

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

**Annual Performance Report
Federal Fiscal Year 2012
(July 1, 2012 through June 30, 2013)**

February 3, 2014

Part C State Annual Performance Report (APR) for Federal Fiscal Year (FFY) 2012

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Part C State Annual Performance Report (APR) for FFY 2012**Overview of the Annual Performance Report Development:**

Vermont's Part C Program is known as Children's Integrated Services-Early Intervention (CIS-EI). There are 12 regional CIS Early Intervention Programs (CIS-EIPs). 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. VT Part C's Individualized Family Service Plan (IFSP) provides the foundation for the CIS 'One Plan,' which the Office of Special Education Programs (OSEP) reviewed and approved, i.e., it meets all IDEA Part C IFSP requirements. All five CIS services were required to use the One Plan as of November 2010. The term One Plan is used throughout the narrative sections of this report. The Vermont Interagency Coordinating Council (VICC) functions in an "advise and assist" role for all of Children's Integrated Services, further supporting the integration of these services and the success of CIS in promoting and enhancing positive outcomes for children and their families.

During FFY 2012, the VICC continued to discuss and provide input into the development of this Annual Performance Report. CIS-EI staff continue to ensure that there is a general orientation to the SPP/APR for new members as well as specific discussion of particular indicators/practices at the VICC meetings. VICC members reviewed trend data from the FFY 2005 through FFY 2011 APRs and provided input on specific areas of concern. During the June 2013 VICC quarterly meeting, VICC members prioritized areas on which to focus members' work in the FFY 2013 year, including public awareness/education; screening (VT Part C Rules adopted 6/1/13 now include screening); transition; collaborative agreements with other programs and services for young children and their families, e.g., Head Start; and development of the State Systemic Improvement Plan (SSIP) due February 2015. The VICC and regional CIS-EIP Director meetings continued to be combined in FFY 2012 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 continued to participate in VICC meetings and provide members with information important to the work of VT Part C and other CIS services statewide. Members of the VICC reviewed this FFY 2012 APR prior to submission.

Vermont Part C received technical assistance related to the development of this FFY 2012 APR from the Office of Special Education Programs (OSEP); the Northeast Regional Resource Center (NERRC); Early Childhood Technical Assistance Center (ECTAC – ECO Center, TACSEI, CELL, DaSy); the Infant Toddlers Coordinators Association (ITCA); and from state/regional/national colleagues administering their states' Parts B and C Programs. Among other activities, State CIS/CIS-EI staff: 1) participated in OSEP SPP/APR webinars and technical assistance calls and 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; 2) attended the summer 2012 IDEA Leadership and ECO Conferences; and regularly accessed the Right IDEA web site for technical assistance, resources and materials.

Vermont Part C's FFY 2011 APR reported that the long-anticipated electronic data management system for Part C was scheduled to 'go live' September 2012 but did not due to the Vermont Department of Information and Innovation's (DII's) concerns related to national security standards around client information. The contract with the vendor was terminated in January 2013. In December 2013 Vermont was awarded a federal Race-to-the-Top Early Learning Challenge Grant in the amount of \$36.9 million, which will be the largest single investment in early childhood education in Vermont's history. The grant includes a significant amount of money committed to the development of a CIS electronic data management system. Vermont Part C continues to collect, analyze and report APR and 619 data with a manual, i.e., 'paper and pencil,' data management system.

The source and time period for the data reported in this 2012 APR is the entire FFY 2012 Part C State Database, July 1, 2012 to June 30, 2013. As reported in the FFY 2011 APR, Vermont Part C issued eight FFY 2011 findings of noncompliance that were identified during a desk audit of the entire FFY 2010 Part C State Database, July 1, 2010 to June 30, 2011. Verification of timely correction of these eight FFY 2011 findings of noncompliance and the specific actions Vermont Part C took to verify correction are reported under Indicators 1, 7, 8A, 8B, 8C and 9 in this FFY 2012 Annual Performance Report.

In its FFY 2011 APR, VT Part C reported less than 100% compliance for FFY 2011 in indicators 1, 7, 8A, 8B and 8C. This FFY 2012 APR reports on the status of the correction of this FFY 2011 noncompliance as required by Vermont's Part C FFY 2011 SPP/APR Response Table. Since VT Part C is reporting less than 100% compliance in Indicators 1, 7, 8A, 8B and 8C for FFY 2012, this FFY 2012 APR also reports on the status of correction of this noncompliance prior to VT Part C issuing findings of noncompliance.

There were three findings of noncompliance issued in FFY 2012 in Indicators 1, 7 and 8B. Two findings of noncompliance in Indicators 1 and 8B were identified during a desk audit of the entire Part C FFY 2011 State Database, July 1, 2011 to June 30, 2012 and issued in FFY 2012. The one finding in Indicator 7 was identified and issued during FFY 2012 based on a desk audit of 10 months (7/1/12 to 4/30/13) of the FFY 2012 Part C State database. After auditing data from the entire FFY 2012 Part C State Database, July 1, 2012 to June 30, 2013, State Part C staff are confident that the 10-month period of data accurately reflects data for infants and toddlers with IFSPs for the full reporting period. The regional CIS-EIP demonstrated 92% compliance for 10 months (33/36) and 93% (42/45) compliance for the entire 12-month reporting period. This FFY 2012 APR is reporting that these three FFY 2012 findings of noncompliance have been timely corrected.

A complete copy of VT Part C's State Performance Plan-revised 2-14 is 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 2012 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 reported to the public in spring 2013 and will report in spring 2014 Vermont's and each of the 12 regional CIS-EIP's progress or slippage in meeting FFY 2011 and FFY 2012 targets in the State Performance Plan at http://dcf.vermont.gov/cdd/reports/IDEA_Part_C/public_reports.

Part C State Annual Performance Report (APR) for FFY 2012

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
2012 (7/1/12-6/30/13)	100%

Actual Target Data for FFY 2012:

97%

Data Method/Source: Desk audit of entire FFY 2012 Part C State Database, July 1, 2012 to June 30, 2013.

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	723
b. Total number of infants and toddlers with IFSPs	745
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%

Of the 745 children with new services on both initial and subsequent IFSPs/One Plans, all services were initiated for 670 children within 30 days of signed parental consent (Vermont’s criteria). Services for 53 children were not initiated in a timely manner due to exceptional family circumstances. These 53 children are included in the numerator as well as the denominator. Exceptional family circumstances included families’ schedules/vacations (majority of reasons), families cancelling or failing to attend scheduled

meetings, requests to reschedule evaluations and/or IFSP/One Plan meetings due to deployment of family members, family illnesses/surgeries/hospitalizations, families who moved or were unreachable after multiple attempts by early intervention providers to contact them, and custody issues.

Vermont issued **one finding of noncompliance in FFY 2012** in Indicator 1 in CIS-EIP 10.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2012:

Vermont CIS-EI demonstrated slight slippage in FFY 2012, going from 97.4% compliance in FFY 2011 to 97% compliance in this reporting year. There were 22 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 22 children. The number of days services were initiated beyond the 30-day timeline for these 22 children ranged from 2 to 139 (unavailability of speech-language pathologist); the average number of days beyond the 30-day timeline was 29. Delays in timely initiation of services for all 22 children were attributable to provider unavailability: speech-language pathologists (14 children), occupational and physical therapists (7 children), and early interventionist (1 child). The lack of a sufficient number of speech-language pathologists continues to present challenges related to timely service provision.

Part C timelines for initiating all services and conducting evaluations and assessments and initial IFSP/One Plan meetings apply across all CIS services and partners. Consistent use of the CIS One Plan by all CIS providers continues to reinforce the timeline requirements. During FFY 2012, state CIS staff developed and disseminated an online technical assistance and training module for all regional CIS Coordinators, administrators and providers outlining Part C/CIS timeline requirements. The SFY 2014 contracts that began July 1, 2013 required all CIS providers to complete, with 100% accuracy, this module and send documentation of completion to the state CIS office. These timeline requirements are in the CIS Guidance Manual completed in June 2013 and posted online (http://dcf.vermont.gov/cdd/cis/providers/intake_coordinators) to ensure all CIS services are correctly implementing them. Along with the timeline modules and the ongoing technical assistance, trainings provided in August and September 2012 to more than 200 providers statewide in anticipation of the now-canceled electronic data management system further reinforced the Part C timeline requirements across the CIS services. State CIS administrative staff and technical assistance liaisons to the regions continued to provide intensive onsite and distance support during FFY 2012 related to the timeline requirements.

State CIS-EI data management staff continued to follow up regularly by telephone/email and onsite visits 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 IFSP/One Plan 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. The VT Part C Data Manager conducted conference calls with specific regional CIS-EI programs and their fiscal agencies to provide intensive support around billing, services and prior authorizations. Based on input from VT Part C’s Data Manager, the VT Part C Coordinator disseminated several written memos and emails to address data issues and clarify timeline and data accuracy requirements.

During the FFY 2012 Determination process for the 12 regional CIS-EIPs, State CIS staff continued to use a rubric to evaluate the quality of data submissions, which factor into each regional program’s determination. 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. The rubric, process and scoring were described in the FFY 2011 APR. Data management staff have an internal system for tracking data submissions throughout the federal fiscal year to assess timeliness, validity and reliability and to identify the need for follow-up and/or specific technical assistance. Regional CIS-EIPs have demonstrated improvement in the quality of their

data submissions due to the use of the data rubric, the internal tracking and follow-up system, and the fact that quality of data submissions will have an impact on their determination each year.

State Part C CIS-EI staff conducted webinars in fall 2012 for families and providers on the September 2011 federal regulations, highlighting specific revisions to the regulations and reinforcing timeline requirements. State of Vermont Special Education Rules implementing the September 2011 Part C regulations were developed in spring of FFY 2012 and adopted June 1, 2013. Part C and Part B 619 staff collaboratively developed and conducted six daylong statewide trainings for Part C and Part B 619 providers in fall 2013 focused on the implementation of the June 2013 VT Special Education Rules and changes to policies, procedures and practices required to implement the new rules. The Interagency Agreement with Vermont Agency of Human Services and Vermont Agency of Education that was implemented in FFY 2012 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.

During FFY 2012, state CIS-EI staff continued to provide extensive and targeted technical assistance to regional CIS-EIPs 5 and 9 that were issued FFY 2011 findings of noncompliance in Indicator 1. The two regional CIS-EIPs implemented and reported progress on their Corrective Action Plans (CAPs) developed to address their FFY 2011 findings of noncompliance. For the development of their CAPs, State CIS-EI staff required these two regions to review and use the resource *'Local Contributing Factor Tool for SPP/APR Compliance Indicators: Collecting and Using Valid and Reliable Data to Determine Underlying Factors Impacting Local Performance and Develop Meaningful Corrective Action Plans.'* Some of the activities/strategies implemented as part of the CAPs included filling positions that had been vacant; implementing a 'tickler' system that identifies upcoming timeline deadlines and is reviewed and updated in group staff meetings; keying in on caseload and workload during 1:1 monthly staff supervision and adjusting among staff, if necessary; using the twice-monthly group supervision time for training as well as monitoring timelines; and meeting twice yearly with community partners who provide services to review and reinforce Part C timeline requirements. CIS-EIP 9 in particular experienced significant staff turnover, including a change in its director, and received increased and intensive onsite technical assistance from its state CIS-EI technical assistance liaison and individualized trainings for the new director and staff.

Correction of FFY 2011 Findings of Noncompliance

Level of compliance Vermont Part C reported for FFY 2011 for Indicator 1: **97.4%**

As reported in the FFY 2011 APR and in the Overview on page 4 of this FFY 2012 APR, the two FFY 2011 findings of noncompliance in Indicator 1 were identified during a desk audit of the entire FFY 2010 Part C State Database and issued in FFY 2011.

1. Number of findings of noncompliance the State made during FFY 2011 (the period from July 1, 2011, through June 30, 2012)	2
2. Number of FFY 2011 findings the State verified as timely corrected (verified as corrected within one year from the date of notification to the EIS program of the finding)	2
3. Number of FFY 2011 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Verification of Timely Correction of FFY 2011 Findings

The two FFY 2011 findings of noncompliance issued in regional CIS-EIPs 5 and 9 were **timely corrected**. 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

FFY 2011 State Database (July 2011 to December 2011), CIS-EIPs 5 and 9 achieved 100% compliance for at least 60 consecutive days, indicating that the programs are correctly implementing the timely service provision requirements in 34 CFR §303.342(e) and 303.344(f)(1); and 2) Part C state staff verified immediately upon review of the 2010 Child Count forms (the data source for identifying the findings) that, although late, all services were initiated for the 8 children for whom services were not initiated in a timely manner in the two programs.

Verification of Correction of FFY 2011 Noncompliance Reported in the 2011 APR

Five regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire FFY 2011 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).

Along with the five regional CIS-EIPs above that demonstrated noncompliance in Indicator 1 and as discussed in the Overview on page 4, a desk audit of the entire Part C FFY 2011 State Database also resulted in CIS-EI state staff identifying one finding in Indicator 1 in regional CIS-EIP 10 and issuing the finding in FFY 2012.

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 FFY 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 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 five 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 was corrected prior to issuing written findings and the FFY 2012 finding of noncompliance issued in regional EIP 10 based on FFY 2011 data had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 1 during the FFY 2011 reporting year.

Verification of Correction of FFY 2012 Noncompliance Reported in this 2012 APR

Five regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire FFY 2012 Part C State Database (July 1, 2012 to June 30, 2013) corrected the noncompliance prior to being issued written findings of noncompliance as of submission of this FFY 2012 APR. CIS-EIP 3 was at 89% compliance (46/52), CIS-EIP 4 was at 96% compliance (175/183), CIS-EIP 6 at 96% compliance (49/51), CIS-EIP 9 at 90% compliance (44/49) and CIS-EIP 10 at 99% compliance (71/72).

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 2013 State Database (July 2013 to December 2013), CIS-EIPs 3, 4, 6, 9 and 10 achieved 100% compliance for at least 40 consecutive days, indicating that these five 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 2012 Child Count forms submitted by the CIS-EIPs for the 22 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 2012 that was corrected prior to issuing written findings had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 1 during the FFY 2012 reporting year.

This FFY 2012 APR also is reporting that the FFY 2012 finding of noncompliance in Indicator 1 in CIS-EIP 10 (based on FFY 2011 data) was timely corrected. 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

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from the first and second quarters of the 2012 State Database (July 2012 to December 2012), CIS-EIP 10 achieved 100% compliance for at least 60 consecutive days, indicating that this program is 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 2011 Child Count forms submitted by CIS-EIP 10 for the 5 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.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2013: The timeline for revision to VT Part C policies and procedures was revised from June 2013 to June 2014 to ensure congruence with the new State of Vermont Special Education Rules adopted June 1, 2013. This revision is in the February 3, 2014 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 2012

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
2012 (7/1/12-6/30/13)	96.2%

Actual Target Data for FFY 2012: 98.7%

Data Source: Child Count Database 12/1/12, 12/2/11 to 12/1/12. These Indicator 2 data are consistent with Vermont's 618 data submitted February 4, 2013 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 2012:

	# Active Children 12/1/12	# Children in Home or Community-Based Settings	# Children in Other Setting	# and % Children in Home or Community-Based Settings	State Target
State Totals	754	744	10	744/754 = 98.7%	96.2%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2012: Pursuant to OSEP Memorandum 14-3 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 2012 because the state met and exceeded its FFY 2012 target.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2013: The timeline for revision to VT Part C policies and procedures was revised from June 2013 to June 2014 to ensure congruence with the new State of Vermont Special Education Rules adopted June 1, 2013. This revision is in the February 3, 2014 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 2012

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

Monitoring Priority: Early Intervention Services In Natural Environments

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

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

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

Measurement:

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

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

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):

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

aged peers = [(# of infants and toddlers who improved functioning to reach a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

- e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers = [(# of infants and toddlers who maintained functioning at a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

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

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

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

Targets and Actual Data for Children Exiting in FFY 2012:

Summary Statements	Actual FFY 2011 (% and # of children)	Actual FFY 2012 (% and # of children)	Targets FFY 2012 (% of children)
Outcome A: Positive social-emotional skills (including social relationships)			
1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they exited the program	64.2% n=550	67.1% n=519	61.4%
2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program	60.7% n=550	62.6% n=519	60%
Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)			
1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program	75.9% n=546	74.4% n=519	68.5%
2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	53.8% n=546	54.5% n=519	54%
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	76.5% n=547	74.4% n=519	73.5%
2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program	62.3% n=547	62.6% n=519	61.2%

Progress Data for Part C Children FFY 2012

A. Positive social-emotional skills (including social relationships):	Number of children	% of children
a. Percent of children who did not improve functioning	6	1.2%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	108	20.8%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	80	15.4%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	152	29.3%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	173	33.3%

Total	519	100%
B. Acquisition and use of knowledge and skills (including early language/communication):	Number of children	% of children
a. Percent of children who did not improve functioning	4	0.8%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	107	20.6%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	125	24.1%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	198	38.2%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	85	16.4%
Total	519	100%
C. Use of appropriate behaviors to meet their needs:	Number of children	% of children
a. Percent of children who did not improve functioning	4	0.8%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	96	18.5%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	94	18.1%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	197	38.0%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	128	24.7%
Total	519	100%

Discussion of Summary Statements and a-e Progress Data for FFY 2012:

The results for Summary Statement 1 (SS1) for all of the Child Outcome sub-indicators are above the targets set for FFY 2012. Depending on the sub-indicator, between 67.1% and 74.4% of infants and toddlers with special needs entering Part C services showed greater than expected growth at the time they exited the program. Results in FFY 2012 for SS1 were slightly above last year’s for Outcome 3A and slightly below last year’s results for Outcomes 3B and 3C.

Similarly, the results for Summary Statement 2 (SS2) are above FFY 2012 targets and are also above FFY 2011 results for all of the sub-indicators. The results indicate that between 54.5% and 62.6% of infants and toddlers eligible for Part C services were functioning within age expectations at the time they exited from Early Intervention (EI) services.

Child outcome data was collected on 519 children or approximately 97.6% of the children who exited in FFY 2012 (n = 532) and who received a minimum of 6 months of service. The range of complete data for regions fell between 91 and 100% with nine of twelve regions reporting outcomes for 100% of exited children. The percentage of data completion is based on the number of exits occurring within FFY 2012 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 all 519 children. This year, regional CIS: EI coordinators were contacted when progress categories yielded ‘Impossible’ in the Early Childhood Outcome Conversion table and asked to address inaccurate exit ratings. Most regions with ‘Impossible’ ratings were independently able to correct inaccuracies without the need for additional TA.

An examination of state progress categories (categories ‘a’ through ‘e’) shows the results to be well within the minimum acceptable ranges as defined by ECO for all three sub-indicators (ECO Webinar, 10/22/13). As expected, progress category ‘a’ (children who did not improve functioning) is very low across all child outcomes for the state. Category ‘e’ (children who maintain functioning at levels comparable to same age peers) is below 60% for the state across all three outcomes.

The data patterns for FY 11-12 and FY 12-13 are almost identical, thereby beginning to show consistency in the state data. As was the case last year, trends for 3B and 3C progress categories display a gradual increase over the categories from ‘b’ to ‘d’ with a drop for ‘e’. Outcome 3A (social relationships) shows a different pattern with a slight spike for progress category ‘b’, decrease for ‘c’, and then a gradual increase through category ‘e’.

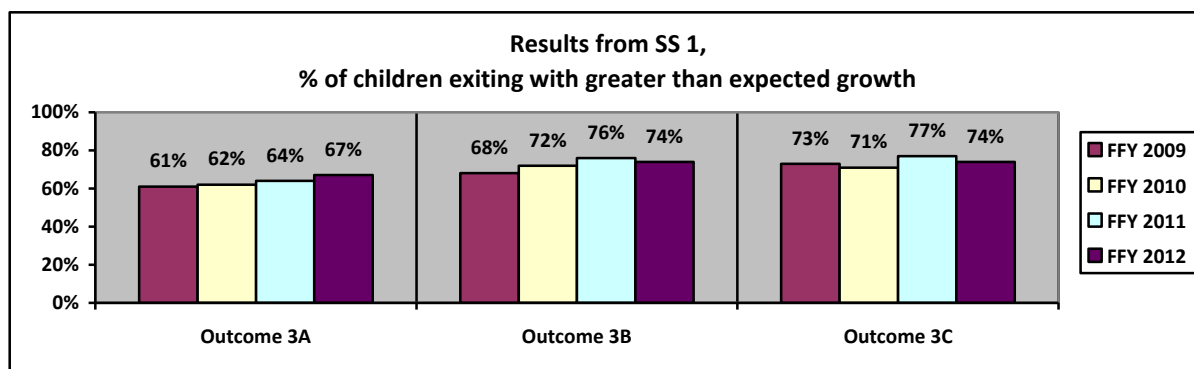
Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2011:

Part C has been following a multi-year plan to increase the quality of child outcome data and identify its relevance to improving practice. The initial focus was on ensuring that the data was complete (a minimum of 95%) as well as accurate. Towards this end, the state office has settled on a monthly practice of pairing regional child exits with COS entry/exit data and sending monthly reports to each region with the expectation that missing data will be completed or given a rationale within 30 days. The state has enjoyed at least a 90% completion rate since FFY 2010.

Part C is continuing its focus on improving the quality of the Child Outcome data with a recognition that improving data quality also leads to program improvement. As practitioners and regional administrators come to understand and trust child outcome data, results and subsequent training and technical assistance (TA) can be linked to improving the quality of Part C services. Vermont is looking forward to using the ECO Child Outcome Competency Check, presented in this year’s Outcomes conference, as a tool to support practitioner competence and confidence in producing accurate ratings.

With the exception of SS1 results for Outcomes 3B and 3C, there was a slight increase across this year’s sub-indicators. ECO’s ‘Difference calculator’ demonstrated that there wasn’t a significant difference in the variation between FFY 2011 and FFY 2012 results for SS1 and SS2. It is expected that there will be a fluctuation in results from year to year as we focus on the various factors that lead to improvements in data quality and performance.

The following graph demonstrates how the results for SS1 have remained relatively stable over the last few years with overall improvements in Outcomes 3A and 3B, possibly due to training from Center on Social Emotional Foundations for Early Learning (CSEFEL) and the Center on Early Literacy Learning (CELL) that took place for some of our regions between FFY 2009 and 2011. The trends in this data will continue to be monitored for the state as well as for regions. As we introduce new initiatives, these trends will be monitored more closely.



During FFY 2012, child outcome clinics were again offered jointly to Part C and Part B/619 practitioners. The purpose of the clinics was to enhance practitioner knowledge related to conducting functional assessments, and writing high quality, functional child and family outcomes. Plans are underway to work

with a region to pilot the incorporation of the global Child Outcomes into the IFSP (One Plan) process with an additional emphasis on writing functional IFSP (One Plan) outcomes.

Improvement Activities in FFY 2012:

- Since the state was unable to introduce the data management system this year, the Child Outcome Summary form was revised to incorporate relevant family/child factors that may help differentiate child outcome results.
- Part C continues to monitor child outcome data collection. The state office now sends monthly updates to regions with a list of children exiting Part C, requesting that missing or inaccurate data are completed or corrected within 30 days. Regions are also asked to give the rationale for missing data which allows regions and the state to track potential patterns in incomplete data.
- Training Efforts:
 - In an effort to improve both data quality and practice, Part C again partnered with Part B/619 to conduct six joint, regional Child Outcome clinics during the winter 2012-13. The training, *Developing High-Quality, Functional IFSP Outcomes*, was developed by NECTAC/ECO/WRRC and used to highlight how integrating functional assessment and the three global child outcomes into the IFSP (One Plan) process could support functional IFSP (One Plan) outcomes.
 - TA was offered to regions that fell below the state target for 2 years in a row. TA was also given to regions with a high percentage of progress category results (i.e., a through e) labeled as 'impossible'.
- Regions continue to receive program reports profiling their child outcome results over time with 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 is a partner in the new SPDG 4 grant and planning is underway to offer the Pyramid Model modules on Family Coaching in support of infant/toddler social emotional development.

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

Resources for FFY 2013: The timeline for revision to VT Part C policies and procedures was revised from June 2013 to June 2014 to ensure congruence with the new State of Vermont Special Education Rules adopted June 1, 2013. This revision is in the February 3, 2014 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 2012

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

Measurement:

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

Target Data and Actual Target Data for FFY 2012:

Target Data and Actual Target Data	FFY 2011	FFY 2012 Actual		FFY 2012 Target
<i>A. Know their rights</i>	78.1%	224/282	79.4%	78.3%
<i>B. Effectively communicate their children's needs</i>	85.9%	240/282	85.1%	86.1%
<i>C. Help their children develop and learn</i>	80.8%	226/281	80.4%	81%

The statewide return rate for the FFY 2012 Family Outcome survey was 42.9%, slightly higher than last year and the highest since data collection began in FFY 2005. It is significantly higher than the state target of 32%. Of the 697 surveys distributed, 282 were returned (a small number of surveys were returned as undeliverable). Eleven of twelve regions were also well above target this year for survey return rate (between 32% and 78%).

In order to examine representativeness of survey data, comparisons between Vermont's 618 report (12/11 – 12/12) and the Family Outcomes survey were made on gender and race/ethnicity. Comparisons indicate data from both sources are similar. Comparisons of race/ethnicity between the two data sets show 9.81% of minority groups are represented in the 618 report while 7.7% are represented in the

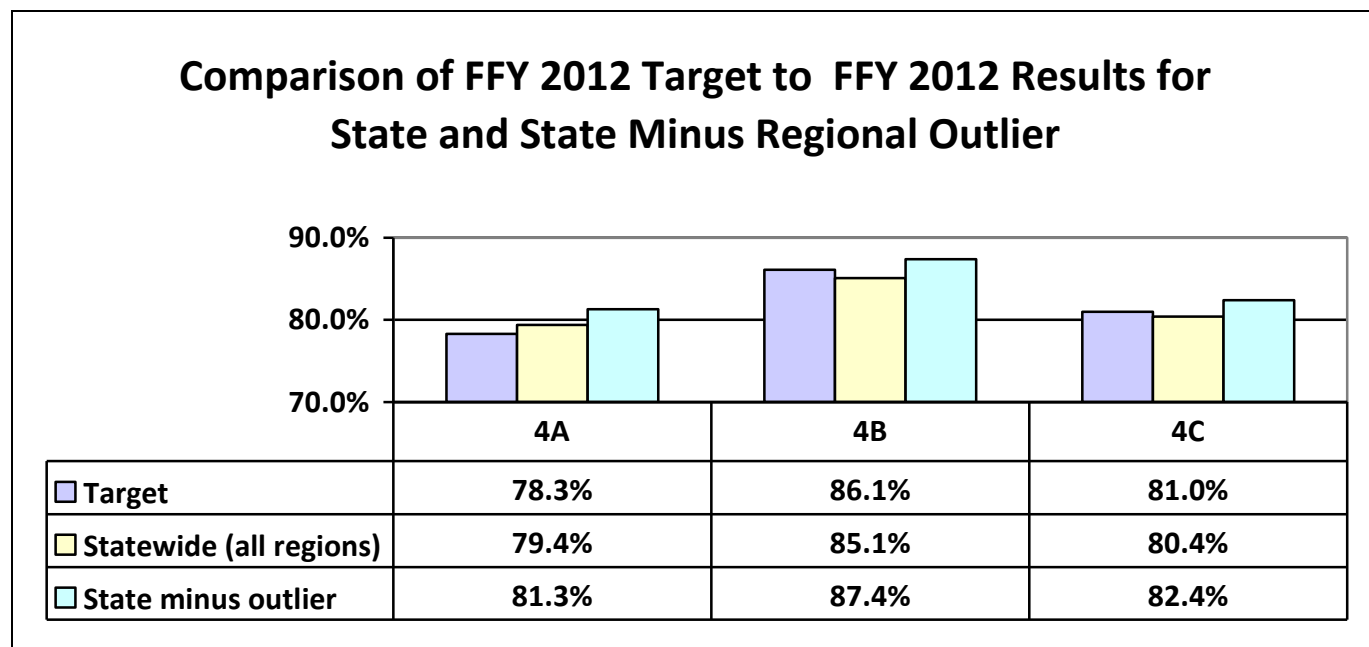
Family Outcome survey. In terms of gender, the 618 report shows 63.26% of exits were male and 36.74% were female, while the surveys indicated 57.3% were male and 42.7%, female. A data management system will allow a more comprehensive and accurate analysis of representativeness, including a comparison 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 2012:

Vermont maintains a strong and stable return rate with a slight increase this year in returned surveys (from 41.7% to 42.9%). The state continues to use outreach strategies which have proven successful, including sharing the *Child and Family Outcome brochure* with families and using practitioner ‘talking points’ to guide practitioners in enlisting family participation in the survey.

For FFY 2012, results for Outcome 4A were slightly above the state target and FFY 2011 results, while results for 4B and 4C were slightly below the state target and FFY 2011 results. The difference for 4B and 4C were within one percentage point of FFY 2011 and the FFY 2012 state target. For the state, results from all seventeen questions comprising the three Family Outcome sub-indicators (4A, 4B, and 4C) were very positive indicating that, depending on the question, between 74.1% and 95.7% of families agreed that Early Intervention services had helped their family. Results for fifteen of the seventeen questions were above the state target and most results were higher than last year.

An examination of results for the state’s twelve regions found one region to be an outlier with results across all 3 sub-indicators well below those of other regions. This region has experienced a large turn-over of staff in the last year and has been receiving ongoing technical assistance (TA) since last spring. A re-analysis of the state’s outcome data without this relatively small region (n=20) yielded results that were above state targets for all three sub-indicators (see graph/chart below).



Last year, Vermont revised baselines and targets to reflect changes brought about by a switch to the revised Early Childhood Outcomes (ECO) survey in FFY 2010. Until that time, Vermont had exceeded its targets. The revised ECO survey is preferred because results for each Family Outcome sub-indicator is based on multiple questions (the original survey had a single question for each sub-indicator), and therefore measures a broader construct. As a result, the revised survey helps families and practitioners

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alike in gaining a broader understanding of the parameters for each sub-indicator. As explained below, in examining the results for each question comprising a sub-indicator, there is typically one question that is below the target. 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 potential areas in need of improvement.

Results for four of the five questions which comprise 4A range from 87% to 90% and are 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 higher than FFY 2011 but still below the target at 74.1%. A similar pattern exists for Outcome 4C in which 5 of the 6 questions were above target, ranging from 87.1% to 92.1% with a sixth question at 79.3%, identifying 'helping your child get along with others' as an area needing to be explored.

This year, Outcome 4 B did not follow this trend. Surprisingly, although Outcome 4B was a percentage point below the state target, the survey results to all six questions comprising this sub-indicator were above the state's target (86.1% to 95.7%).

Improvement has also been shown at the regional level. An examination of results for the five regions that were in need of Program Improvement Plans for FFY 2011 demonstrates the following: One region has surpassed state targets on all three family outcomes. Of the remaining four regions, three have shown improvement in at least 1 family outcome. The only region not to show improvement is the region that experienced extensive staff turnover and is currently receiving ongoing TA.

Improvement Activities in FFY 2012:

- Part C partnered with Part B/619 to conduct six joint, regional Outcome clinics during the winter 2012-13. The training, *Developing High-Quality, Functional IFSP Outcomes*, was developed by NECTAC/ECO/WRRC and used to show how high quality practices (i.e., writing functional ISFP (One Plan) outcomes, including family outcomes that address resource and information needs in the IFSP (One Plan) and an IFSP (One Plan) process that stresses family participation) can have a positive impact on Family Outcomes survey results.
- An analysis of the trends in 5 years of data (to offset small 'n's') identifies regions in need of improvement plans for Family Outcomes. These regions are required to submit a Program Improvement Plan. The state met with each region to review data and mentor programs through the process of developing a plan in the spring. Regions are asked to complete progress reports on a quarterly basis and receive technical assistance as needed.
- Regions continue to receive a program profile report which includes the region's raw data with comparisons to state data and to the regions' previous years. In addition, regions receive a summary of parental comments included on returned surveys.
- ECO documents were shared with regions during the Improvement Planning process, including:
 - NECTAC's article: *Assuring the Family's Role on the Early Intervention Team: Explaining Rights and Safeguards* (as needed).
 - *Relationship of Quality Practices to Child and Family Outcomes Measurement Results*
- Ongoing TA is being provided to a region that has experienced a large turn-over of staff in the last year.

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- Part C continues to analyze the impact of factors such as family's time in program, race and ethnicity, and amount of services on Family Outcome results.
- 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 is a partner in the new SPDG 4 grant and planning is underway to offer the Pyramid Model modules on Family Coaching in support of infant/toddler social emotional development. .

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

Resources for FFY 2013: The timeline for revision to VT Part C policies and procedures was revised from June 2013 to June 2014 to ensure congruence with the new State of Vermont Special Education Rules adopted June 1, 2013. This revision is in the February 3, 2014 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 2012

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
2012 (7/1/12-6/30/13)	.99%

Actual Target Data for FFY 2012: 1.3%

Data Source: Child Count Database 12/1/12, 12/2/11 to 12/1/12. These Indicator 5 data are consistent with Vermont's 618 data submitted February 4, 2013 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 2012:

FFY 2012	# Infants Served in Part C	Total # VT Infants Birth to 1	# and % VT Infants Birth to 1 Served in Part C	2012 SPP State Target
Infants Birth to 1	75	5,783	75/5783 = 1.3%	.99%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2012: Pursuant to OSEP Memorandum 14-3 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 2012 because the state met and exceeded its FFY 2012 target.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2013: The timeline for revision to VT Part C policies and procedures was revised from June 2013 to June 2014 to ensure congruence with the new State of Vermont Special Education Rules adopted June 1, 2013. This revision is in the February 3, 2014 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 2012

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
2012 (7/1/12-6/30/13)	3.5%

Actual Target Data for FFY 2012: 4.22%

Data Source: Child Count Database 12/1/12, 12/2/11 to 12/1/12. These Indicator 6 data are consistent with Vermont’s 618 data February 4, 2013 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 2012:

FFY 2012	# VT Birth to 3 Served in Part C	# Total VT Birth to 3	# and % VT Birth to 3 Served in Part C	2012 SPP State Target
Infants and Toddlers Birth to 3	754	17,885	754/17885 = 4.22%	3.5%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2012: Pursuant to OSEP Memorandum 14-3 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 2012 because the state met and exceeded its FFY 2012 target.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2013: The timeline for revision to VT Part C policies and procedures was revised from June 2013 to June 2014 to ensure congruence with the new State of Vermont Special Education Rules adopted June 1, 2013. This revision is in the February 3, 2014 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 2012

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 initial evaluation and initial 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 were conducted within Part C’s 45-day timeline) divided by the (# of eligible infants and toddlers evaluated and assessed for whom an initial IFSP 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
2012 (7/1/12-6/30/13)	100%

Actual Target Data for FFY 2012:

96%

Data Method/Source: Desk audit of entire FFY 2012 Part C State Database, July 1, 2012 to June 30, 2013.

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	742
b. Number of infants and toddlers with IFSPs evaluated and assessed for whom an initial IFSP meeting was required to be conducted	770
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%

Of the 770 children with new IFSPs/One Plans who were evaluated and assessed and for whom an initial IFSP/One Plan meeting was required to be conducted, 515 children received an evaluation and assessment and initial IFSP/One Plan meeting within Part C's 45-day timeline. Services for 227 children were not initiated in a timely manner due to exceptional family circumstances. These 227 children are included in the numerator as well as the denominator. Exceptional family circumstances included families cancelling or failing to attend scheduled meetings (majority of reasons), families' requests to reschedule evaluations and/or IFSP/One Plan meetings, a family experiencing homelessness, family vacation schedules, family illnesses/surgeries/hospitalizations, families who moved or were unreachable after multiple attempts by early intervention providers to contact them, and custody issues.

Vermont issued **one finding of noncompliance in FFY 2012** in Indicator 7 in CIS-EIP 2.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2012:

Vermont Part C's FFY 2012 compliance of 96% for Indicator 7 reflects a slight decrease from the 96.8% achieved in FFY 2011. 28 children did not receive an evaluation and assessment and initial IFSP/One Plan 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/One Plan meetings ultimately were conducted for these 28 children. The number of days these services were conducted beyond the 45-day timeline for these 28 children ranged from 4 to 96 (unavailability of educational surrogate). The average number of days beyond the 45-day timeline was 34. Delays in meeting the 45-day timeline were due to scheduling conflicts/unavailability of CIS-EI personnel (11 children), LEA personnel (4 children), and speech-language pathologists and physical therapists (5 children); delays in assigning Educational Surrogates (6 children); and delays in finding interpreters (2 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 (733/742), the same percentage reported in the FFY 2011 APR. The 733 evaluations and assessments completed within the 45-day timeline included 93 children for whom exceptional family circumstances caused delays. 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 19 of 28 children.

All improvement activities for FFY 2012 reported under Indicator 1 in this APR apply to Indicator 7, including extensive and targeted technical assistance to CIS-EIPs 4, 9 and 12 that were issued FFY 2011 findings of noncompliance. The three CIS-EIPs implemented and reported progress on their Corrective Action Plans (CAPs) developed to address their FFY 2011 findings of noncompliance (using the '*Local Contributing Factor Tool for SPP/APR Compliance Indicators...*'). Strategies and activities were similar to those discussed under Indicator 1. Like CIS-EIP 9, CIS-EIP 4 (that provides services to almost one-third of Vermont's children receiving Part C services) also experienced considerable staff turnover and extensive delays in filling vacant positions. The Director of the program assumed a position in another agency in FFY 2011 and the acting Director was required to assume the duties and responsibilities of two positions for several months. The VT Part C Coordinator and other CIS staff provided increased onsite technical assistance to regional CIS-EIP 4 to discuss administrative issues resulting in, among other things, noncompliance, and to make recommendations for necessary changes to the administrative infrastructure.

Correction of FFY 2011 Findings of Noncompliance

Level of compliance Vermont Part C reported for FFY 2011 for Indicator 7: **96.8%**

As reported in the FFY 2011 APR and in the Overview on page 4 of this FFY 2012 APR, the three FFY 2011 findings of noncompliance in Indicator 7 were identified during a desk audit of the entire FFY 2010 Part C State Database and issued in FFY 2011.

1. Number of findings of noncompliance the State made during FFY 2011 (the period from July 1, 2011, through June 30, 2012)	3
2. Number of FFY 2011 findings the State verified as timely corrected (verified as corrected within one year from the date of notification to the EIS program of the finding)	3
3. Number of FFY 2011 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Verification of Timely Correction of FFY 2011 Findings

The three FFY 2011 findings of noncompliance issued in regional CIS-EIPs 4, 9 and 12 were **timely corrected**. 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 FFY 2011 State Database (July 2011 to December 2011), CIS-EIPs 4, 5 and 9 achieved 100% compliance for at least 60 consecutive days, indicating that the three 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 21 children for whom services were not conducted in a timely manner and were immediately able to verify that, although late, the evaluations and assessments and initial IFSP/One Plan meetings ultimately were conducted for these 21 children.

Updated data from onsite file reviews that State CIS-EI staff conducted in CIS-EIPs 4 and 12 in May 2012 provided additional verification of timely correction of the FFY 2011 findings. Both CIS-EIPs achieved 100% compliance for Indicator 7, further indicating that the programs are correctly implementing the timely service provision requirements in 34 CFR §303.310(a) and 303.342(a).

Verification of Correction of FFY 2011 Noncompliance Reported in the 2011 APR

Five regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire FFY 2011 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), CIS-EIP 10 at 95% compliance (77/81) and CIS-EIP 12 at 96% compliance (51/53).

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, 10 and 12 achieved 100% compliance for at least 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 11 children for whom services were not conducted in a timely manner and were immediately able to verify that, although late, the evaluations and assessments and initial IFSP/One Plan meetings ultimately were conducted for these 11 children.

The noncompliance in FFY 2011 corrected prior to issuing written findings had an impact on Vermont Part C’s ability to achieve 100% compliance in Indicator 7 during the FFY 2011 reporting year.

Verification of Correction of FFY 2012 Noncompliance Reported in this 2012 APR

Five of six regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database July 1, 2012 to June 30, 2013 corrected the noncompliance prior to being issued written findings of noncompliance as of submission of this FFY 2012 APR. CIS-EIP 1 was at 97% compliance (35/36), CIS-EIP 8 at 89% compliance (24/27), CIS-EIP 9 at 93% compliance (54/58), CIS-EIP 10 at 96% compliance (72/75) and CIS-EIP 12 at 96% compliance (50/52)

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 FFY 2013 State Database (July 2013 to December 2013), CIS-EIPs 1, 8, 9, 10 and 12 achieved 100% compliance for at least 60 consecutive days, indicating that these five 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 2012 Child Count forms submitted by the five CIS-EIPs for the 13 children for whom services were not conducted in a timely manner and were immediately able to verify that, although late, the evaluations and assessments and initial IFSP/One Plan meetings ultimately were conducted for these 13 children.

CIS-EIP 4, the sixth regional CIS EIP that demonstrated FFY 2012 noncompliance, was at 94% compliance (176/188). As of submission of this FFY 2012 APR, CIS-EIP 4 has not corrected the noncompliance. Part C staff reviewed the 2012 Child Count forms submitted by CIS-EIP 4 for the 12 children for whom services were not conducted in a timely manner and were immediately able to verify that, although late, the evaluations and assessments and initial IFSP/One Plan meetings ultimately were conducted for these 12 children. The CIS-EI Data Manager will continue to conduct regular desk audits, i.e., at least monthly, from the third and fourth quarters of the FFY 2013 Part C State Database (January 2014 to June 2014) and work closely with regional CIS-EIP 4 to ensure accuracy on its monthly data submissions. The VT Part C Coordinator and staff also are identifying additional methods to verify correction of CIS-EIP 4's FFY 2012 noncompliance, e.g., self-assessment, onsite file review.

This FFY 2012 APR also is reporting that the FFY 2012 finding of noncompliance in Indicator 7 in CIS-EIP 2 was timely corrected. 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 2013 State Database (July 2013 to December 2013), CIS-EIP 2 achieved 100% compliance for at least 60 consecutive days, indicating that this program is correctly implementing the timely service provision requirements in 34 CFR §303.310(a) and 303.342(a); and 2) Part C staff reviewed the 2012 Child Count forms submitted by CIS-EIP 2 for the 3 children for whom services were not initiated in a timely manner and were immediately able to verify that, although late, the evaluations and assessments and initial IFSP/One Plan meetings ultimately were conducted for these 3 children.

The noncompliance in five CIS-EIPs in FFY 2012 that was corrected prior to issuing written findings, the noncompliance in CIS-EIP 4 that is yet to be verified as corrected, and the noncompliance in CIS-EIP 2 that resulted in a FFY 2012 finding had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 7 during the FFY 2012 reporting year.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2013: The timeline for revision to VT Part C policies and procedures was revised from June 2013 to June 2014 to ensure congruence with the new State of Vermont Special Education Rules adopted June 1, 2013. This revision is in the February 3, 2014 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 2012

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: The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has developed an IFSP with transition steps and services at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler’s third birthday.

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

Measurement:

Percent = [(# of toddlers with disabilities exiting Part C who have an IFSP with transition steps and services at least 90 days, and at the discretion of all parties not more than nine months, prior to their third birthday) divided by the (# of toddlers with disabilities exiting Part C)] times 100.

Account for untimely transition planning, including the reasons for delays.

FFY	Measurable and Rigorous Target
FFY 2012 (7/1/12-6/30/13)	100%

Actual Target Data for FFY 2012:

98%

Data Method/Source: Desk audit of entire FFY 2012 Part C State Database, July 1, 2012 to June 30, 2013.

Children Exiting Part C Who Received Timely Transition Planning:

c. Number of children exiting Part C who have an IFSP with transition steps and services	742
d. Number of children exiting Part C	759
The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the lead agency has developed an IFSP with transition steps and services at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler’s third birthday. (Percent = [(a) divided by (b)] times 100)	98%

742 of the 759 children who exited Part C had written transition plans in place upon exiting Part C. 45 of the 742 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 declined transition planning, families who moved prior to developing/completing the transition plans, providers' inability to contact families after repeated attempts, and two families whose children passed away.

Vermont issued **no findings of noncompliance in FFY 2012** in Indicator 8A.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2012:

Vermont Part C demonstrated 98% compliance for Indicator 8A in FFY 2012, a decrease from the 99% compliance demonstrated in FFY 2011. 17 children did not have completed written transition plans due to providers' failing to develop and include in the IFSP/One Plan. State CIS-EI staff did verify in follow-up emails/calls with regional CIS-EIP staff that transition planning did occur prior to the children's exits from the CIS-EI programs.

All improvement activities for FFY 2012 reported under Indicator 1 in this APR apply to Indicators 8A, 8B and 8C, including extensive and targeted technical assistance to CIS-EIP 1 that was issued FFY 2011 findings of noncompliance in Indicators 8A, 8B and 8C. CIS-EIP 1 implemented and reported progress on its Corrective Action Plan (CAP) developed to address its FFY 2011 finding of noncompliance (using the *'Local Contributing Factor Tool for SPP/APR Compliance Indicators...'*). Some of the activities/strategies that CIS-EIP 1 implemented as part of its CAP to address all three transition indicators included creating a formal CIS-EI orientation packet for newer staff that included a list of transition resources and a checklist and other forms to document transition timelines, activities and reasons for delays across 8A, 8B and 8C; adding a staff meeting each month to provide more support for staff and discuss caseloads/workloads and current 'best practice;' and creating an internal excel spreadsheet to review timelines in regular staff meetings.

Correction of FFY 2011 Finding of Noncompliance

Level of compliance State reported for FFY 2011 for this indicator: **99%**

As reported in the FFY 2011 APR and in the Overview on page 4 of this FFY 2012 APR, the one FFY 2011 finding of noncompliance in Indicator 8A was identified during a desk audit of the entire FFY 2010 Part C State Database and issued in FFY 2011.

1. Number of findings of noncompliance the State made during FFY 2011 (the period from July 1, 2011 through June 30, 2012)	1
2. Number of FFY 2011 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	1
3. Number of FFY 2011 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Verification of Timely Correction of FFY 2011 Finding

The one FFY 2011 finding of noncompliance issued in regional CIS-EIP 1 was **timely corrected**. 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 FFY 2011 State Database (July 2011 to December 2011), CIS-EIP 1 achieved 100% compliance for at least 60 consecutive days, indicating that the program is correctly implementing the timely service provision

requirements in 34 CFR §303.209(d) and 303.344(h); and 2) Part C state staff verified in conference calls with CIS-EIP 1 staff that, although there were no written transition plans, transition planning did occur for the 3 children prior to the children exiting the CIS-EI program.

Verification of Correction of FFY 2011 Noncompliance Reported in the 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 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 the FFY 2011 reporting year.

Verification of Correction of FFY 2012 Noncompliance Reported in this 2012 APR

Five regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2012 to June 30, 2013) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 1 was at 97.3% compliance (36/37), CIS-EIP 4 at 99% compliance (151/152), CIS-EIP 5 at 96% compliance (71/74), CIS-EIP 6 at 88% compliance (61/69), and CIS-EIP 8 at 84% compliance (21/25).

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 2013 Part C State Database (July 2013 to December 2013), CIS-EIPs 1, 4, 5, 6 and 8 achieved 100% compliance for at least 60 consecutive days, indicating that these programs are correctly implementing the transition requirements in 34 CFR §303.209(d) and 303.344(h); and 2) Part C state staff verified in conference calls/emails with staff in the five CIS-EIPs that, although there were no written transition plans, transition planning did occur for the 17 children prior to the children exiting the CIS-EI Program.

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

Resources for FFY 2013: The timeline for revision to VT Part C policies and procedures was revised from June 2013 to June 2014 to ensure congruence with the new State of Vermont Special Education Rules adopted June 1, 2013. This revision is in the February 3, 2014 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 2012

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: The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has notified (consistent with any opt-out policy adopted by the State) the SEA and the LEA where the toddler resides at least 90 days prior to the toddler’s third birthday for potentially eligible Part B preschool services. (Transition Notification)

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

Measurement:

Percent = [(# of toddlers with disabilities exiting part C where notification (consistent with any opt-out policy adopted by the State) to the SEA and the LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services) divided by the (# of toddlers with disabilities who were potentially eligible for Part B)] times 100.

Account for untimely transition planning, including the reasons for delays.

FFY	Measurable and Rigorous Target
FFY 2012 (7/1/12-6/30/13)	100%

Actual Target Data for FFY 2012:

99%

Data Method/Source: Desk audit of entire FFY 2012 Part C State Database, July 1, 2012 to June 30, 2013.

Children Exiting Part C Who Received Timely Transition Planning (Notification to LEA and SEA):

e. Number of children exiting Part C and potentially eligible for Part B where the notification to the LEA and SEA occurred	581
f. Number of children exiting Part C who were potentially eligible for Part B	589
The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has notified (consistent with any opt-out policy adopted by the State) the SEA and the LEA where the toddler resides at least 90 days prior to the toddler’s third birthday for potentially eligible Part B preschool services. (Transition Notification) (Percent = [(a) divided by (b)] times 100)	99%

During FFY 2012, children exiting Vermont Part C who received special instruction, developmental therapy services or speech services through an IFSP/One Plan were (automatically) eligible for Part B, Essential Early Education (EEE-VT’s Early Childhood Special Education) without the need for additional evaluation. Children who did not receive special instruction, developmental therapy or speech services through an IFSP/One Plan, potentially were eligible for EEE services if the Evaluation and Planning Team determined that the child had a medical condition which may result in significant delays by the time of the child’s sixth birthday. Vermont rules in effect prior to July 1, 2013 stated that Part C’s timely notification to Part B was at least six months prior to the child’s third birthday.

The local education agencies (LEAs) and state education agency (SEA) received timely notification from Part C CIS-EI for 533 of 589 children potentially eligible for Part B. 48 of the 589 children potentially eligible for Part B were referred to Part C 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 these 48 children. These 48 children are included in the numerator and denominator.

Vermont issued **one finding of noncompliance in FFY 2012** in Indicator 8B in CIS-EI 6.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2012:

Vermont Part C demonstrated 99% compliance for Indicator 8B in FFY 2012, the same level of compliance demonstrated in FFY 2011. Notification to the LEA and SEA for 8 children potentially eligible for Part B was not timely in six regional CIS-EIPs due to regional CIS-EIP staff neglecting to send notification in a timely way (7 children) and staff allowing one family to decline notification to the LEA and SEA, even though Vermont Part C does not have an opt-out policy. Upon finding this out, State CIS-EI staff immediately contacted the regional early intervention program to clarify this apparent lack of understanding. State CIS-EI staff were able to verify immediately through a desk audit of the 2012 Child Count forms and in follow up communication with staff in five programs that notification, although late, did occur for 7 of the 8 children. The child in the program whose family declined notification was no longer within the jurisdiction of the regional CIS-EIP.

Please see Indicator 1 for discussion of improvement activities and Indicator 8A for the specific improvement activities that CIS-EIP 1 implemented to address its FFY 2011 finding in Indicators 8A, 8B and 8C.

Correction of FFY 2011 Finding of Noncompliance

Level of compliance State reported for FFY 2011 for this indicator: **99%**

As reported in the FFY 2011 APR and in the Overview on page 4 of this FFY 2012 APR, the one FFY 2011 finding of noncompliance in Indicator 8B was identified during a desk audit of the entire FFY 2010 Part C State Database and issued in FFY 2011.

4. Number of findings of noncompliance the State made during FFY 2011 (the period from July 1, 2011 through June 30, 2012)	1
5. Number of FFY 2011 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	1
6. Number of FFY 2011 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Verification of Timely Correction of FFY 2011 Finding of Noncompliance

The one FFY 2011 finding of noncompliance issued in regional CIS-EIP 1 was **timely corrected**. 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 second and third quarters of the FFY 2011 Part C State Database (October 2011 to March 2012), CIS-EIP 1 achieved 100% compliance, indicating that the program is correctly implementing the timely service provision requirements in 34 CFR §303.209(b); and 2) Part C state staff verified in a desk audit and in conference calls with CIS-EIP 1 staff that, although notification was late, it did occur for the 3 children in this program.

CIS-EIP 1 also achieved 100% compliance in Indicator 8B for this FFY 2012 reporting period.

Verification of Correction of FFY 2011 Noncompliance Reported in the 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).

Along with the five regional CIS-EIPs above that demonstrated noncompliance in Indicator 8B and as discussed in the Overview on page 4, a desk audit of the entire FFY 2011 Part C State Database also resulted in CIS-EI state staff identifying one finding in Indicator 8B in regional CIS-EIP 6 and issuing the finding in FFY 2012.

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 FFY 2012 State Database (July 2012 to December 2012), CIS-EIPs 5, 7, 9, 10 and 11 achieved 100% compliance for at least 60 consecutive days, indicating that these four programs are correctly implementing the transition requirements in 34 CFR §303.209(b); and 2) Part C staff reviewed the 2011 Child Count forms for the 5 children for whom notification was not timely and were immediately able to verify that, although late, the notification to the LEA did occur.

The noncompliance in FFY 2011 that was corrected prior to issuing written findings and the FFY 2012 finding of noncompliance issued in regional CIS-EIP 6 based on FFY 2011 data had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 8B during the FFY 2011 reporting year.

Verification of Correction of FFY 2012 Noncompliance Reported in this 2012 APR

Six regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2012 to June 30, 2013) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 3 was at 97% compliance (35/36), CIS-EIP 4 at 99% compliance (120/121), CIS-EIP 5 at 98% compliance (59/62), CIS-EIP 9 at 93% compliance (42/45), CIS-EIP 10 at 98% compliance (55/56) and CIS-EIP 12 at 98% compliance (43/44).

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 2013 Part C State Database (July 2013 to December 2013), CIS-EIPs 3, 4, 5, 9, 10 and 12 achieved 100% compliance for at least 60 consecutive days, indicating that these programs are correctly implementing the transition requirements in 34 CFR §303.209(b); and 2) Part C staff reviewed the 2012 Child Count forms for the 8 children for whom notification was not timely and were immediately able to verify that, although late, the notification to the LEA did occur. Notification to the SEA also occurred immediately for these 8 children.

This noncompliance in FFY 2012 that was corrected prior to issuing written findings had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 8B during the FFY 2012 reporting year.

This FFY 2012 APR also is reporting that the FFY 2012 finding of noncompliance in Indicator 8B in CIS-EIP 6 was **timely corrected**. 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-EIP 10 achieved 100% compliance for at least 60 consecutive days, indicating that this program is correctly implementing the timely service provision requirements in 34 CFR §303.209(b); and 2) Part C staff reviewed the FFY 2011 Child Count forms for the 3 children for whom notification was not timely and were immediately able to verify that, although late, the notification to the LEA did occur.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2013: The timeline for revision to VT Part C policies and procedures was revised from June 2013 to June 2014 to ensure congruence with the new State of Vermont Special Education Rules adopted June 1, 2013. This revision is in the February 3, 2014 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 2012

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: The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the lead agency has conducted the transition conference held with the approval of the family 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 preschool services

(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 planning, including the reasons for delays.

FFY	Measurable and Rigorous Target
FFY 2012 (7/1/12-6/30/13)	100%

Target Data for FFY 2012:

99%

Data Method/Source: Desk audit of entire FFY 2012 Part C State Database, July 1, 2012 to June 30, 2013.

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

Number of children exiting Part C and potentially eligible for Part B where the transition conference occurred	525
Number of children exiting Part C who were potentially eligible for Part B	*531
The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the lead agency has conducted the transition conference held with the approval of the family 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 preschool services(Transition Conference) (Percent = [(a) divided by (b)] times 100)	99%

*Although there were 542 children exiting Part C and potentially eligible for Part B, 11 families did not provide the requisite approval for holding the transition conference in six regional EIPs. Therefore, these 11 children are not included in either the numerator or denominator in calculating compliance for 8C. The transition conference was timely for 346 of the 531 children potentially eligible for Part B services and whose families provided the requisite approval. There were 124 children for whom the transition conference did not occur in a timely way due to exceptional family circumstances. These 124 children are included in the numerator and the denominator. Exceptional family circumstances included cancellations and requests to reschedule the transition conference, families who moved, custody issues, families who were homeless, illness, weather, family vacations, and a death of a family member.

State CIS-EI staff confirmed that these transition conferences, although late, did occur. 55 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.

Vermont issued **no findings of noncompliance in FFY 2012** in Indicator 8C.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2012:

Vermont Part C demonstrated 99% compliance for Indicator 8C in FFY 2012, the same level of compliance achieved in FFY 2011. Timely transition conferences did not occur for 6 children in two regional CIS-EIPs due to staff error in calculating the due date for the conference and scheduling conflicts for LEA personnel. State Part C staff verified that transition conferences ultimately did occur for these 6 children prior to their transition to Part B services.

Please see Indicator 1 for discussion of improvement activities and Indicator 8A for the specific improvement activities that CIS-EIP 1 implemented to address its FFY 2011 finding in Indicators 8A, 8B and 8C.

Correction of FFY 2011 Finding of Noncompliance

Level of compliance State reported for FFY 2011 for this indicator: **99%**

As reported in the FFY 2011 APR and in the Overview on page 4 of this FFY 2012 APR, the one FFY 2011 finding of noncompliance in Indicator 8C was identified during a desk audit of the entire FFY 2010 Part C State Database and issued in FFY 2011.

1. Number of findings of noncompliance the State made during FFY 2011 (the period from July 1, 2011 through June 30, 2012)	1
2. Number of FFY 2011 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	1
3. Number of FFY 2011 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Verification of Timely Correction of FFY 2011 Finding

The one FFY 2011 finding of noncompliance issued in regional CIS-EIP 1 was **timely corrected**. 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 second and third quarters of the FFY 2011 Part C State Database (October 2011 to March 2012), CIS-EIP 1 achieved 100% compliance, indicating that the program is correctly implementing the timely service provision requirements in 34 CFR §303.209(c); and

2) Part C state staff verified in a desk audit and in conference calls with CIS-EIP 1 staff that, although the transition conferences were late, they ultimately did occur for the 2 children in this program.

Verification of Correction of FFY 2011 Noncompliance Reported in the FFY 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 34 CFR §303.209(c); and 2) Part C state staff, in a desk audit of the FFY 2011 Child Count forms and in following up with staff in the three regional CIS-EIPs, verified immediately that, although late, the transition conferences ultimately 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 the FFY 2011 reporting year.

Verification of Correction of FFY 2012 Noncompliance Reported in this FFY 2012 APR

One of two regional CIS EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2012 to June 30, 2013) corrected the noncompliance prior to being issued written findings of noncompliance as of submission of this FFY 2012 APR. CIS-EIP 4 was at 96% compliance (102/106).

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 2013 State Database (July 2013 to December 2013), CIS-EIP 4 achieved 100% compliance for 60 consecutive days, indicating that this program is correctly implementing the transition requirements in 34 CFR §303.209(c); and 2) Part C state staff, in a desk audit of the FFY 2012 Child Count forms and in following up with staff in regional CIS-EIP 4, verified immediately that, although late, the transition conferences ultimately occurred for the 4 children.

Regional CIS-EIP 9 was at 95% compliance (39/41). As of submission of this FFY 2012 APR, CIS-EIP 9 has not corrected the noncompliance. Part C staff reviewed the 2012 Child Count forms submitted by CIS-EIP 9 for the 2 children for whom the transition conferences were not conducted in a timely manner and were immediately able to verify that, although late, the transition conferences ultimately occurred for these 2 children. The CIS-EI Data Manager will continue to conduct regular desk audits, i.e., at least monthly, of updated data from the third and fourth quarters of the FFY 2013 Part C State Database (January 2014 to June 2014) and work closely with regional CIS-EIPs 9 to ensure accuracy on their monthly data submissions. The VT Part C Coordinator and staff also are identifying additional methods to verify correction of CIS-EIP 9's FFY 2012 noncompliance, e.g., self-assessment, onsite file review.

The noncompliance in CIS-EIP 4 that was corrected prior to issuing a written finding and the noncompliance in CIS-EIP 9 that is not yet verified as corrected had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 8C during the FFY 2012 reporting year.

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

Resources for FFY 2013: The timeline for revision to VT Part C policies and procedures was revised from June 2013 to June 2014 to ensure congruence with the new State of Vermont Special Education Rules adopted June 1, 2013. This revision is in the February 3, 2014 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 2012

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.

States are required to use the “Indicator C9 Worksheet” to report data for this indicator (see Attachment 1).

FFY	Measurable and Rigorous Target
FFY 2012 (7/1/12-6/30/13)	100%

Actual Target Data for FFY 2012:

100%

See Attachment 1: Indicator C 9 Worksheet – 8 Timely Corrections of 8 FFY 2011 Findings

Describe the process for selecting EIS programs for Monitoring: As reported in the FFY 2011 APR and noted in the Overview on page 4 of this FFY 2012 APR, Vermont Part C’s FFY 2011 8 findings of noncompliance were identified during a desk audit of the entire FFY 2010 Part C State Database, July 1, 2010 to June 30, 2011, and issued in FFY 2011. During FFY 2010, Vermont Part C monitored all 12 CIS-Early Intervention programs by: 1) conducting a comprehensive desk audit of the entire Part C State Database July 1, 2010 to June 30, 2011 and 2) analyzing data from the 12 CIS-EIPs from the ECO Family Outcomes Survey conducted spring 2011.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2012: Pursuant to OSEP Memorandum 14-3 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 because the state is reporting 100% compliance for FFY 2012 for Indicator 9.

Timely Correction of FFY 2011 Findings of Noncompliance

1. Number of findings of noncompliance the State identified in FFY 2011 (the period from July 1, 2011, through June 30, 2012) (Sum of Column a on the Indicator C9 Worksheet)	8
2. Number of findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS programs of the finding) (Sum of Column b on the Indicator C9 Worksheet)	8
3. Number of findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Verification of Timely Correction of FFY 2011 Findings of Noncompliance

Indicator 1

The two FFY 2011 findings of noncompliance issued in regional CIS-EIPs 5 and 9 were **timely corrected**. 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 FFY 2011 State Database (July 2012 to December 2011), CIS-EIPs 5 and 9 achieved 100% compliance for at least 60 consecutive days, indicating that the programs are correctly implementing the timely service provision requirements in 34 CFR §303.342(e), and 303.344(f)(1); and 2) Part C state staff verified immediately upon review of the 2010 Child Count forms (the data source for identifying the findings) that, although late, all services were initiated for the 8 children for whom services were not initiated in a timely manner in the two programs.

Indicator 7

The three FFY 2011 findings of noncompliance issued in regional CIS-EIPs 4, 9 and 12 were **timely corrected**. 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 FFY 2011 State Database (July 2011 to December 2011), CIS-EIPs 4, 5 and 9 achieved 100% compliance for at least 60 consecutive days, indicating that the three programs are correctly implementing the timely service provision requirements in 34 CFR §303.310(a) and §303.344(f)(1); and 2) Part C staff reviewed the 2010 Child Count forms submitted by the CIS-EIPs for the 21 children for whom services were not conducted in a timely manner and were immediately able to verify that, although late, the evaluations and assessments and initial IFSP/One Plan meetings ultimately were conducted for these 21 children.

Updated data from onsite file reviews that State CIS-EI staff conducted in CIS-EIPs 4 and 12 in May 2012 provided additional verification of timely correction of the FFY 2011 findings. Both CIS-EIPs achieved 100% compliance for Indicator 7, further indicating that the programs are correctly implementing the timely service provision requirements in 34 CFR §303.310(a) and §303.344(f)(1).

Indicator 8A

The one FFY 2011 finding of noncompliance issued in regional CIS-EIP 1 was **timely corrected**. 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 FFY 2011 State Database (July 2011 to December 2011), CIS-EIP 1 achieved 100% compliance for at least 60 consecutive days, indicating that the program is correctly implementing the timely service provision requirements in 34 CFR §303.209(d) and §303.344(h); and 2) Part C state staff verified in conference calls with CIS-EIP 1 staff that, although there were no written transition plans, transition planning did occur for the 3 children prior to the children exiting the CIS-EI program.

Indicator 8B

The one FFY 2011 finding of noncompliance issued in regional CIS-EIP 1 was **timely corrected**. 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 second and third quarters of the FFY 2011 Part C State Database (October 2011 to March 2012), CIS-EIP 1 achieved 100% compliance, indicating that the program is correctly implementing the timely service provision requirements in 34 CFR §303.209(b); and 2) Part C state staff verified in a desk audit and in conference calls with CIS-EIP 1 staff that, although notification was late, it did occur for the 3 children in this program.

CIS-EIP 1 achieved 100% compliance in Indicator 8B for the FFY 2012 reporting period.

Indicator 8C

The one FFY 2011 finding of noncompliance issued in regional CIS-EIP 1 was **timely corrected**. 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 second and third quarters of the FFY 2011 Part C State Database (October 2011 to March 2012), CIS-EIP 1 achieved 100% compliance, indicating that the program is correctly implementing the timely service provision requirements in 34 CFR §303.209(c); and 2) Part C state staff verified in a desk audit and in conference calls with CIS-EIP 1 staff that, although the transition conferences were late, they ultimately did occur for the 2 children in this program.

Specific Actions to Verify Correction of FFY 2011 Findings of Noncompliance

VT Part C CIS-EI required the six regional CIS-EI programs (1 finding in each of five programs and 3 findings in one program) to develop Corrective Action Plans (CAPs) within 30 days of receiving written notification of their findings of noncompliance. State Part C staff reviewed the CAPs, required revisions if necessary, and conducted a status review of the CAPs with program staff six months into implementation. As noted in the discussion in Indicator 1, State CIS-EI staff required the regional CIS-EIPs with findings to review and use the resource *'Local Contributing Factor Tool for SPP/APR Compliance Indicators: Collecting and Using Valid and Reliable Data to Determine Underlying Factors Impacting Local Performance and Develop Meaningful Corrective Action Plans'* to develop their CAPs. State CIS-EIP staff provided increased onsite technical assistance to all six programs, and intensified this TA in CIS-EIPs 4 and 9 due to the significant staff and administrative turnover in these two regions. As part of the verification process, the six regional CIS-EIPs conducted required self-assessments of a percentage of their files, and State CIS-EIP staff conducted onsite file reviews in all six regions and provided further technical assistance to program staff based on results of the onsite file reviews.

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

Resources for FFY 2013: The timeline for revision to VT Part C policies and procedures and development of the General Supervision Manual was revised from June 2013 to June 2014 to ensure congruence with the new State of Vermont Special Education Rules adopted June 1, 2013. This revision is in the February 1, 2014 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 2012

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
FFY 2012 (7/1/12-6/13/13)	Coordinate with and support Part B Targets

Actual Target Data for FFY 2012: 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 2013 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 2012:

The Interagency Agreement with Vermont Agency of Human Services and Vermont Agency of Education, revised and finalized in FFY 2011, was implemented in FFY 2012. 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 2013: None

Part C State Annual Performance Report (APR) for FFY 2012

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
FFY 2012 (7/1/12-6/13/13)	Assist Part B in promoting mediation and in reaching Part B Targets

Actual Target Data for FFY 2012: 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 2013 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 2012:

The Interagency Agreement with Vermont Agency of Human Services and Vermont Agency of Education, revised and finalized in FFY 2011, was implemented in FFY 2012. 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 2013: None

Part C State Annual Performance Report (APR) for FFY 2012

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.

As stated in the Indicator Measurement Table, States may, but are not required, to report data for this indicator. OSEP will use the Indicator 14 Rubric to calculate the State’s data for this indicator. States will have an opportunity to review and respond to OSEP’s calculation of the State’s data.

FFY	Measurable and Rigorous Target
FFY 2012 (7/1/12-6/30/13)	100%

Actual Target Data for FFY 2012: Pursuant to OSEP Memorandum 14-3 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 2012 APR submission on February 3, 2014. 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 2012:

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 and November due dates and accurate. The State Performance Plan-Revised 2-13 and FFY 2011 APR were submitted prior to the February 2013 due date and were accurate.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2013: None