



**District of Columbia  
Part C State Annual Performance Report (APR) for Federal  
Fiscal Year (FFY) 2011**

**Submitted: February 15, 2013**



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### **Overview of the Annual Performance Report Development**

The District of Columbia Office of the State Superintendent of Education (OSSE), Division of Special Education, DC Early Intervention Program (DC EIP), hereinafter referred to as the District, is the District of Columbia's designated Lead Agency for administering Part C of the Individuals with Disabilities Education Act of 2004 (IDEA), including the 2011 Part C regulations. These regulations, issued in September 2011, were implemented in the District effective July 1, 2012.

The District's Part C State Performance Plan (SPP) serves as a road map that outlines performance goals and annual targets necessary for building a coordinated system of early intervention services. Progress in key performance areas is reviewed and reported on annually via the Annual Performance Report (APR). This annual data collection and review process allows OSSE to make data-based decisions that ensure the appropriate allocation of resources to areas of greatest need.

OSSE ensures that stakeholders and the public are engaged in its activities through regular meetings of the Interagency Coordinating Council, monthly meetings with providers and partner agencies, expansion of OSSE's Division of Specialized Education's web page, and regular communications to stakeholders. Together, these tools create a feedback loop which allows for continuous improvement.

The FFY 2011 APR was prepared using instructions forwarded to OSSE by OSEP. Instructions were drawn from several documents:

- OSEP's FFY 2010 APR Response Table
- OSEP's General Instructions for the SPP and APR
- OSEP's SPP and APR Part C Indicator Measurement Table
- OSEP's Optional APR Templates

OSSE staff utilized the Strong Start Tracker (SST), the Child Outcome Summary (COS) forms, and data from the Division's Monitoring and Compliance Unit to determine performance on each of the indicators. Technical assistance was provided by several federal contractors – most notably the Mid-South Regional Resource Center. OSSE leadership discussed each of the requirements, reviewed calculations, and discussed improvement activities. As of FFY 2011, state reporting on Indicators 10 and 11 has been eliminated by OSEP.

As a relatively new Part C lead agency, OSSE is pleased to note that it continued to make tremendous progress in FFY 2011. Key initiatives that were completed include:

- Continued refinement of a robust system of general supervision, with issuance of letters of finding and required corrective actions as warranted;
- Launch of a successful public awareness campaign;
- Proposal of new District regulations governing Part C; and
- Proposal of state-level policies and procedures.

Beginning in FFY 2011, OSEP is permitting the centralization of improvement activities for each indicator. The District has embraced this option as several activities overlap indicators, making it easier to demonstrate how they all fit together to enhance the early intervention system. This report is designed to provide a comprehensive update on the lead agency's efforts to meet both federal and local objectives for all infants and toddlers with developmental disabilities or delays to perform along with their typically developing peers and receive timely and effective support. Together with the SPP, this report will be published on the OSSE website at <http://osse.dc.gov/>.

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

**Monitoring Priority: Early Intervention Services In Natural Environments**

**Indicator 1**

Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.

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

**Measurement:**  
Percent = [(# of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner) divided by the (total # of infants and toddlers with IFSPs)] times 100.  
Account for untimely receipt of services, including the reasons for delays.

FFY	Measurable and Rigorous Target
<i>2011</i>	<i>100%</i>

**Actual Target Data for FFY 2011:**

*84.6%*

**Infants and Toddlers with IFSPs who receive Early Intervention Services in a Timely Manner:**

a. Number of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	438
b. Total number of infants and toddlers with IFSPs	518
Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner (Percent = [(a) divided by (b)] times 100)	84.6%

In FFY 2011, 84.6% of infants and toddlers with Individualized Family Service Plans (IFSPs) received early intervention services in a timely manner. For purposes of this Indicator, “timely manner” is defined as within 30 days of the signed IFSP. Timely services are reported for 438 children, including fifty-three (53) children counted as timely because services were delayed due to exceptional family circumstances. Fifteen percent (15.4%), or 80 of the 518 infants and toddlers with IFSPs, did not receive their services in a timely manner because of Provider, and DC EIP delays.

The following process was used to complete data collection and analysis for timely service delivery:

- Data were collected via the SST. This system captures dates that all services are implemented. The SST was used to identify all children who had a new service on an initial or updated IFSP (6 month, annual, or modified) for the full year of FFY 2011 (7/1/11 – 6/30/12).
- The database is capable of calculating the number of days from the date of the IFSP meeting to the “start date” of the new services.
- The SST produced an Excel spreadsheet that identified the children in the monitoring query, the date of the applicable IFSP meeting, and any new services that were added to an IFSP. Prescribed services were tracked from the date of the IFSP meeting until the start date of each new service to calculate timeliness.
- For any child identified for whom the data system indicated services were started late, DC EIP staff reviewed the case notes, as well as the early intervention record, to determine the reason for delay.

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

The District is reporting slippage for this indicator in FFY 2011 (84.6%) as compared to FFY 2010 (86.6%). During FFY 2011, the Program began the shift from a hybrid service coordination model (i.e., part contract, part DC EIP employee service coordination) to a full contractual model. It is expected that performance in this area will improve in FFY 2012 as full implementation of this shift occurs.

To address the noncompliance in FFY 2011, a drill-down of data was conducted. This data review was facilitated by DC EIP, which completed an initial analysis to determine the responsibility for delays. As a result, 10 findings were issued to three providers with the requirement of specific corrective actions. In addition to child level corrections that have already been made, although late, the noncompliance will be deemed to be corrected when DC

EIP can show, through a subsequent review of data in the SST, that the regulatory requirement for this indicator is being met for 100% of children. Service coordination agencies were required to develop policies and procedures relating to timeliness of service delivery and also to implement internal quality assurance measures, which include file reviews.

The District has nine (9) ongoing improvement activities for this indicator. Much progress has been made in the improvement of the Part C service delivery system. As stated above, the slippage in this indicator can be attributed to the adjustment in the service coordination model. To address changes to the model, as well as impending regulatory and procedural changes, OSSE is developing a comprehensive professional development and data review plan to ensure that the District stays on track. All improvement activities are listed beginning on page 48.

Corrections of FFY 2010 Performance based on findings made in FFY 2011:

Level of compliance reported for FFY 2010 for this indicator: 86.6%

Findings of noncompliance were issued on January 20, 2012, for the noncompliance identified in FFY 2010 to two (2) providers. Beginning in FFY 2011, the District made the decision to only issue findings to service coordination agencies. Although three providers were responsible for the noncompliance, one provider chose not to renew their service coordination contract. Child level correction was verified on all noncompliance and program level verification on subsequent data was completed for the other two providers that received a closure letter on December 12, 2012 and December 17, 2012.

The following are specific actions taken to verify correction of noncompliance:

- Review of the early intervention record for all children for whom the timely service provision requirements were not met to ensure that the children did receive the services on their IFSP, although late, consistent with OSEP Memo 09-02; and
- Subsequent review of data from the SST to verify that the timely service provision requirements (i.e., achieved 100% compliance) in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) are being correctly implemented.

**Correction of FFY 2010 Findings of Noncompliance made on FFY 2009 Performance:**

1. Number of findings of noncompliance the State made during FFY 2010 (the period from July 1, 2010, through June 30, 2011)	<b>1</b>
2. Number of FFY 2010 findings the State verified as timely corrected (verified as corrected within one year from the date of notification to the	<b>0</b>

EIS program of the finding)	
3. Number of FFY 2010 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>1</b>

**Correction of FFY 2010 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:**

4. Number of FFY 2010 findings not timely corrected (same as the number from (3) above)	<b>1</b>
5. Number of FFY 2010 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”)	<b>1</b>
6. Number of FFY 2010 findings <u>not</u> verified as corrected [(4) minus (5)]	<b>0</b>

**Verification of Correction of FFY 2010 noncompliance (either timely or subsequent):**

The provider was issued one finding of noncompliance based on a database review of FFY 2009 data on September 30, 2010. The identified noncompliance was not corrected timely. A subsequent review of data on December 11, 2012 allowed OSSE to verify that for this provider who had noncompliance reflected in the data reported for this indicator in FFY 2010 had met the regulatory requirement by:

- (1) Ensuring that all children for whom data showed services not provided timely, did receive the services on their IFSP, although late, consistent with OSEP Memo 09-02; and
- (2) Ensuring that the timely service provision requirements (i.e., achieved 100% compliance) are being correctly implemented in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) based on a subsequent review of data from the SST.

**Describe the specific actions taken to verify the correction of findings of noncompliance identified in FFY 2010:**

The following are specific actions taken to verify correction of noncompliance:

- Review of the early intervention record for all children for whom the timely service provision requirements were not met to ensure that the children did receive the services on their IFSP, although late, consistent with OSEP Memo 09-02; and

- Subsequent review of data from the SST to verify that the timely service provision requirements (i.e., achieved 100% compliance) in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) are being correctly implemented.

**Revisions, with Justification, to Targets / Improvement Activities / Timelines / Resources for FFY 2012:**

No revisions to targets, improvement activities, timelines or resources are proposed for this indicator for FFY 2012.

<b>Improvement Activity</b>	<b>Timelines and Resources</b>
<p><b><u>Addition</u></b></p> <p>Development of policies and procedures that align with the updated Part C regulations, including a training plan for implementation.</p> <p><b><u>Justification</u></b></p> <p>These policies will standardize the service guidelines ensuring DC EIP provides quality, timely, and effective services to infants and toddlers with disabilities.</p>	<p>FFY 2012 – FFY 2014</p> <p>Part C coordinator and staff; providers; community and governmental agency partners;</p>

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

**Monitoring Priority: Early Intervention Services In Natural Environments**

**Indicator 2**

Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings.

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

**Measurement:** Percent = [(# of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings) divided by the (total # of infants and toddlers with IFSPs)] times 100.

FFY	Measurable and Rigorous Target
<i>2011</i>	<i>95%</i>

**Actual Target Data for FFY 2011:**

*85.7%*

The District is reporting that 85.7% [249 (Home) + 151 (Community) = 400/467\*100] of children with IFSPs are receiving services in the natural environment.

The following process was used to complete data collection and analysis for settings:

- Data were collected via the DC EIP Strong Start Tracker (SST). The database produces an Excel spreadsheet identifying all children who had a service on an IFSP, and the setting in which each service is being provided.
- For children who are receiving services in multiple settings, a determination was made regarding the primary setting for service delivery for each child based on the number of service hours for each setting.

These data were reported on Table 2 in accordance with Section 618 of IDEA and submitted

timely on February 1, 2012.

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

The District is reporting slippage for this indicator in FFY 2011 with 85.7% of infants and toddlers receiving services in the natural environment, as compared to FFY 2010 (91.4%). The District also did not meet its projected target of 95.0% for FFY 2011.

Of the 467 children reported in the December 1, 2011 Child Count Table, 400 were receiving services primarily in their home or community based setting for typically developing children. Sixty-seven (67) children (14.3%) received services in other settings.

OSSE attributes the slippage in the performance of this indicator to the managed care organizations authorizing services in clinical setting when they experience a provider shortage. Their focus is on ensuring that the service is in place timely, regardless of setting. DC EIP continually trains all staff, service providers and service coordinators in the requirement that Part C services are to be provided in the natural environment. DC EIP also sponsors playgroups for children with disabilities and their typically developing peers.

In an effort to address this issue, DC EIP recently completed an organizational shift which allows for Initial Service Coordination to occur with in-house staff rather than contracted providers. This change should create a more consistent situation where families understand that they play an active role in the early intervention system.

The District completed two (2) of the three (3) improvement activities for this indicator: 1) An online training module for early intervention providers and service coordinators on the requirement to provide services in the natural environment was developed in an effort to decrease the number of in-person trainings conducted for providers who are primarily in the field. This module has been well received and 100% participation is required for all providers; 2) The District included materials on the importance of providing services in the natural environment into its public awareness campaign. An online toolkit that can be utilized by community partners outlines child development and the requirement to include children with disabilities or developmental delays in settings where their typical peers would also be found. The success of the public awareness campaign is evident in the number of requests for training and technical assistance in this area. The third improvement activity remains in the District's plan and can be found on page 51, where all improvement activities are listed.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012:

Improvement Activity	Timelines and Resources
<p><b><u>Addition</u></b></p> <p>Conduct quarterly review of settings to ensure adherence to this requirement.</p> <p><b><u>Justification</u></b></p> <p>Increased attention and timely feedback may focus service coordinator attention more closely.</p>	<p>FFY 2012 – FFY 2014</p> <p>Part C coordinator and staff; providers; community and governmental agency partners;</p>

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

## Monitoring Priority: Early Intervention Services In Natural Environments

## Indicator 3

Percent of infants and toddlers with IFSPs who demonstrate improved:

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

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

**Measurement:**

Outcomes:

- 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.

Progress categories for A, B and C:

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

comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

**Summary Statements for Each of the Three Outcomes (use for FFY 2008-2009 reporting):**

**Summary Statement 1:** Of those infants and toddlers who entered or exited early intervention below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program.

**Measurement for Summary Statement 1:**

Percent = # of infants and toddlers reported in progress category (c) plus # of infants and toddlers reported in category (d) divided by [# of infants and toddlers reported in progress category (a) plus # of infants and toddlers reported in progress category (b) plus # of infants and toddlers reported in progress category (c) plus # of infants and toddlers reported in progress category (d)] times 100.

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

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

**Target Data and Actual Data for FFY 2011:**

**Targets and Actual Data for Part C Children Exiting in FFY 2011 (2011 – 12)**

Summary Statements	Actual FFY 2010 % and # of Children	Actual FFY 2011 % and # of children	Target FFY 2011 % of Children
<b>Outcome A: Positive social-emotional skills (including social relationships)</b>			
1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program. <b>Formula (c+d/a+b+c+d)*100</b>	<b>95.5%</b> (n=110)	<b>74.8%</b> (n=155)	<b>75.1%</b>
2. The percent of children who were functioning within age expectations in Outcome A by the time they turned 3 years of age or exited the program. <b>Formula (d+e/a+b+c+d+e)*100</b>	<b>50.0%</b> (n=162)	<b>68.1%</b> (n=254)	<b>31.5%</b>
<b>Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>			

1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program. <b>Formula (c+d/a+b+c+d)*100</b>	<b>85.8%</b> (n=132)	<b>73.6%</b> (n=208)	<b>71.5%</b>
2. The percent of children who were functioning within age expectations in Outcome B by the time they turned 3 years of age or exited the program. <b>Formula (d+e/a+b+c+d+e)*100</b>	<b>33.3%</b> (n=162)	<b>46.1%</b> (n=254)	<b>35.8%</b>
<b>Outcome C: Use of appropriate behaviors to meet their needs</b>			
1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program. <b>Formula (c+d/a+b+c+d)*100</b>	<b>78.7%</b> (n=136)	<b>77.4%</b> (n=195)	<b>80.1%</b>
2. The percent of children who were functioning within age expectations in Outcome C by the time they turned 3 years of age or exited the program. <b>Formula (d+e/a+b+c+d+e)*100</b>	<b>35.8%</b> (n=162)	<b>57.9%</b> (n=254)	<b>44.3%</b>

Calculations within each outcome category are made independently; therefore, total percentages do not equate to 100, as a child may appear in both categories dependent upon the amount of demonstrated progress.

**Progress Data for Part C Children FFY 2011**

<b>A. Positive social-emotional skills (including social relationships):</b>	<b>Number of children</b>	<b>% of children</b>
a. Percent of infants and toddlers who did not improve functioning	6	2.4
b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	33	13.0
c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach	42	16.5
d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers	74	29.1

e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers	99	39.0
<b>Total</b>	<b>254</b>	<b>100%</b>
<b>B. Acquisition and use of knowledge and skills (including early language/communication):</b>	<b>Number of children</b>	<b>% of children</b>
a. Percent of infants and toddlers who did not improve functioning	4	1.6
b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	51	20.1
c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach	82	32.3
d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers	71	28.0
e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers	46	18.1
<b>Total</b>	<b>254</b>	<b>100%</b>
<b>C. Use of appropriate behaviors to meet their needs:</b>	<b>Number of children</b>	<b>% of children</b>
a. Percent of infants and toddlers who did not improve functioning	7	2.8
b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	37	14.6
c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach	63	24.8
d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers	88	34.6
e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers	59	23.2
<b>Total</b>	<b>254</b>	<b>100%</b>

Data were collected on all children who were served for at least six months using the Child Outcomes Summary (COS). The COS allows providers, service coordinators and families to summarize information collected from multiple sources to address the three child

outcomes. The COS's 7-point rating scale is used to determine the extent to which a child's functioning on each outcome is appropriate given his or her age, and whether that child made progress toward age appropriate behavior.

Child outcomes exit data were collected on 254 children for FFY 2011. The following process was used to complete data collection and analysis for child outcome determination:

- The District utilized the Child Outcomes Summary (COS) and ECO's procedures for using the form to collect data for this indicator; the data were recorded in the COS to OSEP Categories Calculator.
- Data were collected on all infants and toddlers who entered DC EIP before 2 years, 6 months of age.
- The entry COS was completed by the initial evaluation provider and the exit COS was completed by either the service coordinator or the re-assessment provider no more than 60 days prior to the child's exit from the program.
- In FFY 2011, the Battelle Developmental Inventory (BDI) was used at exit for children exiting at their 3<sup>rd</sup> birthday.

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

- The Program exited 437 children in FFY 2011. Of this number 62.2% (272 children) received services for 6 months or longer. The Program has entry and exit data for 93.4% (254) of these children.
- Outcome A: The a-e progress data with regard to patterns in the data is what the District would expect to see with regards to positive social-emotional skills. The District has invested considerable resources in this area:
  - Hired 2 behavioral specialists as Initial Service Coordinators;
  - Increased the number of contracts with service providers who specialize in autism;
  - Provided training to all service coordinators and direct service in Parents as Teachers, PECS and other programs with behavioral/social-emotional components.
- Outcome B: The a-e progress data with regard to patterns in the data is what the District would expect to see with regards to acquisition and use of knowledge and skills. The narrow eligibility criteria in the District generally results in children not quite reaching, or reaching and not maintaining functioning comparable to same aged peers.

- Outcome C: The a-e progress data with regard to patterns in the data is what the District would expect to see with regards to use of appropriate behaviors to meet their needs. As with outcome B, the narrow eligibility criteria in the District generally results in children not quite reaching, or reaching and not maintaining functioning comparable to same aged peers.

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

The District has shown both progress and slippage for this indicator from FFY 2010. FFY 2011 is the second year that the District will be reporting twelve months of data where all children who spent at least 6 months in Part C should have both an entry and an exit COS. The increase over FFY 2010 of more than one-third the number of entry and exit COS the Program completed shows the District’s commitment to obtaining valid and reliable data for this indicator.

In Summary Statement 1, the District showed slippage in the percentage of children who substantially increased their rate of growth by the time they turned 3 years of age or exited the program across all three outcomes. The District also did not meet its target for any of the outcome categories.

For Summary Statement 2 the District has made progress in all three Outcomes A, B and C; there was a marked increase in the percentage of children who were functioning within age expectations by the time they turned 3 years of age or exited the program. The District met its target for all of the outcome categories.

The District has five (5) of the six (6) improvement activities ongoing for this indicator. The Program is proposing deletion of one activity, the reliability of the COS across providers, which is no longer relevant due to change in system process. In an effort to improve rater reliability, along with consistency in the District’s performance on this indicator, a more structured tool has been adopted and will be utilized beginning in FFY 2012. The interactive Assessment and Evaluation Programming System for Infants and Children (AEPSi) features reports that automatically gather scores for children on the specific items of the tool that align with the three child outcomes. The AEPSi calculates whether a child is performing at the level of same-aged peers, and provides ratings based on the Early Childhood Outcomes (ECO) COS 1 through 7 scale. At near-exit, the reports also indicate whether the child has made progress. Improvement activities for all indicators are listed beginning on page 48.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012:**

<b>18.</b>	<p><b><u>Deletion</u></b></p> <p>Run a test of outcomes results midyear and work with providers regarding results to increase validity of COS.</p>
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	<p><b><u>Justification</u></b></p> <p>DC EIP has implemented the interactive Assessment and Evaluation Programming System for Infants and Children (AEPSi). Information on the reliability of the data will not be available until FFY 13.</p>
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Part C State Annual Performance Report (APR) for FFY 2011

**Monitoring Priority: Early Intervention Services In Natural Environments**

**Indicator 4**

Percent of families participating in Part C who report that early intervention services have helped the family:

- A. Know their rights;
- B. Effectively communicate their children's needs; and
- C. Help their children develop and learn.

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

**Measurement:**

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

**Target Data and Actual Target Data for FFY 2011:**

Target Data and Actual Target Data	FFY 2011 Target	FFY 2011 Actual	
<i>A. Know their rights</i>	91.0%	93/96	96.9%
<i>B. Effectively communicate their children’s needs</i>	87.5%	96/96	100%
<i>C. Help their children develop and learn</i>	81.0%	94/96	97.9%

OSSE continues to utilize the DC EIP Family Outcomes Survey to collect data for this indicator. The Program has utilized the same distribution procedures for the past 5 years:

- Three hundred fifty (350) surveys (120 were disseminated in Spanish) were distributed to families who participated in the program for 6 months or longer.
- Families were given multiple opportunities to complete the survey. Surveys were given to all families at the 6 month or annual IFSP meeting and returned either by mail or given in a sealed envelope to the service coordinator.
- A follow-up call was made to families who did not return the survey to complete it by phone.

Service Coordinators and families were informed that surveys could be translated in other languages upon request. Each survey question is based on a 7 point scale, with 5 or greater being yes. The Program enters the surveys into an excel spreadsheet that calculates the percentage. Hard copies of the survey are maintained by the Program office. For quality assurance, the data were checked by pulling a 10% sample and comparing the hard copy to the Excel spreadsheet.

For FFY 2011, the response rate for the survey decreased to 27.4% with 96 surveys returned. The Program was not able to maintain the level of follow-up phone calls due to resource shortages.

***Representative Sample:***

Based on the District's child count of 467, this sample size allows us to be 95% confident that 87% to 97% of respondents would say yes that the Program helped them know their rights; 90% to 100% would respond yes that the Program helped them effectively communicate their children's needs; and 88% to 98% would respond affirmatively that the Program helped their children develop and learn.

***Description of the data:***

The breakdown of respondents based on race as follows: 55% African American; 30% Hispanic; 11% White. The District's early intervention Program's population is 64% African American; 20% Hispanic; and 12% White. Surveys were received from every ward in the city, in proportion to the population served.

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

The District of Columbia met its targets for this indicator; however, service coordinators and providers recently began using the Assessment, Evaluation and Programming System for Infants and Children (AEPSi). This new tool, which has been shown to improve child outcomes, should help the District maintain its high level of families reporting a positive impact of the DC EIP. The

Program anticipates it will continue to exceed its targets for this indicator, given the empanelment of the ICC in FFY 2011 and the implementation of the Initial Service Coordinator model in FFY 2012, providing families with a stronger connection to the early intervention system.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012:**

Based on current performance on this indicator, no revisions to targets, improvement activities, timelines or resources are proposed for this indicator for FFY 2012.

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

**Monitoring Priority: Effective General Supervision Part C / Child Find**

**Indicator 5**

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

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

**Measurement:** Percent = [(# of infants and toddlers birth to 1 with IFSPs) divided by the (population of infants and toddlers birth to 1)] times 100 compared to national data.

FFY	Measurable and Rigorous Target
<i>2011</i>	<i>1.50%</i>

**Actual Target Data for FFY 2011:**

*0.84%*

The District of Columbia served 0.84% of its population under age one as compared to the national percentage served of 1.02%.<sup>†</sup> Data were collected via the SST database. The database produces an Excel spreadsheet identifying all children who had a service on an IFSP on December 1, 2011. These data were reported in the 618 Child Count on February 1, 2012.

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

The District’s performance in FFY 2011 reflects slippage from FFY 2010 in the percentage (0.89%) of infants and toddlers less than one year of age in the District of Columbia identified as eligible for, and in receipt of, early intervention services. The District also failed to meet its target for FFY 2011 of 1.50%.

OSSE attributes slippage in its performance on this indicator to the 25% increase in the total

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<sup>†</sup> U.S. Department of Education, Office of Special Education Programs, Data Analysis system (DANS), OMV #1820-0557: “Infants and Toddlers Receiving Early Intervention Services in Accordance with Part C,” 2011.

population of infants in the District (Source: U.S. Bureau of the Census). Although the Program is serving more 0-1 year olds, its efforts did not keep up with the population. In FFY 2010, DC EIP entered into a contract to launch a public awareness campaign. OSSE continues to focus on its child find efforts through its Strong Start materials and targeted outreach to primary referral sources. Although referrals have increased significantly, the Program's narrow eligibility criteria limits the number of eligible children.

In an effort to increase referrals for children birth to age 1, DC EIP continues to engage its community partners in the identification and referral of children. Some of the trainings provided by DC EIP are:

- Early intervention Part C program overview and referral process training for staff at hospitals, child care centers, Child and Family Services Administration (CFSA), Medicaid MCOs, Department of Health (DOH), and primary referral sources; and
- Vision and hearing trainings for DC EIP's Child Find sites as well as Early Head Start centers.
- Understanding typical and atypical development trainings for child care workers.

Due to these ongoing trainings and public awareness activities, the District is likely to see a rebound to the upward trend in the number of children birth to age 1 receiving services previously seen over the past 3 years.

The District has 10 ongoing improvement activities for this indicator. A successful implementation of the Strong Start Campaign, an effort to re-brand the early intervention program, led to a doubling of referrals to the Program. In FFY 2012, the Program continues to see a small but steady increase in referrals. More importantly, the number of referrals that would more likely lead to eligibility for early intervention has increased. The District continues these public awareness activities with outreach efforts at health fairs; distribution of marketing materials; release of an improved website; and child development training for child care workers. Improvement activities for all indicators are listed beginning on page 48.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012:**

No revisions to targets, improvement activities, timelines or resources are proposed for this indicator for FFY 2012.

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

**Monitoring Priority: Effective General Supervision Part C / Child Find**

**Indicator 6**

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

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

**Measurement:** Percent = [(# of infants and toddlers birth to 3 with IFSPs) divided by the (population of infants and toddlers birth to 3)] times 100 compared to national data.

FFY	Measurable and Rigorous Target
2011	3.0%

**Actual Target Data for FFY 2011:**

2.0%
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The District of Columbia served 2.04% of its population birth to age three as compared to the national percentage served of 2.8%.<sup>†</sup> Data were collected via the SST database. The database produces an Excel spreadsheet identifying all children who had a service on an IFSP on December 1, 2011. These data were reported in the 618 Child Count on February 1, 2012.

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

The District’s performance in FFY 2011 of 2.0% reflects progress over FFY 2010 (1.9%) of infants and toddlers, birth to age three (3), in the District of Columbia identified as eligible for, and in receipt of, early intervention services. However, the District failed to meet its target for FFY 2011 of 3.0%.

<sup>†</sup> U.S. Department of Education, Office of Special Education Programs, Data Analysis system (DANS), OMV #1820-0557: “Infants and Toddlers Receiving Early Intervention Services in Accordance with Part C,” 2011.

OSSE attributes improvement in its performance on this indicator to its continued work with its agency partners to increase the number of appropriate referrals it receives. The Strong Start Campaign, launched in FFY 2010, has created a brand awareness of the Program that has helped to increase referrals. DC EIP also continues to engage its community partners in the identification and referral of children by providing the following types of trainings:

- Early intervention Part C program overview and referral process training for staff at hospitals, child care centers, Child and Family Services Administration (CFSA), Medicaid MCOs, Department of Health (DOH), and primary referral sources; and
- Vision and hearing trainings for DC EIP's Child Find sites as well as Early Head Start centers.
- Understanding typical and atypical development trainings for child care workers.

Due to these ongoing trainings and public awareness activities, DC EIP is likely to see a continued increase in the number of children birth to age 3 receiving services.

The District has 9 ongoing improvement activities for this indicator. A successful implementation of the Strong Start Campaign, an effort to re-brand the early intervention program, led to a doubling of referrals to the Program. In FFY 2012, the Program continues to see a small but steady increase in referrals. More importantly, the number of referrals that would more likely lead to eligibility for early intervention has increased. The District continues these public awareness activities with outreach efforts at health fairs; distribution of marketing materials; improved website; and child development training for child care workers. Improvement activities for all indicators are listed beginning on page 48.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012:**

No revisions to targets, improvement activities, timelines or resources are proposed for this indicator for FFY 2012.

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

**Monitoring Priority: Effective General Supervision Part C / Child Find**

**Indicator 7**

Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C’s 45-day timeline.

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

**Measurement:**  
Percent = [(# of infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting was conducted within Part C’s 45-day timeline) divided by the (# of infants and toddlers with IFSPs evaluated and assessed for whom an initial IFSP meeting was required to be conducted)] times 100.  
Account for untimely evaluations, assessments, and initial IFSP meetings, including the reasons for delays.

FFY	Measurable and Rigorous Target
<i>2011</i>	<i>100%</i>

**Actual Target Data for FFY 2011:**

*98.9%*

**Infants Evaluated and Assessed and provided an Initial IFSP meeting Within Part C’s 45-day timeline:**

a. Number of infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting was conducted within Part C’s 45-day timeline	<b>525</b>
b. Number of infants and toddlers with IFSPs evaluated and assessed for whom an initial IFSP meeting was required to be conducted	<b>531</b>

Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline (Percent = [(a) divided by (b)] times 100)	<b>98.9%</b>
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For FFY 2011, 525 children (507 timely plus 18 with documented family reasons), or 98.9% (525/531\*100), were counted as having timely evaluation, assessment and initial IFSP meetings. For the six (6) children whose eligibility process was delayed, the number of days from referral to IFSP meeting ranged from 46 to 69.

Data for this indicator were collected from the SST with additional drill-down information obtained from the early intervention record. The District utilized the full year of data for FFY 2011 (7/1/11- 6/30/12) to complete a compliance review for this indicator.

The following steps were taken to complete data collection and analysis for the 45-day timeline:

- The SST was used as the foundation tool for identifying all children who should have had an IFSP;
- SST produced an Excel spreadsheet that identified the children in the monitoring query who met the criteria of being eligible during that reporting year. Data are tracked until the IFSP meeting was held;
- For any child identified for whom the data system indicated the IFSP meeting was late, DC EIP staff reviewed the case notes, as well as the early intervention record, to determine the reason for delay; and
- A chart was developed to document information identifying the reasons for delay so that findings of noncompliance and the need for corrective action could be issued to the responsible entity.

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

The District demonstrated progress for this indicator from 96.9% in FFY 2010 to 98.9% in FFY 2011. This upward trend has continued over the past 5 years. OSSE attributes much of this progress to the following:

1. Retention of trained contracted evaluation providers who have been with the Program for the past 4 years;

2. Addition of several new evaluation sites in past year to handle the influx of referrals due to the Strong Start Campaign; and
3. Improvements in monitoring and requiring adherence to the 100% standard for this indicator, including issuing letters of finding and requiring corrective action plans.

A drill-down into the data was conducted to determine which programs were responsible for the delays, as well as the reasons for the delays. Four findings of noncompliance were issues to 3 agencies. The letters detailed the data used to determine the findings, the extent of the noncompliance, and the IDEA citations related to the noncompliance were issued with specific corrective actions required.

The District has nine (9) ongoing improvement activities for this indicator. As demonstrated by the OSSE's performance on this indicator over the past few years, significant progress has been made. The improvement activities are focused around initiating a new service coordination model designed to increase awareness of the importance of services in the natural environment as well as the central role that the entire family plays in improving outcomes for infants and toddlers with disabilities or developmental delays. Improvement activities for all indicators are listed beginning on page 48.

**Corrections of FFY 2010 Performance based on findings made in FFY 2011:**

Level of compliance reported for FFY 2010 for this indicator: 96.9%

A letter of finding was issued with specific corrective actions to one agency providing initial service coordination on January 20, 2012. Beginning in FFY 2011, the District made the decision to only issue findings to service coordination agencies. Prior to this change, DC EIP's evaluation sites served as interim service coordinators and received findings. Currently there is only one agency responsible for the 45-day timeline. This agency received a closure letter on December 12, 2012 after both prongs of correction were verified based on federal requirements.

OSSE ensures that for the provider with identified noncompliance in FFY 2010 performance, correction of noncompliance was verified within twelve months. The following are specific actions taken to verify correction of noncompliance:

- Review of the early intervention record for all children for whom the 45-day timeline was not met to ensure that the provider conducted the initial evaluation, assessment, and IFSP meeting, although late, consistent with OSEP Memo 09-02; and
- Subsequent SST database review of children referred to verify that providers were correctly implementing the 45-day timeline requirement (i.e. achieved 100% compliance) in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a). The subsequent review revealed that all children had timely IFSP meetings.

**Correction of FFY 2010 Findings of Noncompliance based on FFY 2009 Performance:**

1. Number of findings of noncompliance the State made during FFY 2010 (the period from July 1, 2010, through June 30, 2011)	<b>1</b>
2. Number of FFY 2010 findings the State verified as timely corrected (verified as corrected within one year from the date of notification to the EIS program of the finding)	<b>1</b>
3. Number of FFY 2010 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>0</b>

**Correction of FFY 2010 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:**

1. Number of FFY 2010 findings not timely corrected (same as the number from (3) above)	<b>0</b>
2. Number of FFY 2010 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”)	<b>0</b>
3. Number of FFY 2010 findings <u>not</u> verified as corrected [(4) minus (5)]	<b>0</b>

**Verification of Correction of FFY 2010 noncompliance (either timely or subsequent):**

OSSE ensured that for this provider with identified noncompliance in FFY 2010, based on a database review of FFY 2009 data, correction of noncompliance was verified within twelve months. OSSE has verified correction of noncompliance reflected in the data reported for this indicator in FFY 2010 by this provider by:

- (1) Ensuring that the provider conducted the initial evaluation, assessment, and IFSP meeting, although late, for all children for whom the 45-day timeline was not met, consistent with OSEP Memo 09-02; and
- (2) Ensuring that the provider is correctly implementing the 45-day timeline requirements (i.e., achieved 100% compliance) in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a) based on a subsequent SST database review of children referred to the program to ensure timeliness for this indicator. The subsequent review revealed that all children had timely IFSP meetings.

**Describe the specific actions taken to verify the correction of findings of noncompliance identified in FFY 2010:**

OSSE ensures that for the providers with identified noncompliance in FFY 2009 performance, correction of noncompliance was verified within twelve months. The following are specific actions taken to verify correction of noncompliance:

- Review of the early intervention record for all children for whom the 45-day timeline was not met to ensure that the provider conducted the initial evaluation, assessment, and IFSP meeting, although late, consistent with OSEP Memo 09-02; and
- Subsequent SST database review of children referred to verify that providers were correctly implementing the 45-day timeline requirement (i.e. achieved 100% compliance) in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a). The subsequent review revealed that all children had timely IFSP meetings.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012:**

Due to continued progress on this indicator, there are no revisions to targets, improvement activities, timelines or resources are proposed for this indicator for FFY 2012.

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

**Monitoring Priority: Effective General Supervision Part C / Effective Transition**

**Indicator 8A**

Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including:

- A. IFSPs with transition steps and services

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

**Measurement:**  
Percent = [(# of children exiting Part C who have an IFSP with transition steps and services) divided by the (# of children exiting Part C)] times 100.

<b>FFY</b>	<b>Measurable and Rigorous Target</b>
<i>2011</i>	<i>100%</i>

**Actual Target Data for FFY 2011:**

*96.4%*

**Indicator 8A - Children Exiting Part C Who Received Timely Transition Planning:**

a. Number of children exiting Part C who have an IFSP with transition steps and services	<b>266</b>
b. Number of children exiting Part C	<b>276</b>
Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday (Percent = [(a) divided by (b)] times 100)	<b>96.4%</b>

Data were collected from the DC EIP Strong Start Tracker (SST). The District utilized the full year of FFY 2011 (July 1, 2011 – June 30, 2012) to complete a compliance review for this indicator.

The following steps were taken to complete data collection and analysis for this indicator:

- The SST was used as the foundation tool for identifying all children who turned three (3) during the reporting year.
- The query included all Part C eligible children who turned three (3) years of age and exited the system during the reporting year. All children with active IFSPs were included in the monitoring activity. IFSPs were reviewed for all children to determine if steps and services were included in their IFSP.

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

The District is reporting slippage for 8A for this reporting period from 100% in FFY 2010 to 96.4% in FFY 2011. Slippage is attributed to the influx of new service coordinators. Two new service coordination providers were added in FFY 2011 and slippage occurred during the training phase. Performance on this indicator is based on the old measurement table as the new Part C regulations were implemented effective July 1, 2012..

In order to address the noncompliance in FFY 2011, OSSE issued 3 findings to two early intervention providers on December 2, 2011 and April 13, 2012 for noncompliance on indicator 8A with specific corrective actions.

The District has two (2) ongoing improvement activities for this indicator. The first is: collaboration with Part B. Since the publication of transition guidelines for Part C and Part B preschool special education, the systems have greatly streamlined the transition process to the benefit of District families. A working group meets twice per month to review and update the process and to ensure that the system is operating at efficiently. The second improvement activity is: utilization of a Transition Specialist. The Program has a bilingual service coordinator that handles children who are entering the Part C system late. This service coordinator remains with the family until the child exits the Program. Improvement activities for all indicators are listed beginning on page 48.

**Corrections of FFY 2010 Performance based on findings made in FFY 2011:**

Level of compliance reported for FFY 2010 for this indicator: 100%

The District reported 100% compliance for this indicator in FFY 2010.

**Correction of FFY 2010 Findings of Noncompliance based on FFY 2009 Performance:**

1. Number of findings of noncompliance the State made during FFY 2010 (the period from July 1, 2010, through June 30, 2011)	<b>1</b>
2. Number of FFY 2010 findings the State verified as timely corrected (verified as corrected within one year from the date of notification to the EIS program of the finding)	<b>1</b>
3. Number of FFY 2010 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>0</b>

**Correction of FFY 2010 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:**

1. Number of FFY 2010 findings not timely corrected (same as the number from (3) above)	<b>0</b>
2. Number of FFY 2010 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”)	<b>0</b>
3. Number of FFY 2010 findings <u>not</u> verified as corrected [(4) minus (5)]	<b>0</b>

**Verification of Correction of FFY 2010 noncompliance (either timely or subsequent):**

The provider was notified of noncompliance based on a database review of FFY 2009 data, on September 30, 2010. OSSE ensured that for this provider with identified noncompliance in FFY 2010, correction of noncompliance was verified within twelve months. OSSE has verified that for this provider who had noncompliance reflected in the data reported for this indicator in FFY 2010 by:

- (1) Ensuring that the provider that showed that the Program has developed an IFSP with transition steps and services for each child, unless the child had already exited the Program, consistent with OSEP Memo 09-02; and
- (2) Ensuring that the provider is correctly implementing the IFSP transition content requirements (i.e., achieved 100% compliance) in 34 CFR §303.148(b)(4) and 303.344(h). The subsequent database review of children exiting DC EIP revealed that all children had steps and services on their IFSP. These data were collected using the Strong Start Tracker (SST) database.

**Describe the specific actions taken to verify the correction of findings of noncompliance identified in FFY 2010 based on FFY 2009 performance:**

The following are specific actions taken to verify correction of noncompliance:

- Review of the early intervention record for all children for whom the IFSP did not have transition steps and services to ensure that the meeting was re-convened and the IFSP modified, unless the child had already exited the Program, consistent with OSEP Memo 09-02; and
- Subsequent database review of children transitioning to verify that providers were correctly implementing is correctly implementing the IFSP transition content requirements (i.e., achieved 100% compliance) in 34 CFR §303.148(b)(4) and 303.344(h).

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012:**

<b>Improvement Activity</b>	<b>Timelines and Resources</b>
<p><b><u>Addition</u></b> Train service coordinators on updated transition guidelines.</p> <p><b><u>Justification</u></b> Improve performance on indicator 8 to ensure a seamless transition for all DC EIP toddlers.</p>	<p>FFY 2012 – FFY 2014 Part C service coordinators.</p>

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

**Monitoring Priority: Effective General Supervision Part C / Effective Transition**

**Indicator 8B**

Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including:

- B. Notification to LEA, if child potentially eligible for Part B

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

**Measurement:**  
Percent = [(# of children exiting Part C and potentially eligible for Part B where notification to the LEA occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.

FFY	Measurable and Rigorous Target
<i>2011</i>	<i>100%</i>

**Actual Target Data for FFY 2011:**

<i>96.1%</i>
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**Children Exiting Part C Who Received Timely Transition Planning (Notification to LEA):**

a. Number of children exiting Part C and potentially eligible for Part B where the notification to the LEA occurred	<b>274</b>
b. Number of children exiting Part C who were potentially eligible for Part B	<b>285</b>
Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday (Notification to LEA) (Percent = [(a) divided by (b)] times 100)	<b>96.1%</b>

Data were collected from the DC EIP Strong Start Tracker (SST). The District utilized the full year of FFY 2011 (July 1, 2011 – June 30, 2012) to complete a compliance review for this indicator.

The following steps were taken to complete data collection and analysis for this indicator:

- The SST was used as the foundation tool for identifying all children who turned three (3) during the reporting year.
- The analysis was accomplished through reviewing documentation of the invitation to the LEA (by fax or email) to the transition planning conference as a means of determining whether notification occurred. In the event that a parent declined a transition conference, a separate referral is sent to the LEA. Due to the narrow eligibility criteria for enrollment in DC EIP, the District assumes that all children eligible for Part C services are potentially eligible for Part B services.

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

The District is reporting slippage for 8B for this reporting period from 100% in FFY 2010 to 96.1% in FFY 2011. Slippage is attributed to the influx of new service coordinators. Two new service coordination providers were added in FFY 2011 and slippage occurred during the training phase. Performance on this indicator is based on the old measurement table as the new Part C regulations were implemented effective July 1, 2012.

In order to address the noncompliance in FFY 2011, OSSE issued findings on April 13, 2012 to two early intervention providers for noncompliance on indicator 8B with specific corrective actions.

The District has two (2) ongoing improvement activities for this indicator. The first is: collaboration with Part B. Since the publication of transition guidelines for Part C and Part B preschool special education, the systems have greatly streamlined the transition process to the benefit of District families. A working group meets twice per month to review and update the process and to ensure that the system is operating at efficiently. The second improvement activity is: utilization of a Transition Specialist. The Program has a bilingual service coordinator that handles children who are entering the Part C system late. This service coordinator remains with the family until the child exits the Program. Improvement activities for all indicators are listed beginning on page 48.

**Corrections of FFY 2010 Performance based on findings made in FFY 2011:**

Level of compliance reported for FFY 2010 for this indicator: 100%

The District reported 100% compliance for this indicator in FFY 2010.

**Correction of FFY 2010 Findings of Noncompliance based on Performance in FFY 2009:**

1. Number of findings of noncompliance the State made during FFY 2010 (the period from July 1, 2010, through June 30, 2011)	<b>1</b>
2. Number of FFY 2010 findings the State verified as timely corrected (verified as corrected within one year from the date of notification to the EIS program of the finding)	<b>1</b>
3. Number of FFY 2010 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>0</b>

**Correction of FFY 2010 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:**

1. Number of FFY 2010 findings not timely corrected (same as the number from (3) above)	<b>0</b>
2. Number of FFY 2010 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”)	<b>0</b>
3. Number of FFY 2010 findings <u>not</u> verified as corrected [(4) minus (5)]	<b>0</b>

**Verification of Correction of FFY 2010 noncompliance (either timely or subsequent):**

The provider was notified of noncompliance based on a database review of FFY 2009 data, on September 30, 2010. OSSE ensures that for this provider with identified noncompliance in FFY 2010, correction of noncompliance was verified within twelve months. OSSE has verified that for this provider who had noncompliance reflected in the data reported for this indicator in FFY 2010 by:

- (1) Ensuring that the provider submitted documentation that showed that the Program has provided notification to the LEA for each child, unless the child is no longer within the jurisdiction of DC EIP, consistent with OSEP Memo 09-02; and
- (2) Ensuring that the provider is correctly implementing the LEA notification requirements (i.e., achieved 100% compliance) in IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §303.148(b)(1). These data were collected using the Strong Start Tracker (SST) database. The subsequent database review of children transitioning from the DC EIP revealed that a transition notification, via either an invitation to the LEA, or a referral to LEA for those families who declined a transition conference, was sent to the LEA.

**Describe the specific actions taken to verify the correction of findings of noncompliance identified in FFY 2010:**

The following are specific actions taken to verify correction of noncompliance:

- Review of the early intervention record for all children for whom the Program had not provided notification to the LEA to ensure that a referral was made to the LEA, unless the child is no longer within the jurisdiction of DC EIP, consistent with OSEP Memo 09-02; and
- Subsequent database review of children transitioning to verify that providers were correctly implementing the LEA notification requirements (i.e., achieved 100% compliance) in IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §303.148(b)(1).

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012:**

<b>Improvement Activity</b>	<b>Timelines and Resources</b>
<p><b><u>Addition</u></b> Train service coordinators on updated transition guidelines.</p> <p><b><u>Justification</u></b> Improve performance on indicator 8 to ensure a seamless transition for all DC EIP toddlers.</p>	<p>FFY 2012 – FFY 2014 Part C service coordinators.</p>

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

**Monitoring Priority: Effective General Supervision Part C / Effective Transition**

**Indicator 8C**

Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including:

- C. Transition conference, if child potentially eligible for Part B

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

**Measurement:**  
Percent = [(# of toddlers with disabilities exiting Part C where the transition conference occurred at least 90 days, and at the discretion of all parties, not more than nine months prior to the toddler’s third birthday for toddlers potentially eligible for Part B) divided by the (# of toddlers with disabilities exiting Part C who were potentially eligible for Part B)] times 100.  
Account for untimely transition conferences, including reasons for delays.

FFY	Measurable and Rigorous Target
2011	100%

**Actual Target Data for FFY 2011:**

90.0%

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

a. Number of children exiting Part C and potentially eligible for Part B where the transition conference occurred	<b>252</b>
b. Number of children exiting Part C who were potentially eligible for Part B	<b>280</b>
Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday (Transition Conference) (Percent = [(a) divided by (b)] times 100)	<b>90.0%</b>

Data were collected from the DC EIP Strong Start Tracker (SST). The District utilized the full year of FFY 2011 (July 1, 2011 – June 30, 2012) to complete a compliance review for this indicator.

The following steps were taken to complete data collection and analysis for this indicator:

- The SST was used as the foundation tool for identifying all children who turned three (3) during the reporting year.
- The District reviewed whether a timely transition conference occurred for children who exited the Part C system during the reporting year. The following activities were completed:
  - The SST was utilized to identify the date of each child’s transition conference, where the meeting date is recorded and all documents are uploaded.
  - The early intervention record and case notes were reviewed for any child whose conference was not held timely [at least 90 days, and not more than nine months before the third (3<sup>rd</sup>) birthday].
  - Verification of the data was completed through a review of each transition conference plan document.

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

The District’s performance showed progress from FFY 2010 (86.5%) to FFY 2011 (90.0%) for indicator 8C. Of the 28 children whose transition planning conference were delayed:

- Thirteen (13) were due to failure of provider staff to schedule the meeting timely.
- Fifteen (15) children were referred to DC EIP less than 135 days prior to their 3<sup>rd</sup> birthday, which did not provide adequate time for eligibility to be determined and the IFSP and transition conference to occur greater than 90 days prior to age 3.

In order to address the noncompliance in FFY 2011, OSSE issued findings to two early intervention providers for noncompliance on indicator 8C with specific corrective actions. Performance on this indicator is based on the old measurement table as the new Part C regulations were implemented effective July 1, 2012. Had the new regulations been in place, the DC EIP’s performance would have been 95.3%.

The District has two (2) ongoing improvement activities for this indicator: 1) Collaboration with Part B - since the publication of transition guidelines for Part C and Part B preschool special education, the systems have greatly streamlined the transition process to the benefit of District families. A working group meets twice per month to review and update the process and to ensure that the system is operating at efficiently; and 2) Utilization of a Transition Specialist – the Program has a bilingual service coordinator that handles children who are entering the Part C system late. This service coordinator remains with the family until the child exits the Program.

Corrections of FFY 2010 Performance based on findings made in FFY 2011:

Level of compliance (actual target data) State reported for FFY 2010 for this indicator: 86.5%

In order to address the noncompliance in FFY 2010, OSSE issued a finding to two (2) early intervention providers for noncompliance on indicator 8C with specific corrective actions. One provider received a letter of indicating the findings were closed on December 12, 2012, the other received a letter of closure on December 17, 2012.

The following are specific actions taken to verify correction of noncompliance:

- Review of the early intervention record for all children for whom the timely transition conference requirements were not met, to ensure that the provider had conducted a transition conference, although late, for both children who were potentially eligible for Part B and whose transition conference was not timely, consistent with OSEP Memo 09-02; and
- A subsequent database review has been conducted to verify that DC EIP is correctly implementing the timely transition conference requirements in 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)) (i.e., achieved 100% compliance) for children exiting DC EIP.

**Correction of FFY 2010 Findings of Noncompliance based on FFY 2009 Performance (if State reported less than 100% compliance):**

1. Number of findings of noncompliance the State made during FFY 2010 (the period from July 1, 2010, through June 30, 2011)	<b>1</b>
2. Number of FFY 2010 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	<b>0</b>
3. Number of FFY 2010 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>1</b>

**Correction of FFY 2010 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:**

1. Number of FFY 2010 findings not timely corrected (same as the number from (3) above)	<b>1</b>
2. Number of FFY 2010 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”)	<b>1</b>

3. Number of FFY 2010 findings <u>not</u> verified as corrected [(4) minus (5)]	<b>0</b>
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**Verification of Correction of FFY 2010 noncompliance (either timely or subsequent):**

The provider was notified of noncompliance based on a database review of FFY 2009 data on September 30, 2010. The identified noncompliance was not corrected timely. A subsequent review of data on December 11, 2012 allowed OSSE to verify correction of noncompliance reflected in the data reported for this indicator in FFY 2010 by this provider by:

- (1) Conducting a transition conference, although late, for both children who were potentially eligible for Part B and whose transition conference was not timely, consistent with OSEP Memo 09-02; and
- (2) Correctly implementing the timely transition conference requirements in 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)) (i.e., achieved 100% compliance) based on a subsequent review of data from the DC EIP Strong Start Tracker (SST) database.

**Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2010:**

The following are specific actions taken to verify correction of noncompliance:

- Review of the early intervention record for all children for whom the timely transition conference requirements were not met, to ensure that the provider had conducted a transition conference, although late, for both children who were potentially eligible for Part B and whose transition conference was not timely, consistent with OSEP Memo 09-02; and
- A subsequent database review has been conducted to verify that DC EIP is correctly implementing the timely transition conference requirements in 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)) (i.e., achieved 100% compliance) for children exiting DC EIP.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012:**

Improvement Activity	Timelines and Resources
<p><b><u>Addition</u></b> Train service coordinators on updated transition guidelines.</p> <p><b><u>Justification</u></b></p>	<p>FFY 2012 – FFY 2014 Part C service coordinators.</p>

Improve performance on indicator 8 to ensure a seamless transition for all DC EIP toddlers.	
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**Part C State Annual Performance Report (APR) for FFY 2011**

<b>Monitoring Priority: Effective General Supervision Part C / General Supervision</b>
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**Indicator 9**

General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification.

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

<p><b>Measurement:</b></p> <p>Percent of noncompliance corrected within one year of identification:</p> <ul style="list-style-type: none"> <li>a. # of findings of noncompliance.</li> <li>b. # of corrections completed as soon as possible but in no case later than one year from identification.</li> </ul> <p>Percent = [(b) divided by (a)] times 100.</p> <p>States are required to use the “Indicator 9 Worksheet” to report data for this indicator (see Attachment A).</p>
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<b>FFY</b>	<b>Measurable and Rigorous Target</b>
<i>2011</i>	<i>100%</i>

**Actual Target Data for FFY 2011:**

<i>60%</i>
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***Describe the process for selecting EIS programs for Monitoring:***

In accordance with APR reporting requirements, OSSE reviews data in the DC EIP Strong Start Tracker (SST) for all Part C programs to identify noncompliance and assess progress toward federal and local targets. All providers who had service coordination duties, i.e. vendors who

conduct multidisciplinary evaluations; provide ongoing service coordination; and the lead agency's in-house staff are monitored for compliance with the Part C requirements. Data are verified against the paper record which is also uploaded into the SST.

In FFY 2010, OSSE issued 5 findings of noncompliance identified from data analyzed to determine compliance for the FFY 2009 annual performance report (APR). Two providers were responsible for the noncompliance. One provider was issued 1 finding for the 45-day timeline requirement (34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a)); and one provider was issued 4 findings for:

- Timely services - 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1);
- Timely transition planning (Steps and Services) - 34 CFR §303.148(b)(4) and 303.344(h);
- Timely transition planning (LEA Notification) - IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §303.148(b)(1); and
- Timely transition planning (Transition Conference) - 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)).

The letter of finding detailed the data used to determine the finding, the extent of the noncompliance, and the IDEA citations related to the noncompliance. In addition, the letters of finding also outlined the required corrective actions.

#### **Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that Occurred for FFY 2011:**

The District of Columbia is reporting slippage in the timely correction of noncompliance as compared to FFY 2010. Several new processes were implemented in OSSE's compliance monitoring during FFY 2011. First, the measure for demonstrating correction of noncompliance for Indicators 1, 7, 8A, 8B, and 8C was raised significantly. Data reviews are now being conducted on a quarterly basis and those total population pulls were used to determine adherence to the regulatory requirement for program level corrections. The District has always maintained 100% compliance with OSEP memo 09-02 with regard to child level corrections. In FFY 2012, the Monitoring and Compliance Unit (MCU) developed a sampling procedure for subsequent database reviews to determine compliance with Part C regulations. The implementation of this method allowed for the Program to demonstrate compliance with the specific regulatory requirements.

The Program has three (3) ongoing improvement activities for this indicator and has proposed one additional activity, related to the incorporation of Part C monitoring and compliance activities into OSSE's new on-line system for tracking findings of noncompliance and their correction. This system, the District of Columbia Corrective Action Tracking System (DC CATS) is currently being released to support Part B monitoring and compliance functions, with a plan to expand the system to incorporate Part C in the next Federal Fiscal Year.

<b>INDICATOR C-9 WORKSHEET</b>				
<b>Indicator/Indicator Clusters</b>	<b>General Supervision System Components</b>	<b># of EIS Programs Issued Findings in FFY 2010 (7/1/10 through 6/30/11)</b>	<b>(a) # of Findings of noncompliance identified in FFY 2010 (7/1/10 through 6/30/11)</b>	<b>(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification</b>
1. Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	1	1	0
	Dispute Resolution: Complaints, Hearings			
2. Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings			
3. Percent of infants and toddlers with IFSPs who demonstrate improved outcomes	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings			
4. Percent of families participating in Part C who report that early	Monitoring Activities: Self-Assessment/ Local			

<b>INDICATOR C-9 WORKSHEET</b>				
<b>Indicator/Indicator Clusters</b>	<b>General Supervision System Components</b>	<b># of EIS Programs Issued Findings in FFY 2010 (7/1/10 through 6/30/11)</b>	<b>(a) # of Findings of noncompliance identified in FFY 2010 (7/1/10 through 6/30/11)</b>	<b>(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification</b>
intervention services have helped the family	APR, Data Review, Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings			
5. Percent of infants and toddlers birth to 1 with IFSPs	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
6. Percent of infants and toddlers birth to 3 with IFSPs	Dispute Resolution: Complaints, Hearings			
7. Percent of eligible infants and toddlers with IFSPs for whom an initial evaluation and initial assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	1	1	1
	Dispute Resolution: Complaints, Hearings			
8. The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			

<b>INDICATOR C-9 WORKSHEET</b>				
<b>Indicator/Indicator Clusters</b>	<b>General Supervision System Components</b>	<b># of EIS Programs Issued Findings in FFY 2010 (7/1/10 through 6/30/11)</b>	<b>(a) # of Findings of noncompliance identified in FFY 2010 (7/1/10 through 6/30/11)</b>	<b>(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification</b>
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;	Dispute Resolution: Complaints, Hearings	1	1	1
8. The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
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	Dispute Resolution: Complaints, Hearings	1	1	1
8. The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			

<b>INDICATOR C-9 WORKSHEET</b>				
<b>Indicator/Indicator Clusters</b>	<b>General Supervision System Components</b>	<b># of EIS Programs Issued Findings in FFY 2010 (7/1/10 through 6/30/11)</b>	<b>(a) # of Findings of noncompliance identified in FFY 2010 (7/1/10 through 6/30/11)</b>	<b>(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification</b>
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.	Dispute Resolution: Complaints, Hearings	1	1	0
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings			
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings			

<b>INDICATOR C-9 WORKSHEET</b>				
<b>Indicator/Indicator Clusters</b>	<b>General Supervision System Components</b>	<b># of EIS Programs Issued Findings in FFY 2010 (7/1/10 through 6/30/11)</b>	<b>(a) # of Findings of noncompliance identified in FFY 2010 (7/1/10 through 6/30/11)</b>	<b>(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification</b>
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings			
<b>Sum the numbers down Column a and Column b</b>			5	3
<b>Percent of noncompliance corrected within one year of identification =</b>			<b>(b) / (a) X 100 =</b>	<b>60.00%</b>
<b>(column (b) sum divided by column (a) sum) times 100.</b>				

**Timely Correction of FFY 2010 Findings of Noncompliance (corrected within one year from identification of the noncompliance):**

1. Number of findings of noncompliance the State identified in FFY 2010 (the period from July 1, 2010, through June 30, 2011) (Sum of Column a on the Indicator C9 Worksheet)	<b>5</b>
2. Number of findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS programs of the finding) (Sum of Column b on the Indicator C9 Worksheet)	<b>3</b>
3. Number of findings <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>2</b>

**Correction of FFY 2010 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:**

1. Number of FFY 2010 findings not timely corrected (same as the number from (3) above)	<b>2</b>
2. Number of FFY 2010 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”)	<b>2</b>
3. Number of FFY 2010 findings <u>not</u> yet verified as corrected [(4) minus (5)]	<b>0</b>

**Verification of Correction for findings of noncompliance identified in FFY 2010 (either timely or subsequent):**

***Indicator 1***

The provider was notified of noncompliance based on a database review on September 30, 2010. The identified noncompliance was not corrected timely. A subsequent review of data on December 11, 2012 allowed OSSE to verify correction of noncompliance reflected in the data reported for this indicator in FFY 2010 by this provider by:

- (1) Ensuring that all children for whom data showed services not provided timely, did receive the services on their IFSP, although late, consistent with OSEP Memo 09-02; and
- (2) Ensuring that the timely service provision requirements (i.e., achieved 100% compliance) are being correctly implemented in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) based on a subsequent review of data from the DC EIP Strong Start Tracker (SST) database.

***Indicator 7***

The provider was notified of noncompliance based on a database review on September 30, 2010. OSSE ensures that for this provider with identified noncompliance in FFY 2010, correction of noncompliance was verified within twelve months. OSSE has verified that for this provider who had noncompliance reflected in the data reported for this indicator in FFY 2010 by:

- (1) Ensuring that the provider submitted documentation to show that they conducted the initial evaluation, assessment, and IFSP meeting, although late, for all 6 children for whom the 45-day timeline was not met, consistent with OSEP Memo 09-02; and
- (2) Ensuring that the provider is correctly implementing the 45-day timeline requirements (i.e., achieved 100% compliance) in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a) based on a subsequent database review of children referred to the program

to ensure timeliness for this indicator. The subsequent review revealed that all children had timely IFSP meetings. The data were collected through the DC EIP Strong Start Tracker (SST) database.

**Indicator 8A**

The provider was notified of noncompliance based on a database review on September 30, 2010. OSSE ensures that for this provider with identified noncompliance in FFY 2010, correction of noncompliance was verified within twelve months. OSSE has verified that for this provider who had noncompliance reflected in the data reported for this indicator in FFY 2010 by:

- (1) Ensuring that the provider that showed that the Program has developed an IFSP with transition steps and services for each child, unless the child had already exited the Program, consistent with OSEP Memo 09-02; and
- (2) Ensuring that the provider is correctly implementing the IFSP transition content requirements (i.e., achieved 100% compliance) in 34 CFR §303.148(b)(4) and 303.344(h). The subsequent database review of children exiting DC EIP revealed that all children had steps and services on their IFSP. These data were collected using the Strong Start Tracker (SST) database.

**Indicator 8B**

The provider was notified of noncompliance based on a database review on September 30, 2010. OSSE ensures that for this provider with identified noncompliance in FFY 2010, correction of noncompliance was verified within twelve months. OSSE has verified that for this provider who had noncompliance reflected in the data reported for this indicator in FFY 2010 by:

- (1) Ensuring that the provider submitted documentation that showed that the Program has provided notification to the LEA for each child, unless the child is no longer within the jurisdiction of DC EIP, consistent with OSEP Memo 09-02; and
- (2) Ensuring that the provider is correctly implementing the LEA notification requirements (i.e., achieved 100% compliance) in IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §303.148(b)(1). These data were collected using the Strong Start Tracker (SST) database. The subsequent database review of children transitioning from the DC EIP revealed that a transition notification, via either an invitation to the LEA, or a referral to the LEA for those families who declined a transition conference, was sent to the LEA.

**Indicator 8C**

The provider was notified of noncompliance based on a database review on September 30, 2010. The identified noncompliance was not corrected timely. A subsequent review of data on December 11, 2012 allowed OSSE to verify that for this provider who had noncompliance reflected in the data reported for this indicator in FFY 2010 had met the regulatory requirement by:

- (1) conducting a transition conference, although late, for both children who were potentially eligible for Part B and whose transition conference was not timely, consistent with OSEP Memo 09-02; and
- (2) correctly implementing the timely transition conference requirements in 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)) (i.e., achieved 100% compliance) based on a subsequent review of data from the DC EIP Strong Start Tracker (SST) database.

**Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2010 (including any revisions to general supervision procedures, technical assistance provided and/or any enforcement actions that were taken):**

Correction of noncompliance was verified by September 30, 2011 for three of the 5 findings of noncompliance. The remaining two findings were verified by December 11, 2012. The following are specific actions taken to verify correction of noncompliance:

- Review of the early intervention record for all children for whom the timely service provision requirements were not met to ensure that the children did receive the services on their IFSP, although late, consistent with OSEP Memo 09-02;
- Subsequent review of data from the SST to verify that the timely service provision requirements (i.e., achieved 100% compliance) in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) are being correctly implemented;
- Review of the early intervention record for all children for whom the 45-day timeline was not met to ensure that the provider conducted the initial evaluation, assessment, and IFSP meeting, although late, consistent with OSEP Memo 09-02;
- Subsequent database review of children referred to verify that providers were correctly implementing the 45-day timeline requirement (i.e. achieved 100% compliance) in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a). The subsequent review revealed that all children had timely IFSP meetings. These data were collected through the DC EIP Strong Start Tracker (SST);
- Review of the early intervention record for all children for whom the IFSP did not have transition steps and services to ensure that the meeting was re-convened and the IFSP modified, unless the child had already exited the Program, consistent with OSEP Memo 09-02;
- Subsequent database review of children transitioning to verify that providers were correctly implementing is correctly implementing the IFSP transition content requirements (i.e., achieved 100% compliance) in 34 CFR §303.148(b)(4) and 303.344(h);

- Review of the early intervention record for all children for whom the Program had not provided notification to the LEA to ensure that a referral was made to the LEA, unless the child is no longer within the jurisdiction of DC EIP, consistent with OSEP Memo 09-02;
- Subsequent database review of children transitioning to verify that providers were correctly implementing the LEA notification requirements (i.e., achieved 100% compliance) in IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §303.148(b)(1);
- Review of the early intervention record for all children for whom the timely transition conference requirements were not met, to ensure that the provider had conducted a transition conference, although late, for both children who were potentially eligible for Part B and whose transition conference was not timely, consistent with OSEP Memo 09-02;
- A subsequent database review has been conducted to verify that DC EIP is correctly implementing the timely transition conference requirements in 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)) (i.e., achieved 100% compliance) for children exiting DC EIP;
- Review of the documents submitted as required by the letters of finding; and
- Provision of training and technical assistance to providers.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012:**

<b>Improvement Activity</b>	<b>Timelines and Resources</b>
<p><b><u>Addition</u></b> Develop and implement of the DC CATS database for Part C findings.</p> <p><b><u>Justification</u></b> Streamline the documentation of correction and verification of correction process for Part C findings.</p>	<p>Effective 4<sup>th</sup> quarter FFY 2012</p> <p>OSSE Monitoring and Compliance Unit.</p>

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

**Monitoring Priority: Effective General Supervision Part C / General Supervision**

**Indicators 10 and 11**

As of FFY 2011, state reporting on Indicators 10 and 11 has been eliminated by OSEP.

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

**Monitoring Priority: Effective General Supervision Part C / General Supervision**

**Indicator 12**

Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements (applicable if Part B due process procedures are adopted).

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

**Measurement:** Percent = (3.1(a) divided by 3.1) times 100.

FFY	Measurable and Rigorous Target
2011	100%

**Actual Target Data for FFY 2011: N/A**

The District did not receive any due process hearing requests related to alleged Part C IDEA violations in FFY 2011.

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

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012:**

Based on current performance on this indicator, no revisions to targets, improvement activities, timelines or resources are proposed for this indicator for FFY 2012.

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

**Monitoring Priority: Effective General Supervision Part C / General Supervision**

**Indicator 13**

Percent of mediations held that resulted in mediation agreements.

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

**Measurement:** Percent = [(2.1(a)(i) + 2.1(b)(i)) divided by 2.1] times 100.

FFY	Measurable and Rigorous Target
<i>2011</i>	<i>100%</i>

**Actual Target Data for FFY 2011: N/A**

The District did not receive any requests for mediation related to alleged Part C IDEA violations in FFY 2011.

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

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012:**

Based on current performance on this indicator, no revisions to targets, improvement activities, timelines or resources are proposed for this indicator for FFY 2012.

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

**Monitoring Priority: Effective General Supervision Part C / General Supervision**

**Indicator 14**

State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.

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

**Measurement:** State reported data, including 618 data, State performance plan, and annual performance reports, are:

- a. Submitted on or before due dates (February 1 for child count and settings and November 1 for exiting and dispute resolution); and
- b. Accurate, including covering the correct year and following the correct measurement.

States are required to use the “Indicator 14 Data Rubric” for reporting data for this indicator (see Attachment B).

FFY	Measurable and Rigorous Target
<i>2011</i>	<i>100%</i>

**Actual Target Data for FFY 2011: 100%**

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

The District’s data submissions for FFY 2011 were both timely and accurate. The District continues to perform at 100% for this indicator.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012:**

Based on current performance on this indicator, no revisions to targets, improvement activities, timelines or resources are proposed for this indicator for FFY 2012.

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

Status of Improvement Activities for FFY 2011, by Indicator

	Improvement Activities	Timelines & Resources	Indicator(s)	Status
1.	Provide technical assistance and training on timely service delivery for sub-grantees and contractors.	Ongoing, 2007-2012 Part C Coordinator and staff, Comprehensive System of Professional Development (CSPD), the Data Accountability Center (DAC), MSRRC, NECTAC, OSSE, and Additional Key Stakeholders.	1	<b>Ongoing</b> Trainings for service coordinators and evaluation/direct service providers are provided on a monthly basis. Obligations related to the provision of timely services are covered at all meetings.
2.	Collaborate with the Department of Health (DOH), and Department of Healthcare Finance’s (DHCF’s) Medicaid Managed Care organizations to develop a formal intake, referral and case management process to monitor and ensure timely receipt of services for eligible families.	Ongoing, 2007-2012 Part C Coordinator and staff, and Medical Assistance Administration, and the Medicaid Managed Care Director.	1	<b>Ongoing</b> DC EIP continues to work closely with DHCF to ensure timely receipt of services for eligible families. Meetings occurred monthly throughout FFY 2011 with care coordinators and their management.
3.	Collaborate with area universities to increase student awareness of early intervention as a career option and to identify interns and new graduates who may be interested in working in the field.	Ongoing, 2006-2012 Part C Coordinator and staff, CSPD, Interagency Coordinating Council (ICC), and other community stakeholders	1	<b>Ongoing</b> DC EIP is partnering with Institutes of Higher Education stakeholders to identify and implement strategies to increase recruitment and

	Improvement Activities	Timelines & Resources	Indicator(s)	Status
				retention of quality service providers.
4.	Implement an electronic distribution of flyers as a marketing campaign to locate and identify additional service providers.	Ongoing, 2007-2012 Part C Coordinator and staff, and OSSE Office of the Chief of Staff	1, 5, 6	<b>Ongoing</b> Outreach with the materials developed during the public awareness campaign is an ongoing child find activity. Staff continue to meet with primary referral sources and community partners to inform and educate about DC EIP and the services it provided to infants and toddlers.
5.	Identify and utilize additional funding opportunities to provide additional financial support for the DC Part C Program.	Ongoing, 2007-2012 Part C Coordinator and staff; OSSE Administrators, and Department of Health	1	<b>Ongoing</b> DC EIP continues to pursue funding by partnering with sister agencies to leverage training dollars and provide support to Program’s eligible children.
6.	Review and revise policies and procedures related to service coordination and timely initiation of services to improve service delivery.	February 2008-2012 Part C Coordinator and staff, NECTAC, MSRRC, and CSPD.	1	<b>Ongoing</b> This activity is still in progress. In FFY 2012, OSSE is promulgating new Part C regulations and policies to include service coordination and timely initiation of services.
7.	Access technical assistance from NECTAC	February 2008-2012 Part Coordinator and	1	<b>Ongoing</b> Ongoing technical

	Improvement Activities	Timelines & Resources	Indicator(s)	Status
	and MSRRC regarding timely provision of services.	staff, NECTAC, and MSRRC		assistance was provided by MSRRC and NECTAC during FFY 2011, including on-site meetings and numerous conference calls.
8.	Explore the feasibility and effectiveness of primary provider coaching model of service delivery.	August 2008-2012 Part C Coordinator and staff, Community Service Providers, and families	1	<b>Ongoing</b> Plans are being developed and the model is scheduled to be implemented in FFY 12.
9.	Continue to consider utilization of DC Part B’s “Easy IEP” system and replicate it for Part C by developing the “Easy IFSP” system with appropriate training and mentoring for staff and providers to insure timely data collection.	October 2008-June 2012 DC Part C Coordinator and staff, OSSE OIS, MSRRC, NECTAC, sub-grantees	1	<b>Ongoing</b> OSSE has also begun a system of data coordination to ensure tracking of outcomes across Part C and Part B data systems for children who transition. However, the utilization of this system for Part C has been determined not to be the best course of action for the Program. OSSE is considering other database options to enhance and support the work of early intervention professionals.
10.	Provide technical assistance and educational activities to	Ongoing, 2009 – 2012	2	<b>Ongoing</b> This activity is ongoing. DC EIP meets

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	promote natural environments and inclusion to families, Part C staff, service providers and service coordinators.	Part C Coordinator and staff, CSPD provider, stakeholders		with providers on a monthly basis to ensure that education around the natural environment requirement is provided.
11.	Develop online training module for early intervention (EI) providers and service coordinators on natural environments.	FFY 2010 – 2012 Part C Coordinator and staff, CSPD provider, DC EIP Providers	2	<b>Completed</b> In collaboration with the Georgetown University Center for Child and Human Development, DC EIP has developing a series of online training modules for early intervention providers and service coordinators on all aspects of early intervention. The natural environments module is complete and being used as a training tool.
12.	Ensure that the DC EIP’s public awareness campaign includes a focus on natural environments (definition, obligations, etc.)	FFY 2010 – 2012 Part C Coordinator and staff	2	<b>Completed</b> The DC public awareness campaign has evolved into a more hands on outreach campaign. The Program has wide name recognition which has improved entry for child find staff to discuss the importance of natural environments with a broader array of

	Improvement Activities	Timelines & Resources	Indicator(s)	Status
				medical professionals, parenting groups, and other agency and community partners.
13.	Collaborate with OSSE Special Education 619 Part B Coordinator to align policies, procedures and practices for measuring child outcomes to ensure a smooth transition from Part C to Part B.	Effective June 2008, this activity will be ongoing for FFY 2008-2012  District Part C, OSSE, Mid-South, NECTAC, ECO	3	<b>Ongoing</b>  The Programs continue to meet on a bi-monthly basis to ensure alignment of policies, procedures, and practices related to the transition of children from Part C to Part B. OSSE has identified a new 619 Coordinator who is spearheading the effort.
14.	Provide technical assistance/training and professional development for service coordinators and evaluation providers on use of the COS.	Effective April 2008, this activity will be ongoing for FFY 2008-2012  NECTAC; ECO; CSPD; DC Part C Staff, service providers	3	<b>Ongoing</b>  Training and TA to service coordinators, evaluation providers, and direct service providers is ongoing. However, beginning in FFY 2011, the District will be switching to the AEPS from the COS. Training and TA on this new project is ongoing and the new Initial Service Coordinators are the first to pilot the use of the software.
15.	Train DC Part C staff in procedures for reviewing completed COSs to identify the	Effective July 2008, this activity will be ongoing for FFY 2008-	3	<b>Ongoing</b>  COSs are reviewed along with the child's

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	need for additional training and TA.	2012 NECTAC; ECO; Mid-South; DC Part C Staff, contractors, sub-grantees		file on entry and exit. Identified training and TA needs are addressed at the provider/staff monthly meetings. In FFY 12, scores for COS will be automatically generated by the AEPS system which is based on ongoing assessments of the child by service providers.
16.	Create online training modules for service coordinators and early intervention providers that focus on Routines Based Intervention to support child outcomes.	FFY 2010 - FFY 2012 CSPD Provider; DC Early Intervention Staff and providers.	3	<b>Ongoing</b> In collaboration with the Program’s CSPD provider, the District is providing training on Routines Based Intervention (RBI) at monthly service coordinator meetings. Plans for creating an online module are currently underway.
17.	Create a targeted public relations campaign aimed at primary care physicians’ offices, clinics, child care providers, and private practice interventionists to disseminate the message about the DC Early Intervention Program.	FFY 2010 - FFY 2012 Public Awareness Contractor; DC Early Intervention Staff and providers.	3, 5, 6	<b>Ongoing</b> OSSE is partnering with DCPS to target physicians and impress upon them the necessity of screening children at well child visits to assess development. A plan is underway in FFY 2011 and FFY 2012 to provide training and assistance

	Improvement Activities	Timelines & Resources	Indicator(s)	Status
				to doctors' offices, clinics, child care providers on the importance of screening and referral to early intervention. An online toolkit is available on the DC EIP website to assist community partners in providing information to caregivers.
18.	Run a test of outcomes results midyear and work with providers regarding results to increase validity of COS.	FFY 2010 DC EIP Staff	3	<b>Completed</b> DC EIP has implemented the interactive Assessment and Evaluation Programming System for Infants and Children (AEPSi). Information on the reliability of the data will not be available until FFY 13.
19.	DC EIP will develop and implement strategies to address program needs identified through analysis of the family outcomes survey.	Ongoing, through FFY 2012 DC EIP staff, NECTAC, ECO	4	<b>Completed</b> DC EIP has met its targets for this indicator.
20.	Expand parent outreach and trainings via ongoing sessions sponsored by DC EIP and in collaboration with the ICC and Parent Training and Information Center.	Ongoing, through FFY 2012  OSEP TA Providers, ICC, Advocates for Justice and Education, Parent Training and Information Center	4	<b>Completed</b> DC EIP has met its targets for this indicator.

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		(PTI), Multicultural Resources, PTRC, Part C Providers, Parents as Teachers National Resource Center (PAT)		
21.	Implement online survey to increase range of questions, improve response rate and streamline analysis.	FFY 2010 – FFY 2012 DC EIP staff	4	<b>Completed</b> DC EIP has met its targets for this indicator.
22.	Ensure parent participation in DC EIP Early Childhood Transition work group to develop parent-friendly ECT guidelines and useful parent handouts.	FFY 2010 DSE Leadership, DC EIP Staff and Providers	4	<b>Completed</b> DC EIP has met its targets for this indicator.
23.	Initiate Part C parent orientation meetings and ensure parent participation.	FFY 2010 – FFY 2012 DC EIP Staff and Providers	4	<b>Completed</b> DC EIP has met its targets for this indicator.
24.	Partner with Neonatal Intensive Care Units (NICUs) on the identification and referral of children to DC EIP.	FFY 2010 – 2012 DC EIP Staff, NNNS Vendor	5	<b>Ongoing</b> The Program continues to engage NICU staff across the District in an effort to increase the number of children, birth to 1 year that are referred for early intervention services.
25.	Continue collaboration and implementation of activities with DCPS, Charter Schools, and OSSE for Child Find,	Ongoing throughout F FY 2005 – 2012  DC	5, 6	<b>Ongoing</b> Regular meetings were held with DCPS to coordinate Child

	Improvement Activities	Timelines & Resources	Indicator(s)	Status
	including meeting at least twice a year with representatives from various outreach initiatives throughout the District.	EIP, OSSE, DCPS, and Charter Schools		Find. A fruitful collaboration grew out of the effort that resulted in outreach to physicians' offices and the larger clinic groups, was jointly conducted.
26.	Maintain linkages with programs that screen infants and toddlers for established risks or conditions including the DOH Community Health Administration (CHA) (formerly Maternal and Primary Care Administration's (MPCA)) screening programs for Newborn Hearing and Metabolic Disorders.	Ongoing throughout FFY 2005 - 2012; DC EIP and CHA staff	5, 6	<b>Ongoing</b> This activity is still ongoing. A formal relationship has not yet been established, however, the Program has a close working relationship with the DOH Community Health Administration and its programs to ensure appropriate referrals.
27.	Continue to participate on advisory boards at the DOH/Community Health Administration (formerly Maternal and Family Health Administration), the CFSA and the Child Care Services Division within OSSE Early Childhood Education (ECE) (formerly Early Care and Education Administration).	Ongoing throughout FFY 2005 – 2012; DC EIP staff	5, 6	<b>Ongoing</b> OSSE ensures that the Program has representation on the following advisory boards: - Children with Special Health Care Needs Advisory Board; - Early Childhood Comprehensive Systems Steering Committee (DOH); and - DC HEARS (Universal Newborn Hearing Screening Program)

	Improvement Activities	Timelines & Resources	Indicator(s)	Status
				Advisory Committee. -State Early Childhood Coordinating Council (State Advisory Council under Head Start Act).
28.	Provide targeted outreach in wards of the city that have generated the most children eligible for DC EIP services. Increase technical assistance and training to child find sub-grantees, community referral sources, and interagency partners to ensure that poor and language minority families are fully represented and participating in Child Find activities.	January 2008 – through FFY 2012  DC EIP Staff; Public Awareness provider.	5, 6	<b>Ongoing</b>  DC EIP continues to train new staff at the Early Head Start centers across the District in the completion of the ASQ-3. DC EIP child find grantees provide screenings at health fairs, mobile health vans and other community events. The DC EIP Child Find Coordinator identifies partners across the District who require training on how to make a referral for Part C services.
29.	Review, revise and widely distribute outreach materials to target populations least likely to access early childhood services (English language learners and families impacted by low socioeconomic circumstances).	FFY 2007-2012  DC EIP Staff; Public Awareness Campaign provider	5, 6	<b>Ongoing</b>  OSSE continues the efforts the Strong Start public awareness campaign began in FFY 2010 by making materials available in several different languages on its website in the form of an online toolkit that community partners can download and

	Improvement Activities	Timelines & Resources	Indicator(s)	Status
				utilize.
30.	Utilize the Human Care Agreement provider procurement processes to increase the number of available providers for all aspects of service provision to ensure eligible children remain active in the DC EIP system; includes evaluations, therapy services, service coordination and child find tasks.	FFY 2008-2012: DC EIP Part C coordinator and Staff, DC Office of Contracts and Procurement and OSSE Grants Management Office.	5, 6	<b>Ongoing</b> The Human Care Agreement (HCA) is currently the primary contract vehicle for evaluation, direct care, and most recently, service coordination services. OSSE is in the process of converting the funding mechanism for child find service providers to HCAs.
31.	Provide access to the Ages and Stages Questionnaire – 3 (ASQ-3) and social emotional (ASQ-SE) to the general public.	August 2009 – Ongoing through FFY 2012 DC EIP staff	5, 6	<b>Ongoing</b> Utilization of the tool is solely for use by community partners and mass screenings. Due to new federal regulations, the Program no longer uses screening as a tool prior to the evaluation and assessment process, however, the Program continues to provide training to child care providers for use in assessing the developmental status of children in their care.
32.	Implement a public awareness campaign to inform and educate District residents about	October 2010-September 2011	5, 6	<b>Completed</b> The launch of its Strong Start Campaign

	Improvement Activities	Timelines & Resources	Indicator(s)	Status
	early intervention for infants and toddlers with development delays or disabilities.	DC EIP staff, Public Awareness Campaign Provider		in FFY 2010 was successful in that the Program was able to re-brand itself and for 6 months, double the number of referrals to the Program. The materials developed are very popular and allows the Program to continue outreach to community and inter-agency partners beyond the mass media portion of the campaign.
33.	Provide technical assistance and training for families, evaluation contractors and sub-grantees regarding Part C requirements related to eligibility determination and the 45-day timeline.	Effective January 2008 – FFY 2012 Part C Coordinator and staff	7	<b>Ongoing</b> The Program conducted monthly meetings throughout the year and completed training for all evaluation providers in FFY 2011. In FFY 2012, the addition of the Initial Service Coordinator model is being incorporated into the eligibility process. They are now solely responsible for ensuring adherence to the 45-day timeline.
34.	Collaborate with DHCF to improve interagency procedures to facilitate timely evaluations.	Effective January 2008 – FFY 2012 Part C Coordinator and staff; DHCF Administration and	7	<b>Ongoing</b> Monthly meetings continued in FFY 2011. OSSE is currently working with DHCF on

	Improvement Activities	Timelines & Resources	Indicator(s)	Status
		staff; MCO staff		a groundbreaking early intervention rule that would standardize early intervention rates across the District.
35.	Part C Coordinator will meet with staff to conduct ongoing reviews of state data for this indicator.	Effective February 2008 – FFY 2012 Part C Coordinator and staff	7	<b>Ongoing</b> Data are reviewed on a monthly basis with staff and providers to track performance.
36.	Review eligibility and evaluations policies to clarify, revise, and streamline procedures, forms and practices.	Effective February 2008 – FFY 2012 Part C Coordinator and staff; NECTAC and MSRRC	7	<b>Ongoing</b> This work continues and will be updated as the updated District Part C regulations are promulgated.
37.	Temporarily suspend payment to noncompliant providers for payment of 1% of their invoices until clear internal policies and procedures are in place and consistent technical assistance can be provided to providers.	Effective February 2008 – FFY 2012 DC EIP; DSE Fiscal Policy Unit	7	<b>Ongoing</b> This sanction is not currently being applied. DC EIP continues to work with the Office of Contracts and Procurement and OSSE Business Support Services on the development of clear policies and procedures. Ongoing technical assistance is being provided to ensure compliance.
38.	The Part C Coordinator will be actively engaged in meetings with evaluation providers to ensure the provision of	Effective March 2008 – FFY 2012 Part C Coordinator and staff	7	<b>Ongoing</b> TA meetings and trainings with evaluation providers

	Improvement Activities	Timelines & Resources	Indicator(s)	Status
	technical assistance and training on timely completion of 45-day timeline requirements.			were held monthly in FFY 2011. In addition, the Monitoring and Compliance Unit has conducted trainings on implementing this specific regulatory requirement.
39.	Part C Coordinator will meet with staff to conduct regular reviews of state data.	Effective February 2008 – FFY 2012 Part C Coordinator and Staff	7	<b>Ongoing</b> Data are reviewed on a monthly basis with staff and providers to track performance.
40.	Consider implementation of Initial Service Coordinator model.	July 2011 – ongoing Part C Coordinator and Staff, MSRRC, NECTAC	7	<b>Ongoing</b> DC EIP is currently in the process of implementing the Initial Service Coordinator (ISC) model on a full scale in FFY 2012. New service coordination staff have been recruited and ongoing service coordinator staff have been converted to ISCs.
41.	Implement Transition Service Coordinator model to facilitate transition planning conferences for children entering late.	Effective July 2010 and ongoing through FFY 2012 DC EIP Staff	8	<b>Ongoing</b> A bilingual of Transition Service Coordinator has been added to the DC EIP staff to facilitate transition meetings for children entering DC EIP at age 2 years 6 months and older. This position

	Improvement Activities	Timelines & Resources	Indicator(s)	Status
				streamlines the process for these families and ensures that transition meetings will be held at the same time as the initial IFSP meeting.
42.	Collaborate with DCPS Part B Early Stages Center, Charter LEA stakeholders, including the Public Charter School Board, and other community stakeholders, including parents, in the development and implementation of comprehensive guidelines to ensure a smooth and effective transition for infants and toddlers.	October 2010 – FFY 2012  DC EIP Staff; DCPS Early Stages Staff; Public Charter School Board; Community Stakeholders; Parents	8	<b>Ongoing</b>  Transition guidelines have been developed, disseminated, and implemented. With the promulgation of new federal Part C regulations, the revision of the local District of Columbia regulations, and the issuance of new District policies, these guidelines will be revised in FFY 2012.
43.	Early Intervention (EI) Specialists make bi-monthly phone calls to families to ensure services are being received and that families are satisfied with the outcomes.	Ongoing 2005 – 2012  Part C staff	9	<b>Ongoing</b>  The Program continues to emphasize regular communication with families. Two new service coordination agencies were added in FFY 2011, thus attention to this activity has been heightened.
44.	EI Specialists facilitate IFSP meetings for children on their service	Ongoing 2005 – 2012  Part C staff	9	<b>Ongoing</b>  Service Coordinators

	Improvement Activities	Timelines & Resources	Indicator(s)	Status
	coordination caseload to ensure compliance with Part C requirements.			continue to meet on a bi-weekly basis to identify and correct any systemic issues. Training in specific areas of need is included as requested.
45.	Track, review and certify provider invoices for payment.	Ongoing 2005 – 2012 Part C staff	9	<b>Ongoing</b> In FFY 2011, the timeliness of payments to vendors continues to be increase. The Program has expanded the duties of one of the current staff to assist in tracking and verifying vendor payments.
46.	Implement review of all DC EIP data requirements to ensure consistency in method and analysis.	FFY 2009 – FFY 2012 DC EIP staff; DSE Data Unit	14	<b>Completed</b> DC EIP has met its targets for this indicator.
47.	Continue to process DC EIP state complaints through the OSSE State Complaint office managed by the Monitoring and Compliance Unit.	Ongoing, FFY 2009 – FFY 2012 DSE Quality Assurance and Monitoring Unit	14	<b>Completed</b> DC EIP has met its targets for this indicator.