

VT Part C

FFY2015 State Performance Plan / Annual Performance Report

Executive Summary:

Vermont Children's Integrated Services Part C Early Intervention Program worked diligently over the reporting year (July 1, 2015 to June 30, 2016) to identify opportunities to improve Vermont's Part C services see better outcomes for infants and toddlers with disabilities. A few notable activities engaged in by Vermont Part C included:

- acquiring an updated Microsoft Access database to improve our ability to monitor regional Part C data more effectively as well as improving our data reporting;
- revising and filling staff positions to focus on Systemic Improvement Plan strategies to foster family connections and develop a Comprehensive System of Personnel Development;
- revising a staff position to provide direct support to regional Part C programs for Continuous Quality Improvement;
- improving monitoring of child outcome data to address data completeness issues;
- implementing new Family Survey distribution strategies to increase response rates in order to maximize family input and improve the efficacy of Vermont's Part C services;
- providing determinations to the regional Part C programs at the Vermont Interagency Coordinating Council meeting, and facilitating a data-informed quality improvement activity to support the regional program's strategic planning;
- administering a personnel survey to CIS Practitioners to identify barriers and opportunities to staff retention;
- as part of the Children's Integrated Services team, hosting the annual CIS Institute, which focused on trauma-informed services and strategies for practitioners.

While the gains Vermont has realized as a result of these and strategic improvement activities are not as significant in this reporting year, Vermont believes that these activities will result in greater improvements in the coming year. This is expected because Vermont continually assesses and adjusts strategies as needed based on the results the strategy demonstrates. For example, based on analysis of the previous APR, Vermont instituted quarterly data monitoring of the Child Outcome data completeness. As a result, Vermont practitioners improved the completeness of their data almost 10%. While encouraging, this is still below acceptable levels. Therefore, Vermont modified this strategy and began, in December of 2016, which was after the close of this reporting year, to monitor this, and all other APR data indicators monthly. Vermont expects to see more marked improvements in the coming year as a result of this change.

Vermont will continue to monitor all strategies regularly to determine effectiveness of each strategy. With the input of regional stakeholders and the Vermont Interagency Coordinating Council, Vermont will adjust strategies as needed in order to realize improved practitioner adherence to federal Part C regulations and to achieve better outcomes for Vermont's infants and toddlers served by Vermont's CIS-EI Program.

Vermont accessed national technical assistance to support ongoing improvement efforts for Part C Early Intervention. Technical assistance received during FFY'15, supported Vermont's family survey, State Systemic Improvement Plan (SSIP) strategies, and the State's understanding of and process improvements for reporting and monitoring.

Specifically, Vermont accessed the National Center for Systemic Improvement (NCSI) throughout our strategic planning and activities related to the SSIP. Specific technical assistance received to support the work SSIP is discussed at length within that document (see Indicator 11). Vermont received an Early Childhood Personnel Center (ECPC) Technical Assistance Grant, which has been directly supporting the Comprehensive System of Personnel Development. The Early Childhood Technical Assistance Center (ECTA) has also supported the SSIP work.

The Center for IDEA Early Childhood Systems (DaSy) and the IDEA Data Center (IDC) supported Vermont to develop new tools and strategies for improving the family survey response rate. See Indicator 5 for more information about the tools and strategies that were developed and implemented, as well as the resultant increased response rate. NCSI, DaSy and IDC were valued partners in Vermont's evaluation work associated with the SSIP. These three TA centers also supported Vermont as we implemented a new database to tracking APR data and monitoring regional compliance. Access to these TA centers ensures that Vermont correctly interprets regulatory and data requirements, and has high quality data collection, monitoring and reporting. Vermont's Part C Data Manager regularly accesses technical assistance to learn or verify understanding before making changes related to Vermont's Part C data.

Vermont regularly participated in Webinars (ex. learning about the difference between screening, evaluation and assessment), cross-state learning collaboratives (ex. to explore and share information with other states about family engagement practices), and OSEP technical assistance (ex. monthly TA calls, as well as direct questions for TA to our OSEP State Lead). Most recently, as a result of last year's APR submission, and Vermont's Differentiated Monitoring Decision in the fall of 2016, the State has accessed OSEP TA to begin exploring improvements to Vermont's child outcomes. Strategies are being developed with ECTA and DaSy for FFY'17 implementation including: education to understand child outcome progress categories, root cause analysis, and strategic activities to support practice improvement.

Vermont participated in the following national meetings/conferences/institutes in FFY'2015:

- OSEP Leadership Meeting – July 2015 and February 2016 (topics included Part C data, evaluation and leadership)
- Division of Early Childhood (DEC) Conference – October 2015 (topics included the Social Emotional Evaluation and Assessment Measure tool and have subsequently incorporated this evidence-informed tool into the SSIP)

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- DEC Institute on Family Engagement – March 2016 (topics included family engagement strategies to support the SSIP)
- Administration for Children and Families, Office of Child Care Infant & Toddler Strategies Institute – June 2016 (topics included family engagement and evidence-based practices)

These technical assistance opportunities served to improve Vermont’s understanding of regulations, monitoring, data collection and reporting, as well as best practices for early intervention.

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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 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.

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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..."

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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 Building Bright Futures Personnel Preparation Committee. 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 being 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. This parent engagement will be coordinated with activities within 10/19/2017

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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 Learning Challenge Grant projects.

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Reporting to the Public:

How and where the State reported to the public on the FFY 2014 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 2014 APR, as required by 34 CFR §303.702(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 2014 APR in 2016, 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 2014 response

OSEP Response

The State's determinations for both 2015 and 2016 were Needs Assistance. Pursuant to section 616(e)(1) of the IDEA and 34 C.F.R. § 300.604(a), OSEP's June 28, 2016 determination letter informed the State that it 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. The State provided the required information.

Required Actions

The State's IDEA Part C determination for both 2016 and 2017 is Needs Assistance. In the State's 2017 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 2016 SPP/APR submission, due February 1, 2018, 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.

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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	2014
Target			100%	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%	97.14%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2015 - FFY 2018 Targets

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

FFY 2015 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 2014 Data*	FFY 2015 Target*	FFY 2015 Data
1016	1286	97.14%	100%	93.00%

Explanation of Slippage

Of the 1286 children with new services on both initial and subsequent IFSPs/One Plans, all services were initiated for 1016 children within 30 days of signed parental consent (Vermont Part C's criteria). Services for 180 children were not initiated in a timely manner due to exceptional family circumstances. These 180 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 average number of days beyond the 30-day timeline for these 180 children was 34 days.

There were 90 children for whom delays in initiating services were attributable to circumstances other than documented exceptional family circumstances. Provider availability caused delays for 90 children. State Part C CIS-EI staff verified that services ultimately were initiated for these 90 children. The most common causes related to non-compliance of timely initiation of services for the 90 children were attributable to: 1) provider unavailability, including speech-language pathologists, occupational and physical therapists, early interventionists and teachers of the visually-impaired. The average number of days services were initiated beyond the 30-day timeline for these 90 children was 40 days.

As indicated above, Vermont has identified a common reason for a delay in timely delivery of planned services is due to insufficient numbers of private speech, physical and occupational therapists. Vermont has a very low unemployment rate. Coupled with this, private providers often find it more desirable to serve school-age children through contracted services as it leads to greater stability of reimbursement than Vermont's Part C fee-for-service model. Through the fall, Vermont has improved the administrative processes related to our system of payments to ensure timely reimbursement to providers for Part C services. However, delays in assignment of social security numbers, and lapses in insurance coverage for infants and toddlers lead to denials of fee-for-service claims, which continue to serve as a disincentive to private providers to serve the Part C population. Throughout 2017, Vermont will be seeking to determine ways we can support the private provider system to provide adequate capacity to meet the needs of eligible infants and toddlers enrolled in Part C.

Over the past several years, Vermont Early Intervention has sought to improve regional performance by monitoring indicator data quarterly. While this has led to some improvement, it has not brought Vermont Early Intervention to the level of compliance to federal timelines our children and their families deserve. As a result, Vermont CIS-EI re-visioned a staff role to be focused on Continuous Quality Improvement. This position, working closely with the CIS-EI Evaluation and Data Quality Coordinator and the Personnel Development Coordinator, will provide additional support to regions who are out of compliance with Part C regulations. In addition, CIS-EI, with the full implementation of our new State database (July 1, 2016), has instituted monthly data reviews to monitor compliance to federal indicators. This monitoring began in December of 2016. Vermont believes that monthly monitoring enables the State to identify regional compliance issues more timely, as well as supporting regions to identify and immediately staff practice issues that lead to non-compliance. In this way, Vermont hopes that through timely State and regional response before issues become chronic, compliance will improve, and families and their children will receive timely delivery of planned services.

<p>Number of documented delays attributable to exceptional family circumstances <i>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" field above to calculate the numerator for this indicator.</i></p>	180
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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, 2015 through June 30, 2016 - the full data set.

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, 2015 to June 30, 2016.

Actions required in FFY 2014 response

none

Note: Any actions required in last year's response that are related to correction of findings should be responded to on the "Correction of Previous Findings of Noncompliance" page of this indicator. If your State's only actions required in last year's response are related to findings of noncompliance, a text field will not be displayed on this page.

Correction of Findings of Noncompliance Identified in FFY 2014

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	1	0	1

FFY 2014 Findings of Noncompliance Verified as Corrected

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

Vermont verified correction in one out of the two regions who had findings of noncompliance in FFY'14. The one region was able to demonstrate 100% compliance for 60 days or more in FFY'15 with implementing the timely initiation of services on the IFSP. The State's process for monitoring compliance is as follows: a. The State had formerly monitored data submissions from the early intervention programs quarterly through FFY'15. As of July 1, 2016, the State implemented a new database, which enabled the State to develop a monitoring process that could be implemented on a monthly basis. This monitoring was implemented in January 2017. A review of the monitoring has demonstrated a marked improvement in early intervention programs being able to demonstrate correction of any non-compliance in a timely way. Vermont expects this new monitoring method to improve Vermont's overall compliance by the end of FFY'16. b. The State makes annual findings of non-compliance using the disaggregated APR data for each early intervention program. Using the APR data and findings, the State makes determinations for each early intervention program. These determinations are shared at the annual Vermont Interagency Coordinating Council (VICC) meeting held in March. At this meeting the State and the VICC provide guidance and technical assistance to regions to consider root causes and develop quality improvement plans. Each regional early intervention program (EIS) who has findings of non-compliance is required to use the Local Contributing Factors Tools developed by the Regional Resources Center, National Early Childhood Technical Assistance Center, and Data Accountability Center. These tools are used to help the regional EIS programs determine root causes and develop a quality improvement plan to address these root causes and demonstrate 100% compliance. Further, regions are given the root data to correct instances of noncompliance.

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

Any region who received a finding of non-compliance was given their root data to verify all individual cases of noncompliance were corrected and consider the root cause(s) of the finding they received.

FFY 2014 Findings Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

The second region who had a finding of non-compliance in FFY'14, was unable to demonstrate 60 consecutive days of compliance. The State made a determination that this region was in need of intervention from the State. The region was required to work with the State's Continuous Quality Improvement Coordinator to develop a quality improvement plan that not only considered the root causes of their non-compliance, but considered deeply the infrastructure changes the early intervention program needed to make in order to correctly implement the Part C regulatory requirements. With the implementation of the quality improvement plan, the State believes that the region will be able to demonstrate 100% compliance by the end of FFY'16.

OSEP Response

Because the State reported less than 100% compliance for FFY 2015, the State must report on the status of correction of noncompliance identified in FFY 2015 for this indicator. In addition, the State must demonstrate, in the FFY 2016 SPP/APR, that the remaining uncorrected finding of noncompliance identified in FFY 2014 was corrected. When reporting on the correction of noncompliance, the State must report, in the FFY 2016 SPP/APR, that it has verified that each EIS program or provider with findings of noncompliance identified in FFY 2015 and each EIS program or provider with remaining noncompliance identified in FFY 2014: (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 2016 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 2015, although its FFY 2015 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2015.

Required Actions

**FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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	2014
Target ≥			94.00%	95.00%	95.00%	95.00%	96.10%	96.20%	96.20%	96.40%	96.60%
Data		98.00%	96.17%	97.00%	98.00%	98.00%	99.00%	99.70%	98.70%	98.88%	97.38%

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

FFY 2015 - FFY 2018 Targets

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

Key:

Targets: Description of Stakeholder Input - Please see the Stakeholder Involvement section of the [introduction](#).

Enter additional information about stakeholder involvement

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2015-16 Child Count/Educational Environment Data Groups	7/14/2016	Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	865	
SY 2015-16 Child Count/Educational Environment Data Groups	7/14/2016	Total number of infants and toddlers with IFSPs	896	

FFY 2015 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 2014 Data*	FFY 2015 Target*	FFY 2015 Data
865	896	97.38%	96.80%	96.54%

Actions required in FFY 2014 response

none

OSEP Response

Required Actions

FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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	2014
A1	2009	Target ≥						71.40%	61.00%	61.20%	61.40%	61.60%	61.60%
		Data					71.20%	60.80%	61.50%	64.20%	67.10%	66.67%	66.88%
A2	2009	Target ≥						66.30%	59.60%	59.80%	60.00%	60.00%	60.00%
		Data					66.10%	59.40%	57.70%	60.70%	62.60%	61.54%	62.13%
B1	2009	Target ≥						79.20%	68.10%	68.30%	68.50%	68.70%	68.90%
		Data					79.00%	67.90%	71.70%	75.90%	74.40%	71.57%	74.56%
B2	2009	Target ≥						58.20%	53.60%	53.80%	54.00%	54.20%	54.20%
		Data					58.00%	53.40%	50.50%	53.80%	54.50%	54.05%	55.20%
C1	2009	Target ≥						77.60%	73.10%	73.30%	73.50%	73.50%	73.50%
		Data					77.40%	72.90%	71.20%	76.50%	74.40%	74.31%	75.84%
C2	2009	Target ≥						65.90%	60.80%	61.00%	61.20%	61.40%	61.40%
		Data					65.70%	60.60%	62.00%	62.30%	62.60%	60.12%	60.21%

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

FFY 2015 - FFY 2018 Targets

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

Key:

Targets: Description of Stakeholder Input - Please see the Stakeholder Involvement section of the [introduction](#).

Enter additional information about stakeholder involvement

FFY 2015 SPP/APR Data

Number of infants and toddlers with IFSPs assessed	597.00
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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	0.00	
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	106.00	23.82%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	68.00	15.28%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	130.00	29.21%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	141.00	31.69%

FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

	Numerator	Denominator	FFY 2014 Data*	FFY 2015 Target*	FFY 2015 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).	198.00	304.00	66.88%	61.60%	65.13%
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).	271.00	445.00	62.13%	60.00%	60.90%

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	0.00	
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	132.00	29.66%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	94.00	21.12%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	163.00	36.63%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	56.00	12.58%

	Numerator	Denominator	FFY 2014 Data*	FFY 2015 Target*	FFY 2015 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).	257.00	389.00	74.56%	69.10%	66.07%
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).	219.00	445.00	55.20%	54.20%	49.21%

Explanation of B1 Slippage

Child outcome data were collected on 445 children who exited in FFY 2015 and who received a minimum of 6 months of service. The Data Quality Index for data completeness, based on the 618 exit count of 896 is 49.0%. This is a statistically significant decrease from the FFY 2014 data completeness of 56.23%.

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 896 while the exit count for 7/1/2015 to 6/30/2016 is 961. 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 that 961 children exited from 7/1/2015 through 6/30/2016 but 451 (46.9%) exited with less than 6 months of service leaving 597 (62%) children for whom to report Child Outcomes. Vermont has a high percentage of children who exit with less than 6 months service.

To address the data completeness degradation, Vermont Part C has implemented a plan to institute a quarterly data completeness validation that is shared with each region within the State. Quarterly completeness validation began in the spring of 2016, with only two quarterly validations occurring during this APR reporting period. Additionally, in September, 2016, the State shared Indicator 3 data with the regions, including completeness data. Vermont Part C has begun to provide technical assistance to those regions not meeting targets. Given that this plan has only been implemented for half of the year, noteworthy improvements cannot yet be fully demonstrated, but the increase from 54% last year to 62% this year is very encouraging.

Additionally, by sharing data earlier (in September 2016) in the year, rather than waiting until the APR submission (February 2017), regional Part C programs were able to see their performance on this indicator and identify outcome areas on which to focus their practice/program improvement. Vermont believes that sharing these data earlier, combined with increased data completeness, will result in improved outcomes for infants and toddlers during this fiscal year. Vermont's goal is, once we have 75% data completeness, to share child outcome data at least twice per year with regional Part C providers to support their ongoing improvement efforts.

Explanation of B2 Slippage

Child outcome data were collected on 445 children who exited in FFY 2015 and who received a minimum of 6 months of service. The Data Quality Index for data completeness, based on the 618 exit count of 896 is 49.0%. This is a statistically significant decrease from the FFY 2014 data completeness of 56.23%.

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 896 while the exit count for 7/1/2015 to 6/30/2016 is 961. 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 that 961 children exited from 7/1/2015 through 6/30/2016 but 451 (46.9%) exited with less than 6 months of service leaving 597 (62%) children for whom to report Child Outcomes. Vermont has a high percentage of children who exit with less than 6 months service.

To address the data completeness degradation, Vermont Part C has implemented a plan to institute a quarterly data completeness validation that is shared with each region within the State. Quarterly completeness validation began in the spring of 2016, with only two quarterly validations occurring during this APR reporting period. Additionally, in September, 2016, the State shared Indicator 3 data with the regions, including completeness data. Vermont Part C has begun to provide technical assistance to those regions not meeting targets. Given that this plan has only been implemented for half of the year, noteworthy improvements cannot yet be fully demonstrated, but the increase from 54% last year to 62% this year is very encouraging.

Additionally, by sharing data earlier (in September 2016) in the year, rather than waiting until the APR submission (February 2017), regional Part C programs were able to see their performance on this indicator and identify outcome areas on which to focus their practice/program improvement. Vermont believes that sharing these data earlier, combined with increased data completeness, will result in improved outcomes for infants and toddlers during this fiscal year. Vermont's goal is, once we have 75% data completeness, to share child outcome data at least twice per year with regional Part C providers to support their ongoing improvement efforts.

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	97.00	22.10%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	61.00	13.90%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	201.00	45.79%

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	Number of Children	Percentage of Children
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	80.00	18.22%

	Numerator	Denominator	FFY 2014 Data*	FFY 2015 Target*	FFY 2015 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).	262.00	359.00	75.84%	73.50%	72.98%
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).	281.00	439.00	60.21%	61.40%	64.01%

Explanation of C1 Slippage

Child outcome data were collected on 445 children who exited in FFY 2015 and who received a minimum of 6 months of service. The Data Quality Index for data completeness, based on the 618 exit count of 896 is 49.0%. This is a statistically significant decrease from the FFY 2014 data completeness of 56.23%.

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 896 while the exit count for 7/1/2015 to 6/30/2016 is 961. 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 that 961 children exited from 7/1/2015 through 6/30/2016 but 451 (46.9%) exited with less than 6 months of service leaving 597 (62%) children for whom to report Child Outcomes. Vermont has a high percentage of children who exit with less than 6 months service.

To address the data completeness degradation, Vermont Part C has implemented a plan to institute a quarterly data completeness validation that is shared with each region within the State. Quarterly completeness validation began in the spring of 2016, with only two quarterly validations occurring during this APR reporting period. Additionally, in September, 2016, the State shared Indicator 3 data with the regions, including completeness data. Vermont Part C has begun to provide technical assistance to those regions not meeting targets. Given that this plan has only been implemented for half of the year, noteworthy improvements cannot yet be fully demonstrated, but the increase from 54% last year to 62% this year is very encouraging.

Additionally, by sharing data earlier (in September 2016) in the year, rather than waiting until the APR submission (February 2017), regional Part C programs were able to see their performance on this indicator and identify outcome areas on which to focus their practice/program improvement. Vermont believes that sharing these data earlier, combined with increased data completeness, will result in improved outcomes for infants and toddlers during this fiscal year. Vermont's goal is, once we have 75% data completeness, to share child outcome data at least twice per year with regional Part C providers to support their ongoing improvement efforts.

Was sampling used? No

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

Actions required in FFY 2014 response

none

OSEP Response

Required Actions

**FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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	2014
A	2011	Target ≥					80.00%	80.00%	81.00%		78.30%	78.30%	78.30%
		Data			83.00%	80.00%	86.00%	84.30%	79.20%	78.10%	79.43%	76.23%	82.63%
B	2011	Target ≥					85.00%	85.00%	86.00%		86.10%	86.10%	86.10%
		Data			85.00%	85.00%	89.00%	90.70%	87.00%	85.90%	85.11%	83.54%	79.78%
C	2011	Target ≥					85.00%	85.00%	88.10%		81.00%	81.00%	81.00%
		Data			87.00%	89.00%	93.00%	93.40%	78.00%	80.80%	80.43%	82.64%	75.86%

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

FFY 2015 - FFY 2018 Targets

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

Key:

Targets: Description of Stakeholder Input - Please see the Stakeholder Involvement section of the [introduction](#).

Enter additional information about stakeholder involvement

FFY 2015 SPP/APR Data

Number of respondent families participating in Part C	332.00
A1. Number of respondent families participating in Part C who report that early intervention services have helped the family know their rights	272.00
A2. Number of responses to the question of whether early intervention services have helped the family know their rights	319.00
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	290.00
B2. Number of responses to the question of whether early intervention services have helped the family effectively communicate their children's needs	326.00
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	272.00
C2. Number of responses to the question of whether early intervention services have helped the family help their children develop and learn	323.00

	FFY 2014 Data*	FFY 2015 Target*	FFY 2015 Data
A. Percent of families participating in Part C who report that early intervention services have helped the family know their rights	82.63%	78.40%	85.27%
B. Percent of families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs	79.78%	86.10%	88.96%
C. Percent of families participating in Part C who report that early intervention services have helped the family help their children develop and learn	75.86%	81.20%	84.21%

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 2015 Family Outcome survey was 46% which was a substantial increase over last year's rate of 30.2%. Of the 721 surveys distributed, 332 were returned (a small number of surveys were returned as undeliverable).

FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

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.

For FFY 2014, Vermont instituted a new process to deliver the Family Survey, in the hopes of improving the response rate. Given that this change in delivery method did not result in an improved response rate, Vermont Part C requested and has continued to receive Technical Assistance from the IDEA Data Center (IDC) Survey process. Vermont's process has been enhanced and includes the following: prior to the first distribution of the survey, all selected families are mailed a postcard with information about the Family Survey and encouragement to respond when they receive the survey. The local CIS-EI service providers will again hand deliver the first pass survey to families. Local providers are also provided with talking points to assist them in encouraging families to respond. Lastly, the Family Survey packet includes 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 was mailed to families who had not responded. These process changes resulted in a significant change to the response rate.

Vermont continues to focus on increasing our overall survey response rate to not only meet, but exceed our target. The increase in response rate in 2015 to 46% is very encouraging. By increasing our overall response rate, Vermont continues to believe we will receive a statistically representative sample of our demographic populations.

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 1, 2015. By surveying all active clients in this method, Vermont assures that the survey responses are representative of the demographics of the state.

The State shared and discussed the Family Survey data results with regions in August of 2016. These discussions helped inform regional practice improvement strategies. The value of family engagement and family input into the State early childhood system is a key strategy in Vermont's State Systemic Improvement Plan. Sharing these data in a timely way with regional programs, and discussing how these data can inform improvement efforts confirms Vermont's commitment to this SSIP strategy and makes it relevant to early intervention programs.

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 2014 response

none

OSEP Response

Required Actions

**FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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	2014
Target ≥			0.91%	0.93%	0.94%	0.96%	0.98%	0.99%	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%	1.48%

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

FFY 2015 - FFY 2018 Targets

FFY	2015	2016	2017	2018
Target ≥	1.11%	1.11%	1.11%	1.11%

Key:

Explanation of Changes

Targets: Description of Stakeholder Input - Please see the Stakeholder Involvement section of the [introduction](#).

Enter additional information about stakeholder involvement

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2015-16 Child Count/Educational Environment Data Groups	7/14/2016	Number of infants and toddlers birth to 1 with IFSPs	105	null
U.S. Census Annual State Resident Population Estimates April 1, 2010 to July 1, 2015	6/30/2016	Population of infants and toddlers birth to 1	5,994	null

FFY 2015 SPP/APR Data

Number of infants and toddlers birth to 1 with IFSPs	Population of infants and toddlers birth to 1	FFY 2014 Data*	FFY 2015 Target*	FFY 2015 Data
105	5,994	1.48%	1.11%	1.75%

Actions required in FFY 2014 response

none

FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

OSEP Response

The State revised its targets for FFYs 2015-2018 for this indicator, and OSEP accepts those targets.

Required Actions

**FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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	2014
Target ≥			3.25%	3.28%	3.30%	3.40%	3.50%	3.50%	3.50%	3.60%	3.60%
Data		3.20%	3.45%	4.00%	3.90%	3.93%	4.23%	4.35%	4.22%	4.38%	4.38%

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

FFY 2015 - FFY 2018 Targets

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

Key:

Targets: Description of Stakeholder Input - Please see the Stakeholder Involvement section of the [introduction](#).

Enter additional information about stakeholder involvement

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2015-16 Child Count/Educational Environment Data Groups	7/14/2016	Number of infants and toddlers birth to 3 with IFSPs	896	
U.S. Census Annual State Resident Population Estimates April 1, 2010 to July 1, 2015	6/30/2016	Population of infants and toddlers birth to 3	18,079	

FFY 2015 SPP/APR Data

Number of infants and toddlers birth to 3 with IFSPs	Population of infants and toddlers birth to 3	FFY 2014 Data*	FFY 2015 Target*	FFY 2015 Data
896	18,079	4.38%	3.70%	4.96%

Actions required in FFY 2014 response

none

OSEP Response

Required Actions

FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

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	2014
Target			100%	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%	96.62%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2015 - FFY 2018 Targets

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

FFY 2015 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 2014 Data*	FFY 2015 Target*	FFY 2015 Data
694	1,039	96.62%	100%	90.76%

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" field above to calculate the numerator for this indicator.

249

Explanation of Slippage

Of the 1039 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, 693 children received an evaluation and assessment and initial IFSP/One Plan meeting within Part C's 45-day timeline. Services for 249 children were not initiated in a timely manner due to exceptional family circumstances. These 249 children are included in the numerator as well as the denominator. Exceptional family circumstances included families who were unreachable after multiple contact attempts/family moves (55 families), families' requests to reschedule evaluations and/or IFSP/One Plan meetings (36 families); families cancelling meetings/not showing (37 families); families experiencing homelessness (3 families); family scheduling/vacation schedules (94 families); family illnesses and hospitalizations (17 families); custody changes (4 families); and the need for additional evaluations to determine eligibility (3 families).

The average number of days these services were conducted beyond the 45-day timeline for these 249 children was 26 days.

96 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 96 children.

There was a delay (10 children) due to assigning Educational Surrogates for children in the State child protection system. Opiate addiction continues to be a serious factor affecting children's safety in Vermont. One of the consequences is a substantial increase in the number of children in DCF custody, from 982 in FFY 2013 to 1,323 in FFY 2016. The increase has been most dramatic for children aged 0 to 5 — from 284 in FFY 2013 to 518 in FFY 2016. While there's been a slight decline in the number of children aged 0 to 5 taken into DCF custody in FFY16, this number is still substantially higher than it was a few years ago. (VT. DCF, Outcomes for Vermonters, January 2017, <http://dcf.vermont.gov/reports>). Vermont's Part C program has worked closely with the Agency of Education in 2016, to improve the timelines for appointing educational surrogates. As a result of this work, Early Intervention practitioners across the state report that most educational surrogate appointments are being made within 2 weeks of a request. This is a marked improvement, and we believe this decrease will be evident in next year's APR.

Delays in meeting the 45-day timeline were also due, in large part, to the state-wide issue for Vermont in provider availability (51 client records). Finding an adequate supply of qualified speech, physical and occupational therapists is a chronic problem in Vermont. Along with this, Vermont, like many other states, experiences high turnover of professionals in the early childhood field. As part of our State Systemic Improvement Plan, Vermont is seeking to identify and address recruitment and retention issues in the field. A survey of professionals was concluded in August of 2016. The results of that survey have been shared with stakeholders and strategies are being identified to improve staff recruitment and retention.

The average number of days these services were conducted beyond the 45-day timeline for these 96 children was 19 days.

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, 2015 through June 30, 2016 - the full data set.

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

10/19/2017

FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

Data Method/Source: Desk audit of entire FFY 2014 Part C State Database, July 1, 2015 to June 30, 2016.

Actions required in FFY 2014 response

none

Note: Any actions required in last year's response that are related to correction of findings should be responded to on the "Correction of Previous Findings of Noncompliance" page of this indicator. If your State's only actions required in last year's response are related to findings of noncompliance, a text field will not be displayed on this page.

Correction of Findings of Noncompliance Identified in FFY 2014

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	3	1	0

FFY 2014 Findings of Noncompliance Verified as Corrected

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

Vermont verified correction in three out of the four EIS regional programs who had findings of non-compliance in FFY'14. These regions were able to demonstrate 100% compliance for 60 days or more in FFY'15 with ensuring evaluations, assessments and the initial IFSP meeting was held within 45 days from the date of referral. The fourth region was able to demonstrate 100% compliance for 60 days or more in FFY'16.

The State's process for monitoring compliance is as follows:

a. The State had formerly monitored data submissions from the early intervention programs quarterly through FFY'15. As of July 1, 2016, the State implemented a new database, which enabled the State to develop a monitoring process that could be implemented on a monthly basis. This monitoring was implemented in January 2017. A review of the monitoring has demonstrated a marked improvement in early intervention programs being able to demonstrate correction of any non-compliance in a timely way. Vermont expects this new monitoring method to improve Vermont's overall compliance by the end of FFY'16.

b. The State makes annual findings of non-compliance using the disaggregated APR data for each early intervention program. Using the APR data and findings, the State makes determinations for each early intervention program. These determinations are shared at the annual Vermont Interagency Coordinating Council (VICC) meeting held in March. At this meeting the State and the VICC provide guidance and technical assistance to regions to consider root causes and develop quality improvement plans. Each regional early intervention program (EIS) who has findings of non-compliance is required to use the Local Contributing Factors Tools developed by the Regional Resources Center, National Early Childhood Technical Assistance Center, and Data Accountability Center. These tools are used to help the regional EIS programs determine root causes and develop a quality improvement plan to address these root causes and demonstrate 100% compliance. Further, regions are given the root data to correct instances of noncompliance.

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

Any region who received a finding of non-compliance was given their root data to verify all individual cases of noncompliance were corrected and consider the root cause(s) of the finding they received for quality improvement.

OSEP Response

Because the State reported less than 100% compliance for FFY 2015, the State must report on the status of correction of noncompliance identified in FFY 2015 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2016 SPP/APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2015 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 2016 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 2015, although its FFY 2015 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2015.

Required Actions

**FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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	2014
Target			100%	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%	100%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2015 - FFY 2018 Targets

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

FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

FFY 2015 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 2014 Data*	FFY 2015 Target*	FFY 2015 Data
799	918	100%	100%	100%

Number of documented delays attributable to exceptional family circumstances <i>This number will be added to the "Number of children exiting Part C who have an IFSP with transition steps and services" field to calculate the numerator for this indicator.</i>	119
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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, 2015 through June 30, 2016

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, 2015 to June 30, 2016.

In addition to the 918 infants/toddlers with disabilities exiting Part C services who were required to have a transition plan, Vermont developed transition plans with an additional 33 toddlers who were referred to Vermont's Early Intervention program less than 90 days from their 3rd birthday. These transition plans were developed at the request of the family. Each transition plan provided the families with service coordination, at a minimum, in order to facilitate transition to Part B or another appropriate service after the child turned 3 years old.

Provide additional information about this indicator (optional)

Vermont has verified that the data submitted for 8A fully meets the APR submission requirements and is valid and reliable, and that there was no error with our reporting.

Actions required in FFY 2014 response

none

Note: Any actions required in last year's response that are related to correction of findings should be responded to on the "Correction of Previous Findings of Noncompliance" page of this indicator. If your State's only actions required in last year's response are related to findings of noncompliance, a text field will not be displayed on this page.

Correction of Findings of Noncompliance Identified in FFY 2014

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

FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

OSEP Response

Required Actions

**FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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	2014
Target			100%	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%	86.71%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2015 - FFY 2018 Targets

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

FFY 2015 SPP/APR Data

Data include notification to both the SEA and LEA

- Yes
- No

Number of toddlers with disabilities exiting Part C where notification to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services	Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B	FFY 2014 Data*	FFY 2015 Target*	FFY 2015 Data
393	445	86.71%	100%	88.31%

<p>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" field to calculate the denominator for this indicator.</p>	null
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Describe the method used to collect these data

In addition to the infants and toddlers for whom LEA and SEA notification was required, Vermont provided LEA and SEA notification for 29 other toddlers who were referred to Vermont's Early Intervention program less than 90 days from their third birthday. This notification was provided at the request of the family in order to support the family to successfully transition to Part B or other appropriate services after their child turned three years of age.

Vermont has worked to improve Early Intervention practitioner's understanding of the requirements to notify the LEA of children who are potentially eligible. 32 out of the 52 toddlers who did not receive timely LEA notification were referred to Vermont's Early Intervention program within 9 months of their 3rd birthday. Vermont has been working with Early Intervention practitioners over the past year to help them understand how initial evaluations can inform identification of a child's Potential Eligibility for Part B services as well as serving to inform the development of the child's IFSP (One Plan). Part C and Part B SEA leadership provided: a webinar to the field in 2015; technical assistance by phone and correspondence to individual regions; and recently provided training in one region (24 LEA personnel and 7 Early Intervention practitioners) to support their knowledge of each practitioner's role and responsibility in complying with potential eligibility decisions, LEA notification, and transition planning with families. Training and technical assistance from the Part B and Part C SEA leadership will continue so that all toddlers found to be potentially eligible for Part B services will receive LEA notification as required.

In addition, as indicated earlier: over the past several years, Vermont Early Intervention has sought to improve regional performance by monitoring indicator data quarterly. While this has led to some improvement, it has not brought Vermont Early Intervention to the level of compliance to federal timelines our children and their families deserve. As a result, Vermont CIS-EI re-visioned a staff role to be focused on Continuous Quality Improvement. This position, working closely with the CIS-EI Evaluation and Data Quality Coordinator and the Personnel Development Coordinator, will provide additional support to regions who are out of compliance with Part C regulations. In addition, CIS-EI, with the full implementation of our new State database (July 1, 2016), has instituted monthly data reviews to monitor compliance to federal indicators. This monitoring began in December of 2016. Vermont believes that monthly monitoring enables the State to identify regional compliance issues more timely, as well as supporting regions to identify and immediately address staff practice issues that lead to non-compliance. In this way, Vermont hopes that through timely State and regional response before issues become chronic, compliance will improve, and families and their children will receive timely notification to LEA's to ensure successful transitions to Part B.

Do you have a written opt-out policy? No

10/19/2017

FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

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, 2015 through June 30, 2016 - the full data set.

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, 2015 to June 30, 2016.

Actions required in FFY 2014 response

none

Note: Any actions required in last year's response that are related to correction of findings should be responded to on the "Correction of Previous Findings of Noncompliance" page of this indicator. If your State's only actions required in last year's response are related to findings of noncompliance, a text field will not be displayed on this page.

Correction of Findings of Noncompliance Identified in FFY 2014

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
10	9	1	0

FFY 2014 Findings of Noncompliance Verified as Corrected

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

Vermont verified correction in nine out of the ten EIS regional programs who had findings of non-compliance in FFY'14. These regions were able to demonstrate 100% compliance for 60 days or more in FFY'15 with ensuring timely notification to the Lead Education Agency (LEA) for all children found to be potentially eligible for Part B services. The tenth region was able to demonstrate 100% compliance for 60 days or more in FFY'16.

The State's process for monitoring compliance is as follows:

- The State had formerly monitored data submissions from the early intervention programs quarterly through FFY'15. As of July 1, 2016, the State implemented a new database, which enabled the State to develop a monitoring process that could be implemented on a monthly basis. This monitoring was implemented in January 2017. A review of the monitoring has demonstrated a marked improvement in early intervention programs being able to demonstrate correction of any non-compliance in a timely way. Vermont expects this new monitoring method to improve Vermont's overall compliance by the end of FFY'16.
- The State makes annual findings of non-compliance using the disaggregated APR data for each early intervention program. Using the APR data and findings, the State makes determinations for each early intervention program. These determinations are shared at the annual Vermont Interagency Coordinating Council (VICC) meeting held in March.

At this meeting the State and the VICC provide guidance and technical assistance to regions to consider root causes and develop quality improvement plans. Each regional early intervention program (EIS) who has findings of non-compliance is required to use the Local Contributing Factors Tools developed by the Regional Resources Center, National Early Childhood Technical Assistance Center, and Data Accountability Center. These tools are used to help the regional EIS programs determine root causes and develop a quality improvement plan to address these root causes and demonstrate 100% compliance. Further, regions are given the root data to correct instances of noncompliance.

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

Any region who received a finding of non-compliance was given their root data to verify all individual cases of noncompliance were corrected and consider the root cause(s) of the finding they received for quality improvement.

OSEP Response

Because the State reported less than 100% compliance for FFY 2015, the State must report on the status of correction of noncompliance identified in FFY 2015 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2016 SPP/APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2015 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 2016 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 2015, although its FFY 2015 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2015.

Required Actions

**FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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	2014
Target			100%	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%	96.91%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2015 - FFY 2018 Targets

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

FFY 2015 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 2014 Data*	FFY 2015 Target*	FFY 2015 Data
298	445	96.91%	100%	92.08%

Number of toddlers for whom the parent did not provide approval for the transition conference <i>This number will be subtracted from the "Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B" field to calculate the denominator for this indicator.</i>	3
Number of documented delays attributable to exceptional family circumstances <i>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" field to calculate the numerator for this indicator.</i>	109

Explanation of Slippage

In addition to the 445 infants/toddlers with disabilities exiting Part C services who were required to have a transition conference, Vermont held transition conferences for an additional 29 toddlers who were referred to Vermont's Early Intervention program less than 90 days from their 3rd birthday. These transition conferences were held at the request of the family. Each transition conference provided the families with the opportunity discuss successful transition to Part B or another appropriate service after the child turned 3 years old.

35 toddlers did not receive a timely transition conference as required by Part C regulations. 19 of these late transition conferences were within one region. This region was determined by Vermont Part C to be in "Needs Intervention" last year and, as a result, has begun to receive intensive technical assistance. Vermont Part C expects to see improved compliance with indicator 8C as a result of this intensive intervention in the coming year.

Another 8 transition conferences that were not timely were the responsibility of another region. This region recently received training from Vermont Part C and Part B leadership. 24 LEA personnel (representing all 5 supervisory unions in the region) and 7 Early Intervention practitioners participated in this training. Vermont Part C expects to see improved compliance with indicator 8C as a result

FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
of this training.

As mentioned previously, beginning this past December, the State began monitoring data on a monthly basis (versus quarterly, as we had previously). This more frequent monitoring was made possible because, in July of this year, Vermont purchased an updated Microsoft Access database, which had more functionality than Vermont's previous database. By monitoring more frequently, Vermont is able to identify regions that are not meeting indicator timelines before it becomes a significant compliance issue. Vermont has learned from the regional early intervention practitioners that the sooner non-compliance is identified and brought to their attention, the more likely staff are to incorporate adherence to timelines into their practice, ensuring families receive timely Part C services.

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, 2015 through June 30, 2016 - the full data set.

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, 2015 to June 30, 2016.

Actions required in FFY 2014 response

none

Note: Any actions required in last year's response that are related to correction of findings should be responded to on the "Correction of Previous Findings of Noncompliance" page of this indicator. If your State's only actions required in last year's response are related to findings of noncompliance, a text field will not be displayed on this page.

Correction of Findings of Noncompliance Identified in FFY 2014

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	1	0	1

FFY 2014 Findings of Noncompliance Verified as Corrected

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

Vermont verified correction in one out of the two regions who had findings of noncompliance in FFY'14. The one region was able to demonstrate 100% compliance for 60 days or more in FFY'15 with holding timely transition conferences.

The State's process for monitoring compliance is as follows:

- a. The State had formerly monitored data submissions from the early intervention programs quarterly through FFY'15. As of July 1, 2016, the State implemented a new database, which enabled the State to develop a monitoring process that could be implemented on a monthly basis. This monitoring was implemented in January 2017. A review of the monitoring has demonstrated a marked improvement in early intervention programs being able to demonstrate correction of any non-compliance in a timely way. Vermont expects this new monitoring method to improve Vermont's overall compliance by the end of FFY'16.
- b. The State makes annual findings of non-compliance using the disaggregated APR data for each early intervention program. Using the APR data and findings, the State makes determinations for each early intervention program. These determinations are shared at the annual Vermont Interagency Coordinating Council (VICC) meeting held in March. At this meeting the State and the VICC provide guidance and technical assistance to regions to consider root causes and develop quality improvement plans. Each regional early intervention program (EIS) who has findings of non-compliance is required to use the Local Contributing Factors Tools developed by the Regional Resources Center, National Early Childhood Technical Assistance Center, and Data Accountability Center. These tools are used to help the regional EIS programs determine root causes and develop a quality improvement plan to address these root causes and demonstrate 100% compliance. Further, regions are given the root data to correct instances of noncompliance.

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

Any region who received a finding of non-compliance was given their root data to verify all individual cases of noncompliance were corrected and consider the root cause(s) of the finding they received for quality improvement.

FFY 2014 Findings Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

The second region who had a finding of non-compliance in FFY'14, was unable to demonstrate 60 consecutive days of compliance. The longest period of consecutive compliance the regional EIS program was able to maintain compliance and correctly implement the regulations was 28 days. The State made a determination that this region was in need of intervention from the State. The region was required to work with the State's Continuous Quality Improvement Coordinator to develop a quality improvement plan that not only considered the root causes of their non-compliance, but considered deeply the infrastructure changes the early intervention program needed to make in order to correctly implement the Part C regulatory requirements. With the implementation of the quality improvement plan, the State believes that the region will be able to demonstrate 100% compliance by the end of FFY'16.

OSEP Response

FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

Because the State reported less than 100% compliance for FFY 2015, the State must report on the status of correction of noncompliance identified in FFY 2015 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2016 SPP/APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2015 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 2016 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 2015, although its FFY 2015 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2015.

The State must demonstrate, in the FFY 2016 SPP/APR, that the remaining finding identified in FFY 2014 was corrected. When reporting on the correction of noncompliance, the State must report, in the FFY 2016 SPP/APR, that it has verified that each EIS program or provider with remaining noncompliance identified in FFY 2014: (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 2016 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

Required Actions

**FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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	2014
Target ≥											
Data											

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

FFY 2015 - FFY 2018 Targets

FFY	2015	2016	2017	2018
Target ≥				

Key:

Targets: Description of Stakeholder Input - Please see the Stakeholder Involvement section of the [introduction](#).

Enter additional information about stakeholder involvement

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2015-16 EMAPS IDEA Part C Dispute Resolution Survey; Section C: Due Process Complaints	11/2/2016	3.1(a) Number resolution sessions resolved through settlement agreements	n	null
SY 2015-16 EMAPS IDEA Part C Dispute Resolution Survey; Section C: Due Process Complaints	11/2/2016	3.1 Number of resolution sessions	n	null

FFY 2015 SPP/APR Data

3.1(a) Number resolution sessions resolved through settlement agreements	3.1 Number of resolution sessions	FFY 2014 Data*	FFY 2015 Target*	FFY 2015 Data
0	0			

Actions required in FFY 2014 response

none

OSEP Response

The State reported fewer than ten resolution sessions held in FFY 2015. The State is not required to provide targets until any fiscal year in which ten or more resolution sessions were held.

Required Actions

**FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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	2014
Target ≥											
Data											

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

FFY 2015 - FFY 2018 Targets

FFY	2015	2016	2017	2018
Target ≥				

Key:

Targets: Description of Stakeholder Input - Please see the Stakeholder Involvement section of the [introduction](#).

Enter additional information about stakeholder involvement

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2015-16 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/2/2016	2.1.a.i Mediations agreements related to due process complaints	n	null
SY 2015-16 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/2/2016	2.1.b.i Mediations agreements not related to due process complaints	n	null
SY 2015-16 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/2/2016	2.1 Mediations held	n	null

FFY 2015 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 2014 Data*	FFY 2015 Target*	FFY 2015 Data
0	0	0			

Actions required in FFY 2014 response

none

FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

OSEP Response

The State reported fewer than ten mediations held in FFY 2015. The State is not required to provide targets until any fiscal year in which ten or more mediations were held.

Required Actions

**FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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	2015
Target		52.10%	54.00%
Data	52.10%	74.14%	76.63%

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

FFY 2016 - FFY 2018 Targets

FFY	2016	2017	2018
Target	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.

Vermont's SIMR is: 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. Therefore, while only reporting on Child Outcome 3A within the indicator measure, Vermont is monitoring data on both:

Child Outcome 3A summary statement 1: Increasing the percentage of infants and toddlers who show substantial growth in positive social-emotional skills.

and,

Family Outcome 4C: CIS-EI has helped me to help my child develop and learn.

Targets: Description of Stakeholder Input - Please see the Stakeholder Involvement section of the [introduction](#).

Enter additional information about stakeholder involvement

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.

FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

(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.

**FFY 2015 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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, MSW

Title: Children's Integrated Services Part C Administrator

Email: danielle.howes@vermont.gov

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