY 2010 data for CIS-EIP 5 and CIS-EIP 9 and the noncompliance corrected prior to issuing written findings for CIS-EIP 4 and CIS-EIP 6 and discussed above had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 1.

Verification of Correction of FFY 2011 Noncompliance Reported in this 2011 APR:

Five regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2011 to June 30, 2012) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 4 was at 95% compliance (165/173), CIS-EIP 5 at 97% compliance (61/63), CIS-EIP 6 at 99% compliance (72/73), CIS-EIP 9 at 95% compliance (61/64) and CIS-EIP 12 at 98% compliance (52/53).

As discussed in the Overview on page 3, a desk audit of the entire Part C FFY 2011 State Database resulted in CIS-EI state staff issuing one new finding of noncompliance in Indicator 1. Due to the continued use of a manual data management system, however, the finding was issued in FFY 2012 and will be reported on in the FFY 2012 APR submitted February 2014. Please note that state Part C staff did, however, review the 2011 Child Count forms for the 5 children for whom services were not initiated in a timely manner in the program that received the finding and were immediately able to verify that, although late, all services ultimately were initiated.

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 1) In a desk audit of updated data from the first and second quarters of the 2012 State Database (July 2012 to December 2012), CIS-EIPs 4, 5, 6, 9 and 12 achieved 100% compliance for 60 consecutive days, indicating that these five programs are correctly implementing the timely service

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provision requirements in 34 CFR §303.342(e) and 303.344(f)(1); and 2) Part C staff reviewed the 2011 Child Count forms submitted by the CIS-EIPs for the 15 children for whom services were not initiated in a timely manner and were immediately able to verify that, although late, all services ultimately were initiated.

This noncompliance in FFY 2011 that resulted in a FFY 2012 finding, along with the noncompliance corrected prior to issuing written findings (discussed above), had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 1 during this FFY 2011 reporting year.

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 2011 APR, the State must review its improvement activities and revise them, if necessary, to ensure compliance.	SFY 2014 contracts will require all CIS providers to complete, with 100% accuracy, the timeline module and submit documentation of completion to the state CIS office. Revisions to Indicator 1 are documented below and in the February 1, 2013 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 2012: 1) As noted in the Overview on page 3, the 9/15/12 timeline for full implementation of Vermont Part C's electronic data management system known as VFACTS was not met due to the Vermont Department of Information and Innovation's (DII's) concerns related to national security standards around client information and the vendor's inability to resolve the concerns to Vermont's satisfaction. The state of Vermont terminated the contract in January 2013. The Department for Children and Families (DCF) is working with State Information Technology to develop a plan and the timeline for completion and implementation of the project. Vermont Part C therefore will continue to use its manual, i.e., paper and pencil, data management system to collect, analyze and report data for FFY 2012; 2) SFY 2014 contracts (beginning July 1, 2013) will require that all CIS providers complete the timeline module (with 100% accuracy) and submit verification of completion to the state CIS office. These revisions are in the February 1, 2013 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 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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
2011 (7/1/11-6/30/12)	96.2%

Actual Target Data for FFY 2011: 99.7%

Data Source: Child Count Database 12/1/11, 12/2/10 to 12/1/11. These Indicator 2 data are consistent with Vermont’s 618 data submitted January 2012 and collected on Table 2 of Information Collection 1820-0557 (*Report of Program Settings Where Early Intervention Services are Provided to Children with Disabilities and Their Families in Accordance with Part C*).

Data Analysis for Indicator 2, FFY 2011:

	# Active Children 12/1/10	# Children in Home or Community-Based Settings	# Children in Other Setting	# and % Children in Home or Community-Based Settings	State Target
State Totals	785	783	2	783/785 = 99.7%	96.2%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011: Pursuant to OSEP Memorandum 13-7 with the accompanying Part C State Performance Plan (SPP) and Annual Performance Report (APR) Part C Indicator Measurement Table and Instructions, Vermont Part C is not required to report on progress/slippage or improvement activities for this Indicator for FFY 2011 because the state met and exceeded its FFY 2011 target.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: As noted in the Overview on page 3, the 9/15/12 timeline for full implementation of Vermont Part C’s electronic data management system known as VFACTS was not met due to the Vermont Department of Information and Innovation’s (DII’s) concerns related to national security standards around client information and the vendor’s inability to resolve the concerns to Vermont’s satisfaction. The state of Vermont terminated the contract in January 2013. The Department for Children and Families (DCF) is working with State Information Technology to develop a plan and the timeline for completion and implementation of the project. Vermont Part C therefore will continue to use its manual, i.e., paper and pencil, data management system to collect, analyze and report data for FFY 2012. This revision is in the February 1, 2013 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 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

Monitoring Priority: Early Intervention Services In Natural Environments

Indicator C3: 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:

A. Positive social-emotional skills (including social relationships):

- 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 = $[(\# \text{ of infants and toddlers who maintained functioning at a level comparable to same-aged peers}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.

If a + b + c + d + e does not sum to 100%, explain the difference.

B. Acquisition and use of knowledge and skills (including early language/communication and early literacy):

- 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 = $[(\# \text{ of infants and toddlers who maintained functioning at a level comparable to same-aged peers}) \div (\# \text{ of infants and toddlers with IFSPs assessed})] \times 100$.

If a + b + c + d + e does not sum to 100%, explain the difference.

C. Use of appropriate behaviors to meet their needs:

- 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:

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 = $[\# \text{ of infants and toddlers reported in progress category (c) plus } \# \text{ of infants and toddlers reported in category (d)} \div [\# \text{ of infants and toddlers reported in progress category (a) plus } \# \text{ of infants and toddlers reported in progress category (b) plus } \# \text{ of infants and toddlers reported in progress category (c) plus } \# \text{ of infants and toddlers reported in progress category (d)}] \times 100$.

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 = $[\# \text{ of infants and toddlers reported in progress category (d) plus } \# \text{ of infants and toddlers reported in progress category (e)} \div \text{the total } \# \text{ of infants and toddlers reported in progress categories (a) + (b) + (c) + (d) + (e)}] \times 100$.

APR Template – Part C (4)

vt-apr-2013c-revised 5-16-13-docx.CDD Website

Vermont

Targets and Actual Data for Children Exiting in FFY 2011 (2011-12):

Summary Statements	Actual FFY 2010 (% and # of children)	Actual FFY 2011 (% and # of children)	Targets FFY 2011 (% 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	61.5% n = 523	64.2% n=550	61.2%
2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program	57.7% n = 523	60.7% n=550	59.8%
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	71.7% n = 523	75.9% n=546	68.3%
2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	50.5% n = 523	53.8% n=546	53.8%
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	71.2% n = 523	76.5% n=547	73.3%
2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program	62% n = 523	62.3% n=547	61%

Progress Data for Part C Children FFY 2011

A. Positive social-emotional skills (including social relationships):	Number of children	% of children
a. Percent of children who did not improve functioning	4	0.7%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	123	22.4%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	89	16.2%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	139	25.3%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	195	35.5%
Total	550	100%

APR Template – Part C (4)

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	0.5%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	106	19.4%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	143	26.2%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	201	36.8%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	93	17.0%
Total	546	100%
C. Use of appropriate behaviors to meet their needs:	Number of children	% of children
a. Percent of children who did not improve functioning	1	0.2%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	97	17.7%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	108	19.7%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	211	38.6%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	130	23.8%
Total	547	100%

Discussion of Summary Statements and a-e Progress Data for FFY 2011:

The results for Summary Statement 1 (SS1) for all of the Child Outcome sub-indicators are above the targets set for FFY 2011 and are higher than the results reported for FFY2010. Depending on the sub-indicator, between 64.2% and 76.5% of infants and toddlers with special needs entering Part C services showed greater than expected growth at the time they exited the program.

Similarly, the results for Summary Statement 2 (SS2) are above FFY 2011 targets and FFY 2010 results for all of the sub-indicators. These results indicate that between 53.8% and 62.3% of infants and toddlers eligible for Part C services were functioning within age expectations at the time they exited from Early Intervention.

Child outcome data was collected on 552 children or approximately 95% of the children who exited in FFY 2011 and who received a minimum of 6 months of service. The number of children in this year's data set is slightly above last year's total of 523 children. The range of complete data for regions fell between 90 and 100%. The percentage of data completion is based on the number of exits occurring within FFY 2011 minus children receiving services for less than 6 months and a handful of families that programs were unable to contact.

Data on all three child outcomes were available for 543 children, slightly less than the total collected. Data for at least one outcome was calculated on 551 children. This slight discrepancy was the result of data deemed 'Impossible' because of an inaccurate rating. A closer examination of the regions having one of the ten inaccurate ratings revealed that three of the regions were not well represented at last year's child outcome clinics (FFY 2011) where reasons for 'Impossible' data combinations were addressed.

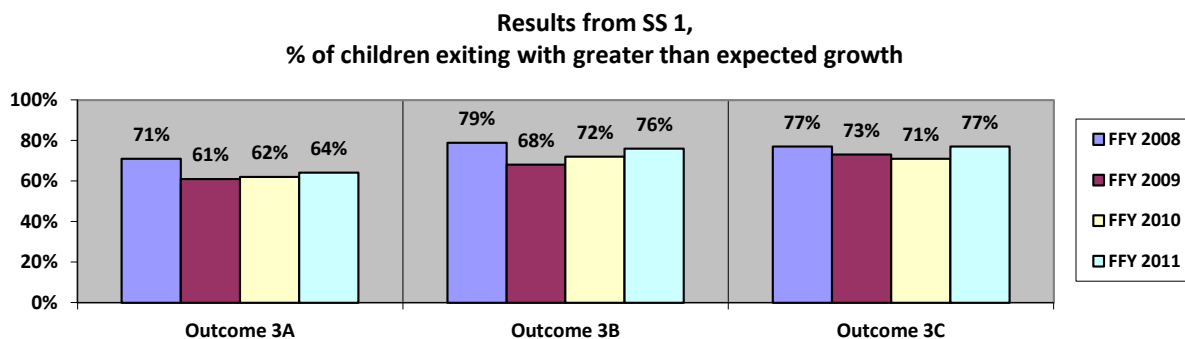
An examination of state progress categories (categories 'a' through 'e') shows the results to be within an acceptable range for all three outcomes. As expected, progress category 'a' (children who did not

improve functioning) is very low across all outcomes for the state as well as for regions. For categories 'b' through 'e', data is balanced throughout, neither too low (< 5%) or too high (> 60%). Trends for 3B and 3C progress categories are similar with a gradual increase over the categories from 'b' to 'd' and a drop for 'e'. Outcome 3A (social relationships) shows a different pattern with a slight spike for category 'b', decrease for 'c' and then a gradual increase through category 'e'.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011:

Part C has been following a multi-year plan to increase the quality of child outcome data and identify its relevance to improving practice. Towards this end, the initial focus was on ensuring that the data was complete (a minimum of 95%) as well as accurate. As practitioners and administrators begin to understand and trust child outcome data, results and subsequent training can be linked to improving the quality of programming.

A couple of reasons may account for the progress that has occurred across the three child outcomes this year. In FFY 2009, the baseline and targets were revised because it was thought that the substantial increase in the percentage of child outcome data collected (over 70%) may have been associated with a drop in results for this indicator. Since then, the state has maintained a return rate of at least 95% and most regions have continued to collect a high percentage of their child outcome data (90 to 100%). The following graph demonstrates how the results for SS1 relate more closely to the targets set in FFY 2009 and are trending upwards.



Another reason for progress in this indicator may be the result of the Child Outcome clinics that were held in conjunction with Part B/619 last year. The ultimate goal of the clinics was to increase the reliability, credibility and functionality of Child Outcome data. The clinics were used to orient new practitioners, review rating systems, explain and describe the purpose of the COSF, increase understanding of the individual outcomes and how they relate to practice, and introduce the wealth of ECO resources to practitioners and administrators. As part of the clinic, regional results and trends are analyzed and examined with individual programs.

In the last two years, Part C also partnered with Part B/619 on trainings to support the adoption of functional assessments. In FFY 2011, a two-day training was held on the Assessment Evaluation and Programming System; in FFY 2010 training was offered on the Transdisciplinary Play-Based Assessment. These trainings have also led to renewed discussions about the various roles and purposes of assessment among some practitioners.

Activities:

- Part C continues to monitor child outcome data collection. Since Vermont does not yet have an automated data management system, regions receive quarterly child outcome data grids with children’s names highlighted if there is missing or inaccurate data and are asked to complete/correct data within 30 days. Regions are also asked to give the rationale for missing data which allows regions and the state to track potential patterns of incomplete data.

- Training Efforts:
 - In an effort to improve data quality, Part C partnered with Part B/619 to conduct five joint, regional Child Outcome clinics during the winter 2011-12. These clinics (as mentioned above) served as an orientation for new practitioners and administrators as well as a review and clarification for others.
 - Training in the Assessment, Evaluation and Programming System (AEPS) was conducted in the spring 2012.
 - Dr. Robin McWilliam provided training in the Routines Based Interview (RBI) and his Routines Based Early Intervention system in the spring, 2012 to practitioners across Children's Integrated Services (CIS). Vermont is working on a plan to provide more in-depth training opportunities on the RBI.
- Regions receive program reports profiling their child outcome results and comparisons to state and national (when available) data.
- Part C participated in ECO/OSEP Community of Practice calls and webinars when available and in the annual Child and Family Outcomes meeting sponsored by OSEP/ECO/NECTAC.
- Part C continued to participate in SPDG efforts inclusive of two national TA efforts addressing social-emotional development (CSEFEL) and early literacy (CELL). Last year, plans were made to support a continuum of services from birth that bridges efforts to address children's social emotional and literacy development and that supports ongoing parental involvement. During the spring, Part C attended the National Training Institute (CSEFEL/TACSEI) which addressed among many other issues, how to implement coaching practices with families in Part C.
- The Interagency Agreement with Vermont Agency of Human Services and Vermont Department of Education (now Vermont Agency of Education) was revised and finalized in FFY 2011. This agreement supports collaboration between the two agencies to ensure the statewide early intervention system is coordinated and provided in the manner required by Part C of the Individuals with Disabilities Education Improvement Act of 2004.

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

Resources for FFY 2012: As noted in the Overview on page 3, the 9/15/12 timeline for full implementation of Vermont Part C's electronic data management system known as VFACTS was not met due to the Vermont Department of Information and Innovation's (DII's) concerns related to national security standards around client information and the vendor's inability to resolve the concerns to Vermont's satisfaction. The state of Vermont terminated the contract in January 2013. The Department for Children and Families (DCF) is working with State Information Technology to develop a plan and the timeline for completion and implementation of the project. Vermont Part C therefore will continue to use its manual, i.e., paper and pencil, data management system to collect, analyze and report data for FFY 2012. This revision is in the February 1, 2013 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 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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 2011:

Target Data and Actual Target Data	FFY 2011 Target	FFY 2011 Actual	
<i>A. Know their rights</i>	81.5%	250/320	78.1%
<i>B. Effectively communicate their children's needs</i>	86.5%	274/319	85.9%
<i>C. Help their children develop and learn</i>	88.5%	257/318	80.8%

The statewide return rate for the FFY 2011 Family Outcome survey was 41.7% and the highest since data collection began in FFY 2005. It is significantly higher than this year's target of 32%, and last year's return rate of 29.3%. Of the 773 surveys distributed, 322 were returned (a small number of surveys were returned as undeliverable). In terms of the regions, eleven of twelve are also well above target this year for survey return rate.

In order to examine representativeness of survey data, comparisons between Vermont's 618 report (12/10 – 12/11) and the Family survey were made on gender and race/ethnicity. Comparisons indicate data from both sources are very similar. Comparisons of race/ethnicity between the two data sets show 8.7% of minority groups are represented in the 618 report while 9.5% are represented in the Family Outcome survey. In terms of gender, the 618 report shows 63.5% of exits were male and 36.4% were female, while the surveys indicated 64.7% were male and 35.2%, female. The data management system will allow a more comprehensive and accurate analysis of representativeness, including a comparison to the population currently being served and the inclusion of additional family demographic descriptors.

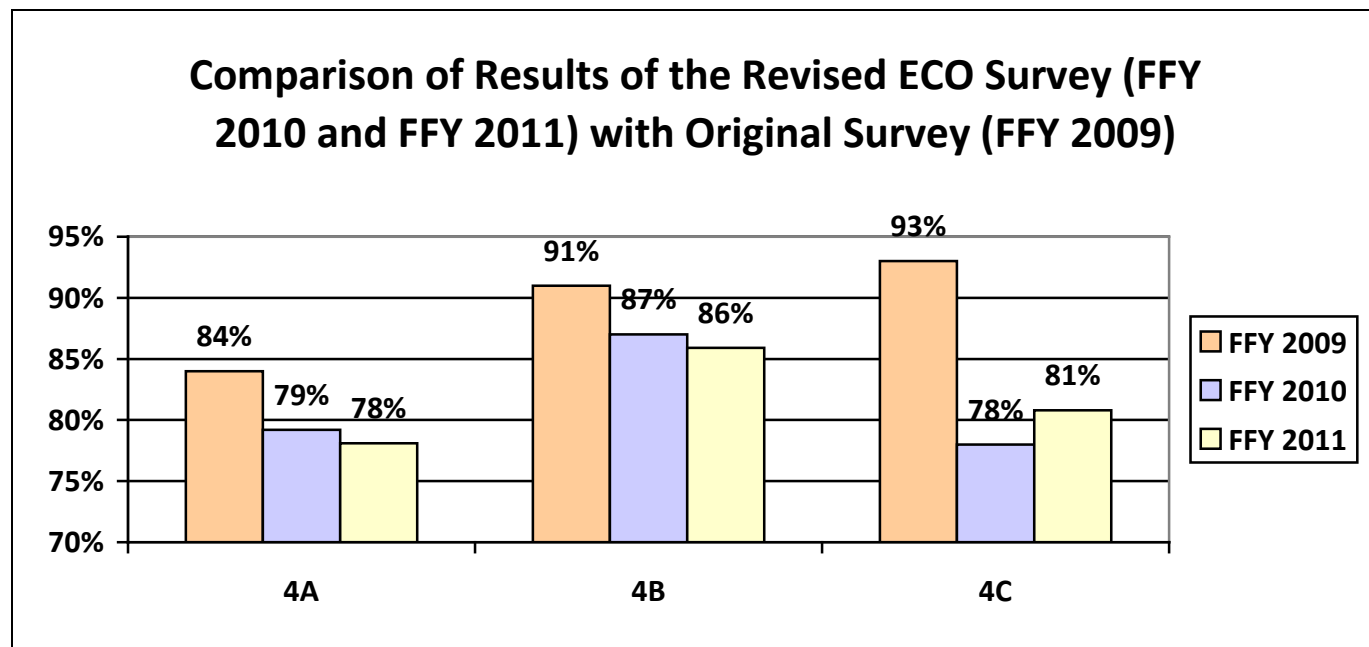
Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011:

There was a 12.4% increase in returned surveys this year (from 29.3% to 41.7%). To address last year's disappointing return rate, the state targeted practitioners in its outreach to ensure everyone understood the purpose of the survey and the importance of family feedback. To this end, FFY 2010 survey results were reviewed with practitioners during our regional outcome clinics. Through these meetings, practitioners became aware of how data were reported and learned about the added features of the revised ECO Family survey. Finally, practitioners were asked to comment on the Family Survey's 'talking points' - strategies to be used by practitioners to encourage family response to the survey. Recommendations from these discussions were incorporated into the Family Survey's 'talking points' for the current year.

Until last year, Vermont had five continuous years where it met or exceeded its annual target for all three Family Outcomes. Vermont now has 2 years of data from the revised ECO Family survey which was instituted in in FFY 2010. A comparison between the results of the original and revised surveys (see chart) shows that:

- The revised survey results are generally lower than those found for the original survey. In a comparison with FFY 2009 (the last year of the original survey), 4A is 5 - 6% lower, 4B is 3 - 4% lower and 4C is between 12 - 15% lower.
- There is also a different pattern in the results across the 3 Family Outcomes. Whereas, in previous years, results became progressively higher as you moved from 4A to 4C, the revised survey yields results that spike for 4B and drop for 4C. This pattern is similar to results found in other states that have adopted the revised ECO survey.

Noteworthy is that despite the significant increase in the return rate this year, results are surprisingly consistent for the two years of data from the revised survey (see chart). Differences from FFY 2010 to FFY 2011 are 4 A (-1.1) and 4 B (-1.1) and 4 C (+2.8)



For FFY 2011, results from all seventeen questions comprising the three Family Outcomes were very positive (range from 70% to 92.8%) with the majority of responses well above the state target. Yet, all three Family Outcomes fell below the state target for this year. One reason the state may not be continuing to meet its targets is that current state targets for Family Outcomes are based on results from the original survey. Differences between the two surveys may contribute to these findings. Not only does the revised ECO survey base its results for each outcome on multiple questions (the original survey had a single question for each outcome), but it measures a broader construct. In examining the results for each question comprising an outcome, there is typically one question that is an outlier.

Results from four of five questions which comprise 4A ranged from 85.5% to 89.3% and are therefore well above the state target. They include three questions which directly address parental rights, including ‘How helpful has Early Intervention been in

- giving you useful information about your rights related to your child's special needs?’
- giving you useful information about who to contact when you have questions or concerns?’
- explaining your rights in ways that are easy for you to understand?’

The fifth question, ‘giving you useful information about available options when your child leaves the program?’ was significantly lower than the others at 70.2%. This finding warrants further study as a parent comment from the survey stated this question was answered from the perspective of the receiving program not CIS: EI.

A similar pattern exists for Outcome 4B in which five of the six questions were also above target, ranging from 88% to 92.8% with a sixth question, relating to ‘additional services’ slightly below target at 85%. The results for questions in Outcome 4C clusters between 85.7% and 89.9% for five of six questions with a sixth question at 76.7%, identifying ‘helping your child get along with others’ as an area needing to be addressed more closely.

Regardless of the findings, the approach of the revised survey is preferred by Vermont as it offers more information about our strengths as well as areas in need of improvement. It also supports families and practitioners alike in gaining a broader understanding of the parameters of each of outcome. Now that there are two years of relatively consistent data, the ICC, state and regions can examine these results more closely.

The regions that were in need of Program Improvement Plans for FFY 2010 have all shown improvement. In 4A, two out of five regions are now above the state target, two regions have shown vast improvement and one remains the same. In 4 B, of the three regions needing improvement, two are above target and one is just below target. For 4 C, one out of five regions needing improvement is now above target; the four remaining regions have shown improvement and have made this a priority for the coming year. The state is also planning training and technical assistance that seeks to improve practice.

Improvement activities during FFY 2011 include the following:

- An analysis of the trends in 5 years of data (to offset small n's) yielded 5 regions in need of improvement plans for Family Outcomes. These regions were required to submit a Program Improvement Plan. The state met with each region to review data and mentor programs through this process in the spring, including apprising the region's understanding of the purpose of collecting Family Outcome data. Regions are contacted and required to update progress towards their improvement plans on a quarterly basis and receive technical assistance as needed.
- The following documents were shared with regions during the Improvement Planning process:
 - NECTAC's article: Assuring the Family's Role on the Early Intervention Team: Explaining Rights and Safeguards
 - Relationship of Quality Practices to Child and Family Outcomes Measurement Results
- Regional teams attended a 2 day presentation by Dr. Robin McWilliam on Routines Based Intervention. Vermont is working with NERRC to develop a process for implementing the Routine Based Interview, a component of Dr. McWilliam's model.
- Regions receive Family Outcome profiles which include their raw data and comparisons with the state data.
- The state continues to analyze the impact of factors such as family's time in program, race and ethnicity, and amount of services on Outcome results.
- The revised ECO survey and survey 'talking points' (to encourage family survey completion) were discussed during regional Child Outcome Clinics.
- Training on Vermont's data management system was begun this year. Implementation is expected in spring of 2013.
- Participation in annual ECO/NECTAC/OSEP outcomes meeting
- Participate in Community of Practice calls and webinars as available.
- The Interagency Agreement with Vermont Agency of Human Services and Vermont Department of Education (now Vermont Agency of Education) was revised and finalized in FFY 2011. This agreement supports collaboration between the two agencies to ensure the statewide early intervention system is coordinated and provided in the manner required by Part C of the Individuals with Disabilities Education Improvement Act of 2004.

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

Resources for FFY 2012: 1) Due to the change in data collection approach (use of revised survey beginning in FFY 2010) and the increase in percentage of returned surveys (FFY 2011), Vermont believes there is a need to revise its baseline and state targets for Family Outcomes to help regions and the state address the broader conceptualization of each Family Outcome represented in the revised survey. With two years of data from the revised ECO Family Outcome survey, including one year (FFY 2011) with ample return rate, there is a clear differential between the results from the revised ECO Family survey and the original ECO Family survey. Changes to the Baseline and FFY 2012 state targets are as follows:

APR Template – Part C (4)

vt-apr-2013c-revised 5-16-13-docx.CDD Website

Revised Baseline:

Family Outcomes		% of Families
3A	Percent of families in Part C report that early intervention services have helped the family: <i>A. Know their rights</i>	78.1%
3B	Percent of families in Part C report that early intervention services have helped the family: <i>B. Effectively communicate their children's needs</i>	85.9%
3C	Percent of families in Part C report that early intervention services have helped the family: <i>C. Help their children develop and learn</i>	80.8%

Revised Target Data for FFY 2012:

Family Outcomes		% of Families
3A	Percent of families in Part C report that early intervention services have helped the family: <i>A. Know their rights</i>	78.3%
3B	Percent of families in Part C report that early intervention services have helped the family: <i>B. Effectively communicate their children's needs</i>	86.1%
3C	Percent of families in Part C report that early intervention services have helped the family: <i>C. Help their children develop and learn</i>	81%

2) As noted in the Overview on page 3, the 9/15/12 timeline for full implementation of Vermont Part C's electronic data management system known as VFACTS was not met due to the Vermont Department of Information and Innovation's (DII's) concerns related to national security standards around client information and the vendor's inability to resolve the concerns to Vermont's satisfaction. The state of Vermont terminated the contract in January 2013. The Department for Children and Families (DCF) is working with State Information Technology to develop a plan and the timeline for completion and implementation of the project. Vermont Part C therefore will continue to use its manual, i.e., paper and pencil, data management system to collect, analyze and report data for FFY 2012. These revisions are in the February 1, 2013 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 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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 toddlers 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
2011 (7/1/11-6/30/12)	.99%

Actual Target Data for FFY 2011: 1.21%

Data Source: Child Count Database 12/1/11, 12/2/10 to 12/1/11. These Indicator 5 data are consistent with Vermont’s 618 data submitted January 2012 and collected on Table 1 of Information Collection 1820-0557 (*Report of Children Receiving Early Intervention Services in Accordance with Part C*).

Data Analysis for Indicator 5, Child Find Infants Birth to One, FFY 2011:

FFY 2011	# Infants Served in Part C	Total # VT Infants Birth to 1	# and % VT Infants Birth to 1 Served in Part C	2011 SPP State Target
Infants Birth to 1	72	5,935	72/5935 = 1.21%	.99%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011: Pursuant to OSEP Memorandum 13-7 with the accompanying Part C State Performance Plan (SPP) and Annual Performance Report (APR) Part C Indicator Measurement Table and Instructions, Vermont Part C is not required to report on progress/slippage or improvement activities for this Indicator for FFY 2011 because the state met and exceeded its FFY 2011 target.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: As noted in the Overview on page 3, the 9/15/12 timeline for full implementation of Vermont Part C’s electronic data management system known as VFACTS was not met due to the Vermont Department of Information and Innovation’s (DII’s) concerns related to national security standards around client information and the vendor’s inability to resolve the concerns to Vermont’s satisfaction. The state of Vermont terminated the contract in January 2013. The Department for Children and Families (DCF) is working with State Information Technology to develop a plan and the timeline for completion and implementation of the project. Vermont Part C therefore will continue to use its manual, i.e., paper and pencil, data management system to collect, analyze and report data for FFY 2012. This revision is in the February 1, 2013 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 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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 toddlers 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
2011 (7/1/11-6/30/12)	3.5%

Actual Target Data for FFY 2011: 4.35%

Data Source: Child Count Database 12/1/11, 12/2/10 to 12/1/11. These Indicator 6 data are consistent with Vermont’s 618 data submitted January 2012 and collected on Table 1 of Information Collection 1820-0557 (*Report of Children Receiving Early Intervention Services in Accordance with Part C*).

Data Analysis for Indicator 6, Child Find Infants and Toddlers Birth to Three, FFY 2011:

FFY 2011	# VT Birth to 3 Served in Part C	# Total VT Birth to 3	# and % VT Birth to 3 Served in Part C	2011 SPP State Target
Infants and Toddlers Birth to 3	785	18,038	785/18038 = 4.35%	3.5%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011: Pursuant to OSEP Memorandum 13-7 with the accompanying Part C State Performance Plan (SPP) and Annual Performance Report (APR) Part C Indicator Measurement Table and Instructions, Vermont Part C is not required to report on progress/slippage or improvement activities for this Indicator for FFY 2011 because the state met and exceeded its FFY 2011 target.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: As noted in the Overview on page 3, the 9/15/12 timeline for full implementation of Vermont Part C’s electronic data management system known as VFACTS was not met due to the Vermont Department of Information and Innovation’s (DII’s) concerns related to national security standards around client information and the vendor’s inability to resolve the concerns to Vermont’s satisfaction. The state of Vermont terminated the contract in January 2013. The Department for Children and Families (DCF) is working with State Information Technology to develop a plan and the timeline for completion and implementation of the project. Vermont Part C therefore will continue to use its manual, i.e., paper and pencil, data management system to collect, analyze and report data for FFY 2012. This revision is in the February 1, 2013 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 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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 eligible infants and toddlers with IFSPs for whom an initial evaluation and initial assessment and an initial IFSP meeting was conducted within Part C’s 45-day timeline) divided by the (# of eligible infants and toddlers 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
2011 (7/1/11-6/30/12)	100%

Actual Target Data for FFY 2011:

96.8%

Data Method/Source: Desk audit of entire Part C State Database, July 1, 2011 to June 30, 2012

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	776
b. Number of infants and toddlers with IFSPs evaluated and assessed for whom an initial IFSP meeting was required to be conducted	801
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)	96.8%

Of the 801 children with new IFSPs who were evaluated and assessed and for whom an initial IFSP meeting was required to be conducted, 523 children received an evaluation and assessment and initial IFSP meeting within Part C’s 45-day timeline. Services for 253 children were not initiated in a timely manner due to exceptional family circumstances. These 253 children are included in the numerator as

well as the denominator. Exceptional family circumstances included families affected by extreme weather conditions, including Tropical Storm Irene that occurred in August 2011 and had an extended impact on some families who were receiving services; a family experiencing homelessness; family requests to reschedule meetings; families cancelling or failing to attend scheduled meetings; family vacation schedules; family illnesses/surgeries/hospitalizations; families who moved; and a family emergency.

Vermont made **three new findings of noncompliance in FFY 2011** in Indicator 7 for CIS-EIP 4, CIS-EIP 9 and CIS-EIP 12.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011:

Vermont Part C's FFY 2011 compliance of 96.8% for Indicator 7 reflects a slight increase from the 96.6% achieved in FFY 2010. During FFY 2011, the number of children with One Plans/IFSPs upon which the percentage of compliance is based increased by 64 (801 in FFY 2011, 737 in FFY 2010). 25 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 evaluations and assessments and initial IFSP meetings ultimately were conducted for these 25 children. The number of days these services were conducted beyond the 45-day timeline for these 25 children ranged from 1 to 117. The average number of days beyond the 45-day timeline was 23. Delays in meeting the 45-day timeline were due to scheduling conflicts/unavailability of CIS-EI personnel, including due to sudden medical issues (14 children); LEA personnel (3 children); speech-language pathologist, physical therapist and occupational therapist (3 children); and delay in assigning Educational Surrogates (5 children).

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 (790/801), the same percentage reported in the FFY 2010 APR. The 790 evaluations and assessments completed within the 45-day timeline included 89 children for whom exceptional family circumstances caused a delay. These data demonstrate that the majority of noncompliance occurred primarily between completion of the evaluation and assessment and conducting the initial One Plan/IFSP meeting, i.e., for 14 of 25 children.

In the CIS-EI 4 region that provides services to almost one-third of Vermont's children receiving Part C services (and in which more than half of the FFY 2011 delays in meeting the 45-day timeline occurred), the main reason for noncompliance in Indicator 7 for FFY 2011 was CIS-EI provider conflicts (for 11 of 13 children whose services were delayed). As described in the 2009 and 2010 APRs, staff from the LEAs in this particular region provide service coordination and conduct evaluations and assessments, presenting unique challenges in coordinating two different service systems (C and B) and personnel. Scheduling issues on the part of supervisory union personnel have been main factors affecting this regional CIS-EIP's compliance for the past three years. During FFY 2011, however, supervisory union scheduling conflicts accounted for only two of 13 instances of noncompliance. The former Director of the CIS-EIP (who assumed a position in another agency in FFY 2011) worked hard to ensure she maintained regular communication with the supervisory unions and that there was a system for the supervisory unions to inform this regional CIS-EIP in a timely way that their staff were not able to meet the 45-day timeline. Unfortunately medical issues and turnover among CIS-EI staff during FFY 2011 had a significant impact on this CIS-EIP's ability to meet the 45-day timeline for 11 of 13 children whose services were delayed.

As discussed in Vermont's FFY 2010 APR, all CIS service providers, not just Part C CIS-EI providers, are required to use an integrated family service plan (i.e., One Plan) that is based on the IFSP and to adhere to Part C timeline requirements for timely service provision. Consistent use of the One Plan by all CIS providers reinforces the timeline regulations for initiating services, i.e., conducting initial evaluations, assessments and One Plan/IFSP meetings. During FFY 2011, state CIS staff developed and disseminated an online technical assistance and training module outlining Part C timeline requirements for all regional CIS Intake Coordinators, administrators and providers. The SFY 2014 contracts beginning July 1, 2013 will require all CIS providers to complete, with 100% accuracy, this module and send documentation of completion to the state CIS office. State CIS team regional technical assistance liaisons

continued to provide intensive onsite and distance support during FFY 2011 and, among other areas, addressed the timeline requirements based on information provided by the state data management team. Although as discussed in the overview on page 3 final implementation of the electronic data management system is delayed, the VFACTS User Acceptance Testing that occurred statewide in June 2012 and the trainings provided in August and September 2012 to more than 200 providers statewide had a significant impact on reinforcing the Part C timeline requirements across the CIS services.

State CIS-EI data management staff continued to follow up regularly by telephone and/or email with regional CIS-EIP staff to request missing/clarify information on the monthly child count forms. The child count instructions and forms continued to require regional CIS-EIP staff to document for each child the dates of the referral, evaluation and assessment, and initial One Plan/IFSP meeting, and family or other reasons for delays. This enables state CIS-EI data management staff reviewing the data forms to determine immediately compliance or noncompliance, and to determine actual number of days beyond the 45-day period of time from referral that the evaluation, assessment and initial One Plan/IFSP meeting is conducted.

During FFY 2011, state data management staff further refined a rubric to evaluate the quality of data submissions (Indicator 14) during VT Part C's annual determination process in spring 2012 following submission of the 2010 APR in February 2012. State CIS data management staff use this rubric to track quality of data throughout the year and determine necessary follow-up and technical assistance to regional CIS-EIPs. The rubric contains criteria for determining if required data that the regional CIS-EIPs submit to the state CIS office are: 1) timely, i.e., consistently submitted on time; 2) valid, i.e., consistently complete/submitted with all required information; and 3) reliable, i.e., consistently accurate/submitted with minimal errors and/or need for clarification. There also are criteria for determining a program's response rate that factor into the 'Timely' and 'Accurate' scores. Regional CIS-EIPs may receive up to three points for the quality of their data, one point each for timeliness, validity and reliability. A score of '3' on Indicator 14 indicates that all data the regional CIS-EIPs submit to the state office for Indicators 1, 2, 3, 5, 6, 7, 8A, 8B and 8C in a year are consistently timely, valid and reliable. A score less than a '3' automatically results in a regional CIS-EIP having to develop a plan to address quality of its data submissions and receive technical assistance. Having Indicator 14 factor into a program's annual determination provides added incentive for regional staff to ensure quality data submissions for Indicator 7, as well as for indicators 1, 2, 3, 5, 6, 8A, 8B and 8C, for reporting in this FFY 2011 Annual Performance Report.

The FFY 2009 transition to an electronic statewide billing system (Hewlett Packard Enterprise System-HPES), discussed in the 2009 APR, continued to provide a mechanism in FFY 2011 for verifying that data were complete and accurate. Given the unforeseen delay in the planned implementation of the electronic data management system, it is especially critical that the state CIS-EI staff can compare on a weekly basis the data entered into the Early Intervention ACCESS database with data entered into the HPES system to check for accuracy and query for any duplicate data. Prior authorizations (PAs) continue to help regions keep up with paperwork in order to inform state data management staff of changes to services.

As reported in past APRs, several regional CIS-EIPs have developed their own internal databases to collect, verify and report data in anticipation of full implementation of the electronic data management system. It is anticipated that additional regions will develop internal databases and seek support from the CIS state office as well as peer regions that have these systems in place. Regional CIS-EIP Directors continue to conduct regular internal file reviews to monitor timeliness of services, and require staff to do systematic self-assessments of their files to ensure accurate and complete documentation and to flag areas of concern. CIS-EIP staff continue to regularly share information about and reinforce Part C timeline requirements with partner providers (e.g., schools, home health agencies) to ensure timely service provision.

During FFY 2011, state CIS-EI staff provided extensive and targeted technical assistance to the three regional CIS-EIPs 4, 9 and 12 that had FFY 2011 findings of noncompliance in Indicator 7. These regional CIS-EIPs developed Corrective Action Plans (CAPs) to address their findings of noncompliance. To support the development and implementation of these CAPs, State CIS-EI staff provided these regions with copies of the *document Local Contributing Factor Tool for SPP/APR Compliance Indicators*

APR Template – Part C (4)

Vermont

vt-apr-2013c-revised 5-16-13-docx.CDD Website

C-1, C-7, C-9/15, B-11 and B-12: Collecting and Using Valid and Reliable Data to Determine Underlying Factors Impacting Local Performance and Develop Meaningful Corrective Action Plans. This resource provides a foundation for Vermont Part C's Corrective Action Plan template. The three regions, **CIS-EIP 4, CIS-EIP 9 and CIS-EIP 12**, with findings in Indicator 7 identified strategies to address, e.g., infrastructure and staffing, collection of valid and reliable data, development/revisions to program policies and procedures, changes to supervision, provision of training and technical assistance, and changes to provider practices. Some specific strategies included filling vacant staff positions (i.e., inability to fill in timely way had impact on meeting timelines); assessing workload vs. caseloads among staff and shifting responsibilities accordingly; devising a master 'tickler' system that anticipated timeline deadlines and incorporating status updates into weekly staff meetings; providing specific orientation/training to partner providers on timeline requirements; and establishing regular meetings with partner providers to reinforce timeline requirements as well as discuss other relevant areas related to practice. State CIS-EI staff, including data management staff, provided onsite and distance technical assistance throughout FFY 2011 to support these three regions in achieving 100% compliance in Indicator 7. The FFY 2012 APR submitted in February 2014 will report on correction of these three findings of noncompliance and the specific actions Vermont Part C took/is taking to verify the correction.

The Interagency Agreement with Vermont Agency of Human Services and Vermont Department of Education (now Vermont Agency of Education) was revised and finalized in FFY 2011. This agreement supports collaboration between the two agencies to ensure the statewide early intervention system is coordinated and provided in the manner required by Part C of the Individuals with Disabilities Education Improvement Act of 2004.

Correction of FFY 2010 Findings of Noncompliance: As explained in the Overview on page 3, there were **no findings of noncompliance in FFY 2010** in Indicator 7.

Level of compliance Vermont Part C reported for FFY 2010 for Indicator 7: **96.6%**

Verification of Correction of FFY 2010 Noncompliance Reported in the 2010 APR:

As reported in the FFY 2010 APR, three regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2010 to June 30, 2011) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 1 was at 96% compliance (26/27), CIS-EIP 6 at 98% compliance (47/48), and CIS-EIP 10 at 97% compliance (69/71).

As reported in the 2010 APR and discussed in the overview on page 3 of this FFY 2011 APR, a desk audit of the entire Part C FFY 2010 State Database resulted in state CIS-EI staff issuing three findings of noncompliance in Indicator 7 for CIS-EIP 4, CIS-EIP 9 and CIS-EIP 12. Due to the use of a manual data management system, however, the three findings were issued in FFY 2011. Please note that state Part C staff did, however, review the 2010 Child Count forms for the 21 children for whom services were not initiated in a timely manner and were immediately able to verify that, although late, the initial evaluations, assessments and One Plan/IFSP meetings ultimately were conducted for these children. Correction of these three findings of noncompliance and specific actions Vermont Part C took/is taking to verify the correction will be reported on under Indicators 7 and 9 in the 2012 APR submitted in February 2014.

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 1) In a desk audit of updated data from the first and second quarters of the 2011 State Database (July 2011 to November 2011), CIS-EIPs 1, 6 and 10 achieved 100% compliance for 60 consecutive days, indicating that these two programs are correctly implementing the timely service provision requirements in 34 CFR §303.310(a) and 303.342(a)); and 2) Part C staff reviewed the 2010 Child Count forms submitted by the CIS-EIPs for the 4 children for whom services were not initiated in a timely manner and were immediately able to verify that, although late, the initial evaluations, assessments and One Plan/IFSP meetings ultimately were conducted for these children. The number of days services were initiated beyond the 45-day timeline ranged from 9 to 79 for the 4 children. Reasons for the delays were scheduling conflicts/unavailability of LEA personnel, a speech-language pathologist, and service coordinator; and delay in assigning an Educational Surrogate.

The noncompliance in FFY 2010 that resulted in three FFY 2011 findings, **(CIS-EIP's 4,9 and 12)** along with the noncompliance corrected prior to issuing written findings (discussed above), had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 7 during the FFY 2010 reporting year.

Verification of Correction of FFY 2011 Noncompliance Reported in this 2011 APR:

Four regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2011 to June 30, 2012) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 5 was at 97% compliance (63/65), CIS-EIP 6 at 99% compliance (75/76), CIS-EIP 9 at 97% compliance (67/69) and CIS-EIP 12 at 96% compliance (51/53).

One regional CIS-EIP 4 that was issued a finding in Indicator 7 for FFY 2011 (based on FFY 2010 data) demonstrated ongoing noncompliance in FFY 2011 based on a desk audit of the entire Part C FFY 2011 State Database. Part C staff did, however, review the 2011 Child Count forms for the 13 children for whom services were not initiated in a timely manner and were immediately able to verify that, although late, the initial evaluations, assessments and One Plan/IFSP meetings ultimately were conducted for these children.

As discussed in the Overview on page 3, a desk audit of the entire Part C FFY 2011 State Database resulted in CIS-EI state staff issuing one new finding of noncompliance in Indicator 7. Due to the continued use of a manual data management system, however, the finding was issued in FFY 2012 and will be reported on in the FFY 2012 APR submitted February 2014. Please note that state Part C staff did, however, review the 2011 Child Count forms for the 5 children for whom services were not initiated in a timely manner in the program that received the finding and were immediately able to verify that, although late, the initial evaluations, assessments and One Plan/IFSP meetings ultimately were conducted for these children.

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 1) In a desk audit of updated data from the first and second quarters of the 2012 State Database (July 2012 to December 2012), CIS-EIPs 5, 6, 9 and 12 achieved 100% compliance for 60 consecutive days, indicating that these programs are correctly implementing the timely service provision requirements in 34 CFR §303.310(a) and 303.342(a); and 2) Part C staff reviewed the 2011 Child Count forms submitted by the CIS-EIPs for the 7 children for whom services were not initiated in a timely manner and were immediately able to verify that, although late, the initial evaluations, assessments and One Plan/IFSP meetings ultimately were conducted for these children.

The noncompliance in FFY 2011 that resulted in a FFY 2012 finding and the noncompliance corrected prior to issuing written findings and the ongoing noncompliance in one regional CIS-EIP (discussed above), had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 7 during this FFY 2011 reporting year.

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 2011 APR, the State must review its improvement activities and revise them, if necessary, to ensure compliance.	SFY 2014 contracts will require all CIS providers to complete, with 100% accuracy, the timeline module and submit documentation of completion to the state CIS office. Revisions to Indicator 7 are documented below and in the February 1, 2013 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 2012: 1) As noted in the Overview on page 3, the 9/15/12 timeline for full implementation of Vermont Part C’s electronic data management system known as VFACTS was not met due to the Vermont Department of Information and Innovation’s (DII’s) concerns related to national security standards around client information and the vendor’s inability to resolve the concerns to Vermont’s satisfaction. The state of Vermont terminated the contract in January 2013. The Department for Children and Families (DCF) is working with State Information Technology to develop a plan and the timeline for completion and implementation of the project. Vermont Part C therefore will continue to use its manual, i.e., paper and pencil, data management system to collect, analyze and report data for FFY 2012; 2) SFY 2014 contracts (beginning July 1, 2013) will require that all CIS providers complete the timeline module (with 100% accuracy) and submit verification of completion to the state CIS office. These revisions are in the February 1, 2013 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 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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
2011 (7/1/11-6/30/12)	100%

Actual Target Data for FFY 2011:

99%

Data Method/Source: Desk audit of entire Part C State Database, July 1, 2011 to June 30, 2012

Children Exiting Part C Who Received Timely Transition Planning (Plan with Steps and Services):

a. Number of children exiting Part C who have an IFSP with transition steps and services	786
b. Number of children exiting Part C	795
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 (IFSP with Transition Steps and Services) (Percent = [(a) divided by (b)] times 100)	99%

786 of the 795 children who exited Part C had written transition plans in place upon exiting Part C. 55 of the 786 children did not have transition plans in place due to exceptional family circumstances. These

children are included in the numerator as well as the denominator. Exceptional family circumstances included families who refused transition planning, families who moved prior to developing/completing the transition plans, providers' inability to contact families after repeated attempts, and a family whose child passed away.

Vermont made **one new finding of noncompliance in FFY 2011** in Indicator 8A.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011:

Vermont Part C demonstrated 99% compliance for Indicator 8A in FFY 2011, the same level of compliance achieved in FFY 2010. Nine children did not have written transition plans due to providers' failing to include in the One Plan/IFSP. State CIS-EI staff did verify in follow-up emails/calls with CIS-EIP staff that transition planning did occur prior to the children's exits from the CIS-EIP.

As discussed in Vermont's FFY 2010 APR, all CIS service providers, not just Part C CIS-EI providers, are required to use an integrated family service plan (i.e., One Plan) that is based on the IFSP and to adhere to Part C timeline requirements for timely service provision. Consistent use of the One Plan/IFSP by all CIS providers reinforces the timeline regulations for initiating services. During FFY 2011, state CIS staff developed and disseminated an online technical assistance and training module outlining Part C timeline requirements for all regional CIS Intake Coordinators, administrators and providers. The SFY 2014 contracts beginning July 1, 2013 will require all CIS providers to complete, with 100% accuracy, this module and send documentation of completion to the state CIS office. CIS-EI providers will be required to complete the separate transition modules targeted specifically for Part C/B providers and staff. State CIS team regional technical assistance liaisons continued to provide intensive onsite and distance support during FFY 2011 and, among other areas, addressed the timeline requirements based on information provided by the state data management team. Although as discussed in the overview on page 3 final implementation of the electronic data management system is delayed, the VFACTS User Acceptance Testing that occurred statewide in June 2012 and the trainings provided in August and September 2012 to more than 200 providers statewide had a significant impact on reinforcing the Part C timeline requirements across the CIS services.

State CIS-EI data management staff continued to follow up regularly by telephone and/or email with regional CIS-EIP staff to request missing/clarify information on the monthly child count forms. The child count instructions and forms continued to require CIS-EIP staff to document for each child and family that 1) a transition plan was completed, 2) the LEA was notified in a timely way, and c) the transition conference was conducted at least 90 days prior to a child's third birthday. If the CIS-EIP did not meet these timeline requirements for individual children, they were required to document the reasons. This enables state CIS-EI data management staff reviewing the data forms to determine immediately compliance or noncompliance. As described in Indicators 1 and 7 in this APR, during FFY 2011 state data management staff further refined a rubric to formally evaluate the quality of data submissions (Indicator 14) for use in VT Part C's annual determination process. State CIS data management staff regularly use this rubric to track quality of data throughout the year and determine necessary follow-up and technical assistance to regional CIS-EIPs. Having Indicator 14 factor into a program's annual determination provides added incentive for regional staff to ensure quality data submissions for Indicators 8A, 8B and 8C, as well as for indicators 1, 2, 3, 5, 6 and 7, for reporting in this FFY 2011 Annual Performance Report.

As reported in past APRs, several regional CIS-EIPs have developed their own internal databases to collect, verify and report data prior to full implementation of the electronic data management system. It is anticipated that additional regions will develop internal databases and seek support from the CIS state office as well as peer regions that have these systems in place. Regional CIS-EIP Directors continue to conduct regular internal file reviews to monitor timeliness of services, and require staff to do systematic self-assessments of their files to ensure accurate and complete documentation and to flag areas of concern. CIS-EIP staff continue to regularly share information about and reinforce Part C timeline requirements with partner providers (e.g., schools, home health agencies) to ensure timely service provision.

During FFY 2011, state CIS-EI staff provided extensive and targeted technical assistance to the one regional CIS-EIP that had FFY 2011 findings of noncompliance in Indicators 8A, 8B and 8C. This regional CIS-EIP developed a Corrective Action Plan (CAP) to address these three findings of noncompliance. To support the development and implementation of this CAP, State CIS-EI staff provided the regional CIS-EIP with a copy of the *document Local Contributing Factor Tool for SPP/APR Compliance Indicators C-1, C-7, C-9/15, B-11 and B-12: Collecting and Using Valid and Reliable Data to Determine Underlying Factors Impacting Local Performance and Develop Meaningful Corrective Action Plans*. This resource provides a foundation for Vermont Part C's Corrective Action Plan template. The regional CIS-EIP identified strategies for all three transition indicators to address, e.g., infrastructure and staffing, collection of valid and reliable data, development/revisions to program policies and procedures, changes to supervision, provision of training and technical assistance, and changes to provider practices. Some specific strategies included creating a formal CIS-EI orientation packet for new CIS-EI staff with a checklist that delineates steps and forms needing to be completed and list of resources and training modules available from the state CIS office; requiring all CIS staff to complete the CIS timeline modules and send documentation to the state office; and creating an internal computerized data system to document and review timelines for all children and provide a 'tickler' system for impending timelines. State CIS-EI staff, including data management staff, provided onsite and distance technical assistance throughout FFY 2011 to support this CIS-EIP in achieving 100% compliance in Indicators 8A, 8B and 8C. The FFY 2012 APR submitted in February 2014 will report on correction of these three findings of noncompliance and the specific actions Vermont Part C took to verify the correction.

The Interagency Agreement with Vermont Agency of Human Services and Vermont Department of Education (now Vermont Agency of Education) was revised and finalized in FFY 2011. This agreement supports collaboration between the two agencies to ensure the statewide early intervention system is coordinated and provided in the manner required by Part C of the Individuals with Disabilities Education Improvement Act of 2004.

Correction of FFY 2010 Findings of Noncompliance: As explained in the Overview on page 3, there were **no findings made of noncompliance in FFY 2010** in Indicator 8A.

Level of compliance Vermont Part C reported for FFY 2010 for Indicator 8A: **99%**

Verification of Correction of FFY 2010 Noncompliance Reported in the 2010 APR:

Three regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2010 to June 30, 2011) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 5 was at 99% compliance (96/97), CIS-EIP 6 at 97% compliance (68/70), and CIS-EIP 12 at 98% compliance (50/51).

As reported in the 2010 APR and discussed in the overview on page 3 of this FFY 2011 APR, a desk audit of the entire Part C FFY 2010 State Database resulted in state CIS-EI staff issuing a finding of noncompliance in Indicator 8A. Due to the use of a manual data management system, however, the finding was issued in FFY 2011. Correction of this finding of noncompliance and specific actions Vermont Part C took to verify the correction will be reported on under Indicators 8A and 9 in the 2012 APR submitted in February 2014. This noncompliance in FFY 2010 that resulted in a FFY 2011 finding, along with the noncompliance corrected prior to issuing written findings (discussed above), had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 8A during the FFY 2010 reporting year.

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 1) In a desk audit of updated data from the first and second quarters of the 2011 Part C State Database (July 2011 to November 2011), CIS-EIPs 5, 6 and 12 achieved 100% compliance for 60 consecutive days, indicating that these three programs are correctly implementing the transition requirements in prior 34 CFR §303.148(b)(4) and 303.344(h) and 20 U.S.C. 1436(a)(3) and (d)(8) (now 34 CFR §§303.209(d) and 303.344(h)); and 2) Part C state staff verified in conference calls with staff in

APR Template – Part C (4)

Vermont

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CIS EIPs 5, 6 and 12 that, although there were no written transition plans, transition planning did occur for the 4 children prior to the children exiting the CIS-EI Program.

This noncompliance in FFY 2010 that resulted in a FFY 2011 finding, along with the noncompliance corrected prior to issuing written findings (discussed above), had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 8A during the FFY 2010 reporting year.

Verification of Correction of FFY 2011 Noncompliance Reported in this 2011 APR:

Seven regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2011 to June 30, 2012) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 1 was at 95% compliance (35/37), CIS-EIP 5 at 99% compliance (71/72), CIS-EIP 7 at 98% compliance (53/54), CIS-EIP 8 at 98% compliance (41/42), CIS-EIP 9 at 98% compliance (65/66), CIS-EIP 10 at 99% compliance (78/79) and CIS-EIP 12 at 95% compliance (35/37).

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 1) In a desk audit of updated data from the first and second quarters of the 2012 Part C State Database (July 2012 to December 2012), CIS-EIPs 1, 5, 7, 8, 9, 10 and 12 achieved 100% compliance for 60 consecutive days, indicating that these programs are correctly implementing the transition requirements in prior 34 CFR §303.148(b)(4) and 303.344(h) and 20 U.S.C. 1436(a)(3) and (d)(8) (now 34 CFR §§303.209(d) and 303.344(h)); and 2) Part C state staff verified in conference calls with staff in all CIS-EIPs that, although there were no written transition plans, transition planning did occur for the 9 children prior to the children exiting the CIS-EI Program.

This noncompliance that was corrected prior to issuing written findings had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 8A during this FFY 2011 reporting year.

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 2011 APR, the State must review its improvement activities and revise them, if necessary, to ensure compliance.	SFY 2014 contracts will require all CIS providers to complete, with 100% accuracy, the timeline module and CIS-EI providers the transition modules as well and submit documentation of completion to the state CIS office. Revisions to Indicator 8A are documented below and in the February 1, 2013 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 2012: 1) As noted in the Overview on page 3, the 9/15/12 timeline for full implementation of Vermont Part C's electronic data management system known as VFACTS was not met due to the Vermont Department of Information and Innovation's (DII's) concerns related to national security standards around client information and the vendor's inability to resolve the concerns to Vermont's satisfaction. The state of Vermont terminated the contract in January 2013. The Department for Children and Families (DCF) is working with State Information Technology to develop a plan and the timeline for completion and implementation of the project. Vermont Part C therefore will continue to use its manual, i.e., paper and pencil, data management system to collect, analyze and report data for FFY 2012; 2) SFY 2014 contracts (beginning July 1, 2013) will require that all CIS providers complete the timeline (with 100% accuracy) and CIS-EI providers the transition modules as well, and submit verification

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of completion to the state CIS office. These revisions are in the February 1, 2013 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 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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
2011 (7/1/11-6/30/12)	100%

Actual Target Data for FFY 2011:

99%

Data Method/Source: Desk audit of entire Part C State Database, July 1, 2011 to June 30, 2012

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	550
b. Number of children exiting Part C who were potentially eligible for Part B	558
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%

In Vermont, children exiting Part C who received special instruction, developmental therapy services or speech services through a One Plan/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 a One Plan/IFSP, may potentially be 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 550 of 558 children potentially eligible for Part B. 121 of the 558 children potentially eligible for Part B were referred seven months or sooner prior to their third birthday. State CIS-EI staff verified with all 12 CIS-EIPs that a written notification occurred as soon as possible upon determination of Part C eligibility for all 121 children. These 121 children are included in the numerator and denominator.

Vermont made **one new finding of noncompliance in FFY 2011** in Indicator 8B.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011:

Vermont Part C demonstrated 99% compliance for Indicator 8B in FFY 2011, progress from 98% compliance in FFY 2010. Notification to the LEA for 8 children potentially eligible for Part B was not timely in six regional CIS-EIPs due to staff error in calculating notification due dates. State CIS-EI staff were able to verify immediately through a desk audit of the monthly data forms and in follow up communication with staff in the six programs that notification, although late, did occur for these 8 children.

Improvement activities discussed in Indicator 8A apply to Indicator 8B.

Correction of FFY 2010 Findings of Noncompliance: As explained in the Overview, there were **no findings made of noncompliance were made in FFY 2010** in Indicator 8B.

Level of compliance Vermont Part C reported for FFY 2010 for Indicator 8B: **98%**

Verification of Correction of FFY 2010 Noncompliance Reported in the 2010 APR:

Four regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2010 to June 30, 2011) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 4 was at 98% compliance (129/132), CIS-EIP 6 at 98% compliance (52/53), CIS-EIP 11 at 95% compliance (38/40) and CIS-EIP 12 at 96% compliance (26/27).

Additional updated data gathered during the second quarter of FFY 2011 further indicated that CIS-EIP 4 was correctly implementing the transition requirements for Indicator 8B. During November 2011, state CIS-EI/CIS staff conducted an onsite file review of records of children who exited this program between July 1, 2011 and November 15, 2011. Regional CIS-EIP 4 demonstrated 100% compliance (22/22 files).

As reported in the 2010 APR and discussed in the overview on page 3 of this FFY 2011 APR, a desk audit of the entire Part C FFY 2010 State Database resulted in state CIS-EI staff issuing a finding of noncompliance in Indicator 8B (CIS-EIP 1). Due to the use of a manual data management system, however, the finding was issued in FFY 2011. Correction of this finding of noncompliance and specific actions Vermont Part C took to verify the correction will be reported on under Indicators 8B and 9 in the 2012 APR submitted in February 2014.

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 1) In a desk audit of updated data from the first and second quarters of the 2011 State Database (July 2011 to November 2011), CIS-EIPs 4, 6, 11 and 12 achieved 100% compliance for 60 consecutive days, indicating that these four programs are correctly implementing the transition requirements in prior 34 CFR §303.148(b)(1) (now 34 CFR 303.209(b)); and 2) Part C state staff verified

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in a desk audit of monthly child count forms and conference calls with staff in the five programs that, although notification was late, it did occur for the 7 children in these programs.

This noncompliance in FFY 2010 that resulted in a FFY 2011 finding, along with the noncompliance corrected prior to issuing written findings (discussed above), had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 8B during the FFY 2010 reporting year.

Verification of Correction of FFY 2011 Noncompliance Reported in this 2011 APR:

Five regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2011 to June 30, 2012) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 5 was at 98% compliance (59/60), CIS-EIP 7 at 98% compliance (41/42), CIS-EIP 9 at 98% compliance (53/54), CIS-EIP 10 at 98% compliance (57/58) and CIS-EIP 11 at 97% compliance (32/33).

As discussed in the Overview on page 3, a desk audit of the entire Part C FFY 2011 State Database resulted in CIS-EI state staff issuing one new finding of noncompliance in Indicator 8B. Due to the continued use of a manual data management system, however, the finding was issued in FFY 2012 and will be reported on in the FFY 2012 APR submitted February 2014. Please note that state Part C staff did, however, review the 2011 Child Count forms for the 3 children for whom notification was not timely in the program that received the finding and were immediately able to verify that, although late, the notification to the LEA did occur.

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 1) In a desk audit of updated data from the first and second quarters of the 2012 State Database (July 2012 to December 2012), CIS-EIPs 5, 7, 9, 10 and 11 achieved 100% compliance for 60 consecutive days, indicating that these four programs are correctly implementing the transition requirements in prior 34 CFR §303.148(b)(1) (now 34 CFR 303.209(b)); prior 34 CFR §303.148(b)(1) (now 34 CFR 303.209(b)); prior 34 CFR §303.148(b)(1) (now 34 CFR 303.209(b)); and 2) Part C state staff verified in a desk audit of monthly child count forms and conference calls with staff in the five programs that, although notification was late, it did occur for the 5 children in these programs.

This noncompliance in FFY 2011 that resulted in a FFY 2012 finding, along with the noncompliance corrected prior to issuing written findings (discussed above), had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 8B during this FFY 2011 reporting year.

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 2011 APR, the State must review its improvement activities and revise them, if necessary, to ensure compliance.	SFY 2014 contracts will require all CIS providers to complete, with 100% accuracy, the timeline module and CIS-EI providers the transition modules as well and submit documentation of completion to the state CIS office. Revisions to Indicator 8B are documented below and in the February 1, 2013 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 2012: 1) As noted in the Overview on page 3, the 9/15/12 timeline for full implementation of Vermont Part C's electronic data management system known as VFACTS was not met due to the Vermont Department of Information and Innovation's (DII's) concerns related to national security standards around client information and the vendor's inability to resolve the concerns to Vermont's satisfaction. The state of Vermont terminated the contract in January 2013. The Department for Children and Families (DCF) is working with State Information Technology to develop a plan and the timeline for completion and implementation of the project. Vermont Part C therefore will continue to use its manual, i.e., paper and pencil, data management system to collect, analyze and report data for FFY 2012; 2) SFY 2014 contracts (beginning July 1, 2013) will require that all CIS providers complete the timeline (with 100% accuracy) and CIS-EI providers the transition modules as well, and submit verification of completion to the state CIS office. These revisions are in the February 1, 2013 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 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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 toddlers with disabilities exiting Part C where the transition conference occurred at least 90 days, and at the discretion of all parties, not more than nine months prior to the toddler’s third birthday for toddlers potentially eligible for Part B) divided by the (# of toddlers with disabilities 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
2011 (7/1/11-6/30/12)	100%

Actual Target Data for FFY 2011:

99%

Data Method/Source: Desk audit of entire Part C State Database, July 1, 2011 to June 30, 2012

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	549
b. Number of children exiting Part C who were potentially eligible for Part B	*553
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)	99%

*Although there were 558 children exiting Part C and potentially eligible for Part B, 5 families did not provide the requisite approval for holding the transition conference in five regional EIPs. Therefore, these 5 children are not included in either the numerator or denominator in calculating compliance for 8C.

The transition conference was timely for 347 of the 553 children potentially eligible for Part B services and whose families provided the requisite approval. There were 136 children for whom the transition conference did not occur in a timely way due to exceptional family circumstances. These 136 children are included in the numerator and the denominator. Exceptional family circumstances included cancellations and requests to delay the transition conference. State CIS-EI staff confirmed that these transition conferences, although late, did occur. 64 children whose referral to Part C occurred fewer than 120 days prior to their third birthday, and whose transition conferences occurred as soon as Part C eligibility was established, also are included in the numerator and denominator. There were 2 children whose families chose to delay the conference so that the LEA personnel could attend the transition conference in person when scheduling conflicts prevented them from participating in the originally-scheduled conference. These 2 children are included in the numerator and denominator.

Vermont made **one new finding of noncompliance in FFY 2011** in Indicator 8C.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011:

Vermont Part C demonstrated 99% compliance for Indicator 8C in FFY 2011, the same level of compliance achieved in FFY 2010. Timely transition conferences did not occur for 4 children in three regional CIS-EIPs due to staff error in calculating the due date for the conference, scheduling conflicts for LEA personnel, and provider illness. State Part C staff verified that transition conferences ultimately did occur for these 4 children prior to their transition to Part B services.

Improvement activities discussed in Indicator 8A apply to Indicator 8C.

Correction of FFY 2010 Findings of Noncompliance: As explained in the Overview, there were **no findings made of noncompliance in FFY 2010** in Indicator 8C.

Level of compliance Vermont Part C reported for FFY 2010 for Indicator 8C: **99%**

Verification of Correction of FFY 2010 Noncompliance Reported in the 2010 APR:

Two regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2010 to June 30, 2011) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 4 was at 98% compliance (129/132) and CIS-EIP 12 at 96% compliance (26/27).

Additional updated data gathered during the second quarter of FFY 2011 further indicated that CIS-EIP 4 was correctly implementing the transition requirements for Indicator 8C. During November 2011, state CIS-EI staff conducted an onsite file review of records of children who exited this program between July 1, 2011 and November 15, 2011. Regional CIS-EIP 4 demonstrated 100% compliance (22/22 files).

As reported in the 2010 APR and discussed in the overview on page 3 of this FFY 2011 APR, a desk audit of the entire Part C FFY 2010 State Database resulted in state CIS-EI staff issuing a finding of noncompliance in Indicator 8C (CIS-EI 1). Due to the use of a manual data management system, however, the finding was issued in FFY 2011. Correction of this finding of noncompliance and specific actions Vermont Part C took to verify the correction will be reported on under Indicators 8C and 9 in the 2012 APR submitted in February 2014. This noncompliance in FFY 2010 that resulted in a FFY 2011 finding, along with the noncompliance corrected prior to issuing written findings (discussed above), had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 8C during the FFY 2010 reporting year.

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Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 1) in a desk audit of updated data from the first and second quarters of the 2011 State Database (July 2011 to November 2011), CIS-EIPs 4 and 12 achieved 100% compliance for 60 consecutive days, indicating that the programs are correctly implementing the transition requirements in prior 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)) (now 34 CFR §303.209(c)(1)); and 2) Part C state staff, in a desk audit of monthly child count forms and in following up with staff in the two regional CIS-EIPs, verified immediately that, although late, the transition conferences occurred for the 4 children.

This noncompliance in FFY 2010 that resulted in a FFY 2011 finding, along with the noncompliance corrected prior to issuing written findings (discussed above), had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 8C during the FFY 2010 reporting year.

Verification of Correction of FFY 2011 Noncompliance Reported in this 2011 APR:

Three regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2011 to June 30, 2012) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 4 was at 99% compliance (157/158), CIS-EIP 10 at 97% compliance (56/58) and CIS-EIP 12 at 96% compliance (23/24).

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 1) in a desk audit of updated data from the first and second quarters of the 2012 State Database (July 2012 to December 2012), CIS-EIPs 4, 10 and 12 achieved 100% compliance for 60 consecutive days, indicating that the programs are correctly implementing the transition requirements in prior 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)) (now 34 CFR §303.209(c)(1)); and 2) Part C state staff, in a desk audit of monthly child count forms and in following up with staff in the three regional CIS-EIPs, verified immediately that, although late, the transition conferences occurred for the 4 children.

This noncompliance that was corrected prior to issuing written findings had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 8C during this FFY 2011 reporting year.

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 2011 APR, the State must review its improvement activities and revise them, if necessary, to ensure compliance.	SFY 2014 contracts will require all CIS providers to complete, with 100% accuracy, the timeline module and CIS-EI providers the transition modules as well and submit documentation of completion to the state CIS office. Revisions to Indicator 8C are documented below and in the February 1, 2013 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 2012: 1) As noted in the Overview on page 3, the 9/15/12 timeline for full implementation of Vermont Part C's electronic data management system known as VFACTS was not met due to the Vermont Department of Information and Innovation's (DII's) concerns related to national security standards around client information and the vendor's inability to resolve the concerns to Vermont's satisfaction. The state of Vermont terminated the contract in January 2013. The Department for Children and Families (DCF) is working with State Information Technology to develop a plan and the

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timeline for completion and implementation of the project. Vermont Part C therefore will continue to use its manual, i.e., paper and pencil, data management system to collect, analyze and report data for FFY 2012; 2) SFY 2014 contracts (beginning July 1, 2013) will require that all CIS providers complete the timeline (with 100% accuracy) and CIS-EI providers the transition modules as well, and submit verification of completion to the state CIS office. These revisions are in the February 1, 2013 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 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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.

FFY	Measurable and Rigorous Target
2011 (7/1/11-6/30/12)	100%

Actual Target Data for FFY 2011: NA

As reported in the FFY 2010 APR and in the overview and in Indicators 1, 7, 8A, 8B, and 8C in this FFY 2011 APR, Vermont Part C did not make findings of noncompliance in FFY 2010. Some findings were made in FFY 2011 based on FFY 2010 data and will be reported in the FFY 2011 APR to be submitted on 2/1/14.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011:

Because the state does not have actual target data and pursuant to OSEP Memorandum 13-7 with the accompanying Part C State Performance Plan (SPP) and Annual Performance Report (APR) Part C Indicator Measurement Table and Instructions, Vermont Part C is not required to report on progress/slippage or improvement activities for this Indicator for FFY 2011.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: 1) As noted in the Overview on page 3, the 9/15/12 timeline for full implementation of Vermont Part C’s electronic data management system known as VFACTS was not met due to the Vermont Department of Information and Innovation’s (DII’s) concerns related to national security standards around client information and the vendor’s inability to resolve the concerns to Vermont’s satisfaction. The state of Vermont terminated the contract in January 2013. The Department for Children and Families (DCF) is working with State Information Technology to develop a plan and the timeline for completion and implementation of the project. Vermont Part C therefore will continue to use its manual, i.e., paper and pencil, data management system to collect, analyze and report data for FFY

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2012; 2) SFY 2014 contracts (beginning July 1, 2013) will require that all CIS providers complete the timeline module (with 100% accuracy) and CIS-EI providers the transition modules as well and submit verification of completion to the state CIS office; 3) Timeline for development of General Supervision Manual revised to June 2013 to ensure congruence with Vermont Part C revised policies and procedures and new plan and timeline for under-development electronic data management system. These revisions are in the February 1, 2013 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 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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
2011 7/1/11-6/30/12)	100%

Actual Target Data for FFY 2011: There were no signed written complaints for the Part C program during this reporting period. This is consistent with Vermont’s 618 data generated in October 2012 and collected on Table 4 of Information Collection 1820-0678 (*Report of Dispute Resolution Under Part C of the Individuals with Disabilities Education Act*).

Pursuant to OSEP Memorandum 13-7 with the accompanying Part C State Performance Plan (SPP) and Annual Performance Report (APR) Part C Indicator Measurement Table and Instructions, Indicators 10 (Complaints) and 11 (Due Process Hearings) have been deleted from the SPP/APR, effective with the submission of the FFY 2011 APR. Vermont Part C chose to report on this indicator to ensure consistency with prior APRs and make this information readily accessible.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011:

The Interagency Agreement with Vermont Agency of Human Services and Vermont Department of Education (now Vermont Agency of Education) was revised and finalized in FFY 2011. This agreement supports collaboration between the two agencies to ensure the statewide early intervention system is coordinated and provided in the manner required by Part C of the Individuals with Disabilities Education Improvement Act of 2004.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: There are no revisions to Indicator 10 for FFY 2012.

Part C State Annual Performance Report (APR) for FFY 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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
2011 7/1/11-6/30/12)	100%

Actual Target Data for FFY 2011: There were no hearing requests and no adjudications for the Part C program during this reporting period. This is consistent with Vermont's 618 data generated in October 2012 and collected on Table 4 of Information Collection 1820-0678 (*Report of Dispute Resolution Under Part C of the Individuals with Disabilities Education Act*).

Pursuant to OSEP Memorandum 13-7 with the accompanying Part C State Performance Plan (SPP) and Annual Performance Report (APR) Part C Indicator Measurement Table and Instructions, Indicators 10 (Complaints) and 11 (Due Process Hearings) have been deleted from the SPP/APR, effective with the submission of the FFY 2011 APR. Vermont Part C chose to report on this indicator to ensure consistency with prior APRs and to make this information readily accessible.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011:

The Interagency Agreement with Vermont Agency of Human Services and Vermont Department of Education (now Vermont Agency of Education) was revised and finalized in FFY 2011. This agreement supports collaboration between the two agencies to ensure the statewide early intervention system is coordinated and provided in the manner required by Part C of the Individuals with Disabilities Education Improvement Act of 2004.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: There are no revisions to Indicator 11 for FFY 2012.

Part C State Annual Performance Report (APR) for FFY 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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
2011 (7/1/11-6/30/12)	Coordinate with and support Part B Targets

Actual Target Data for FFY 2011: There were no Part C requests for hearings that went to resolution sessions that were resolved through resolution settlement agreements during this reporting period. This is consistent with Vermont’s 618 data generated in October 2012 and collected on Table 4 of Information Collection 1820-0678 (*Report of Dispute Resolution Under Part C of the Individuals with Disabilities Education Act*).

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011:

The Interagency Agreement with Vermont Agency of Human Services and Vermont Department of Education (now Vermont Agency of Education) was revised and finalized in FFY 2011. This agreement supports collaboration between the two agencies to ensure the statewide early intervention system is coordinated and provided in the manner required by Part C of the Individuals with Disabilities Education Improvement Act of 2004.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: There are no revisions to Indicator 12 for FFY 2012.

Part C State Annual Performance Report (APR) for FFY 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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
2011 (7/1/11-6/30/12)	Assist Part B in promoting mediation and in reaching Part B Targets

Actual Target Data for FFY 2011: There were no mediation requests for Part C that resulted in mediation agreements during this reporting period. This is consistent with Vermont’s 618 data generated in October 2012 and collected on Table 4 of Information Collection 1820-0678 (*Report of Dispute Resolution Under Part C of the Individuals with Disabilities Education Act*).

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011:

The Interagency Agreement with Vermont Agency of Human Services and Vermont Department of Education (now Vermont Agency of Education) was revised and finalized in FFY 2011. This agreement supports collaboration between the two agencies to ensure the statewide early intervention system is coordinated and provided in the manner required by Part C of the Individuals with Disabilities Education Improvement Act of 2004.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: There are no revisions to Indicator 13 for FFY 2012.

Part C State Annual Performance Report (APR) for FFY 2011

Overview of the Annual Performance Report Development: Please see description on pages 3 and 4.

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, including race and ethnicity, settings and November 1 for exiting, personnel, dispute resolution); and
- b. Accurate, including covering the correct year and following the correct measurement.

FFY	Measurable and Rigorous Target
2011 (7/1/11-6/30/12)	100%

Actual Target Data for FFY 2011: Pursuant to OSEP Memorandum 13-7 with the accompanying Part C State Performance Plan (SPP) and Annual Performance Report (APR) Part C Indicator Measurement Table and Instructions, Vermont Part C is not reporting data for this indicator for the initial FFY 2011 APR submission on February 15, 2013. Vermont Part C will review and respond to OSEP’s calculation of Vermont Part C’s data for this indicator when it is received from OSEP.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011: If required, Vermont Part C will report on after it reviews OSEP’s calculation of Indicator 14 data. Vermont Part C is confident that its data are 100% compliant for Indicator 14. Tables 1, 2, 3 and 4 of the 618 reports were submitted prior to the February 1st and November 1st due dates and accurate. The State Performance Plan-Revised and 2010 APR were submitted prior to the February 1st due date and were accurate.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: As noted in the Overview on page 3, the 9/15/12 timeline for full implementation of Vermont Part C’s electronic data management system known as VFACTS was not met due to the Vermont Department of Information and Innovation’s (DII’s) concerns related to national security standards around client information and the vendor’s inability to resolve the concerns to Vermont’s satisfaction. The state of Vermont terminated the contract in January 2013. The Department for Children and Families (DCF) is working with State Information Technology to develop a plan and the timeline for completion and implementation of the project. Vermont Part C therefore will continue to use its manual, i.e., paper and pencil, data management system to collect, analyze and report data for FFY 2012. This revision is in the February 1, 2013 revised version of the SPP posted on the Vermont Part C website: http://dcf.vermont.gov/cdd/reports/IDEA_Part_C.