

VT Part C

FFY2013 State Performance Plan / Annual Performance Report

Introduction to the State Performance Plan (SPP)/Annual Performance Report (APR)

General Supervision System:

The systems that are in place to ensure that IDEA Part C requirements are met, e.g., monitoring systems, dispute resolution systems.

General Supervision:

Vermont's Part C Early Intervention services are part of Vermont's statewide Children's Integrated Services (CIS). CIS is a program administered by the Agency Of Human Services, Department for Children and Families, Child Development Division. The Agency of Education is Vermont's co-lead for Part C services. This relationship is governed by an Interagency Agreement, revised June, 2014, and subsequently approved by OSEP.

CIS is a statewide health promotion, prevention and early intervention system of services intended to:

- Promote a child's healthy growth and development
- Support parents/guardians and child care providers to prevent health or developmental challenges arising from social and environmental factors
- Support families with a child birth to three with a developmental delay or medical condition that may result in a developmental delay

Vermont's Part C Early Intervention services are known as CIS-EI services. The State of Vermont Child Development Division contracts with 12 regional non-profit entities (often Parent-Child Centers) to deliver CIS-EI services. Vermont CIS-EI serves approximately 1,600 children annually.

More broadly, Vermont's CIS-EI services are delivered in the context of CIS. CIS Services are provided to:

1. Pregnant/Postpartum women who desire support to stay healthy, and/or have questions about a condition or risk situation that affects their well-being.
2. Children whose parent or caregiver has questions or concerns about a suspected developmental delay or condition.
3. Families who have questions or concerns about their children's behavior, health, mental health, wellbeing, or providing a stable, healthy environment for their family.
4. Early Childhood/Child Care providers who enroll children with specialized health or developmental needs.

CIS provides a systematic referral and intake process that leads to a multidisciplinary and consultative team review, linking with other community resources as needed; comprehensive screening and assessment; identification of a primary service coordinator working with a family to develop functional outcomes; and regular reviews to assess progress and achievement of goals to promote better outcomes for Vermonters. CIS supports families transitioning from CIS services (such as when all goals are successfully met, to on-going services for women beyond two months postpartum, at age 3 for Part C Early Intervention, and beyond age six for other services).

CIS services are provided by community-based organizations with qualified and supervised professionals. CIS-EI is developing an early intervention credential. CIS home visiting services are moving to evidence-based models to be delivered in accordance with standards adopted by Vermont's Home Visiting Alliance in response to Act 66: *An Act Relating to Home Visiting Standards*. CIS services, including CIS-EI, are available year-round. Service delivery occurs in the natural environments of the families or children to the maximum extent possible – the home or a community-based program or setting – to support families' routines and children's inclusion with typically developing peers.

The purpose of Children's Integrated Services is to:

1. increase child and family access to high quality child development services;
2. promote the health, social and economic well-being of the recipients of these services;
3. provide performance-based contracts for the provision of services to pregnant/postpartum women, children from birth to age six and their families;
4. increase access to health insurance and a medical and dental home;
5. strengthen implementation of CIS with a particular emphasis on: infrastructure; outreach; referral and intake; multidisciplinary screening and assessment; integrated services planning; service delivery; and transition; and
6. support a more comprehensive approach to service delivery including: supporting timely delivery of direct services, consultation, group education, team and supervision time, documentation, other record keeping requirements, and data collection and reporting.

Fiscal Management:

CIS-EI adheres to Fiscal Certification 34 CFR §303.202 requirements. This includes ensuring that Part C funds are not used to satisfy a financial commitment for services that would otherwise have been paid for from another private or public source consistent with 34 CFR §303.510; and ensuring written parental consent to bill private insurance or Medicaid is obtained and kept in the child's file. Regional CIS-EI host agencies are required to submit both budget and actual expenditures annually to ensure maintenance of effort for early intervention funding as required by 34 CFR §300.225(b).

Supervision and Monitoring:

CIS conducts contract monitoring on three regions annually, resulting in each region being monitored at least once every four years. This monitoring includes file reviews for adherence to contractual requirements, including timeliness of service delivery that meets Part C regulations. Regions are then provided with a summary of the contract monitoring visit including three identified areas of strength and up to three areas in need of improvement, which results in the submission of a Quality Improvement Plan. This monitoring assures all CIS services are delivered in accordance with the CIS contract. Further, this assures that CIS-EI services are maintained and delivered in accordance with Federal IDEA Law, Part C Regulations and Vermont Special Education Rule within the CIS array.

CIS Part C is further supervised and specifically monitored as follows:

1. Each CIS-EI host agency is required by contract to keep on file at the Early Intervention site for reference and guidance, copies of the current federal and state laws, regulations, rules and state policies and procedures related to Part C Early Intervention and Part B Special Education for Preschool Children.
2. Vermont Part C (CIS-EI), in collaboration with Vermont Part B, continues to review its current rules, policies and procedures to ensure compliance with the Part C federal regulations and the State of Vermont Special Education Rules and provide any necessary training and/or technical assistance to regional CIS-EI Programs. The Part C and Part B Program Administrators meet monthly.
3. The State CIS-EI program reviews and keeps on file, on-site at the regional CIS-EI program, and posts for the public (http://dcf.vermont.gov/cdd/reports/IDEA_Part_C) the Vermont Part C Early Intervention State Performance Plan and Annual Performance Report. Additionally, any Monitoring Reports, Letters of findings of noncompliance and Corrective Action Plans, Determination letters, Quality Improvement Plans and Regional Interagency Agreements are maintained by the State CIS-EI program. Copies of all monitoring records and corrective action plans are made available to the CIS administrative team and key partners who are participating in carrying out the Part C Early Intervention services. The CIS administrative team and key partners will:
 - o Seek input on the status of the region's outcomes by reviewing the publically reported data and other data used to develop regional goals and maintain, improve and/or correct performance and/or compliance,
 - o Include goals that reference corrective action plans and activities so that non-compliance is corrected within one year of identification.
4. The State CIS-EI program provides the Vermont Interagency Coordinating Council (VICC) with copies of the State Performance Plan and Annual Performance Report for their review prior to submission. The State CIS-EI program reviews these data with the VICC annually for their input, as they function in an "advise and assist" role.
5. Vermont Part C has a manual data management system. All data are submitted manually by regions and manually entered by State CIS-EI Staff. The State CIS-EI data management system and process enables Vermont to review and verify each data element for the APR and 618 (including Child Count) at the time of entry. If errors (such as missing data, discrepancies or unexplained anomalies) are noted, regions are promptly provided technical assistance to correct their data or their interpretation of Federal regulation and/or State rule to ensure compliance in the delivery of Part C services.
6. The State CIS-EI data management staff performs desk audits of regional host agencies quarterly to identify any potential noncompliance, any data anomalies, and data trends requiring targeted Technical Assistance. The Data Manager also reviews the data during a designated period of time to identify findings of non-compliance requiring Corrective Action Plans.
7. Regional CIS-EI host agencies with findings of non-compliance must submit a self-assessment to the State CIS-EI office and, subsequently, host on-site monitoring by State CIS-EI staff to verify correction of non-compliance to 100% within one year of the date of written notification of the finding of non-compliance.
8. Annually, child and family outcomes are reviewed as part of the State's determination process. Quality Improvement Plans with technical assistance provided by the State CIS-EI staff are required for CIS-EI host agencies having 'Required Actions' as a result of the determination process.

Procedural Safeguards, Complaints and Dispute Resolution

VT Part C has an agreement with the VT Agency of Education (AOE) to use the Part B Special Education Dispute Resolution process. The AOE has the capacity and skills to conduct the Part C dispute resolution process that the Part C host agency does

not. This process is posted on the web http://education.vermont.gov/documents/EDU-Procedural_Safeguards_Notice_English.pdf. A database managed by a representative of the AOE is used to track signed, written complaints, including complaints with reports issued, complaints withdrawn or dismissed and complaints pending and the timelines within each action was completed. The AOE database also includes tracking data for due process hearings and mediations.

The CIS Contracts include language requiring CIS-EI host agencies to assure and document that families are regularly informed of their rights under IDEA, Part C dispute resolution and that staff refer a family to the State office immediately if a complaint is not resolved by the Early Intervention supervisor/director to the family's satisfaction. CIS-EI host agency staff inform families of their rights to file a formal complaint and/or request mediation or a due process hearing during the intake process, and at least at the initial IFSP/One Plan meeting, during annual reviews and at transition. Written materials are given to families at these times and additionally upon request.

Finally, families are informed by CIS-EI host agency staff about and have access to a Procedural Safeguards online training module housed at Vermont Family Network, Vermont's Parent Training Information Center. Based on results of the annual Family Outcomes Survey, State CIS-EI staff have identified and prioritized Parental Rights as a focus area and provide ongoing technical assistance to the regional CIS-EI programs.

Technical Assistance System:

The mechanisms that the State has in place to ensure the timely delivery of high quality, evidenced based technical assistance and support to early intervention service (EIS) programs.

Technical Assistance is provided to the regional CIS-EI host agency staff as follows:

1. The State CIS-EI hosts a monthly call with the regional CIS-EI host agencies. This call is used to disseminate information, gather regional feedback or input, and provide technical assistance related to interpretation of Federal regulations and/or State Rules to ensure the provision of timely, high-quality Part C services in accordance with IDEA.
2. The State CIS-EI staff provides on-going technical assistance on site to CIS-EI host agencies experiencing staff or supervisor changes, determinations of non-compliance, or in response to questions asked by regional Part C staff. Technical assistance includes the use of materials from ECTAC.
3. The State CIS-EI staff provides technical assistance to regions based on results of Family Outcomes and Child Outcomes, that includes the following steps:
 - i. Inclusion of the regional EI team in a review of the results so that all providers and service coordinators are aware of their status regarding child/family outcomes and can participate in plan development
 - ii. Analysis of the data and Identification of contributing factors with the regional EI team, using *Contributing Factors tool* and the *Relationship of Quality Practices to Child and Family Outcome Measurement*
 - iii. Determination of desired results and a plan to address identified contributing factors (including strategies, resources needed, timeline)
 - iv. Quarterly review and revision of plan
 - v. Provision of TA as identified in the plan

Professional Development System:

The mechanisms the State has in place to ensure that service providers are effectively providing services that improve results for infants and toddlers with disabilities and their families.

Current CIS-EI Activities

The State CIS contract includes the following language related to professional development:

"All CIS professionals demonstrate competence and adhere to current best practices by participating in ongoing, annual professional development and regular supervision. CIS supervisors will maintain a record of staff professional development for State review upon request. Staff can also elect to document their professional development through the Bright Futures Information System (BFIS). All professional development activities referenced in this contract count toward demonstration of competence..."

All Staff and subcontractors funded through CIS must:

- a. *regularly access the CDD CIS Website (<http://dcf.vermont.gov/cdd/cis>), CIS Blog (<http://cisvt.wordpress.com/author/childrensintegratedservices/>), and CIS Guidance Manual (<http://dcf.vermont.gov/cdd/cis/providers/guidance>) for guidance, forms, and current information;...*

All staff new to CIS shall successfully complete (with an 80% or better quiz score) on-line CIS training modules within

30 days of hire. These training modules are available on: <http://dcf.vermont.gov/cdd/cis/providers/trainings>. These include, but are not limited to:

- a. CIS Orientation (3 modules)
- b. One Plan [IFSP] Orientation (5 modules)
- c. Early Intervention Orientation (8 modules) – Required for EI providers only; recommended for all other CIS service providers.
- d. Other modules as they become available...

In addition to professional development required by the service provider's specialty, license or certification; those outlined in the job descriptions in Appendix 1; and trainings required to meet Federal and State requirements, all CIS staff shall attend/complete at least 10 additional clock hours of professional development activities annually from the following;

- a. the annual CIS Conference (attendance may be limited by the State);
- b. scheduled CIS Community of Practice Calls, which will be identified in advance as professional development by the state, and for which participants must complete an electronic evaluation at the conclusion of each call;
- c. relevant on-line CIS training modules;
- d. other professional development required by CIS State Staff based on contract monitoring activities;
- e. other State-sponsored trainings, both core and discipline-specific....”

Additionally, CIS-EI host agencies are required to submit resumes of staff to the State to assure the Office of special Education that all Early Intervention staff meet the Vermont Part C requirement of holding a Bachelor's degree in early childhood or a related field.

The State CIS-EI program provides direct training to regional CIS-EI staff and early childhood professionals as needed related to new initiatives such as the updated State of Vermont Special Education Rules adopted June 1, 2013, and Ages and Stages Questionnaire (ASQ) trainings to implement screening requirement for Part C. Additionally, the State CIS-EI program provides joint training and Memos to the Field with our Part B/619 partner to address Child Find, child and family outcomes, potentially eligible, and transitions. These trainings are provided regionally in person or via webinars.

The State CIS-EI program provides financial support for the annual conference hosted by the Vermont Family Network, Vermont's Parent Training Information Center; and, at times, financial support is provided to the regional CIS-EI host agency staff to attend relevant trainings provided by organizations such as the Division of Early Childhood and the Vermont Higher Education Collaboration.

State CIS-EI staff are members of professional development committees such as the Child Development Division Professional Preparation and Development Committee and the Division for Early Childhood. Through a contract with the Center on Disability and Community Inclusion, the VT I-Team Early Intervention Project provides interdisciplinary, collaborative training focused on supporting infants and toddlers with significant and complex needs and their families.

The Vermont early childhood system has the following additional resources for professional development:

- The Child Development Division's Bright Futures Child Care Information System is examined as an option for tracking CIS professional development in the future
- UVM's Early Childhood Special Education Personnel Preparation Program
- Higher Education Collaborative
- Early Multi-Tiered System of Supports, in collaboration with Part B/619
- VT LEND (Leadership Education in Neurodevelopmental and Related Disabilities) program. Provides long-term, graduate level interdisciplinary training and interdisciplinary services and care.

The State CIS program has contracted with an individual who coordinates and leads the CIS Professional Development Committee. This committee is composed of CIS-Nursing and CIS-EI State staff and representatives from regional CIS programs and CIS partners, including the Child Development Division's Statewide Systems and Community Collaboration unit, Northern Lights Career Development Center, and the VT Department of Health. This committee plans and coordinates the annual CIS Conference, the CIS on-line training modules, and is developing the CIS Competencies and CIS-EI Credential.

Planned CIS-EI Activities

The State CIS-EI program is in the process of developing a CIS-EI credential, based on review of EI credentialing in other states, which will be required of regional CIS-EI staff who wish to conduct evaluations for determining eligibility for Part C, and who provide developmental education to children and families.

Stakeholder Involvement:

The mechanism for soliciting broad stakeholder input on targets in the SPP, including revisions to targets.

The Vermont Interagency Coordinating Council (VICC) functions in an “advise and assist” role for all of Children’s Integrated Services (CIS). This further supports the integration of CIS services and the success of CIS in promoting and enhancing positive outcomes for children and their families prenatally through age six. The VICC meets at least quarterly in order to review and advise the State about: the SPP and APR targets, APR data submissions, new guidance or initiatives such as updated State Rules and the State Systemic Improvement Plan, outreach activities, and other CIS system or CIS-EI-specific issues.

The State CIS-EI team provides funding for a position employed by the Vermont Family Network, Vermont’s Parent Information Training Center. This position is primarily focused on recruitment and retention of members (especially parents) of the VICC and engagement with parents. This parent engagement will be coordinated with activities within the scope of Vermont’s Early Learning Challenge Grant as these activities seek to engage families around early childhood issues statewide.

Through monthly calls with the CIS-EI host agencies, as well as on-going technical assistance provided to regional Part C staff as described above, the State CIS-EI program regularly engages with service providers to determine issues and challenges they are facing in their provision of Part C services and to provide support to address these issues as needed. Further, as part of the SSIP process, the State CIS-EI program engages with the regional CIS-EI staff and is gathering their feedback and input into the State’s root cause and infrastructure analysis, as well as the strategies at the practice and systems level that the State should consider as part of our SSIP.

The CIS-EI State Team contributes articles to the Parent Information Center newsletter produced by the Vermont Family Network, Vermont’s Parent Training Information Center, in order to keep families informed of activities such as Indicator 11 and the development of Vermont’s SSIP. The newsletter further serves as a way of keeping families informed about training, resources, and ways they can become involved in providing input into Vermont’s Part C system, such as participating as a member of the Vermont Interagency Coordinating Council.

CIS-EI State Team members participate in many statewide initiatives and work groups representing the needs of infants and toddlers with disabilities and their families. These groups include: Early Childhood Multi-tiered System of Supports; Universal Screening; Child and Family Trauma Workgroup; Vt-FACTS (broad health and developmental screening for children involved with child protection); VT Early Learning Standards development and revisions; Early Challenge Grant projects.

Reporting to the Public:

How and where the State reported to the public on the FFY 2012 performance of each EIS Program or Provider located in the State on the targets in the SPP/APR as soon as practicable, but no later than 120 days following the State’s submission of its FFY 2012 APR, as required by 34 CFR §300.602(b)(1)(i)(A); and a description of where, on its Web site, a complete copy of the State’s SPP, including any revision if the State has revised the SPP that it submitted with its FFY 2012 APR in 2014, is available.

As reported above, the State CIS-EI publishes all reports on line as follows:

- February: Post complete copies of VT Part C’s State Performance Plan FFYs 2013-2018 and FFY 2013 Annual Performance Report to the Agency of Human Services/Child Development Division’s website http://dcf.vermont.gov/cdd/reports/IDEA_Part_C; forward website link to VT Agency of Education and Vermont Family Network for posting on their respective websites and in VFN’s statewide newsletter and to CIS blog and other relevant statewide early childhood listservs
- March: Report out on/discuss State Performance Plan 2013-2018 and statewide and regional EI program data from the FFY 2013 Annual Performance report at combined VT Interagency Coordinating Council and CIS-EI Regional Program Directors Meeting
- March/April: Publicly report VT Part C’s statewide and regional EI program data on Agency of Human Services/Child Development Division’s website: http://dcf.vermont.gov/cdd/reports/IDEA_C/public_reports
- April and November: Publicly report VT Part C 618/Child Count data on Agency of Human Services/Child Development Division’s website: http://dcf.vermont.gov/cdd/reports/IDEA_C/public_reports

OSEP Response

Required Actions

Indicator 1: Timely provision of services

Monitoring Priority: Early Intervention Services In Natural Environments

Compliance indicator: 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)

Historical Data

Baseline Data: 2005

FFY	2005	2006	2007	2008	2009	2010	2011	2012
Target		100%	100%	100%	100%	100%	100%	100%
Data	86.40%	92.34%	97.00%	98.00%	98.70%	97.70%	97.40%	97.00%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2013 - FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%	100%

FFY 2013 SPP/APR Data

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2013-14 Child Count/Educational Environment Data Groups	9/24/2014	Total number of infants and toddlers with IFSPs	802	795

Explanation of Alternate Data

802 data are from Child Count Database 12/1/2013, 12/2/2012 to 12/1/2013. These are point in time data on December 1st 2013.

795 are data from a desk audit of entire FFY 2013 Part C State Database, July 1, 2013 through June 30, 2014. This is the data source Vermont Part C uses for indicator 1.


FFY 2013 SPP/APR Data

Number of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	Total number of infants and toddlers with IFSPs	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
720	795	97.00%	100%	97.36%

Number of documented delays attributable to exceptional family circumstances (this number will be added to the Number of infants and toddlers with IFSPs who receive their early intervention services on their IFSPs in a timely manner)	54
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What is the source of the data provided for this indicator?

- State monitoring

 State database

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).

July 1, 2013 through June 30, 2014

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Data Method/Source: Desk audit of entire FFY 2013 Part C State Database, July 1, 2013 to June 30, 2014.

 Provide additional information about this indicator (optional)

Discussion of Data

Of the 795 children with new services on both initial and subsequent IFSPs/One Plans, all services were initiated for 720 children within 30 days of signed parental consent (Vermont Part C's criteria). Services for 54 children were not initiated in a timely manner due to exceptional family circumstances. These 54 children are included in the numerator as well as the denominator. Exceptional family circumstances included families cancelling or not being home when service providers arrived (majority of reasons), families' vacations, requests to delay services, family illnesses and surgeries, families who moved or were unreachable after multiple attempts by early intervention providers to contact them, and custody issues. The number of days these services were initiated beyond the 30-day timeline for these 54 children ranged from 1 to 75 (inability to contact family after multiple attempts). The average number of days beyond the 30-day timeline was 21.

There were 21 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 21 children. Delays in timely initiation of services for all 21 children were attributable to provider unavailability: speech-language pathologists (9 children), occupational and physical therapists (5 children), and early interventionist (7 children). The lack of a sufficient number of speech-language pathologists continues to present challenges related to timely service provision. The number of days services were initiated beyond the 30-day timeline for these 21 children ranged from 3 to 58 (unavailability of physical therapist). The average number of days beyond the 30-day timeline was 23.

Vermont issued **one finding of noncompliance in FFY 2013** in Indicator 1 in CIS-EIP 9.

Actions required in FFY 2012 response table

None

Responses to actions required in FFY 2012 response table, **not including correction of findings**

Because the State reported less than 100% compliance for FFY 2012, the State must report on the status of correction of noncompliance identified in FFY 2012 for this indicator. When reporting on the correction of noncompliance, the State must report, in its FFY 2013 APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2012 for this indicator: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider, consistent with OSEP Memo 09-02.4 In the FFY 2013 APR, the State must describe the specific actions that were taken to verify the correction.

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. CIS-EIP 3 was at 89% compliance (46/52), CIS-EIP 4 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),

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CIS-EIPs 3, 4, 6, 9 and 10 achieved 100% compliance for at least 40 consecutive days, indicating that these five programs were 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 five 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.

Correction of Findings of Noncompliance Identified in FFY 2012

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
1	1	null	0

FFY 2012 Findings of Noncompliance Verified as Corrected

Describe how the State verified that each LEA with noncompliance is correctly implementing the regulatory requirements

The one FFY 2012 finding of noncompliance in Indicator 1 in CIS-EIP 10 was timely corrected. This finding was based on a desk audit of FFY 2011 data and written notification of the finding was issued in FFY 2012. Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 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 was correctly implementing the timely service provision requirements in 34 CFR §303.342(e) and 303.344(f)(1).

Describe how the State verified that each LEA corrected each individual case of noncompliance

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 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.

OSEP Response

The State provided targets for FFYs 2013 through 2018 for this indicator, and OSEP accepts those targets.

Because the State reported less than 100% compliance for FFY 2013, the State must report on the status of correction of noncompliance identified in FFY 2013 for this indicator. When reporting on the correction of noncompliance, the State must report, in its FFY 2014 APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2013 for this indicator: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider, consistent with OSEP Memo 09-02. In the FFY 2014 APR, the State must describe the specific actions that were taken to verify the correction.

Required Actions

Indicator 2: Services in Natural Environments

Monitoring Priority: Early Intervention Services In Natural Environments

Results indicator: 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)

Historical Data

Baseline Data: 2005

FFY	2005	2006	2007	2008	2009	2010	2011	2012
Target ≥		94.00%	95.00%	95.00%	95.00%	96.10%	96.20%	96.20%
Data	98.00%	96.17%	97.00%	98.00%	98.00%	99.00%	99.70%	98.70%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2013 - FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target ≥	96.40%	96.60%	96.80%	97.00%	97.20%	97.30%

Targets: Description of Stakeholder Input

As discussed in the introduction, the Vermont Interagency Coordinating Council (VICC) meets at least quarterly in order to review and advise the State about: the SPP and APR targets, APR data submissions, new guidance or initiatives such as updated State Rules and the State Systemic Improvement Plan, outreach activities, and other CIS system or CIS-EI-specific issues.

At the November 14th 2014 VICC meeting, the Vermont actual and target indicator data from 2005 through 2013 was reviewed and new targets were proposed, accepted and included here.

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2013-14 Child Count/Educational Environment Data Groups	9/24/2014	Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	793	
SY 2013-14 Child Count/Educational Environment Data Groups	9/24/2014	Total number of infants and toddlers with IFSPs	802	

FFY 2013 SPP/APR Data

Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	Total number of infants and toddlers with IFSPs	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
793	802	98.70%	96.40%	98.88%

Actions required in FFY 2012 response table

None

Responses to actions required in FFY 2012 response table

OSEP Response

The State provided targets for FFYs 2013 through 2018 for this indicator, and OSEP accepts those targets.

Required Actions

Indicator 3: Early Childhood Outcomes

Monitoring Priority: Early Intervention Services In Natural Environments

Results indicator: 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)

Historical Data

	Baseline Year	FFY	2005	2006	2007	2008	2009	2010	2011	2012
A1	2009	Target ≥					71.40%	61.00%	61.20%	61.40%
		Data				71.20%	60.80%	61.50%	64.20%	67.10%
A2	2009	Target ≥					66.30%	59.60%	59.80%	60.00%
		Data				66.10%	59.40%	57.70%	60.70%	62.60%
B1	2009	Target ≥					79.20%	68.10%	68.30%	68.50%
		Data				79.00%	67.90%	71.70%	75.90%	74.40%
B2	2009	Target ≥					58.20%	53.60%	53.80%	54.00%
		Data				58.00%	53.40%	50.50%	53.80%	54.50%
C1	2009	Target ≥					77.60%	73.10%	73.30%	73.50%
		Data				77.40%	72.90%	71.20%	76.50%	74.40%
C2	2009	Target ≥					65.90%	60.80%	61.00%	61.20%
		Data				65.70%	60.60%	62.00%	62.30%	62.60%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2013 - FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target A1 ≥	61.60%	61.60%	61.60%	61.60%	61.60%	61.60%
Target A2 ≥	60.00%	60.00%	60.00%	60.00%	60.00%	60.00%
Target B1 ≥	68.70%	68.90%	69.10%	69.30%	69.50%	69.70%
Target B2 ≥	54.20%	54.20%	54.20%	54.20%	54.20%	54.20%
Target C1 ≥	73.50%	73.50%	73.50%	73.50%	73.50%	73.50%
Target C2 ≥	61.40%	61.40%	61.40%	61.40%	61.40%	61.40%

Targets: Description of Stakeholder Input

As discussed in the introduction, the Vermont Interagency Coordinating Council (VICC) meets at least quarterly in order to review and advise the State about: the SPP and APR targets, APR data submissions, new guidance or initiatives such as updated State Rules and the State Systemic Improvement Plan, outreach activities, and other CIS system or CIS-EI-specific issues.

At the November 14th 2014 VICC meeting, the Vermont actual and target indicator data from 2009 through 2013 was reviewed and new targets were proposed, accepted and included here.

FFY 2013 SPP/APR Data

Number of infants and toddlers with IFSPs assessed	494
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Does the State’s Part C eligibility criteria include infants and toddlers who are at risk of having substantial developmental delays (or “at-risk infants and toddlers”) under IDEA section 632(5)(B)(i)? No

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

	Number of Children
a. Infants and toddlers who did not improve functioning	0
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	106
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	84
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	128
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	176

	Numerator	Denominator	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
A1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program $(c+d)/(a+b+c+d)$.	212	318	67.10%	61.60%	66.67%
A2. The percent of infants and toddlers who were functioning within age expectations in Outcome A by the time they turned 3 years of age or exited the program $(d+e)/(a+b+c+d+e)$.	304	494	62.60%	60.00%	61.54%

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

	Number of Children
a. Infants and toddlers who did not improve functioning	0
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	118
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	109
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	188
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	79

	Numerator	Denominator	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
B1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program $(c+d)/(a+b+c+d)$.	297	415	74.40%	68.70%	71.57%
B2. The percent of infants and toddlers who were functioning within age expectations in Outcome B by the time they turned 3 years of age or exited the program $(d+e)/(a+b+c+d+e)$.	267	494	54.50%	54.20%	54.05%

Outcome C: Use of appropriate behaviors to meet their needs

	Number of Children
a. Infants and toddlers who did not improve functioning	0
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	103
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	94
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	204
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	93

	Numerator	Denominator	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
C1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program (c+d)/(a+b+c+d).	298	401	74.40%	73.50%	74.31%
C2. The percent of infants and toddlers who were functioning within age expectations in Outcome C by the time they turned 3 years of age or exited the program (d+e)/(a+b+c+d+e).	297	494	62.60%	61.40%	60.12%

Explanation of C2 Slippage

In FFY 2013, the results for Summary Statement 1 (SS1) show that all three Child Outcomes were above the state targets. Depending on the child outcome, between 66.7% and 74.3% 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 2013 for SS1 were slightly below last year’s results for Outcomes 3A and 3B and on par with 3C.

The results for Summary Statement 2 (SS2) are above FFY 2013 state targets for 3A, less than 1 percentage (0.15%) below target for 3B, and just below target for 3C (1.3%). For each child outcome, the results indicate that between 54% and 61.5% of infants and toddlers eligible for Part C services were functioning within age expectations at the time they exited from Early Intervention (EI) services. Results for FFY 2013 were slightly below last year’s results for each of the outcomes (i.e., between .5 and 2.5%).

This is the first year (since the baseline was revised in FFY 2009) that C2 has been below target and the first time in three years that any sub-indicator has been below the state target. A comparison of SS1 and SS2 results between FFY 2013 and FFY 2012 was conducted using ECO’s ‘Meaningful Differences Calculator’. This analysis indicated that there wasn’t a significant or meaningful difference in the variation between results for these two years. The *Vermont Child Outcome Data Quality Profile* (DASY, 2014) states that ‘small variations from year to year are to be expected’.

Changes in Part C rules may have negatively influenced results this year but it is believed these changes will have a positive impact on results and practice in the long run. One change that may account for below target results relates to who conducts the initial evaluation (upon which entry Child Outcome Summary (COS) ratings are based). With Part C rule changes last year, the responsibility for conducting eligibility evaluations was clarified and became the sole responsibility of CIS: EI practitioners. This rule change resulted in a transfer of responsibility for conducting eligibility evaluations from school districts in four of our largest regions, two of whom were below target in this sub-indicator. Another change relates to the State’s requirements for determining ‘potential eligibility’. Regions are now required to determine ‘potential eligibility’ based on the results of a state approved assessment tool between 6 months and 90 days before the child’s transition (which might impact exit COS ratings). With continued support and TA, both rule modifications should ensure consistency across regions and more reliable COS ratings because these evaluations are now being completed by CIS: EI personnel only.

An additional ‘contributing factor’ is the turnover of EI personnel across the state in the last couple of years, including four regions that have had a change in leadership. Clearly, staff turnover can impact COS ratings and necessitates the development of strategies for sustainability of data quality.

Part C plans to continue and increase its efforts to ensure data quality and improve practice. The new Part C rules offer an opportunity to ensure consistency and quality in conducting functional assessments and reliable use of COS ratings. As EI practitioners and regional administrators learn, and come to understand and trust the child outcome data, results and subsequent training and technical assistance (TA) can be linked to improving the quality of Part C services. To address staff turnover and increased responsibility for conducting the evaluations that are linked to COS ratings as well as improve practice, the following activities will help change the trajectory of this year’s results:

- As an intermediate step to improving its infrastructure, the state will use an ACCESS data system to support data input at the regional level. This system has already been built through the cooperative work of two regions and is expected to be rolled out in FFY 2015.

Not only will this effort ease data input at the regional level but it will provide a concrete link between global child outcomes and a child and family's One Plan (IFSP).

This data system will allow regions to monitor their own child outcomes data. Currently, the state office sends monthly updates to regions with a list of children exiting Part C, requesting that missing or inaccurate child outcome data are completed or corrected within 30 days. Regions are also asked to give the rationale for missing data which allows the state to track potential patterns in incomplete data.

- Plans are underway to integrate the three global child outcomes with the One Plan (IFSP) by FFY 2015. This will give practitioners a guiding framework from which to discuss a child's developmental/behavioral functioning with families, conduct and interpret functional assessments, and write functional outcomes and strategies. Integration will also help ease transition from Part C to B/619 as Vermont's school districts already include the outcomes in their IEPs. Finally, incorporating child outcomes into the data system will eventually allow an examination of the total percentages for each outcome (i.e. 3A, 3B, 3C) represented in the One Plan (IFSP) by region and practitioner, as well as a comparison of child outcomes with other factors.
- To ensure data quality and improve practice, Vermont conducted regional trainings in FFY 2011 addressing the Child Outcomes process. Since then, regions have conducted their own trainings for new personnel. This year, the state will be able to upload the COS training materials to a state website to make the trainings more accessible to regions and practitioners. Additional TA will be offered to those regions that have experienced major changes due to the new Part C rules or staff turnover (see above for description).
- A mini-session on 'Writing Functional Outcomes' was developed last year based on the NECTAC/ECO/WRRC training, *Developing High-Quality, Functional IFSP Outcomes*, which the state conducted in FFY 2012. This mini-session was conducted in a region that experienced high turnover (including leadership) in FFY 2013 and reviewed positively. The mini-session allows for a more focused, responsive and abbreviated training, and will increase high quality functional outcomes. As a follow-up to the training, state and regional leadership can review One Plan (IFSP) outcomes, especially in regions that are struggling to reach targets.
- Vermont participated in the initial pilot and is looking forward to using the ECO Child Outcome Competency Check when completed as a tool to support practitioner competence and confidence in producing accurate COS ratings. This tool can be used in several ways, including with regions who are shown to trend below target over several years, and as a check on training of new personnel.
- Regions continue to receive program reports profiling their child outcome results over time with comparisons to state and national (when available) data. Regional who show a trend in results that are below the state target over time will be required to complete a Quality Improvement Plan (QIP). The QIP process helps regions to identify their plan's focus, potential contributing factors, and the strategies, resources and timeline necessary to reach identified goals. Plans are reviewed and updated quarterly.
- CIS: EI continues work that was begun last year on developing an EI credential.
- Continue participation in ECTAC and DASY Learning Communities.

Was sampling used? No

Did you use the Early Childhood Outcomes Center (ECO) Child Outcomes Summary Form (COSF)? Yes

Provide additional information about this indicator (optional)

Progress Data for Part C Children FFY 2013

OSEP Progress Category Totals

Data shown exclude: children with service less than 6 months, those missing entry or exit dates, children with no information about child's progress at exit, and situations where entry and exit data generated impossible progress category combinations.

Outcome 1. Positive social-emotional skills (including social relationships):	Number	Percent
a: Children who did not improve functioning	0	0.0%

b: Children who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	106	21.5%
c: Children who improved functioning to a level nearer to same-aged peers but did not reach it	84	17.0%
d: Children who improved functioning to reach a level comparable to same-aged peers	128	26.0%
e: Children who maintained functioning at a level comparable to same-aged peers	176	35.5%
Total	494	100%

Outcome 2. Acquisition and use of knowledge and skills (including early language/communication):	Number	Percent
a: Children who did not improve functioning	0	0%
b: Children who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	118	23.9%
c: Children who improved functioning to a level nearer to same-aged peers but did not reach it	109	22.1%
d: Children who improved functioning to reach a level comparable to same-aged peers	188	38.1%
e: Children who maintained functioning at a level comparable to same-aged peers	79	16.0%
Total	494	100%

Outcome 3. Use of appropriate behaviors to meet their needs:	Number	Percent
a: Children who did not improve functioning	0	0%
b: Children who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	103	20.9%
c: Children who improved functioning to a level nearer to same-aged peers but did not reach it	94	19.0%
d: Children who improved functioning to reach a level comparable to same-aged peers	204	41.3%
e: Children who maintained functioning at a level comparable to same-aged peers	93	18.8%
Total	494	100%

Discussion of Summary Statements and a-e Progress Data for FFY 2013:

Child outcome data were collected on 494 children or approximately 98.6% of the children who exited in FFY 2013 and who received a minimum of 6 months of service (n = 501). The range of complete data for regions fell between 63.3 and 100% with nine of twelve regions reporting child outcome data for 100% of exited children. (The percentage of data completion is based on the number of exits occurring within FFY 2013 minus children receiving services for less than 6 months.)

Data on the three child outcomes were available for all 494 children. Regional CIS: EI coordinators were contacted when progress categories yielded ‘Impossible’ in the Early Childhood Outcome (ECO) Conversion table and asked to address missing or inaccurate progress ratings at exit. All regions with ‘Impossible’ ratings were able to correct inaccuracies without the need for additional TA. DASY’s *Vermont Child Outcome Data Quality Profiles* (for 2012-2013 and 2011-2012) show Vermont nearing 1 SD above the national average for data completion.

An examination of state progress categories (categories ‘a’ through ‘e’) shows the results to be well within the acceptable ranges as defined by ECO for all three child outcomes (ECO Webinar, 10/22/13). Progress category ‘a’ (children who did not improve functioning) had values of 0% across the outcomes. (Expected values should fall between 0% and 5 %.) Category ‘e’ (children who maintain functioning at levels comparable to same age peers) also has values within expected parameters.

The *Vermont Child Outcome Data Quality Profile* indicates that state trends over time for all 6 sub-indicators (i.e., two summary statements for each of three child outcomes) were slightly above the national average in 2012-13.

The State must report progress data and actual target data for FFY 2013 in the FFY 2013 APR.

Responses to actions required in FFY 2012 response table

Indicator 3 FFY 2013 data and targets have been added to this report.

OSEP Response

The State provided targets for FFYs 2013 through 2018 for this Indicator, and OSEP accepts those targets.

Required Actions

Indicator 4: Family Involvement

Monitoring Priority: Early Intervention Services In Natural Environments

Results indicator: 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)

Historical Data

	Baseline Year	FFY	2005	2006	2007	2008	2009	2010	2011	2012
A	2011	Target ≥				80.00%	80.00%	81.00%		78.30%
		Data		83.00%	80.00%	86.00%	84.30%	79.20%	78.10%	79.43%
B	2011	Target ≥				85.00%	85.00%	86.00%		86.10%
		Data		85.00%	85.00%	89.00%	90.70%	87.00%	85.90%	85.11%
C	2011	Target ≥				85.00%	85.00%	88.10%		81.00%
		Data		87.00%	89.00%	93.00%	93.40%	78.00%	80.80%	80.43%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2013 - FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target A ≥	78.30%	78.30%	78.40%	78.40%	78.50%	78.50%
Target B ≥	86.10%	86.10%	86.10%	86.10%	86.10%	86.10%
Target C ≥	81.00%	81.00%	81.20%	81.20%	81.20%	81.20%

Targets: Description of Stakeholder Input

As discussed in the introduction, the Vermont Interagency Coordinating Council (VICC) meets at least quarterly in order to review and advise the State about: the SPP and APR targets, APR data submissions, new guidance or initiatives such as updated State Rules and the State Systemic Improvement Plan, outreach activities, and other CIS system or CIS-EI-specific issues.

At the November 14th 2014 VICC meeting, the Vermont actual and target indicator data from 2005 through 2013 was reviewed and new targets were proposed, accepted and included here.

FFY 2013 SPP/APR Data

Number of respondent families participating in Part C	244
A1. Number of respondent families participating in Part C who report that early intervention services have helped the family know their rights	186
A2. Number of responses to the question of whether early intervention services have helped the family know their rights	244
B1. Number of respondent families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs	203
B2. Number of responses to the question of whether early intervention services have helped the family effectively communicate their children's needs	243

C1. Number of respondent families participating in Part C who report that early intervention services have helped the family help their children develop and learn	200
C2. Number of responses to the question of whether early intervention services have helped the family help their children develop and learn	242

	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
A. Percent of families participating in Part C who report that early intervention services have helped the family know their rights	79.43%	78.30%	76.23%
B. Percent of families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs	85.11%	86.10%	83.54%
C. Percent of families participating in Part C who report that early intervention services have helped the family help their children develop and learn	80.43%	81.00%	82.64%

Explanation of A Slippage

This year, Outcome 4A (Percent of families participating in Part C who report that early intervention services have helped the family know their rights) was 2.1% below the state's target and 3.2% below last year's results. The low response rate (approximately 25% lower than the past couple of years with half the regions receiving less than 20 returned surveys) is cause for caution in interpreting the results; therefore, the state will continue to consider trends in the data and be mindful of this drop as it may relate to developing regional data profiles and recommendations.

To obtain the family's perspective on the 'Helpfulness of Early Intervention', the state utilizes the revised Early Childhood Outcome (ECO) survey. Although the state's percentages were much higher across the three Family Outcomes when using the original ECO survey, the state has chosen to continue with the revised version. The revised survey is preferred because results for each Family Outcome is based on multiple questions (the original survey posed a single question for each outcome) and therefore, measures a broader construct. As a result, the revised survey helps families and practitioners alike drill down on areas of strength and those needing improvement.

Positive results for 4A indicate that most Part C practitioners are comfortable in providing and explaining parental rights. Regions that have made great strides in this area have talked about overcoming the 'bias' against discussing rights with families as perfunctory to a perspective of parental rights as integral to EI's process and developing partnership with families. Results for four of the five questions that comprise 4A are well above the state target, ranging from 84% to 90%. The following survey questions include three which directly address parental rights.

How helpful has Early Intervention been in

- *giving you useful information about services and supports for you and your child?*
- *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?*

A fifth question, *giving you useful information about available options when your child leaves the program*, was primarily responsible for bringing this outcome below target.

Regions found to be in need of improvement are required to complete a Quality Improvement Plan (QIP) with technical assistance and support from the state. A region's QIP is developed based upon several steps, including data review, identification and prioritization of needs based on the survey results, and an exploration of potential causes for below target results by the regional team. Once these steps are taken, the team identifies outcomes and creates an action plan to meet prioritized needs.

Regions that fell behind in this area identified several factors that need to be addressed in their plan. In addition to the *Contributing Factor Tool: C4*, the state uses the *Relationship of Quality Practices to Child and Family Outcome Measurement Results* with regional teams to help guide identification of issues as well as potential strategies and activities to improve their

practice. Some of the issues addressed by regions included:

- how to ensure all affiliated and new personnel are aware of available program options for children and families when transitioning
- identifying and ensuring staff implement quality practices regarding transition and parental rights
- identifying and using available resources for training on transition

Finally, a challenge faced by many regions this year was the change in the definition and procedures for establishing 'Potential Eligibility'. To address the resulting questions and misinterpretations, Part C and B/619 together have conducted trainings, provided technical assistance, and produced supporting documents.

Explanation of B Slippage

This year, Outcome 4B (Percent of families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs) was 2.6% below the state's target and 1.9% below last year's results. The low response rate (approximately 25% lower than the past couple of years with half the regions receiving less than 20 returned surveys) is cause for caution in interpreting the results; therefore the state will continue to consider trends in the data and be mindful of this drop as it may relate to developing regional data profiles and recommendations.

To obtain the family's perspective on the 'Helpfulness of Early Intervention', the state utilizes the revised Early Childhood Outcome (ECO) survey. Although the state's percentages were much higher across the three Family Outcomes when using the original ECO survey, the state has chosen to continue with the revised version. The revised survey is preferred because results for each Family Outcome is based on multiple questions (the original survey posed a single question for each outcome) and therefore, measures a broader construct. As a result, the revised survey helps families and practitioners alike drill down on areas of strength and those needing improvement.

Positive results for 4B indicate that Part C practitioners are engaging and communicating with families about their children's needs, and are listening to and respecting family choices. Results for five of the six questions that comprise 4B are well above the state target, ranging from 87.1% to 93.4%. They include:

How helpful has Early Intervention been in

- *giving you useful information about your child's delays or needs?*
- *listening to you and respecting your choices?*
- *talking with you about your family's strengths and needs?*
- *talking with you about what you think is important for your child and family?*
- *developing a good relationship with you and your family?*

A sixth question, *connecting you with other services or people who can help your child and family*, was primarily responsible for bringing this outcome below target (83.3%).

Regions found to be in need of improvement are required to complete a Quality Improvement Plan (QIP) with technical assistance and support from the state. A region's QIP is developed based upon several steps, including data review, identification and prioritization of needs based on the survey results, and an exploration of potential causes for below target results by the regional team. Once these steps are taken, the team identifies outcomes and creates an action plan to meet prioritized needs.

Regions that fell behind in this area identified several factors that need to be addressed in their plan. In addition to the *Contributing Factor Tool*, the state used the *Relationship of Quality Practices to Child and Family Outcome Measurement Results* with regional teams to help guide identification of issues as well as potential strategies and activities to improve their practice. Some of the issues identified by regions this past year included offering to connect families with other families in

early intervention or family organizations, periodically checking in with families about whether they need additional resources, and ensuring all practitioners understand the breadth of resources available both within and external to CIS.

Finally, a challenge faced by several regions in recent years is staff turnover. One region stated that they had transitioned a new practitioner every year for the last three years (a big impact on a small program). The Family Outcomes survey has helped this region's administration recognize the vast amount of information needed by Part C practitioners to ensure high quality practices are implemented, and the importance of ongoing mentoring and training.

Describe how the State has ensured that any response data are valid and reliable, including how the data represent the demographics of the State.

The statewide return rate for the FFY 2013 Family Outcome survey was 30.4% which was slightly below our target for this year and well below last year's return rate of 42.9% (approximately a 25% decrease). Of the 830 surveys distributed, 244 were returned (a small number of surveys were returned as undeliverable). Unusually, only half of the twelve regions were above target.

The Family Outcome survey is mailed annually to all families who have been receiving services for a minimum of 6 months. 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. The state also conducts a second mailing and offers multiple avenues for returning the survey.

State staff met to identify potential factors which may have contributed to the low return rate this year. In addition, the state reached out to several regions to glean their perspective. Two primary factors were identified: an agency move which impacted the timing of the survey, and the inclusion of some families who had exited services (more than 6 months) in the survey mailing list.

The *Local Contributing Factor Tool: C4* highlights other issues that can be addressed to support consistency in the return rate from year to year. CIS: EI practitioners have voiced concern about whether families recognize what services/personnel are being addressed in the survey. State staff are considering revising its method of survey distribution from 2 mailings to hand delivery followed by a 2nd mailing. This will help ensure families know which of their services are represented by the survey as well as ensure the survey is shared only with families who are active. This change in distribution will also help address another issue – practitioner turnover in recent years. Sharing the responsibility for distribution with regional staff will help remind regions to regularly inform new practitioners about the survey and its purpose. This change will be presented to the ICC before implementation.

In order to examine representativeness of survey data, comparisons between Vermont's 618 report (12/12 – 12/13) 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 9.7% of minority groups are represented in the 618 report while 8.6% are represented in the Family Outcome survey. For gender, the 618 report shows 64.5% of exits were male and 35.5% were female, while the surveys indicated 55.3% were male and 44.7%, female.

Was sampling used? No

Was a collection tool used? Yes

Is it a new or revised collection tool? No



Yes, the data accurately represent the demographics of the State



No, the data does not accurately represent the demographics of the State

Actions required in FFY 2012 response table

None

Responses to actions required in FFY 2012 response table, not including correction of findings

OSEP Response

The State provided targets for FFYs 2013 through 2018 for this indicator, and OSEP accepts those targets.

Required Actions

Indicator 5: Child Find (Birth to One)

Monitoring Priority: Effective General Supervision Part C / Child Find

Results indicator: Percent of infants and toddlers birth to 1 with IFSPs compared to national data.

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

Historical Data

Baseline Data: 2005

FFY	2005	2006	2007	2008	2009	2010	2011	2012
Target ≥		0.91%	0.93%	0.94%	0.96%	0.98%	0.99%	0.99%
Data	1.10%	1.29%	1.36%	1.34%	1.12%	1.01%	1.21%	1.30%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2013 - FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target ≥	0.99%	0.99%	1.00%	1.00%	1.00%	1.00%

Targets: Description of Stakeholder Input

As discussed in the introduction, the Vermont Interagency Coordinating Council (VICC) meets at least quarterly in order to review and advise the State about: the SPP and APR targets, APR data submissions, new guidance or initiatives such as updated State Rules and the State Systemic Improvement Plan, outreach activities, and other CIS system or CIS-EI-specific issues.

At the November 14th 2014 VICC meeting, the Vermont actual and target indicator data from 2005 through 2013 was reviewed and new targets were proposed, accepted and included here.

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2013-14 Child Count/Educational Environment Data Groups	9/24/2014	Number of infants and toddlers birth to 1 with IFSPs	91	null
U.S. Census Annual State Resident Population Estimates April 1, 2010 to July 1, 2013	12/16/2014	Population of infants and toddlers birth to 1	6,015	null

FFY 2013 SPP/APR Data

Number of infants and toddlers birth to 1 with IFSPs	Population of infants and toddlers birth to 1	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
91	6,015	1.30%	0.99%	1.51%

Provide additional information about this indicator (optional)

In FFY 2013, Vermont exceeded by 0.52% its target figure of serving 0.99% of its infants born in the most recent year of census figures. Vermont Part C exceeded by 0.4% the national baseline figure of 1.11% (50 states, District of Columbia and Puerto Rico).

Actions required in FFY 2012 response table

None

Responses to actions required in FFY 2012 response table

OSEP Response

The State provided targets for FFYs 2013 through 2018 for this indicator, and OSEP accepts those targets.

Required Actions

Indicator 6: Child Find (Birth to Three)

Monitoring Priority: Effective General Supervision Part C / Child Find

Results indicator: Percent of infants and toddlers birth to 3 with IFSPs compared to national data.

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

Historical Data

Baseline Data: 2005

FFY	2005	2006	2007	2008	2009	2010	2011	2012
Target ≥		3.25%	3.28%	3.30%	3.40%	3.50%	3.50%	3.50%
Data	3.20%	3.45%	4.00%	3.90%	3.93%	4.23%	4.35%	4.22%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2013 - FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target ≥	3.60%	3.60%	3.70%	3.80%	3.90%	3.90%

Targets: Description of Stakeholder Input

As discussed in the introduction, the Vermont Interagency Coordinating Council (VICC) meets at least quarterly in order to review and advise the State about: the SPP and APR targets, APR data submissions, new guidance or initiatives such as updated State Rules and the State Systemic Improvement Plan, outreach activities, and other CIS system or CIS-EI-specific issues.

At the November 14th 2014 VICC meeting, the Vermont actual and target indicator data from 2005 through 2013 was reviewed and new targets were proposed, accepted and included here.

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2013-14 Child Count/Educational Environment Data Groups	9/24/2014	Number of infants and toddlers birth to 3 with IFSPs	802	
U.S. Census Annual State Resident Population Estimates April 1, 2010 to July 1, 2013	12/16/2014	Population of infants and toddlers birth to 3	18,305	

FFY 2013 SPP/APR Data

Number of infants and toddlers birth to 3 with IFSPs	Population of infants and toddlers birth to 3	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
802	18,305	4.22%	3.60%	4.38%

Provide additional information about this indicator (optional)

In FFY 2013, Vermont exceeded by 0.78% its target figure of serving 3.60% of its birth to three population born in the most

FFY 2013 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

recent year of census figures. Vermont exceeded by 1.56% the FFY 2010 national baseline figure of 2.82% (50 states, District of Columbia and Puerto Rico).

Actions required in FFY 2012 response table

None

Responses to actions required in FFY 2012 response table

OSEP Response

The State provided targets for FFYs 2013 through 2018 for this indicator, and OSEP accepts those targets.

Required Actions

Indicator 7: 45-day timeline

Monitoring Priority: Effective General Supervision Part C / Child Find

Compliance indicator: 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)

Historical Data

Baseline Data: 2005

FFY	2005	2006	2007	2008	2009	2010	2011	2012
Target		100%	100%	100%	100%	100%	100%	100%
Data	79.80%	79.20%	93.00%	97.00%	97.00%	96.60%	96.80%	96.00%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2013 - FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%	100%

FFY 2013 SPP/APR Data

Number of eligible infants and toddlers with IFSPs for whom an initial evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline	Number of eligible infants and toddlers evaluated and assessed for whom an initial IFSP meeting was required to be conducted	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
546	836	96.00%	100%	95.57%
Number of documented delays attributable to exceptional family circumstances (this number will be added to the Number of eligible infants and toddlers with IFSPs for whom an initial evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline)				253

What is the source of the data provided for this indicator?

- State monitoring
- State database

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).

July 1, 2013 to June 30, 2014

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Data Method/Source: Desk audit of entire FFY 2013 Part C State Database, July 1, 2013 to June 30, 2014.

Provide additional information about this indicator (optional)

Discussion of Data

Of the 836 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, 546 children received an evaluation and assessment and initial IFSP/One Plan meeting within Part C's 45-day timeline. Services for 253 children were not initiated in a timely manner due to exceptional family circumstances. These 253 children are included in the numerator as well as the denominator. Exceptional family circumstances included families who were unreachable after multiple attempts to contact them or who failed to attend a scheduled meeting (majority of reasons), families cancelling meetings, families' requests to reschedule evaluations and/or IFSP/One Plan meetings, a family experiencing homelessness, family vacation schedules, family illnesses/surgeries/hospitalizations, weather factors, deaths in families and custody issues. The number of days these services were conducted beyond the 45-day timeline for these 253 children ranged from 1 to 148 (death in a family). The average number of days beyond the 45-day timeline was 25.

37 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 37 children. Delays in meeting the 45-day timeline were due to scheduling conflicts/unavailability of CIS-EI personnel (15 children), LEA personnel (6 children), and speech-language pathologists and occupational and physical therapists (3 children); and delays in assigning Educational Surrogates and challenges in obtaining interpreters (13 children). The number of days these services were conducted beyond the 45-day timeline for these 37 children ranged from 1 to 133 (unavailability of educational surrogate). The average number of days beyond the 45-day timeline was 31.

Data analysis specific to timeliness of evaluations and assessments demonstrated that evaluations and assessments were completed within Part C's 45-day timeline for 85% of the children (710/836). The 710 evaluations and assessments included 114 children for whom exceptional family circumstances caused delays. 12 delays were due to provider and other system factors. 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 25 of 37 children.

Vermont issued **one finding of noncompliance in FFY 2013** in Indicator 7 in CIS-EIP 9.

Actions required in FFY 2012 response table

None

Responses to actions required in FFY 2012 response table, not including correction of findings

Because the State reported less than 100% compliance for FFY 2012, the State must report on the status of correction of noncompliance identified in FFY 2012 for this indicator. When reporting on the correction of noncompliance, the State must report, in its FFY 2013 APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2012 for this indicator: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider, consistent with OSEP Memo 09-02. In the FFY 2013 APR, the State must describe the specific actions that were taken to verify the correction.

Six 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. CIS-EIP 1 was at 97% compliance (35/36), *CIS-EIP 4 at 94% compliance (176/188), 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 and CIS-EIP 4 for at least 50 consecutive days, indicating that these six programs were 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 six CIS-EIPs for the 25 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 25 children.

*It was reported in the FFY 2012 APR that 'as of submission of this FFY 2012 APR, CIS-EIP 4 has not corrected the

noncompliance. Subsequent to submission, the VT Part C Data Manager confirmed that CIS-EIP 4 had corrected the noncompliance based on the July 2013 to December 2013 desk audit.

Correction of Findings of Noncompliance Identified in FFY 2012

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
1	1	null	0

FFY 2012 Findings of Noncompliance Verified as Corrected

Describe how the State verified that each LEA with noncompliance is correctly implementing the regulatory requirements

The one FFY 2012 finding of noncompliance in Indicator 7 in CIS-EIP 2 was timely corrected. This finding was based on a desk audit of 10 months of the FFY 2012 Part C Database (7/1/12 to 4/30/13) and written notification of the finding was issued in FFY 2012. Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 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 was correctly implementing the timely service provision requirements in 34 CFR §303.310(a) and 303.342(a).

Describe how the State verified that each LEA corrected each individual case of noncompliance

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 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.

OSEP Response

The State provided targets for FFYs 2013 through 2018 for this indicator, and OSEP accepts those targets.

Because the State reported less than 100% compliance for FFY 2013, the State must report on the status of correction of noncompliance identified in FFY 2013 for this indicator. When reporting on the correction of noncompliance, the State must report, in its FFY 2014 APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2013 for this indicator: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider, consistent with OSEP Memo 09-02. In the FFY 2014 APR, the State must describe the specific actions that were taken to verify the correction.

Required Actions

Indicator 8A: Early Childhood Transition

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Compliance indicator: The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:

- A. 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;
- B. 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 toddlers potentially eligible for Part B preschool services; and
- C. 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)

Historical Data

Baseline Data: 2005

FFY	2005	2006	2007	2008	2009	2010	2011	2012
Target		100%	100%	100%	100%	100%	100%	100%
Data	92.00%	93.00%	100%	99.00%	99.00%	99.00%	99.00%	98.00%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2013 - FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%	100%

FFY 2013 SPP/APR Data

Data include only those 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.

- Yes
- No

Number of children exiting Part C who have an IFSP with transition steps and services	Number of toddlers with disabilities exiting Part C	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
726	802	98.00%	100%	98.88%

Number of documented delays attributable to exceptional family circumstances (this number will be added to the Number of children exiting Part C who have an IFSP with transition steps and services)	67
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What is the source of the data provided for this indicator?

- State monitoring
- State database

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection)

from the full reporting period).

July 1, 2013 to June 30, 2014

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Data Method/Source: Desk audit of entire FFY 2013 Part C State Database, July 1, 2013 to June 30, 2014.

Provide additional information about this indicator (optional)

Discussion of Data

793 of the 802 children who exited Part C had written transition plans in place upon exiting Part C. 67 of the 793 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 the transition plans, providers' inability to contact families after repeated attempts, custody issues that had an impact on transition planning, and one family whose child passed away.

Vermont issued **no findings of noncompliance in FFY 2013** in Indicator 8A.

Actions required in FFY 2012 response table

None

Responses to actions required in FFY 2012 response table, not including correction of findings

Because the State reported less than 100% compliance for FFY 2012, the State must report on the status of correction of noncompliance identified in FFY 2012 for this indicator. When reporting on the correction of noncompliance, the State must report, in its FFY 2013 APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2012 for this indicator: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider, consistent with OSEP Memo 09-02. In the FFY 2013 APR, the State must describe the specific actions that were taken to verify the correction.

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. 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 were 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.

Correction of Findings of Noncompliance Identified in FFY 2012

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
0	null	null	0

OSEP Response

The State provided targets for FFYs 2013 through 2018 for this indicator, and OSEP accepts those targets.

Because the State reported less than 100% compliance for FFY 2013, the State must report on the status of correction of noncompliance identified in FFY 2013 for this indicator. When reporting on the correction of noncompliance, the State must report, in its FFY 2014 APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2013 for this indicator: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider, consistent with OSEP Memo 09-02. In the FFY 2014 APR, the State must describe the specific actions that were taken to verify the correction.

Required Actions

Indicator 8B: Early Childhood Transition

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Compliance indicator: The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:

- A. 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;
- B. 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 toddlers potentially eligible for Part B preschool services; and
- C. 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)

Historical Data

Baseline Data: 2005

FFY	2005	2006	2007	2008	2009	2010	2011	2012
Target	100%	100%	100%	100%	100%	100%	100%	100%
Data	79.50%	94.00%	95.00%	99.60%	99.00%	98.00%	99.00%	99.00%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2013 - FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%	100%

FFY 2013 SPP/APR Data

Data include notification to both the SEA and LEA

- Yes
- No

Number of toddlers with disabilities exiting Part C where notification to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services	Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
510	570	99.00%	100%	89.47%

Number of parents who opted out (this number will be subtracted from the number of toddlers with disabilities exiting Part C who were potentially eligible for Part B when calculating the FFY 2013 Data)	null
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Explanation of Slippage

Discussion of Data

Based on the Vermont Special Education Rules adopted June 1, 2013 and effective July 1, 2013, a child receiving Part C CIS-EI services is potentially eligible for Part B preschool services if the child demonstrates at least a 25% delay in one or more of the following developmental areas: speech and language development (receptive and/or expressive communication,

including articulation, fluency and/or voice); adaptive development; social or emotional development; physical development, including gross or fine motor skills; and/or cognitive skills such as perception, memory, processing and reasoning. The IFSP/One Plan team must determine a child potentially eligible for Part B preschool services and send written notification of potential eligibility to the Local Education Agency (LEA) and Part C state office between six months and 90 days prior to a child's third birthday. The Part C office notifies the State education Agency (SEA) upon receiving notification from the Part C CIS-EI programs. Vermont Part C does not have an opt-out policy for families. The local education agencies (LEAs) and state education agency (SEA) received timely written notification from Part C CIS-EI for 510 of 570 children potentially eligible for Part B. 48 of the 510 children were late referrals to Part C and their potential eligibility for Part B was determined fewer than 90 days prior to their third birthdays. State CIS-EI staff verified with the appropriate CIS-EI programs that staff sent written notification to the LEA and Part C state office/SEA as soon as they determined these children were potentially eligible. These 48 children are included in the numerator and denominator.

Vermont issued **four findings of noncompliance in FFY 2013** in Indicator 8B in CIS-EIPs 7, 9, 10 and 12.

Explanation of Slippage

Vermont Part C's FFY 2013 compliance of 89.47% for Indicator 8B is a decrease from the 99.00% achieved in FFY 2012. Written notification to the LEA and SEA for 60 children potentially eligible for Part B was noncompliant in 10 regional CIS-EIPs. The noncompliance in notification for the majority of the 60 children was due to regional CIS-EIP staff not sending the written notification between the required six months and 90 days prior to the children's third birthdays. State CIS-EI staff were able to verify immediately through a desk audit of the 2013 Child Count forms and in follow up communication with staff in the 10 CIS-EI programs that notification, although not sent within the designated time period, did occur for 57 of the 60 children. Staff did not send written notification for two children and, in spite of Vermont Part C not having an opt-out policy for families, one CIS-EI Program did not send written notification to the LEA in response to parent request. State Part C staff reinforced for this program's staff that there is no opt-out policy and notification must occur for all children potentially eligible for Part B preschool services.

Prior to FFY 2013, 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 preschool services 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 Part B preschool 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 Vermont Special Education Rules effective July 1, 2013 resulted in systemic changes to fulfill the revised requirements for notification to the LEA and SEA of children potentially eligible for Part B preschool services. The more 'rigorous' definition of potentially eligible (at least a 25% delay in one or more developmental areas), new requirements for determining potential eligibility (use of ongoing assessment measures and a state-approved diagnostic instrument) and the change to a more specific and 'tighter' time period in which to send written notification (between six and nine months prior to a child's third birthday) all required major changes in provider practices. In particular, the need to document a 25% delay under the new rules requires providers to convert the results from the state-approved diagnostic tool into percentages. Vermont Part C's criteria for eligibility for Part C services is based on an observable and measurable delay (not a percentage delay) in one or more developmental areas 'as determined by state approved diagnostic instruments, other appropriate measures including observations, medical records or other records deemed necessary and procedures, emphasizing the use of informed clinical opinion.'

In spite of advance preparations by the state Part C office to ensure compliance with the new rules, some CIS-EI programs already had notified LEAs about potentially eligible children prior to the rules taking effect 7/1/13, i.e., notification went to the LEAs more than six months prior to a child's third birthday. Part C state staff determined that notifications for those children were noncompliant. Additionally, one of the CIS-EIPs that was issued a FFY 2013 finding of noncompliance in Indicator 8B experienced a change in administration and staff during the transition to the new rules, which contributed significantly to the program's noncompliance.

As a result of the FFY 2013 noncompliance, significant training and technical assistance occurred. Part C state staff and Agency of Education Part B preschool staff jointly collaborated on conducting six statewide, full-day onsite trainings on the new rules for regional Part C CIS-EI and Part B preschool providers; conducted webinars for families and Part C/B providers; and issued joint memos to the field containing guidance specific to the new definition of 'potentially eligible' and revised notification timeline. An online module was developed and is available for orientation for new Part C CIS-EI staff and ongoing reference. The four programs that were issued FFY 2013 findings of noncompliance developed Corrective Action Plans (CAPs) to address the findings and have received/continue to receive targeted technical assistance from state CIS regional technical assistance liaisons. These four programs accounted for 47 of the 60 notifications that were noncompliant.

FFY 2013 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

The four findings of noncompliance issued in FFY 2013 in Indicator 8B in CIS-EIPs 7, 9, 10 and 12 and the noncompliance in six additional CIS-EIPs had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 8B during the FFY 2013 reporting year.

Describe the method used to collect these data

Data Method/Source: Desk audit of entire FFY 2013 Part C State Database, July 1, 2013 to June 30, 2014.

Do you have a written opt-out policy? No

Actions required in FFY 2012 response table

None

Responses to actions required in FFY 2012 response table, not including correction of findings

Because the State reported less than 100% compliance for FFY 2012, the State must report on the status of correction of noncompliance identified in FFY 2012 for this indicator. When reporting on the correction of noncompliance, the State must report, in its FFY 2013 APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2012 for this indicator: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider, consistent with OSEP Memo 09-02. In the FFY 2013 APR, the State must describe the specific actions that were taken to verify the correction.

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 were correctly implementing the transition requirements in 34 CFR §303.209(b); and 2) Part C staff reviewed the 2012 Child Count forms for the 10 children for whom notification was not timely and were immediately able to verify that, although late, the notification to the LEA and the SEA did occur for these 10 children.

Correction of Findings of Noncompliance Identified in FFY 2012

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
1	1	null	0

FFY 2012 Findings of Noncompliance Verified as Corrected

Describe how the State verified that each LEA with noncompliance is correctly implementing the regulatory requirements

The one FFY 2012 finding of noncompliance in Indicator 8B in CIS-EIP 6 was timely corrected. This finding was based on a desk audit of FFY 2011 data and written notification of the finding was issued in FFY 2012. Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 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 6 achieved 100% compliance for at least 60 consecutive days, indicating that this program was correctly implementing the timely service provision requirements

in 34 CFR §303.209(b).

Describe how the State verified that each LEA corrected each individual case of noncompliance

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: 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.

OSEP Response

The State provided targets for FFYs 2013 through 2018 for this indicator, and OSEP accepts those targets.

Because the State reported less than 100% compliance for FFY 2013, the State must report on the status of correction of noncompliance identified in FFY 2013 for this indicator. When reporting on the correction of noncompliance, the State must report, in its FFY 2014 APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2013 for this indicator: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider, consistent with OSEP Memo 09-02. In the FFY 2014 APR, the State must describe the specific actions that were taken to verify the correction.

Required Actions

Indicator 8C: Early Childhood Transition

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Compliance indicator: The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:

- A. 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;
- B. 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 toddlers potentially eligible for Part B preschool services; and
- C. 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)

Historical Data

Baseline Data: 2005

FFY	2005	2006	2007	2008	2009	2010	2011	2012
Target	83.00%	100%	100%	100%	100%	100%	100%	100%
Data	83.00%	91.00%	97.00%	98.00%	98.00%	99.00%	99.00%	99.00%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2013 - FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%	100%

FFY 2013 SPP/APR Data

Data reflect only those toddlers 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

- Yes
- No

Number of toddlers with disabilities exiting Part C where the transition conference occurred at least 90 days, and at the discretion of all parties at least nine months prior to the toddler's third birthday for toddlers potentially eligible for Part B	Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
366	570	99.00%	100%	95.76%

Number of toddlers for whom the parent did not provide approval for the transition conference (this number will be subtracted from the number of toddlers with disabilities exiting Part C who were potentially eligible for Part B when calculating the FFY 2013 Data)	51
Number of documented delays attributable to exceptional family circumstances (this number will be added to the Number of toddlers with disabilities exiting Part C where the transition conference occurred at least 90 days, and at the discretion of all parties at least nine months prior to the toddler's third birthday for toddlers potentially eligible for Part B)	131

Explanation of Slippage

Discussion of Data

Although 8B documents there were 570 children determined potentially eligible for Part B preschool services, the number ultimately used in the denominator is 519. 43 of the 570 children determined potentially eligible exited at some point between 30 months (typically when Part C notifies the LEA) and 33 months (typically when transition conferences occur). Some of these children exited due to their families moving away; some children exited because they achieved their outcomes and no longer required Part C services, i.e., their skills were at a developmentally appropriate level; parents withdrew their children; or the CIS-EI program lost contact with families. 8 families of children determined potentially eligible did not provide the requisite approval for holding the transition conference in six regional EIPs. Therefore, 51 children are not included in either the numerator or denominator and 519 is the number used in calculating compliance for 8C (570 potentially eligible children, minus 43 children who exited prior to timeline for conducting conference, minus 8 children whose families did not give approval = 519).

The transition conference was timely for 319 children potentially eligible for Part B services. There were 131 children for whom the transition conference did not occur in a timely way due to exceptional family circumstances. These 131 children are included in the numerator and the denominator. Exceptional family circumstances included cancellations and requests to reschedule the transition conference (majority of reasons), custody issues, illness/hospitalization, and family vacations. State CIS-EI staff confirmed that these transition conferences, although late, did occur. 47 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 (319 timely conferences, 131 with family circumstances delaying the conferences, 47 late referrals = 497).

Vermont issued **two findings of noncompliance in FFY 2012** in Indicator 8C in CIS-EIPs 2 and 9.

Explanation of Slippage

Vermont Part C's FFY 2013 compliance of 95.76% for Indicator 8C is a decrease from the 99.00% achieved in FFY 2012. Timely transition conferences did not occur for 22 children in seven regional CIS-EIPs primarily due to scheduling conflicts for LEA personnel and CIS-EI program providers. In one of the two regions that were issued findings in 8C, a sudden and unexpected vacancy in the program supervisor position and the transition to a new program supervisor had an impact on this CIS-EI program meeting the required timelines for conducting transition conferences. State Part C staff verified that transition conferences, although late, ultimately did occur for 21 of the 22 children prior to their transition to Part B preschool services; the transition conference for the one other child did not occur since the child no longer was within the jurisdiction of the Part C CIS-EI program. Please see indicator 8B under Explanation of Slippage for a description of technical assistance and trainings that are in place to improve program practices and ensure compliance in indicator 8C.

The two findings of noncompliance issued in FFY 2013 in Indicator 8B in CIS-EIPs 2 and 9 and the noncompliance in five additional CIS-EIPs had an impact on Vermont Part C's ability to achieve 100% compliance in Indicator 8B during the FFY 2013 reporting year.

What is the source of the data provided for this indicator?

State monitoring



State database that includes data for the entire reporting year

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).

July 1, 2013 to June 30, 2014

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.**Data Method/Source:** Desk audit of entire FFY 2013 Part C State Database, July 1, 2013 to June 30, 2014.**Actions required in FFY 2012 response table**

None

Responses to actions required in FFY 2012 response table, not including correction of findings

Because the State reported less than 100% compliance for FFY 2012, the State must report on the status of correction of noncompliance identified in FFY 2012 for this indicator. When reporting on the correction of noncompliance, the State must report, in its FFY 2013 APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2012 for this indicator: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider, consistent with OSEP Memo 09-02. In the FFY 2013 APR, the State must describe the specific actions that were taken to verify the correction.

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. CIS-EIP 4 was at 96% compliance (102/106) and *CIS-EIP 9 at 95% compliance (39/41).

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 and CIS-EIP 9 for 37 consecutive days, indicating that these two programs were 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-EIPs 4 and 9, verified immediately that, although late, the transition conferences ultimately occurred for the 6 children.

*It was reported in the FFY 2012 APR that ‘as of submission of this FFY 2012 APR, CIS-EIP 9 has not corrected the noncompliance.’ Subsequent to submission, the VT Part C Data Manager confirmed that CIS-EIP 9 had corrected the noncompliance based on the July 2013 to December 2013 desk audit.

Correction of Findings of Noncompliance Identified in FFY 2012

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
0	null	null	0

OSEP Response

The State provided targets for FFYs 2013 through 2018 for this indicator, and OSEP accepts those targets.

Because the State reported less than 100% compliance for FFY 2013, the State must report on the status of correction of noncompliance identified in FFY 2013 for this indicator. When reporting on the correction of noncompliance, the State must report, in its FFY 2014 APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2013 for this indicator: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider, consistent with OSEP Memo 09-02. In the FFY 2014 APR, the State must describe the specific actions that were taken to verify the correction.

Required Actions

Indicator 9: Resolution Sessions

Monitoring Priority: Effective General Supervision Part C / General Supervision

Results indicator: 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)

Historical Data

Baseline Data:

FFY	2005	2006	2007	2008	2009	2010	2011	2012
Target ≥								
Data								

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2013 - FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target ≥						

Targets: Description of Stakeholder Input

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
EMAPS IDEA Part B Dispute Resolution Survey; Section C: Due Process Complaints	11/12/2013	3.1 Number of resolution sessions	n	null
EMAPS IDEA Part B Dispute Resolution Survey; Section C: Due Process Complaints	11/12/2013	3.1(a) Number resolution sessions resolved through settlement agreements	n	null

FFY 2013 SPP/APR Data

3.1 Number of resolution sessions	3.1(a) Number resolution sessions resolved through settlement agreements	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
0	0			

Provide additional information about this indicator (optional)

Vermont Part C uses Vermont Part B Dispute Resolution. Vermont Part B sets targets and Vermont Part C supports Part B's targets and improvement activities.

Actions required in FFY 2012 response table

None

Responses to actions required in FFY 2012 response table

OSEP Response

The State reported fewer than ten resolution sessions held in FFY 2013. The State is not required to provide targets until any fiscal year in which ten or more resolution sessions were held.

Required Actions

Indicator 10: Mediation

Monitoring Priority: Effective General Supervision Part C / General Supervision

Results indicator: Percent of mediations held that resulted in mediation agreements.

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

Historical Data

Baseline Data: 2005

FFY	2005	2006	2007	2008	2009	2010	2011	2012
Target ≥								
Data			100%					

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2013 - FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target ≥						

Targets: Description of Stakeholder Input

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
EMAPS IDEA Part B Dispute Resolution Survey; Section B: Mediation Requests	11/5/2014	2.1.a.i Mediations agreements related to due process complaints	n	null
EMAPS IDEA Part B Dispute Resolution Survey; Section B: Mediation Requests	11/5/2014	2.1.b.i Mediations agreements not related to due process complaints	n	null
EMAPS IDEA Part B Dispute Resolution Survey; Section B: Mediation Requests	11/5/2014	2.1 Mediations held	n	null

FFY 2013 SPP/APR Data

2.1.a.i Mediations agreements related to due process complaints	2.1.b.i Mediations agreements not related to due process complaints	2.1 Mediations held	FFY 2012 Data*	FFY 2013 Target*	FFY 2013 Data
0	0	0			

Provide additional information about this indicator (optional)

Vermont Part C uses Vermont Part B Dispute Resolution. Vermont Part B sets targets and Vermont Part C supports Part B's targets and improvement activities.

Actions required in FFY 2012 response table

None

Responses to actions required in FFY 2012 response table

OSEP Response

The State reported fewer than ten mediations held in FFY 2013. The State is not required to provide targets until any fiscal year in which ten or more mediations were held.

Required Actions

Indicator 11: State Systemic Improvement Plan

Monitoring Priority: General Supervision

Results indicator: The State's SPP/APR includes a State Systemic Improvement Plan (SSIP) that meets the requirements set forth for this indicator.

Baseline Data

FFY	2013
Data	52.10%

FFY 2014 - FFY 2018 Targets

FFY	2014	2015	2016	2017	2018
Target	52.10%	54.00%	57.00%	62.00%	68.00%

Description of Measure

Targets: Description of Stakeholder Input

Data Analysis

A description of how the State identified and analyzed key data, including data from SPP/APR indicators, 618 data collections, and other available data as applicable, to: (1) select the State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and their Families, and (2) identify root causes contributing to low performance. The description must include information about how the data were disaggregated by multiple variables (e.g., EIS program and/or EIS provider, geographic region, race/ethnicity, socioeconomic status, gender, etc.) As part of its data analysis, the State should also consider compliance data and whether those data present potential barriers to improvement. In addition, if the State identifies any concerns about the quality of the data, the description must include how the State will address these concerns. Finally, if additional data are needed, the description should include the methods and timelines to collect and analyze the additional data.

Analysis of State Infrastructure to Support Improvement and Build Capacity

A description of how the State analyzed the capacity of its current infrastructure to support improvement and build capacity in EIS programs and/or EIS providers to implement, scale up, and sustain the use of evidence-based practices to improve results for infants and toddlers with disabilities and their families. State systems that make up its infrastructure include, at a minimum: governance, fiscal, quality standards, professional development, data, technical assistance, and accountability/monitoring. The description must include current strengths of the systems, the extent the systems are coordinated, and areas for improvement of functioning within and across the systems. The State must also identify current State-level improvement plans and other early learning initiatives, such as Race to the Top-Early Learning Challenge and the Home Visiting program and describe the extent that these new initiatives are aligned, and how they are, or could be, integrated with, the SSIP. Finally, the State should identify representatives (e.g., offices, agencies, positions, individuals, and other stakeholders) that were involved in developing Phase I of the SSIP and that will be involved in developing and implementing Phase II of the SSIP.

State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and Their Families

FFY 2013 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

A statement of the result(s) the State intends to achieve through the implementation of the SSIP. The State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and their Families must be aligned to an SPP/APR indicator or a component of an SPP/APR indicator. The State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and their Families must be clearly based on the Data and State Infrastructure Analyses and must be a child- or family-level outcome in contrast to a process outcome. The State may select a single result (e.g., increase the rate of growth in infants and toddlers demonstrating positive social-emotional skills) or a cluster of related results (e.g., increase the percentage reported under child outcome B under Indicator 3 of the SPP/APR (knowledge and skills) and increase the percentage trend reported for families under Indicator 4 (helping their child develop and learn)).

Statement

Description

Selection of Coherent Improvement Strategies

An explanation of how the improvement strategies were selected, and why they are sound, logical and aligned, and will lead to a measurable improvement in the State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and their Families. The improvement strategies should include the strategies, identified through the Data and State Infrastructure Analyses, that are needed to improve the State infrastructure and to support EIS program and/or EIS provider implementation of evidence-based practices to improve the State-identified result(s) for infants and toddlers with disabilities and their families. The State must describe how implementation of the improvement strategies will address identified root causes for low performance and ultimately build EIS program and/or EIS provider capacity to achieve the State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and their Families.

Theory of Action

A graphic illustration that shows the rationale of how implementing the coherent set of improvement strategies selected will increase the State's capacity to lead meaningful change in EIS programs and/or EIS providers, and achieve improvement in the State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and their Families.

Submitted Theory of Action: No Theory of Action Submitted



Provide a description of the provided graphic illustration (optional)

OSEP Response

Required Actions

Certify and Submit your SPP/APR

I certify that I am the Director of the State's Lead Agency under Part C of the IDEA, or his or her designee, and that the State's submission of its IDEA Part C State Performance Plan/Annual Performance Report is accurate.

Selected: Lead Agency Director

Name and title of the individual certifying the accuracy of the State's submission of its IDEA Part C State Performance Plan/Annual Performance Report.

Name: Danielle Howes

Title: Part C Program Administrator

Email: Danielle.howes@state.vt.us

Phone: 802-279-1302