

VT Part C

FFY2014 State Performance Plan / Annual Performance Report

Introduction to the State Performance Plan (SPP)/Annual Performance Report (APR)**Executive Summary:**

APR Executive Summary for 2014 APR:

Vermont was focused throughout the 2014 APR year on developing our State Systemic Improvement Plan (SSIP). As a result, it is important to note that data reported in this APR reflect Vermont's CIS-EI services delivered simultaneously with the development of the SSIP. Therefore, none of these data were impacted by the subsequent strategies developed to address Vermont's State Identified Measureable Result (SIMR): Vermont families are able to help their infants and toddlers develop and learn functional social and/or emotional skills, and infants and toddlers substantially improve their social and/or emotional functional development.

Vermont's SSIP was developed with the input of the Vermont Interagency Coordinating Council and the regional Children's Integrated Services Early Intervention (CIS-EI) program staff based on a review of Vermont's 2013 and preceding years' APRs as well as a deeper root cause analysis. Both during and since the development of the SSIP, Vermont CIS-EI staff have been involved in discussions and received regular information about Vermont's SIMR and SSIP improvement strategies, and have received direct training related to the SIMR during 2015 (this will be discussed in detail in Vermont's SSIP Phase II submission on April 1, 2016). Therefore, though the improvement strategies and evaluation methods associated with the SSIP are still in the planning stages, it is reasonable to assume that Vermont's data for 2015 will be positively impacted by the preliminary implementation activities and the increased awareness of the field from the regular communication they have received.

Vermont's 2013 APR data also informed the State that we needed to attend to other APR indicators beyond the SSIP. To that end, throughout 2015 Vermont Part C worked on many improvements to our general supervision. Most notably:

1. Vermont Part C reached out to Vermont's child protection system, the Family Services Division (FSD), to investigate how data might be shared to ensure children referred by FSD to Part Care correctly identified as a child eligible under CAPTA within our data reporting. Since FSD policy supports making referrals to ensure all children they become involved with receive a screening, FSD often makes referrals to Part C before the disposition of a case. Data sharing would provide a way to ensure accuracy of our data collection for children referred under CAPTA. Because of Vermont FSD's policy, Vermont Part C feels confident that Vermont effectively meets the CAPTA requirements. FSD has a request in the information technology queue for this data sharing report to be created. We hope to have access to these data some time in 2016.
2. In an effort to standardize the State's review of regional quality improvement plans (QIPs) required as a result of each regional CIS-EI program's determination, Vermont Part C developed a review rubric. Each QIP is reviewed using the rubric to determine if the requirements described in the region's determination have been fully and adequately addressed in the region's QIP. After review, regions received acknowledgement back from the State indicating whether their regional QIP was approved, or

whether it needed additional work. The State's rubric was included with each letter in order to inform regions where they needed to make improvements to their QIP. Vermont's Part C CIS-EI programs responded positively to the use of the rubric, as it helped them understand the State's expectations for their QIPs. During 2016, the State intends to seek ways to continue to use the QIPS as a way to monitor and support program improvement efforts within each region.

3. In 2015, as a result of continued low response rates on the Vermont's Family Survey, the State sought input from the Vermont Interagency Coordinating Council and national technical assistance from the IDEA Data Center (IDC) for improvement. With input from these entities, Vermont will be utilizing a 3 tiered system to improve response rates on the Family Survey: families will receive a post card two weeks prior to dissemination of the Family Survey informing them that it will be coming; families who are actively receiving services will have surveys hand-delivered to them by their Service Coordinator or Early Interventionist; and finally, surveys will be mailed approximately thirty days later, providing one final opportunity for families to respond who have not already. Another improvement, based on IDC input, was to include a few brief data points in the cover letter to the survey informing families of responses we had received in the previous year, and what changes Vermont Part C was making based on that feedback. With these changes, Vermont Part C believes that families will understand their input is highly valued to inform program improvement, and that this will result in more families responding to the survey.

4. Vermont Part C has reinstated a system of monthly calls with our regional host agencies. The purpose of these calls is to ensure that regions have regular communication with the State and each other. These calls are often used to ensure regions:
 1. clearly understand data reporting expectations (ex. patterns of data anomalies, or trends around incomplete data reporting);
 2. are able to discuss together common challenges or issues they are finding among themselves and tap into their shared expertise on how to respond (ex. significant increases in children born diagnosed with neo-natal abstinence syndrome, or delays in appointment of educational surrogates for children in child protection custody);
 3. receive real time data information from the State to the regional host agencies (ex. family survey response rates, or increase in diagnosed conditions); and to
 4. have opportunities to discuss guidance or policy updates to ensure they understand the State's expectations.

It is the State's belief that these calls afford regular opportunities for all regions to hear from the State and from each other. After each call, the State disseminates notes to regions so that each region can refer back to what was discussed. These monthly calls have led to improved communication, improved regional data quality, and regional compliance with Federal regulations and State rules.

Vermont is continually seeking ways to improve Part C service delivery and increase regulatory compliance and performance to ensure each child receives the highest quality services to optimize her development. Vermont understands that such improvement takes regular and ongoing work, review, and improvement cycles. We value the input of our State team members, our Interagency Coordinating Council, our regional Part C practitioners, State and community partners, national technical assistance centers, and OSEP leadership to ensure ongoing quality improvement of Vermont's Part C services.

Attachments

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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

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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.

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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

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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 has developed the CIS Competencies and CIS-EI Credential.

CIS-EI Certification:

The State CIS-EI program is in the process of implementing a CIS-EI Certificate, based on review of EI credentialing in other states. By June 30, 2016 all regional CIS-EI staff who wish to conduct evaluations for determining eligibility for Part C, and who provide developmental education to children and families will be required to hold a CIS-EI Certificate or a Special Education Endorsement.

Vermont CIS-EI’s development of a Comprehensive System of Personnel Development is discussed in detail in Vermont’s submission of the State Systemic Improvement Plan for Indicator 11.

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Stakeholder Involvement: apply this to all Part C results indicators

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 Rutland County Parent Child Center. This position is primarily focused on recruitment and retention of members (especially parents) of the VICC and engagement with parents.

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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 has developed a newsletter, which is posted on the CIS Blog and distributed to a wide array of stakeholders, including the Vermont Family Network, Vermont’s parent information center, in order to keep families informed of activities related to Indicator 11 and Vermont’s SSIP. Additionally, the Vermont Family Network produces a monthly newsletter that 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.

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Reporting to the Public:

How and where the State reported to the public on the FFY 2013 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 2013 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 2013 APR in 2015, 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/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/part_c
- 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/part_c

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Actions required in FFY 2013 response

None

OSEP Response

Required Actions

The State's IDEA Part C determination for both 2015 and 2016 is needs assistance.

In the State's 2016 determination letter, the Department advised the State of available sources of technical assistance, including OSEP-funded technical assistance centers, and required the State to work with appropriate entities.

The Department directed the State to determine the results elements and/or compliance indicators, and improvement strategies, on which it will focus its use of available technical assistance, in order to improve its performance.

The State must report, with its FFY 2015 SPP/APR submission, due February 1, 2017, on: (1) the technical assistance sources from which the State received assistance; and (2) the actions the State took as a result of that technical assistance.

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	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Target			100%	100%	100%	100%	100%	100%	100%	100%
Data		86.40%	92.34%	97.00%	98.00%	98.70%	97.70%	97.40%	97.00%	97.36%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2014 - FFY 2018 Targets

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

FFY 2014 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 2013 Data*	FFY 2014 Target*	FFY 2014 Data
724	838	97.36%	100%	97.14%

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)	90
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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, 2014 through June 30, 2015.

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

Desk audit of entire FFY 2014 Part C State Database, July 1, 2014 to June 30, 2015.

Provide additional information about this indicator (optional)

Discussion of Data

Of the 838 children with new services on both initial and subsequent IFSPs/One Plans, all services were initiated for 724 children within 30 days of signed parental consent (Vermont Part C's criteria). Services for 90 children were not initiated in a timely manner due to exceptional family circumstances. These 90 children are included in the numerator as well as the denominator. Exceptional family circumstances included families rescheduling, including due to vacations (majority of reasons); families cancelling or not being home when service providers arrived; requests to delay services; family illnesses and hospitalizations; families who moved or were unreachable after multiple attempts by early intervention providers to contact them; families experiencing homelessness; and custody issues. The number of days these services were initiated beyond the 30-day timeline for these 90 children ranged from 1 to 155. The average number of days beyond the 30-day timeline was 24.

There were 24 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 24 children. Delays in timely initiation of services for the 24 children were attributable to: 1) provider unavailability, including speech-language pathologists, occupational and physical therapists, early interventionists and teachers of the visually-impaired (22 children); and 2) the refusal of two child care programs to allow the early interventionists to provide services at the child care programs. The number of days services were initiated beyond the 30-day timeline for these 24 children ranged from 2 to 75; the average number of days beyond the 30-day timeline was 24.

Vermont issued no findings of noncompliance in FFY 2014 in Indicator 1.

Required Actions from FFY 2013

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. Three regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire FFY 2013 Part C State Database (July, 2013 to June 30, 2014) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 3 was at 95.5% compliance (42/44), CIS-EIP 4 at 96.4% compliance (216/224 and CIS-EIP 10 at 97.1% compliance (68/70).

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, second and third quarters of the 2014 State Database (July 2014 to March 2015), CIS-EIPs 3, 4 and 10 achieved 100% compliance for at least 60 consecutive days, indicating that these three 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 2013 Child Count forms submitted by the three CIS-EIPs for the 12 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 for these 12 children.

Actions required in FFY 2013 response

None

Correction of Findings of Noncompliance Identified in FFY 2013

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 2013 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements

The one FFY 2013 finding of noncompliance in Indicator 1 in CIS-EIP 9 was timely corrected. This finding was based on a desk audit of 9 months of the FFY 2013 Part C State Database (July 1, 2013 to March 27, 2014) and written notification issued in FFY 2013. 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 quarter of the 2014 State Database (July 2014 to September 2014), CIS-EIP 9 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 individual case of noncompliance was corrected

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: Part C staff reviewed the 2013 Child Count forms submitted by CIS-EIP 9 for the 9 children for whom services were not initiated in a timely manner and were immediately able to verify that, although late, all services ultimately were initiated for these 9 children.

OSEP Response

Because the State reported less than 100% compliance for FFY 2014, the State must report on the status of correction of noncompliance identified in FFY 2014 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2015 SPP/APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2014 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 2015 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

If the State did not identify any findings of noncompliance in FFY 2014, although its FFY 2014 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2014.

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	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Target ≥			94.00%	95.00%	95.00%	95.00%	96.10%	96.20%	96.20%	96.40%
Data		98.00%	96.17%	97.00%	98.00%	98.00%	99.00%	99.70%	98.70%	98.88%

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2014 - FFY 2018 Targets

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

Key:

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 2014-15 Child Count/Educational Environment Data Groups	7/2/2015	Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	779	
SY 2014-15 Child Count/Educational Environment Data Groups	7/2/2015	Total number of infants and toddlers with IFSPs	800	

FFY 2014 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 2013 Data*	FFY 2014 Target*	FFY 2014 Data
779	800	98.88%	96.60%	97.38%

Actions required in FFY 2013 response

None

OSEP Response

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)

Does your 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

Historical Data

	Baseline Year	FFY	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
A1	2009	Target ≥						71.40%	61.00%	61.20%	61.40%	61.60%
		Data					71.20%	60.80%	61.50%	64.20%	67.10%	66.67%
A2	2009	Target ≥						66.30%	59.60%	59.80%	60.00%	60.00%
		Data					66.10%	59.40%	57.70%	60.70%	62.60%	61.54%
B1	2009	Target ≥						79.20%	68.10%	68.30%	68.50%	68.70%
		Data					79.00%	67.90%	71.70%	75.90%	74.40%	71.57%
B2	2009	Target ≥						58.20%	53.60%	53.80%	54.00%	54.20%
		Data					58.00%	53.40%	50.50%	53.80%	54.50%	54.05%
C1	2009	Target ≥						77.60%	73.10%	73.30%	73.50%	73.50%
		Data					77.40%	72.90%	71.20%	76.50%	74.40%	74.31%
C2	2009	Target ≥						65.90%	60.80%	61.00%	61.20%	61.40%
		Data					65.70%	60.60%	62.00%	62.30%	62.60%	60.12%

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2014 - FFY 2018 Targets

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

Key:

Explanation of Changes

The State's FFY 2013 SPP/APR included an FFY 2018 target of 60% for Summary Statement A2, and OSEP accepted that target. However, the State's FFY 2014 SPP/APR includes no FFY 2018 target for Summary Statement A2, due to a pre-population error.

Targets: Description of Stakeholder Input

As discussed in the introduction, the Vermont Interagency Coordinating Council (VICC) meets at least quarterly in order to

FFY 2014 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

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 2014 SPP/APR Data

Number of infants and toddlers with IFSPs assessed	442.00
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Outcome A: Positive social-emotional skills (including social relationships)

	Number of Children	Percentage of Children
a. Infants and toddlers who did not improve functioning	1.00	0.21%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	103.00	21.91%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	74.00	15.74%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	136.00	28.94%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	156.00	33.19%

	Numerator	Denominator	FFY 2013 Data*	FFY 2014 Target*	FFY 2014 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 $(c+d)/(a+b+c+d)$.	210.00	314.00	66.67%	61.60%	66.88%
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 $(d+e)/(a+b+c+d+e)$.	292.00	470.00	61.54%	60.00%	62.13%

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

	Number of Children	Percentage of Children
a. Infants and toddlers who did not improve functioning	1.00	0.21%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	101.00	21.44%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	109.00	23.14%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	190.00	40.34%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	70.00	14.86%

	Numerator	Denominator	FFY 2013 Data*	FFY 2014 Target*	FFY 2014 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 $(c+d)/(a+b+c+d)$.	299.00	401.00	71.57%	68.90%	74.56%

FFY 2014 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

	Numerator	Denominator	FFY 2013 Data*	FFY 2014 Target*	FFY 2014 Data
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).	260.00	471.00	54.05%	54.20%	55.20%

Outcome C: Use of appropriate behaviors to meet their needs

	Number of Children	Percentage of Children
a. Infants and toddlers who did not improve functioning	0.00	
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	93.00	19.79%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	94.00	20.00%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	198.00	42.13%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	85.00	18.09%

	Numerator	Denominator	FFY 2013 Data*	FFY 2014 Target*	FFY 2014 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).	292.00	385.00	74.31%	73.50%	75.84%
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).	283.00	470.00	60.12%	61.40%	60.21%

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)

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 or exit dates generated impossible progress category combinations.

	Vermont	
	Number	Percentage
Outcome 3a		
a: Children who did not improve functioning	1	0.0%
b: Children who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	103	21.9%
c: Children who improved functioning to a level nearer to same-aged peers but did not reach it	74	15.7%
d: Children who improved functioning to reach a level comparable to same-aged peers	136	28.7%
e: Children who maintained functioning at a level comparable to same-aged peers	156	33.2%
Total	470	100%
Outcome 3b		
a: Children who did not improve functioning	1	0.0%
b: Children who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	101	21.5%
c: Children who improved functioning to a level nearer to same-aged peers but did not reach it	109	23.2%
d: Children who improved functioning to reach a level comparable to same-aged peers	190	40.4%
e: Children who maintained functioning at a level comparable to same-aged peers	70	14.9%
Total	471	100%
Outcome 3c		
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	93	19.8%
c: Children who improved functioning to a level nearer to same-aged peers but did not reach it	94	20.2%
d: Children who improved functioning to reach a level comparable to same-aged peers	198	42.2%
e: Children who maintained functioning at a level comparable to same-aged peers	85	18.0%
Total	470	100%

FFY 2014 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

Discussion of Summary Statements and a-e Progress Data for FFY 2014:

Child outcome data were collected on 474 children who exited in FFY 2014 and who received a minimum of 6 months of service. The Data Quality Index for data completeness, based on the 618 exit count of 843 is 56.23% this is a statistically significant decrease from the FFY 2013 data completeness of 60.91%.

The Data Quality Index has sources of error, first the Vermont's Child Count year is 12/2 through 12/1 each year whereas the Indicator 3 reporting period is 7/1 to 6/30. Vermont has observed that the 618 exit count is 843 while the exit count for 7/1/2014 to 6/30/2015 is 870. Secondly, Child Outcomes are only reported on children who have received 6 months or more of services while the exit count is for all children exiting, regardless of service duration. Vermont observed the 870 children exited from 7/1/2014 through 6/30/2015 but 294 exited with less than 6 months of service leaving only 576 children for whom to report Child Outcomes. Thus an accurate reflection of Vermont's Data Completeness is actually 474/576 or 82%. The Summary of Common Data Issues is:

Vermont has a high percentage of children who exit with less than 6 months service as seen by our Summary of Common Data Issues:

	Summary of Common Data Issues						
	Number	Percent of total with data entered					
Children with data entered	870						
Missing entry dates	0	0%					
Missing exit dates	0	0%					
Time in service is less than 6 months	294	33.8%					
Usable data on at least one outcome	474	54.5%					
Usable data on all 3 outcomes	463	53.2%					
Missing progress question responses	1	Outcome 1	Outcome 2	Outcome 3	Outcome 1	Outcome 2	Outcome 3
		0	0	0	0.1%	0%	0%
Impossible combinations	23	23	24	2.6%	2.6%	2.8%	

Even so, the Vermont data completeness has degraded from FFY 2013 to FFY 2014. To address the data completeness degradation, Vermont Part C plans to institute a quarterly data completeness validation that will be shared with each region within the State. Vermont Part C will provide technical assistance to those regions not meeting targets.

An examination of state progress categories 'a' through 'e' shows the results to be well within the "low percentage" and "high percentage" as defined by ECO ("low percentage" and "high percentage" from FFY 2013 Results Matrix).

A comparison of Vermont Child Outcomes shows the results to be well within the national 10 to 90 percentile range for each outcome as defined by ECO for all three child outcomes (percentiles from FFY 2013 Results Matrix).

A comparison of Vermont Child Outcomes from FFY 2013 to FFY 2014 using the Test of Proportional Differences method shows no significant change in outcomes from FFY 2013.

In Phase I of the State Systemic Improvement Plan (SSIP), Vermont chose the following State Identified Measurable Result (SIMR): Families are able to help their infants and toddlers develop and learn functional social and/or emotional skills, and infants and toddlers substantially improve their social and/or emotional functional development. With 3A as a part of the State Identified Measurable Result, Vermont is actively developing the Phase II requirements for the State Systemic Improvement Plan. It is believed that since strategies associated with Vermont's SSIP are directly intended to address outcome 3A, and since these improvements were in the planning stage during this 2014 APR period, Vermont will only begin to see improved outcomes in the 2015 APR. Vermont will describe these improvements, and the results expected, in full detail in the Phase II SSIP document to be submitted to OSEP April 1, 2016.

As an example, one of these improvements is to begin quarterly data completeness validation as described above.

Actions required in FFY 2013 response

None

OSEP Response

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	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
A	2011	Target ≥					80.00%	80.00%	81.00%		78.30%	78.30%
		Data			83.00%	80.00%	86.00%	84.30%	79.20%	78.10%	79.43%	76.23%
B	2011	Target ≥					85.00%	85.00%	86.00%		86.10%	86.10%
		Data			85.00%	85.00%	89.00%	90.70%	87.00%	85.90%	85.11%	83.54%
C	2011	Target ≥					85.00%	85.00%	88.10%		81.00%	81.00%
		Data			87.00%	89.00%	93.00%	93.40%	78.00%	80.80%	80.43%	82.64%

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2014 - FFY 2018 Targets

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

Key:

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 2014 SPP/APR Data

Number of respondent families participating in Part C	185.00
A1. Number of respondent families participating in Part C who report that early intervention services have helped the family know their rights	138.00

FFY 2014 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

A2. Number of responses to the question of whether early intervention services have helped the family know their rights	167.00
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	146.00
B2. Number of responses to the question of whether early intervention services have helped the family effectively communicate their children's needs	183.00
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	132.00
C2. Number of responses to the question of whether early intervention services have helped the family help their children develop and learn	174.00

	FFY 2013 Data*	FFY 2014 Target*	FFY 2014 Data
A. Percent of families participating in Part C who report that early intervention services have helped the family know their rights	76.23%	78.30%	82.63%
B. Percent of families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs	83.54%	86.10%	79.78%
C. Percent of families participating in Part C who report that early intervention services have helped the family help their children develop and learn	82.64%	81.00%	75.86%

Explanation of B Slippage

The slippage in 4B, Families that report that early intervention services have helped the family effectively communicate their children's needs, tracks with the slippage in 4C and will be addressed in conjunction with 4C as described below.

Explanation of C Slippage

In Phase I of the State Systemic Improvement Plan (SSIP), Vermont chose the following State Identified Measurable Result (SIMR): Families are able to help their infants and toddlers develop and learn functional social and/or emotional skills, and infants and toddlers substantially improve their social and/or emotional functional development. With 4C as a part of the State Identified Measurable Result, Vermont is actively developing the Phase II requirements for the State Systemic Improvement Plan. It is believed that since strategies associated with Vermont's SSIP are directly intended to address outcomes 4B and 4C, and since these improvements were in the planning stage during this 2014 APR, Vermont will only begin to see improved outcomes in the 2015 APR. Vermont will describe these improvements, and the results expected, in full detail in the Phase II SSIP document to be submitted to OSEP April 1, 2016.

As an example, one of these improvements is to modify the process of delivering the survey to improve response rates as described in the following section.

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 2014 Family Outcome survey was 30.2% which was slightly below Vermont's target of 32% for this year as well as last year's return rate of 30.4%. Of the 649 surveys distributed, 185 were returned (a small number of surveys were returned as undeliverable).

The Family Outcome survey is offered annually to all families who have been receiving services for a minimum of 6 months including those families who have exited within the 6 month period prior to the survey. In FFY 2013 and prior to that, local service providers were asked to encourage families to respond to the survey when they received it. The State would mail the surveys to all selected families. A second mailing would follow to those who had not responded to the first mailing. For FFY 2014, Vermont instituted a new process to deliver the Family Survey. Each local service provider hand delivered the first pass survey to families, encouraging them to respond. A second survey was mailed to those families who did not respond. This change in process resulted in no significant change in response rate.

Since the changes in delivery method did not result in an improved response rate, Vermont Part C requested and has received Technical Assistance from the IDEA Data Center (IDC). Based on the technical assistance from IDC, Vermont will enhance the FFY 2015 Family Survey process. Prior to the first distribution of the survey, all selected families will be mailed a postcard with information about the Family Survey and encouragement to respond when they receive the survey. The local service providers will again hand deliver the first pass survey to families. Local providers will also be provided with talking points to assist them in encouraging families to respond. Lastly, the Family Survey packet itself will include a brochure explaining the results of the previous year's survey and the actions the State has taken based on results of the survey. The belief is that if families understand the value of the survey, they will take the time to respond. A second pass Family Survey will be mailed to families who have not responded.

In order to examine representativeness of survey data, comparisons were made between Vermont's 618 report (12/13 – 12/14) and the Family Outcomes survey on gender and race/ethnicity. Comparisons indicate data from both sources are similar. Comparisons of race/ethnicity between the two data sets show 9.9% of minority groups are represented in the 618 report while 7.6% are represented in the Family Outcome survey. For gender, the 618 report shows 63.7% of exits were male and 36.3% were female, while the surveys indicated 55.4% were male and 44.6%, female.

Vermont's method of selecting a Family Survey cohort is to select all active clients who have received at least 6 months of service and all clients who have exited the program since October 1st and received at least six months of service. Based on that we selected a survey cohort of 618 families and have the following results:

Male Female All % Male

FFY 2014 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

618 Report	536	306	842	63.7%
Survey Cohort	377	241	618	61.0%
Survey Response	102	82	184	55.4%
	Non-white	White	All	%Non-White
618	83	759	842	9.9%
Survey Cohort	55	563	618	8.7%
Survey Response	14	170	184	7.6%

The difference in response rates for non-white clients is not statistically different than the 618 population and is representative of the race and ethnicity of families being served in Vermont.

The difference in gender response rates compared to the 618 gender is statistically significant. However, if one additional survey response was received from a parent with a male child, this would not have been statistically significant. Therefore, in effect, since Vermont's population is so small, Vermont does believe that the survey responses were representative of the gender demographics. We will therefore not be targeting increasing responses from parents of males. Vermont will continue to survey 100% of all families that are active or recently exited services. As indicated above and in the Introduction (item #3) of this report, Vermont is focused on increasing our overall survey response rate to not only meet, but exceed our target. By increasing our overall response rate, Vermont believes we will receive a statistically representative sample of our demographic populations as we have seen in previous years.

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 2013 response

None

OSEP Response

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	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Target ≥			0.91%	0.93%	0.94%	0.96%	0.98%	0.99%	0.99%	0.99%
Data		1.10%	1.29%	1.36%	1.34%	1.12%	1.01%	1.21%	1.30%	1.51%

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2014 - FFY 2018 Targets

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

Key:

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 2014-15 Child Count/Educational Environment Data Groups	7/2/2015	Number of infants and toddlers birth to 1 with IFSPs	89	null
U.S. Census Annual State Resident Population Estimates April 1, 2010 to July 1, 2013	4/3/2014	Population of infants and toddlers birth to 1	6,023	null

FFY 2014 SPP/APR Data

Number of infants and toddlers birth to 1 with IFSPs	Population of infants and toddlers birth to 1	FFY 2013 Data*	FFY 2014 Target*	FFY 2014 Data
89	6,023	1.51%	0.99%	1.48%

Actions required in FFY 2013 response

None

OSEP Response

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	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Target ≥			3.25%	3.28%	3.30%	3.40%	3.50%	3.50%	3.50%	3.60%
Data		3.20%	3.45%	4.00%	3.90%	3.93%	4.23%	4.35%	4.22%	4.38%

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2014 - FFY 2018 Targets

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

Key:

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 2014-15 Child Count/Educational Environment Data Groups	7/2/2015	Number of infants and toddlers birth to 3 with IFSPs	800	
U.S. Census Annual State Resident Population Estimates April 1, 2010 to July 1, 2014	7/2/2015	Population of infants and toddlers birth to 3	18,247	

FFY 2014 SPP/APR Data

Number of infants and toddlers birth to 3 with IFSPs	Population of infants and toddlers birth to 3	FFY 2013 Data*	FFY 2014 Target*	FFY 2014 Data
800	18,247	4.38%	3.60%	4.38%

Actions required in FFY 2013 response

None

OSEP Response

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	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Target			100%	100%	100%	100%	100%	100%	100%	100%
Data		79.80%	79.20%	93.00%	97.00%	97.00%	96.60%	96.80%	96.00%	95.57%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2014 - FFY 2018 Targets

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

FFY 2014 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 2013 Data*	FFY 2014 Target*	FFY 2014 Data
594	888	95.57%	100%	96.62%

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)	264
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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, 2014 through June 30, 2015.

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 2014 Part C State Database, July 1, 2014 to June 30, 2015.

Provide additional information about this indicator (optional)

Discussion of Data

Of the 888 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, 594 children received an evaluation and assessment and initial IFSP/One Plan meeting within Part C's 45-day timeline. Services for 264 children were not initiated in a timely manner due to exceptional family circumstances. These 264 children are included in the numerator as well as the denominator. Exceptional family circumstances included families who were unreachable after multiple attempts by early intervention providers to contact them or who failed to attend a scheduled meeting (majority of reasons); families' requests to reschedule evaluations and/or IFSP/One Plan meetings; families cancelling meetings; families experiencing homelessness; family vacation schedules; family illnesses and hospitalizations, including for surgeries; weather factors; and the need for additional evaluations to determine eligibility. The number of days these services were conducted beyond the 45-day timeline for these 264 children ranged from 1 to 152. The average number of days beyond the 45-day timeline was 26.

30 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 30 children. Delays in meeting the 45-day timeline were due to scheduling conflicts/unavailability of early interventionists, speech-language pathologists, occupational and physical therapists and autism consultants (20 children); and delays in assigning Educational Surrogates (10 children). The number of days these services were conducted beyond the

45-day timeline for these 30 children ranged from 1 to 80. The average number of days beyond the 45-day timeline was 23.

Data analysis specific to timeliness of evaluations and assessments demonstrated that evaluations and assessments were completed within Part C's 45-day timeline for 87% of the children (770/888). The 118 evaluations and assessments not completed within Part C's 45-day timeline included 110 children for whom exceptional family circumstances caused delays. 8 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 22 of the 30 children.

Vermont issued no findings of noncompliance in FFY 2014 in Indicator 7.

Required Actions from FFY 2013

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.

Eight regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire FFY 2013 Part C State Database (July 1, 2013 to June 30, 2014) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 1 was at 97.6% compliance (40/41), CIS-EIP 2 at 80.9% compliance (38/47), CIS-EIP 3 at 86.7% compliance (39/45), CIS-EIP 4 at 95.6% compliance (217/227), CIS-EIP 8 at 95.5% compliance (21/22), CIS-EIP 10 at 97.3% compliance (72/74), CIS-EIP 11 at 97.9% compliance (46/47) and CIS-EIP 12 at 94.1% compliance (48/51).

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, second and third quarters of the FFY 2014 State Database (July 2014 to March 2015), CIS-EIPs 1, 2, 3, 4, 8, 10, 11 and 12 achieved 100% compliance for at least 60 consecutive days, indicating that these eight 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 2013 Child Count forms submitted by the eight CIS-EIPs for the 33 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 33 children.

Actions required in FFY 2013 response

None

Correction of Findings of Noncompliance Identified in FFY 2013

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 2013 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements

The one FFY 2013 finding of noncompliance in Indicator 7 in CIS-EIP 9 was timely corrected. This finding was based on a desk audit of 9 months of the FFY 2013 Part C State Database (July 1, 2013 to March 27, 2014) and written notification issued in FFY 2013. 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 quarter of the 2014 State Database (July 2014 to September 2014), CIS-EIP 9 achieved 100% compliance

FFY 2014 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

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 individual case of noncompliance was corrected

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: Part C staff reviewed the 2013 Child Count forms submitted by CIS-EIP 9 for the 4 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 for these 4 children.

OSEP Response

Because the State reported less than 100% compliance for FFY 2014, the State must report on the status of correction of noncompliance identified in FFY 2014 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2015 SPP/APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2014 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 2015 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

If the State did not identify any findings of noncompliance in FFY 2014, although its FFY 2014 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2014.

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	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Target			100%	100%	100%	100%	100%	100%	100%	100%
Data		92.00%	93.00%	100%	99.00%	99.00%	99.00%	99.00%	98.00%	98.88%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2014 - FFY 2018 Targets

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

FFY 2014 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 2013 Data*	FFY 2014 Target*	FFY 2014 Data
762	843	98.88%	100%	100%

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)	81
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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, 2014 through June 30, 2015.

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 2014 Part C State Database, July 1, 2014 to June 30, 2015.

Provide additional information about this indicator (optional)

Discussion of Data

762 of the 843 children who exited Part C had timely written transition plans in place upon exiting Part C. 81 of the 843 children did not have timely written 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, and early intervention providers' inability to contact families after multiple attempts.

Vermont issued no findings of noncompliance in FFY 2014 in Indicator 8A.

Required Actions from FFY 2013

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.

Six regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire FFY 2013 Part C State Database (July 1, 2013 to June 30, 2014) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 1 was at 95.8% compliance (23/24), CIS-EIP 3 at 97.1% compliance (33/34), CIS-EIP 4 at 99.5% compliance (203/204), CIS-EIP 5 at 96.8% compliance (60/62), CIS-EIP 6 at 93.9% compliance (46/49), and CIS-EIP 10 at 98.6% compliance (69/70). 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 2014 Part C State Database (July 2014 to December 2014), CIS-EIPs 1, 3, 4, 5, 6 and 10 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 emails with staff in the six CIS-EIPs that, although there were no timely written transition plans, transition planning did occur for the 9 children prior to the children exiting the CIS-EI Program.

Actions required in FFY 2013 response

None

Correction of Findings of Noncompliance Identified in FFY 2013

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

OSEP Response

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	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
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%	89.47%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2014 - FFY 2018 Targets

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

FFY 2014 SPP/APR Data

Data include notification to both the SEA and LEA

- Yes
- No

Please explain

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 2013 Data*	FFY 2014 Target*	FFY 2014 Data
450	519	89.47%	100%	86.71%

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 2014 Data)	0
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Explanation of Slippage

FFY 2014 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

Vermont Part C's FFY 2014 compliance of 86.71% for Indicator 8B is a decrease from the 89.47% compliance in FFY 2013. Written notification to the LEA and SEA for 69 children potentially eligible for Part B was noncompliant. The noncompliance in notification for the majority of the 69 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 2014 Child Count forms and in follow up communication with CIS-EI regional program staff that notification for 36 children occurred more than six months prior to their third birthdays and notification for 32 children occurred fewer than 90 days prior to their third birthdays. CIS-EI program staff in one regional program did not send written notification for one child. Therefore notification, although not occurring within Vermont Part C's required time period (between six months and 90 days prior to third birthday), did occur for 68 of the 69 children.

As reported in Vermont Part C's FFY 2013 Annual Performance Report, 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 Part B 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 months and 90 days 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 addition to statewide provision of training and technical assistance provided collaboratively by state Part C and Part B Preschool staff prior to the rule changes taking effect in FFY 2013 and the development of other resources to support implementation documented in Vermont's FFY 2013 APR, Part C CIS-EI staff have continued to provide specific and targeted guidance and technical assistance to regional CIS-EI program staff. The state Part C Data Manager, who is consistently 'hands on' with Vermont Part C's data (which continue to be generated via a manual vs. electronic data management system), immediately follows up with regional CIS-EI program staff if data they submit are noncompliant and clarifies the timeline requirement for notification to the LEA and SEA. The Data Manager also works closely with Vermont's Part C Coordinator/Administrator to ensure the monthly agendas for the state CIS-EI conference calls/webinars with regional CIS-EI programs regularly include clarification and reinforcement of the requirements and guidance specific to all Part C CIS-EI rules and regulations. There has been a particular focus on 8B, however, since the Vermont Part C Rules effective July 2013 required significant changes in procedures and practices. Based on Vermont Part C's decrease in compliance since the rule for notification went into effect in FFY 2013, it is evident that regional CIS-EI programs continue to experience challenges in fulfilling the timeline requirements for Indicator 8B.

Vermont issued no findings of noncompliance in FFY 2014 in Indicator 8B. As reported in this FFY 2014 APR, the FFY 2013 findings of noncompliance in four regional CIS-EI programs were timely corrected. Data analysis shows the low level of statewide compliance in FFY 2014 for Indicator 8B was particularly impacted by noncompliance in five different regional CIS-EI programs. These five programs demonstrated a high level of compliance in FFY 2013, i.e., 95% and above. State CIS-EI staff consider the noncompliance in these five regional programs to reflect data 'anomalies,' since trend data in these five regions from the FFY 2006 through the FFY 2013 APR reporting years primarily demonstrate high levels of compliance for Indicator 8B.

Describe the method used to collect these data

Data Method/Source: Desk audit of entire FFY 2014 Part C State Database, July 1, 2014 to June 30, 2015.

Do you have a written opt-out policy? No

Is the policy on file with the Department? No

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

- State monitoring
- State database

Describe the method used to select EIS programs for monitoring.

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, 2014 through June 30, 2015.

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, 2014 to June 30, 2015.

Provide additional information about this indicator (optional)

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 450 of 519 children potentially eligible for Part B. 51 of the 450 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 51 children are included in the numerator and denominator.

Vermont issued no findings of noncompliance in FFY 2014 in Indicator 8B.

Required Actions from FFY 2013

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.

Six regional CIS-EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2013 to June 30, 2014) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 1 was at 95.0% compliance (19/20), CIS-EIP 3 at 84.6% compliance (22/26), CIS-EIP 4 at 98.8% compliance (161/163), CIS-EIP 6 at 97.3% compliance (36/37), CIS-EIP 8 at 92.3% compliance (12/13) and CIS-EIP 11 at 88.6% compliance (31/35).

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, second, third and fourth quarters of the 2014 Part C State Database (July 2014 to June 2015), CIS-EIPs 1, 3, 4, 6, 8 and 11 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 2013 Child Count forms for the 13 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 13 children.

Actions required in FFY 2013 response

None

Correction of Findings of Noncompliance Identified in FFY 2013

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
4	4	null	0

FFY 2013 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements

The four FFY 2013 findings of noncompliance in Indicator 8B in CIS-EIPs 7, 9, 10 and 12 were timely corrected. These findings were based on a desk audit of 9 months of the FFY 2013 Part C State Database (July 1, 2013 to March 27, 2014) and written notification issued in FFY 2013. 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, second, third and fourth quarters of the 2014 State Database (July 2014 to June 2015), CIS-EIPs 7, 9, 10 and 12 achieved 100% compliance for at least 60 consecutive days, indicating that these programs were correctly implementing the timely service provision requirements in 34 CFR §303.209(b).

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

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: Part C staff reviewed the 2013 Child Count forms submitted by CIS-EIPs 7, 9, 10 and 12 for the 47 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 47 children.

OSEP Response

Because the State reported less than 100% compliance for FFY 2014, the State must report on the status of correction of noncompliance identified in FFY 2014 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2015 SPP/APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2014 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 2015 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

If the State did not identify any findings of noncompliance in FFY 2014, although its FFY 2014 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2014.

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	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Target			100%	100%	100%	100%	100%	100%	100%	100%
Data		83.00%	91.00%	97.00%	98.00%	98.00%	99.00%	99.00%	99.00%	95.76%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2014 - FFY 2018 Targets

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

FFY 2014 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 2013 Data*	FFY 2014 Target*	FFY 2014 Data
360	519	95.76%	100%	96.91%

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 2014 Data)	34
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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)

110

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, 2014 through June 30, 2015.

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 2014 Part C State Database, July 1, 2014 to June 30, 2015.

Provide additional information about this indicator (optional)

Discussion of Data

Although 8B documents there were 519 children determined potentially eligible for Part B preschool services, the number ultimately used in the denominator for 8C is 485. 16 of the 519 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. 18 families of children determined potentially eligible did not provide the requisite approval for holding the transition conference. Therefore, 34 children are not included in either the numerator or denominator and 485 is the number used in calculating compliance for 8C (519 potentially eligible children, minus 16 children who exited prior to timeline for conducting conference, minus 18 children whose families did not give approval = 485).

The transition conference was timely for 314 children potentially eligible for Part B services. There were 110 children for whom the transition conference did not occur in a timely way due to exceptional family circumstances. These 110 children are included in the numerator and the denominator. Exceptional family circumstances included family cancellations and requests to reschedule the transition conference, including for vacations (majority of reasons); families who moved; families the early intervention providers had difficulties in contacting, causing delays in scheduling and late conferences; illness and hospitalization; and a custody issue. State CIS-EI staff confirmed that transition conferences, although late, did occur for all of the 110 children. 46 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 (314 timely conferences, 110 with family circumstances delaying the conferences, 46 late referrals = 470).

Timely transition conferences did not occur for 15 children due to scheduling conflicts for LEA personnel and CIS-EI program staff and other providers. State Part C staff verified that transition conferences, although late, ultimately did occur for these 15 children prior to their transition to Part B preschool services.

Vermont issued no findings of noncompliance in FFY 2014 in Indicator 8C.

Required Actions from FFY 2013

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.

Five regional CIS EIPs that demonstrated noncompliance based on analysis of the entire Part C State Database (July 1, 2013 to June 30, 2014) corrected the noncompliance prior to being issued written findings of noncompliance. CIS-EIP 1 was at 88.2% compliance (15/17), CIS-EIP 3 at 90.9% compliance (20/22), CIS-EIP 4 at 96.9% compliance (155/160), CIS-EIP 7 at 97.1% compliance (33/34) and CIS-EIP 10 at 98.2% compliance (56/57).

Actions required in FFY 2013 response

None

Correction of Findings of Noncompliance Identified in FFY 2013

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
2	2	null	0

FFY 2013 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements

The two FFY 2013 findings of noncompliance in Indicator 8C in CIS-EIPs 2 and 9 were timely corrected. These findings were based on a desk audit of 9 months of the FFY 2013 Part C State Database (July 1, 2013 to March 27, 2014) and written notification issued in FFY 2013. 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 2014 State Database (July 2014 to October 2014), CIS-EIPs 2 and 9 achieved 100% compliance for at least 60 consecutive days, indicating that these programs were correctly implementing the timely service provision requirements in 34 CFR §303.209(c).

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

Consistent with October 17, 2008 Letter to Dear Colleague/OSEP Memorandum 09-02 and September 3, 2008 FAQs: Part C staff reviewed the 2013 Child Count forms submitted by CIS-EIPs 2 and 9 for the 11 children whose transition conferences were not timely and verified immediately that, although late, the transition conferences ultimately occurred for these 11 children.

OSEP Response

Because the State reported less than 100% compliance for FFY 2014, the State must report on the status of correction of noncompliance identified in FFY 2014 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2015 SPP/APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2014 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 2015 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

If the State did not identify any findings of noncompliance in FFY 2014, although its FFY 2014 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2014.

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	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Target ≥										
Data										

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2014 - FFY 2018 Targets

FFY	2014	2015	2016	2017	2018
Target ≥					

Key:

Targets: Description of Stakeholder Input

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2014-15 EMAPS IDEA Part C Dispute Resolution Survey; Section C: Due Process Complaints	11/5/2015	3.1(a) Number resolution sessions resolved through settlement agreements	n	null
SY 2014-15 EMAPS IDEA Part C Dispute Resolution Survey; Section C: Due Process Complaints	11/5/2015	3.1 Number of resolution sessions	n	null

FFY 2014 SPP/APR Data

3.1(a) Number resolution sessions resolved through settlement agreements	3.1 Number of resolution sessions	FFY 2013 Data*	FFY 2014 Target*	FFY 2014 Data
0	0			

Actions required in FFY 2013 response

None

OSEP Response

The State reported fewer than ten resolution sessions held in FFY 2014. 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	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Target ≥										
Data				100%						

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2014 - FFY 2018 Targets

FFY	2014	2015	2016	2017	2018
Target ≥					

Key:

Targets: Description of Stakeholder Input

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2014-15 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/5/2015	2.1.a.i Mediations agreements related to due process complaints	n	null
SY 2014-15 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/5/2015	2.1.b.i Mediations agreements not related to due process complaints	n	null
SY 2014-15 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/5/2015	2.1 Mediations held	n	null

FFY 2014 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 2013 Data*	FFY 2014 Target*	FFY 2014 Data
0	0	0			

Actions required in FFY 2013 response

None

OSEP Response

The State reported fewer than ten mediations held in FFY 2014. 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.

Reported Data

Baseline Data: 2013

FFY	2013	2014
Target		52.10%
Data	52.10%	74.14%

Key: Gray – Data Prior to Baseline Yellow – Baseline
 Blue – Data Update

FFY 2015 - FFY 2018 Targets

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

Key:

Description of Measure

Vermont CIS-EI will measure progress on the SIMR by reporting data on the three regions selected to implement targeted supports. The goal of these targeted supports is to help these regions improve results for child outcome 3a, summary statement 1: the percentage of infants and toddlers with One Plans who demonstrate substantially improved positive social and/or emotional skills by the time they exited Part C services.

Targets: Description of Stakeholder Input

Overview

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

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)

Infrastructure Development

- (a) Specify improvements that will be made to the State infrastructure to better support EIS programs and providers to implement and scale up EBPs to improve results for infants and toddlers with disabilities and their families.
- (b) Identify the steps the State will take to further align and leverage current improvement plans and other early learning initiatives and programs in the State, including Race to the Top-Early Learning Challenge, Home Visiting Program, Early Head Start and others which impact infants and toddlers with disabilities and their families.
- (c) Identify who will be in charge of implementing the changes to infrastructure, resources needed, expected outcomes, and timelines for completing improvement efforts.
- (d) Specify how the State will involve multiple offices within the State Lead Agency, as well as other State agencies and stakeholders in the improvement of its infrastructure.

Support for EIS programs and providers Implementation of Evidence-Based Practices

- (a) Specify how the State will support EIS providers in implementing the evidence-based practices that will result in changes in Lead Agency, EIS program, and EIS provider practices to achieve the SIMR(s) for infants and toddlers with disabilities and their families.
- (b) Identify steps and specific activities needed to implement the coherent improvement strategies, including communication strategies and stakeholder involvement; how identified barriers will be addressed; who will be in charge of implementing; how the activities will be implemented with fidelity; the resources that will be used to implement them; and timelines for completion.
- (c) Specify how the State will involve multiple offices within the Lead Agency (and other State agencies such as the SEA) to support EIS providers in scaling up and sustaining the implementation of the evidence-based practices once they have been implemented with fidelity.

Evaluation

- (a) Specify how the evaluation is aligned to the theory of action and other components of the SSIP and the extent to which it includes short-term and long-term objectives to measure implementation of the SSIP and its impact on achieving measurable improvement in SIMR(s) for infants and toddlers with disabilities and their families.
- (b) Specify how the evaluation includes stakeholders and how information from the evaluation will be disseminated to stakeholders.
- (c) Specify the methods that the State will use to collect and analyze data to evaluate implementation and outcomes of the SSIP and the progress toward achieving intended improvements in the SIMR(s).
- (d) Specify how the State will use the evaluation data to examine the effectiveness of the implementation; assess the State's progress toward achieving intended improvements; and to make modifications to the SSIP as necessary.

Technical Assistance and Support

Describe the support the State needs to develop and implement an effective SSIP. Areas to consider include: Infrastructure development; Support for EIS programs and providers implementation of EBP; Evaluation; and Stakeholder involvement in Phase II.

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: Designated by the Lead Agency Director to certify

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 Coordinator

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