

**Indiana
Part C
Annual
Performance
Report (APR)**



FFY09

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Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report (APR) Development: The Indiana APR for FFY2009 was developed by the Bureau of Child Development Services, Division of Disability and Rehabilitative Services, Family and Social Services Administration (lead agency) utilizing direction and input from a broad group of stakeholders, including parents, providers, state contractors for quality review, training and evaluation, community leaders from the Indiana Interagency Coordinating Council (ICC), the ten Cluster Local Planning and Coordinating Councils (LPCC) and Cluster System Points of Entry (SPOE), Quality Review-Focused Monitoring Teams, the Central Reimbursement Office (CRO), and staff from Family and Social Services Administration (FSSA), Bureau of Child Development Services (BCDS) and the Indiana Department of Education, Division of Exceptional Learners. Several stakeholder meetings were held in 2009 and 2010 to discuss the State Performance Plan and Indiana's progress in meeting its targets. The FFY2009 APR indicator data were presented to the ICC at their quarterly meeting November 10, 2010. A Power Point presentation, *Measuring Up! SPP/APR Stakeholders Report* can be found at <http://www.utsprokids.org/firststepsinfo.asp>. Additionally, all ICC members received updated drafts of the indicator narratives, as they were written. On January 26, 2011, the ICC completed its review of the FFY2009 APR and revised SPP. The ICC Chairperson signed the Annual Report Certification to use the State's IDEA, Part C, APR for FFY2009 in lieu of submitting the ICC's own annual report.

Data for the indicators in the APR were derived from numerous sources. These include the state centralized database (data warehouse, claims data from the Centralized Reimbursement Office (CRO) vendor, Quality Review-Focused Monitoring data, SPOE self-reviews and Cluster Performance Plan Reports, the Early Childhood Outcomes (ECO) Family Survey (parent exit interviews) and child outcomes data collected and analyzed by the Indiana Institute for Disability and Community (IIDC) at Indiana University. All data used in this annual progress report have been verified by staff at the Bureau of Child Development Services, Indiana First Steps System.

Indiana has posted its Revised State Performance Plan (SPP), Annual Progress Report (APR) for FFY2005, 2007, 2008 and 2009, OSEP letters responding to the State's December 2005 SPP and the FFY2005, FFY2006, FFY2007 and FFY2008 APRs on the First Steps web site located at <http://www.firststeps.in.gov> and the Unified Training System website at <http://www.utsprokids.org/firststepsinfo.asp>. Indiana will post the revised SPP 2005-2012 and APR for FFY2009 following its submission on February 1, 2011. Public postings of Indicators, 1, 2, 3, 4, 5, 6, 7 and 8 can also be found at <http://www.utsprokids.org/firststepsinfo.asp>.

Part C State Annual Performance Report (APR) for FFY2009

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 |
|------|--|
| 2009 | 100% of infants and toddlers with IFSPs receive the early intervention services on their IFSPs in a timely manner |

Definition of Timely: In the 2005 SPP, Indiana defined timely as, “*all services written in the IFSP are initiated within 30 calendar days from the IFSP date, with parent approval or within 30 days from the parent signature date on the IFSP service change page for newly added services*”. The expectation is that 30 days represents a reasonable amount of time that may be allowed for services to begin. This time period allows adequate time for authorized services to be entered into the Central Reimbursement Office (CRO) database, for providers to be selected and for appointments with the family to be scheduled. As recommended by OSEP, in the SPP December 2005 letter, Indiana allows an exception for IFSP services that are delayed due to exceptional family circumstances and for less frequently delivered services, such as hearing aid maintenance scheduled on a quarterly basis

Indiana monitors each EIS program (Cluster) annually. For FFY2009, Indiana reviewed a sample of IFSPs (initial, annual and those with IFSP service changes) written between July 1, 2009 and June 30, 2010 to determine if new IFSP services were initiated within 30 days of the parent signature date of IFSP or service change page. The sampling unit for this indicator included all children with an IFSP written during FFY2009, (n=19,798). The minimum sample size of 642 IFSPs was determined by using a sampling calculator made available from the website (<http://www.raosoft.com/samplesize.html>) by Raosoft, Inc. The actual number sampled far exceeds the required sample size for a confidence level of 99%, with a confidence interval of +/- 5%. The sampling stratification process employed a random selection process based on gender and ethnicity. These random samples also included at least 8 files from every service coordinator in the state, thus insuring that all geographic areas of the state were sampled. The data collection strategy involved samples from each of the ten regional clusters. The purpose of

using these categories was to ensure adequate representation of all children receiving First Steps services in Indiana.

Sample data were derived from early intervention record reviews performed by the Quality Review contractors and from state-verified, early intervention record reviews completed by the local SPOE as part of their quality review and progress monitoring system. Random pull lists of early intervention records were sent to each cluster. Reviewers noted if the *Documentation of Service Start* form was present in the record and if all new services started within 30 days of the parent signature on the IFSP or change of service page. If services were not delivered within 30 days, the reason for delay and actual date of service must be specified.

Actual Target Data for FFY 2009: Infants and Toddlers with IFSPs who received Early Intervention Services in a Timely Manner: 98.5% (3017/3064)

| | |
|--|--------------|
| 1. Number of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner | 3017 |
| 2. Total number of infants and toddlers with IFSPs | 3064 |
| 3. 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) | 98.5% |

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY09: The sample reviewed included 3064 IFSPs and service change pages written from July 1, 2009 through June 30, 2010. 98.5% (3017/3064) of the records reviewed documented all new services written on the IFSP or the IFSP service change page were initiated within 30 days of the parent signature date was (Table C1.1). This represents an improvement of .75% over the 97.75% reported for FFY2008. In FFY2009, one cluster SPOE (J) demonstrated 100% compliance for documentation of all new services within 30 days of the initial, annual IFSP and service change page date for the entire fiscal year. The remaining nine clusters demonstrated a level of compliance in excess of 97%.

Table C1.1 Timely Services – FFY2009

| | # of IFSPs reviewed | % of total new IFSP services initiated ≤ 30 days | Services provided >30 days | Service never provided | Range in days to service start |
|------------------|---------------------|--|----------------------------|------------------------|--------------------------------|
| State | 3064 | 98.5% (3017/3064) | 40 | 7 | 31-79 days |
| Cluster A | 296 | 98.3% (291/296) | 4 | 1 | 33-79 days |
| Cluster B | 248 | 98.8% (245/248) | 1 | 2 | 34 days |
| Cluster C | 245 | 98% (240/245) | 3 | 2 | 35-49 days |
| Cluster D | 308 | 97.4% (300/308) | 6 | 2 | 33-44 days |
| Cluster E | 234 | 98.3% (230/234) | 4 | 0 | 32-54 days |
| Cluster F | 271 | 99.3% (269/271) | 2 | 0 | 31-33 days |
| Cluster G | 528 | 97.7% (516/528) | 12 | 0 | 31-43 days |
| Cluster H | 351 | 98.3% (345/351) | 6 | 0 | 33-45 days |
| Cluster I | 292 | 99.3% (290/292) | 2 | 0 | 31-34 days |
| Cluster J | 291 | 100% (291/291) | 0 | 0 | |

Account for untimely receipt of services for FFY2009: There were 47 instances in which new services were not initiated within 30 days (see Table C1.1). 85% (40/47) of these new services were subsequently provided after the 30 day timeline. The range for service start dates was 31 to 79 days. The EI record reviews for 7 children indicated that the service had never been provided. In four of seven instances, the family, initially waiting for the service later decided that their child’s other currently provided services were adequate and chose to delete the service from their child’s IFSP. In three instances, the child aged out prior to receiving the service. In each of the seven instances in which the children did not receive the service as written in their IFSP, these children were receiving one or more other early intervention services.

- 4 of the 7 services not provided were speech therapy
- 2 were not provided developmental therapy, and
- 1 was not provided physical therapy

Subsequent Correction of non-compliance: Indiana requires all local clusters to develop a Cluster Performance Plan and to submit quarterly reports for all indicators not in 100% compliance. The local clusters are required to review a minimum of 25 records that included least 2 records per Service Coordinator. The records were selected randomly by the QR Contractor. Clusters report their progress data to the state quarterly. All data is verified by the State through an onsite review of the early intervention record review forms used by the cluster to document timely services and a sampling of records to verify the accuracy of the data used for the progress report. Additional data verification is performed during the annual QR-Focused Monitoring on-site visits.

During the annual, on-site, state verification visits to each cluster, the state was able to demonstrate subsequent correction of non-compliance for four of the nine clusters identified in (Table C1.2). Clusters B, C, H and I demonstrated 100% compliance with timely services during the state-verified review of a random sample of early intervention records. Clusters B, C, H and I demonstrated compliance prior to the issuance of findings in January 2011. Clusters A, D, E, F and G were unable to demonstrate compliance and will continue to be monitored by the state. Clusters A, D, E, F & G were issued findings on 1/24/11. They are required to review and revise their cluster performance plans to ensure 100% compliance as soon as possible, but in no case later than one year from their findings letter of January 2011.

Table C1.2 Subsequent Correction of Timely Services

| Cluster SPOE | State Verified Correction of Non-Compliance Data | State Verification Annual on-Site Review Date |
|---------------------|---|--|
| A | 98% (98/98) | 1/18/11 |
| B | 100% (76/76) | 1/19/11 |
| C | 100% (76/76) | 12/7/10 |
| D | 97.4% (75/77) | 11/11/10 |
| E | 92% (68/74) | 12/20/10 |
| F | 97.6% (82/84) | 10/28/10 |
| G | 98.5% (195/198) | 1/13/11 |
| H | 100% (77/77) | 12/8/10 |
| I | 100% (81/81) | 12/1/10 |

OSEP Response Table: In its FFY2008 Response Table, OSEP requested, “Because the state reported less than 100% compliance for FFY2008, the state must report on the status of correction of non-compliance reflected in data the state reported for this indicator. In its FFY2009 APR that it has verified that each EIS program with noncompliance reflected in the data the State reported for this indicator: (1) is correctly implementing the specific regulatory requirements; and (2) has initiated services for each child, although late, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02). If the State is unable to demonstrate compliance in the FFY2009 APR, the state must review its improvement activities and revise them, if necessary to insure compliance.

Indiana was unable to demonstrate 100% compliance for this indicator in FFY2009. While not currently at 100%, Indiana has demonstrated a significant improvement in meeting this target from FFY2005 data of 91% to the current 98.5%. Indiana has reviewed its improvement activities and while the state has shown ongoing improvement several new plans and strategies have been added to the SPP and are outline under the Revision with justification section.

Correction of FFY 2008 Findings of Noncompliance (if State reported less than 100% compliance): Level of compliance (actual target data) State reported for FFY 2008 for this indicator: 97.75%

| | |
|---|----------|
| 1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009) | 8 |
| 2. Number of FFY 2008 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) | 7 |
| 3. Number of FFY 2008 findings <u>not</u> verified as corrected within one year [(1) minus (2)] | 1 |

| | |
|--|----------|
| Correction of FFY 2008 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected: | |
| 4. Number of FFY 2008 findings not timely corrected (same as the number from (3) above) | 1 |
| 5. Number of FFY 2008 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”) | 0 |
| 6. Number of FFY 2008 findings <u>not</u> verified as corrected [(4) minus (5)] | 1 |

OSEP Memorandum 09-02: Verification of Correction of FFY 2008 noncompliance or FFY 2008 findings (either timely or subsequent): As reported in the FFY08 APR, Indiana was able to demonstrate subsequent correction of non-compliance and state verification of correction for eight of nine clusters.

Table C1.3 Correction of FFY2008 Noncompliance

| Cluster SPOE | FFY 2008 Reported Data | State Verified Correction of Non-Compliance Data | State Verification Dates |
|--------------|------------------------|--|----------------------------|
| A | 97.16% (308/317) | 100% (113/113) | 09/28/09 |
| B | 97.41% (301/309) | 100% (133/133) | 09/29/09 |
| CH | 98% (981/1001) | 100% (207/207) | 10/21-22/09 |
| D* | 94.5% (257/272) | 97.4% (300/308) | 10/13/09, 1/15/10, 6/15/10 |
| E | 93.88% (261/278) | 100% (131/131) | 10/8/09 |
| F | 98.5% (266/270) | 100% (160/160) | 10/6/09 |
| G | 98% (581/592) | 100% (130/130) | 11/13/09 |
| I | 99.6% (478/480) | 100% (295/295) | 11/17/09 |

*D failed to demonstrate subsequent compliance in FFY09.

Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2008: Indiana required all local clusters to develop a Cluster Performance Plan and to submit quarterly reports for all indicators not in 100% compliance. The local clusters were required to review a minimum of 25 records that included least 2 records per Service Coordinator. The records were selected randomly by the QR Contractor. Clusters report their progress data to the state quarterly. All data is verified by the State through an onsite review of the early intervention record review forms used by the cluster to document timely services and a sampling of records to verify the accuracy of the data used for the progress report. Additional data verification is performed during the annual QR-Focused Monitoring on-site visits.

Actions Taken if Noncompliance Not Corrected:

One cluster (D) failed to demonstrate correction of its noncompliance within one year of identification. In the past year, this cluster has shown significant improvement from 94.5% for FFY08 to 97.4% for FFY09. While, the Cluster remains below 100% compliance, it is now at an improved level of compliance (greater than 95%). The state did require written outcomes and strategies to address the non-compliance and it monitors the Cluster's Performance Plan and reports quarterly to assure that they are making progress (see summary below).

Correction Action Plans: Cluster D:

Outcome: Increase to 100% compliance for timely services within 30 days of IFSP or service change page. ***SPOE must account for all noncompliance with actual date of service and reason for delay in service.***

Responsible Party: Service coordinators have been identified by state staff as the individuals responsible for completing documentation of service starts for the child EI records. Providers and families are also involved in starting timely services.

Strategies: Implement the use of state approved form for documentation of all service starts. Train staff by reviewing 30 day start policy in supervision and staff meeting.

Improvement Plans:

- SPOE supervisor will focus on intake timeliness and communication in transferring the files to ongoing providers in the next quarter.
- Intake will notify ongoing provider within 2 business days of the IFSP while waiting for physician signature.
- Intake will inform families about the importance of scheduling appointments promptly to get services started.
- Intake will give families the contact information for the selected provider and the SC at

- the initial meeting.
- SPOE supervisor will work with SC to document the start date and follow up within 2 weeks of IFSP.
- LPCC coordinator will send monthly provider updates reminding of the importance of accuracy of the matrix, serving the areas listed in their matrix and scheduling to start within 30 days of parent signature.
- LPCC coordinator will address timely service start at quarterly provider networking meetings.
- Staff will continue to audit files monthly for service start documentation.
- Cluster will perform an analysis to determine the source for all non-compliance, i.e. SPOE issues, delay in MD signature, provider issues
- SPOE will develop plans to address identified issues

Measurement and timelines: SPOE staff will audit files monthly and tally results. Sample will be at least 2 per service coordinator for initial IFSP, 6 month and annual new services. All noncompliance will be corrected by June 30, 2010.

OSEP Memorandum 09-02: Initiation of services, although late, for any child whose services were not initiated in a timely manner, unless the child is no longer within the jurisdiction of the EIS program:

As reported in the FFY08 APR, all services written in the IFSP were initiated, albeit beyond the 30 day timeline. While systemic issues were not identified, the reasons for untimely services in the reviewed IFSPs included the following:

- For 58% (50/86) the delay in the initiation of the service was due to problems contacting the family and/or due to families who cancelled or were not available for the initial appointment set by the provider. Families who moved or who cancelled two or more consecutive appointments were not included in this count, as those were counted with the exceptional family circumstances.
- For 26.7% (23/86) the delay in initiation of services was due to the family selection of a provider who was not available. Indiana utilizes an online matrix of service providers. This matrix includes provider availability and current openings for weekdays, evenings and weekends. Providers may also specify their area of service. The matrix is updated by the individual provider. When providers have one or two openings, it is possible that they can be chosen by multiple families simultaneously and therefore, not be able to service each of them. In these cases, the service coordinator must re-contact the family to choose another provider, causing a delay in the service initiation. There were also instances in which a family chose a specific provider who does not provide service the families' location. While some providers will make allowances, others are unable due to the increased driving distance. Finally, parents may choose to wait for a specific provider type or individual provider, delaying the start of services. In FFY08, these family choices did not meet the definition of exceptional family circumstances.
- The remaining 15.3% (13/86) were due to processing issues at the SPOE which included: delays in finding an available provider, delays in notifying the provider that they were chosen to provide services, delays in obtaining the physician signature on the IFSP and provider availability issues related to vacations, illness, etc.

Correction of Remaining FFY 2007 Findings of Noncompliance (if applicable): Not applicable.

Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable): Not applicable.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable): While Indiana did not meet the 100% target for this indicator, the state continues to be consistently above 97% for indicator. The state has reviewed its improvement activities and revisions were made to the SPP. Indiana also extended the rigorous and measurable target for this indicator through FFY2012.

Revised improvement plans for FFY2010 to increase compliance with timely services:

1. All providers must be employed or contracted through a state approved provider network. Networks will be responsible for the supervision of its providers.
2. While the IFSP is written for a one year period, IFSP service authorizations will be written for 3 months and providers must submit progress notes at 3 month intervals.
3. Provider Progress notes must include service start dates.
4. To streamline the initial and annual evaluation/assessment process, Eligibility Teams will work under the direction of the SPOEs as employees or contractors.

Part C State Annual Performance Report (APR) for FFY2009

Monitoring Priority: Early Intervention Services In Natural Environments

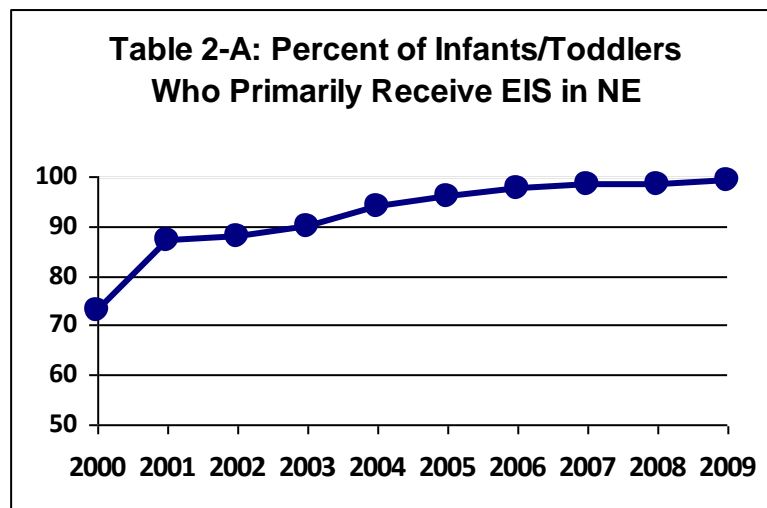
Indicator 2: Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings.

(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 |
|------|---|
| 2009 | 95% of infants and toddlers with IFSPs primarily receive early intervention services in the home or community-based settings. |

Actual Target Data for FFY09: As reported in Table 2 of the 618 data report, 99.18% (9982/10064) of Indiana’s infants and toddlers with an IFSP primarily received early intervention services in the home or community-based settings for typically developing children (child care homes/centers, local parks, churches, etc.). Indiana has exceeded its target of 95%. These data represent an increase from the 98.49% reported in FFY2008.



For the FFY2009 APR, Indiana captured the number of early intervention services in the natural environment from the Central Reimbursement Office (CRO) provider claims data which require a location code for all services provided (these data are collected and analyzed by the state

data warehouse). To validate that the claim location data are valid and reliable, Indiana performs billing reviews for approximately 10% of its early intervention providers annually. These reviews conducted by the Quality Review contractors, compare the face-to-face form for each service provided during a specified two week period to the provider electronic claim data for the same period. The face-to-face form includes the date, time in, time out, and service location address. The form is signed by the provider and the parent/guardian attesting to its accuracy. Providers are notified when a discrepancy is found. Providers are required to payback any payments for services not provided as they were represented on the face-to-face form. This includes the higher payment rate made for services provided in the home or community-based setting. In FFY2009, no location code discrepancies were found for the 175 providers who were reviewed.

Since the adoption of natural environments and the provision of early intervention services within the child and family routines, activities and places as a best practice for early intervention services in 2000, Indiana has increased the number of services in the natural environment from 73% to 99.18% (Table 2-A Percent of Children With IFSPs Who Receive Services in the Natural Environment). Indiana has developed policies and procedures to ensure that, to the maximum extent appropriate to the needs of the child and family, early intervention services are provided in the natural environment, including the home and other community settings in which children without disabilities participate. When the IFSP team (including the parent and Service Coordinator) determines that the provision of early interventions services for an infant/toddler cannot satisfactorily be achieved in the child/family's natural environment, a setting other than a natural environment can be selected. IFSP teams must make individualized decisions regarding the setting in which infants/toddlers receive early intervention services, in accordance with the IDEA. The IFSP team is trained to consider all possible service options for the child in order to individualize the IFSP for the child and family. When it has been determined by the IFSP team that services are best provided in a setting other than a natural environment for typically developing children, Indiana requires justification for that decision, including options that were considered by the IFSP team, along with a plan and timeline for transitioning the service into the natural environment. This information becomes a part of the child's IFSP.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY09: The SPP target for FFY 2009 was 95%. Indiana has met its SPP target for the percent of IFSPs with services in the home or programs for typically developing children. It was noted in the FFY2008 SPP/APR Response Table that no expectation for an increase in the percentage was necessary.

To ensure that service setting decisions were made by the IFSP team on an individualized basis, Indiana's Quality Review Teams (QR Teams) monitor the percent of services in the natural environment from the System Point of Entry database and through a sample review of EI records. Documentation of the setting decision is part of the IFSP. The settings decision page and meeting minutes are reviewed for acceptable justification, when the IFSP team, (including the parent and Service Coordinator) determined that exceptions are warranted

Indiana has placed an emphasis on training in regards to appropriate service settings, with a focus on routines based-intervention. The Best Practice Document used in provider and service coordinator training reflects evidenced-based practices regarding the acquisition of developmental skills within the child's and the family's everyday routines, activities and settings. All direct service providers must complete a comprehensive orientation via distance learning with two additional half day, face-to-face courses within their first year of enrollment. Service Coordinators also complete a distance learning orientation module that includes local supervision, along with two additional full-day, face-to-face trainings. Both of the new orientation

courses include modules on service settings in the natural environment and IFSP development. In 2008, a new distance learning module *Providing Early Intervention Supports and Services in Everyday Routines, Activities and Places* was developed and is now available as an online training module. As providers become more skilled in providing services that involve the child’s and family’s natural routines, activities and places, the barriers to providing early intervention services in “other” settings are few.

Indiana is currently looking at policies for enhanced parent communication and participation when the child’s services are provided in child care centers. A proposed policy change will require one face-to-face meeting with the parent monthly. The state is working with provider networks and parent advocacy groups to insure that this policy change does not present an undue burden on working families.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY09: The SPP target of 95% was extended to FFY2012. A new improvement activity was added to enhance parent and provider communication, participation and education when the child receives services in a child care setting.

| | | |
|---|---|--|
| <p>Develop and monitor policy for monthly provider/family face-to-face contact to enhance family communication, participation and education when the child receives his/her early intervention services in a child care center.</p> | <p>Bureau of Child Development Services First Steps Agencies Child & Family Advocacy Groups</p> | <p>Policy initiated 1/1/2011. Incorporate policy review into QR billing reviews (documentation of family contact monthly) Continue to monitor early intervention records for notes on team discussions regarding service location decisions and parent participation. Timeline: Ongoing to 2012.</p> |
|---|---|--|

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested.

Part C State Annual Performance Report (APR) for FFY09

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

Summary Statements for Each of the Three Outcomes (use for FFY 2009-2012 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.

| FFY09 | Measurable and Rigorous Target |
|---|--|
| Summary Statements | |
| Outcome A: Positive social-emotional skills (including social relationships) | |
| 52% | 1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they exited the program |
| 50% | 2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program |
| Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy) | |
| 57% | 1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program |
| 69% | 2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program |
| Outcome C: Use of appropriate behaviors to meet their needs | |
| 54% | 1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they exited the program |
| 62% | 2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program |

Actual Target Data for FFY09:

The data reported for FFY 2009 represent 99.5% (6030/6055) of the children receiving early intervention services for a minimum of six months. It is representative of the children the program services. In addition, the quality of the data and data analyses reflect several years of implementing and improving the system for collecting and analyzing the data.

| Summary Statements | Targets FFY 2009 | Actual FFY 2009 |
|--|---------------------|-----------------------|
| Outcome A: Positive social-emotional skills (including social relationships) | | |
| 1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they exited the program | 52% | 51% |
| 2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program | 50% | 49% |
| Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy) | | |
| 1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program | 57% | 59% |
| 2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program | 69% | 68% |
| Outcome C: Use of appropriate behaviors to meet their needs | | |
| 1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they exited the program | 54% | 54% |
| 2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program | 62% | 59% |

Progress Data for Part C Children FFY 2009

| A. Positive social-emotional skills (including social relationships): | Number of children | % of children |
|--|-----------------------|------------------|
| a. Percent of children who did not improve functioning | 333 | 5.5% |
| b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers | 2175 | 36.1% |
| c. Percent of children who improved functioning to a level | 587 | 9.7% |

| | | |
|--|---------------------------|----------------------|
| nearer to same-aged peers but did not reach | | |
| d. Percent of children who improved functioning to reach a level comparable to same-aged peers | 2055 | 34.1% |
| e. Percent of children who maintained functioning at a level comparable to same-aged peers | 880 | 14.6% |
| Total | N=6030 | 100.0% |
| B. Acquisition and use of knowledge and skills (including early language/communication): | Number of children | % of children |
| a. Percent of children who did not improve functioning | 314 | 5.2% |
| b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers | 1079 | 17.9% |
| c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach | 551 | 9.1% |
| d. Percent of children who improved functioning to reach a level comparable to same-aged peers | 1456 | 24.1% |
| e. Percent of children who maintained functioning at a level comparable to same-aged peers | 2630 | 43.6% |
| Total | N=6030 | 100.0% |
| C. Use of appropriate behaviors to meet their needs: | Number of children | % of children |
| a. Percent of children who did not improve functioning | 347 | 5.8% |
| b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers | 1598 | 26.5% |
| c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach | 519 | 8.6% |
| d. Percent of children who improved functioning to reach a level comparable to same-aged peers | 1740 | 28.9% |
| e. Percent of children who maintained functioning at a level comparable to same-aged peers | 1826 | 30.3% |
| Total | N=6030 | 100.0% |

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY09: All targets were set at a level of up to 1% over the baseline data reported in the FFY08 SPP. Comparing this year’s results with FFY 2008, there are minimal differences in progress noted, with the largest difference being a 2.6% drop for Outcome C.2. The state has been consistent over time in its percent of children who improve functioning. Indiana will continue to monitor its data. Once national data are compiled and published, Indiana will perform further analysis of the data. Indiana has reviewed its process for collecting and analyzing child outcome data. Monthly, the Indiana Institute on Disability and Community (IIDC) receives data on all children and families who have exited First Steps. Using these data (each child has a unique identifier), IIDC collects the web-based child and family outcome data entered by the SPOEs, and integrates it with the demographic data provided by the state. IIDC then conducts a simple analysis to highlight data that are complete, incomplete, or missing; and issues monthly reports for each SPOE as to the

quality and completeness of their data entry. The SPOE has the opportunity to provide the missing or incomplete data during the following month. Any time staff at the SPOE has questions or concerns regarding the data entry process, they can contact IIDC for assistance.

All children in Indiana's First Steps program received an evaluation/assessment using the Assessment, Evaluation, Programming System for Infants and Children (AEPS® 2nd Ed.), in conjunction with medical diagnoses, family report and other testing, as necessary to determine eligibility and service needs, on entrance and exit from First Steps. Before October of 2006, infants and toddlers were initially assessed using multiple assessment tools. FFY2008 was the first reporting period in which all infants and toddlers in the First Steps System met the higher eligibility requirements (instituted in 2006) at their initial eligibility determination.

Indiana has maintained its efforts to improve the quality of the data and the quality of programs and services in order to improve the children's outcomes from previous years. As a result of continued information and technical assistance, Indiana was able to improve the number and percentage of children included in the final analyses. This year, child assessment data were collected on 99% of all eligible infants and toddlers receiving Part C services for a minimum of six months—the target population included in our data reporting for APR Indicator C3. This is a marked improvement over last year's sample of 66% of the total population.

The transition to the use of the Indiana Standards Tool for Alternative Reporting-Kindergarten Readiness (ISTAR-KR) system for measuring child outcomes continues to be delayed pending final standardization of the tool. Indiana completed a General Supervision Enhancement Grant (GSEG) in December of 2008. The work of the GSEG included: alignment the ISTAR-KR with the Indiana academic standards; demonstration of the tool's reliability and validity as a measure of academic standards progress; and cross-walking ISTAR-KR items with the OSEP child outcomes. The identification of cut scores for typical development was completed in 2008 utilizing a panel of experts from various fields, including education, child development, speech pathology, occupational and physical therapy. Currently, the Indiana Department of Education is using data to determine developmental ages for the indicators. Once this is completed, the tool will allow Indiana to utilize one system for progress measurement of academic standards and the OSEP outcomes, from birth to 5 years. The proposed date for the transition to ISTAR-KR is July 1, 2011.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY09: Targets for the child outcomes were revised to show the extension of SPP Targets through FFY2012. New activities were added to develop and provide training for use of the ISTAR-KG.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested.

Part C State Annual Performance Report (APR) for FFY2009

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.

| FFY | Measurable and Rigorous Target |
|------|---|
| 2009 | <ul style="list-style-type: none"> A. 100% of respondent families participating in Part C who reported that early intervention services have helped the family know their rights. B. 100% of respondent families participating in Part C who reported that early intervention services have helped the family effectively communicate their children's needs. C. 100% of respondent families participating in Part C who reported that early intervention services have helped the family help their children develop and learn. |

Actual Target Data for FFY2009: For FFY 2009, family outcome data were collected from 4,195 families who exited the First Steps program and received services for a minimum of six months. This number represents 69.3% of the 6,055 eligible families that exited during FFY2009 and received services for a minimum of six months. The family survey information that Indiana collects is based on the Early Childhood Outcome Center Family Survey. This survey is completed within three months of their exit from First Steps. Family participation is voluntary.

A. 96.3% (4023/ 4176) of respondent families participating in Part C who report that early intervention services have helped the family know their rights.

B. 98.9% (4133/4176) of respondent families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs.

C. 95.3% (3978/4176) of respondent families participating in Part C who report that early intervention services have helped the family help their children develop and learn.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY2009:

Many of the improvement activities were maintained for this current year. All service coordinators who are responsible for administering and reporting the family assessment receiving training and technical assistance from their supervisors in each of the 10 regional System Point of Entry (SPOE) clusters. In addition, service coordinators and clerical staff who are responsible for entering the family survey data onto a web-based data collection site are able to access ongoing technical assistance to the contractor responsible for collecting, maintaining, and analyzing both the child and family outcome data—Indiana Institute on Disability and Community, Indiana University.

In this past year, additional efforts were made to encourage and monitor the number and proportion of family surveys completed and entered by each of the 10 regional SPOEs. Each month, IIDC would provide a report to each SPOE and the state identifying the percentage of children and families for whom complete child and family assessment data were collected and entered. In addition, the name of individual children/families for which data were either missing or incomplete was provided to the respective SPOEs, with the request that these data were entered for the following month.

As a result of these additional progress monitoring and reporting activities, the SPOEs provided child and family outcome data for 69% of all children and families exiting the program after at least six months of services. The 69% completion rate represents continued progress in increasing the percentage of families who participate over the past four years.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY2009: Indiana's measurable and rigorous targets for the family outcomes have increased to 100%. While Indiana has achieved very high percentages for each of its family outcome measures, Indiana did not meet the targets of 100% for each outcome. Indiana set its targets in 2005 when it was using a yes/no questionnaire. Indiana began using the ECO Family Survey which utilizes a Likert scale in 2006. The state believes that targets of 100% are unreasonable for a Likert scale survey. Indiana had elected to monitor its family outcome data through FFY2010 before revising these targets.

The state has developed several trainings and initiated policies to increase the percentage of Family Exit Surveys that are returned and data entered. Service Coordinators were moved into the SPOEs in April of 2008. This move increased consistency in the process for obtaining and data entering the Family Exit Survey. Service Coordinators have received training in routines-based interviews, cultural competency and procedural safeguards. An independent study module on Procedural Safeguards, entitled A Family-Centered Approach to Procedural Safeguards was completed in 2009. A new course was developed for service coordinators and providers to assist families in obtaining information online. It's Online, But Can I Trust It? Identifying Authoritative Online Sources for Health & Education will be offered in each region over the next year. In 2010 the course Hey Kids, Let's Play was developed to assist families in

understanding their child’s development, highlighting infant and toddler development, atypical development, and activities and strategies they can do with their child.

With the extension of the SPP through 2012, Indiana is now proposing to utilize the data from FFY 2006-2009 to set new targets for the SPP extension for 2011 and 2012. The proposed changes to the family outcome targets are:

| FFY | Measurable and Rigorous Target |
|------------------|--|
| 2010-2012 | <ul style="list-style-type: none"> A. 99% of respondent families participating in Part C who reported that early intervention services have helped the family know their rights. B. 98% of respondent families participating in Part C who reported that early intervention services have helped the family effectively communicate their children's needs. C. 97% of respondent families participating in Part C who reported that early intervention services have helped the family help their children develop and learn. |

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested.

Part C State Annual Performance Report (APR) for FFY2009

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 toddler 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 |
|-------------|--|
| 2009 | 1.40% of infants and toddlers birth to 1 with IFSPs compared to national data. |

Actual Target Data for FFY09: Indiana served 1,156 infants, birth to 1 year in FFY09. This represents 1.3% of the birth to one year population of 88,683.

Table 5.1: Actual Target Data for FFY2009:

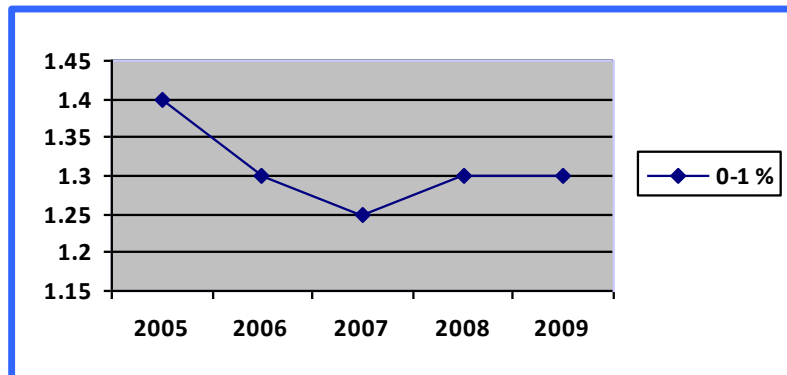
| STATE | CHILD COUNT 0-1 | POPULATION 0-1 | % OF POP. 0-1 | CURRENT ELIGIBILITY |
|----------|-----------------|----------------|---------------|--------------------------------------|
| Indiana | 1,156 | 88,683 | 1.3% | Moderate Eligibility Criteria |
| National | 44,234 | 4,306,594 | 1.03% | |

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY09: Indiana’s 1.3% of infants birth to one year with an IFSP represents no change from the 1.3% reported in FFY08. While the number of eligible children birth to one year served remains less than the SPP target of 1.4%, Indiana remains well above the national percentage of 1.03%.

In 2006, Indiana’s eligibility rules were revised through state legislation and an amendment to the state’s Part C application. The change in the state’s eligibility rules eliminated the biological risk category and raised eligibility by developmental delay from a delay 20% or -1.5SD to 25% or -2SD in one developmental domain and from 15% or -1SD to 20% or -1.5SD in two or more developmental domains.

Indiana anticipated that child count numbers for eligible children birth to one year with an IFSP would decrease due to changes in the state’s eligibility criteria, as biological risk was removed and the level of delay for eligibility was increased. Table 5.2 illustrates the decrease in the number of infants served from FFY2005 through FFY2009. In FFY08 and FFY09, the number has stabilized to 1.3%.

Table 5.2: Percent of infants 0-1 year with an IFSP



Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY09: The 1.4% target for FFY2006-2010 was revised in the FFY2005 SPP. Indiana has revised the SPP targets and activities for the SPP extension to FFY2012.

The state has included child find activities as part of the Local Planning and Coordinating grant deliverables. Each LPCC reports its child find activities and referral numbers to the state as part of its grant outcomes. LPCC activities include the development and distribution of child development information, including information on the First Steps System to local hospitals, physician offices, child care centers and other community locations that serve families with young children. All LPCCs are required to maintain memorandums of agreement with local referral agencies.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested.

Part C State Annual Performance Report (APR) for FFY2009

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 toddler 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 |
|------|--|
| 2009 | 3.15% of infants and toddlers birth to 3 with IFSPs compared to national data. |

Actual Target Data for FFY09: Indiana served 10064 infants and toddlers, birth to 3 years of age in FFY09. This represents 3.74% of the birth to three years population of 268,753.

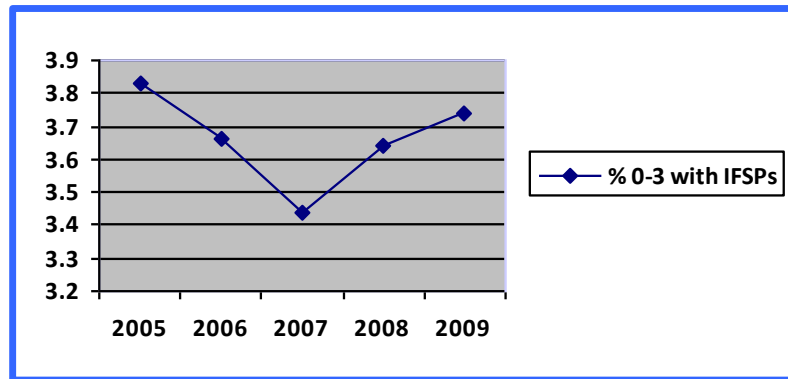
Table 6.1: Actual Target Data for FFY2009:

| STATE | CHILD COUNT 0-2 | POPULATION 0-2 | % OF POP. 0-2 | CURRENT ELIGIBILITY CRITERIA |
|----------|--------------------|-------------------|------------------|------------------------------------|
| Indiana | 10,064 | 268,753 | 3.74% | Moderate |
| National | 348,143 | 13,032,221 | 2.66% | |

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY09: Indiana continues to serve a high percentage of children birth through two years when compared to national data. Indiana’s 3.74% is above the state’s proposed target of 3.15% and the national average of 2.66%.

In 2006, Indiana’s eligibility rules were revised through state legislation and an amendment to the state’s Part C application. The change in the state’s eligibility rules eliminated the biological risk category and raised eligibility by developmental delay from a delay 20% or -1.5SD to 25% or -2SD in one developmental domain and from 15% or -1SD to 20% or -1.5SD in two or more developmental domains. The state anticipated that child count numbers for eligible children birth through two years with an IFSP would decrease in subsequent years. Table 6.2 illustrates a decline in children with an IFSP from FFY2005 through FFY2007 due to changes made to the state’s eligibility criteria. The state has experienced an increase in the number of children served in FFY2008 and 2009. The increase in child count is most likely a result of an increase in referrals.

Table 6.2: Percent of infants 0-3 years with an IFSP



Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY09: The targets for the percent of children with IFSP were revised in the SPP 2/1/2007 due to the change in eligibility rules for the state. Indiana has revised the SPP targets and activities for the SPP extension to FFY2012.

The state has included child find activities as part of the Local Planning and Coordinating grant deliverables. Each LPCC reports its child find activities and referral numbers to the state as part of its grant outcomes. LPCC activities include the development and distribution of child development information, including information on the First Steps System to local hospitals, physician offices, child care centers and other community locations that serve families with young children. All LPCCs are required to maintain memorandums of agreement with local referral agencies.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested.

Part C State Annual Performance Report (APR) for FFY2010

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 eligible 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 eligible infants and toddlers evaluated and assessed)] times 100.

Account for untimely evaluations, assessments, and initial IFSP meetings, including the reasons for delays.

| FFY | Measurable and Rigorous Target |
|------|--|
| 2009 | 100% of eligible 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 |

Data Source and Measurement Considerations: Indiana has a centralized data system. Every referral to Indiana First Steps is entered into the System Point of Entry (SPOE) database with the referral date, child name, and date of birth, address, referral source, and contact information. An Intake Service Coordinator contacts the family within 2 business days to set an appointment to meet with the family to explain the program, family rights and procedural safeguards and to obtain consent to gather information and to proceed with the evaluation/assessment. Once the family has consented to proceed, the intake coordinator assists obtaining the physician health summary and in the scheduling of the evaluation/assessment within 10 working days of the intake appointment. In Indiana, every child proceeding to evaluation/assessment receives a comprehensive developmental assessment by a multidisciplinary team, representing at least 2 professional disciplines. In addition to information received from the medical home and the multidisciplinary team, every child is assessed using the AEPS®. Additional observations and tests are performed as needed and appropriate.

Once the Eligibility Determination Team (EDT) assessment is completed, the information is sent to the intake coordinator who contacts the family. Based on evaluation and assessment results and recommendations of the ED team, the family makes a choice to proceed to an eligibility meeting or to accept the results that their child does not meet Indiana’s eligibility criteria. If the family chooses to proceed, the eligibility meeting is scheduled. Once the team determines that the child is eligible, the IFSP can be developed. If the child does not meet eligibility criteria and the family chooses not to proceed to the eligibility meeting, they are provided with local resource

information and are informed that they will receive a follow up call within the next 3 to 6 months to determine if the family has continued concerns about their child’s development.

After the IFSP is written, the SPOE Cluster enters the child’s date of intake, eligibility meeting and IFSP meeting date into the SPOE database. If the child is not found eligible or the family chooses not to participate, the appropriate termination code is entered.

The local Cluster SPOE generates a monthly report listing every eligible child with an IFSP meeting date that exceeds the 45-day timeline. Each Cluster SPOE must submit a “Delay of IFSP” form for every IFSP that exceeds the 45-day timeline. This form provides information on why the initial 45 day timeline was not met. The parent signs this form indicating that they have been informed of their rights and procedural safeguards and understand that the IFSP exceeded the 45-day timeline and they are in agreement with the delay of IFSP reason stated on the form. Supporting documentation as to the circumstances of the delay must also be included in the Service Coordinator log notes. The Delay of IFSP form and the log notes become part of the early intervention record.

In order to monitor that the IFSP timelines are met, a Quality Review process has been developed to examine every instance when the IFSP exceeds the 45-day timeline. The determination on whether the delay was the result of an exceptional family circumstance (ex. family medical emergency, parent/child illness, family relocation or custody change, etc.) or the result of a systemic issue is made by the state and not the Cluster SPOE. The data analysis includes the number of initial IFSPs exceeding 45-day timeline divided by the total number of eligible infants and toddler evaluated and assessed for whom an IFSP meeting was required, and includes the reason for the delay. When the development of the IFSP exceeds 45 days, the actual date of the IFSP is recorded to insure that the child/family did subsequently have an IFSP developed.

Actual Target Data for FFY09

Actual Target Data for FFY09: 99.9% (10,196/10,203) of eligible infants and toddlers had an evaluation and assessment and an initial IFSP developed within 45 days of referral.

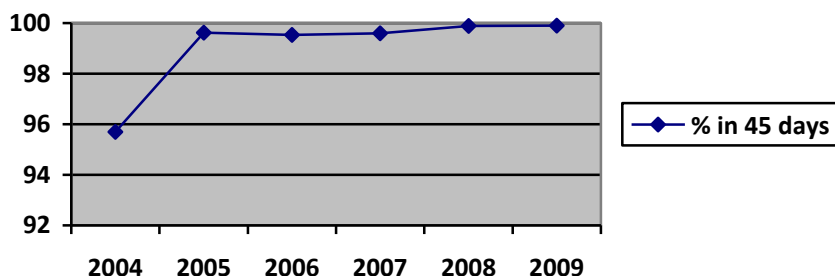
Infants Evaluated and Assessed and provided an Initial IFSP meeting Within Part C’s 45-day timeline: 99.9% (10,196/10,203)

| | |
|--|--------------|
| 1. 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 | 10196 |
| 2. Number of infants and toddlers with IFSPs evaluated and assessed for whom an initial IFSP meeting was required to be conducted | 10203 |
| 3. 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) | 99.9% |

In FFY2009, 99.9% (10196 of 10203) of eligible children received an evaluation/assessment and an initial IFSP within the Part C, 45-day timeline (those with exceptional family circumstances are counted in both the numerated and denominator). This percentage is

consistent with previously reported data from FFY2005-2007 (Table 7.1) and represents a significant improvement from FFY2004.

Table 7.1: Percent of IFSPs within 45 days of Referral



On April 1, 2010, Cluster CH was split into Clusters C & H. Data for CH include the period of July 1, 2009 through March 31, 2010. Data for C & H are for the period of April 1, 2010 through June 30, 2010. The chart below represents all eleven entities that reported data for FFY09. The data include all children referred who were found to be eligible for Part C services. Eight Clusters demonstrated 100% compliance for the entire FFY. This represents an increase from only four clusters in FFY2008. The combined cluster CH no longer exists. Clusters C and H each have separately achieved 100% compliance since April 2010. The remaining two clusters (G & J) have achieved levels of compliance at 99.6%. A review of each Cluster’s performance is listed below in table 7.2.

| | Total IFSPs | % ≤ 45 days, including EFC | # ≥ 45 days | Exceptional Family Circumstances EFC | System Issues | For System Issues, the number of days until IFSP was developed Range- 46-58 days |
|--------------------|--------------|----------------------------|-------------|--------------------------------------|---------------|---|
| State Total | 10203 | 99.9% (10196/10203) | 13 | 6 | 7 | |
| Cluster A | 1025 | 100% (1025/1025) | 0 | 0 | 0 | |
| Cluster B | 935 | 100% (935/935) | 0 | 0 | 0 | |
| Cluster CH | 1147 | 99.9% (1146/1147)* | 0 | 0 | 1 | 46 |
| Cluster C | 214 | 100% (214/214)^ | 0 | 0 | 0 | |
| Cluster D | 584 | 100% (584/584) | 0 | 0 | 0 | |
| Cluster E | 529 | 100% (529/529) | 0 | 0 | 0 | |
| Cluster F | 569 | 100% (569/569) | 0 | 2 | 0 | |
| Cluster G | 3161 | 99.9% (3158/3161) | 5 | 2 | 3 | 57, 48, 47 |
| Cluster H | 160 | 100% (160/160)^ | 0 | 1 | 0 | |
| Cluster I | 1076 | 100% (1076/1076) | 0 | 1 | 0 | |
| Cluster J | 803 | 99.6% (800/803) | 3 | 0 | 3 | 72, 71, 47 |

*July 1, 2009-March 31, 2010 ^April 1, 2010 – June 30, 2010

All Clusters demonstrated a level of compliance at greater than 99.6% throughout the FFY. For the 7 IFSPs that were not written within 45 days, all were completed. The range for completion was 46 to 72 days following referral.

OSEP Response Table: the State must report, in its FFY 2009 APR, that it has verified that each EIS program with noncompliance reflected in the data the State reported for this indicator: (1) is correctly implementing 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has conducted the initial evaluation, assessment, and IFSP meeting, although late, for any child for whom the 45-day timeline was not met, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02. In the FFY 2009 APR, the State must describe the specific actions that were taken to verify the correction. If the State does not report 100% compliance in the FFY 2009 APR, the Monitoring Priorities and Indicators Status of APR Data/SPP Revision Issues OSEP Analysis/Next Steps State must review its improvement activities and revise them, if necessary.

As stated, for FFY2009, all ten regional SPOE Clusters demonstrated a level of compliance of at least 99.6%. In the 7 identified delays due to a systems issue there were no specific systemic trends identified. Specific reasons for delays in the development of the initial IFSPs were varied and included:

- Cluster J experienced a building fire on December 24, 2009. While no files were damaged the office was closed and phones and fax machine were transferred to a temporary office. Staff were unable to re-enter the building for several weeks. On reentry to the office, 2 referrals were found on the fax machine.
- Wrong date of referral written on referral form (1) Service Coordinator thought she was within timeline due to error in recording/entering referral date.
- Intake/Service Coordinator error (4). The assigned Intake/Service Coordinator overlooked the 45-day timeline.

Indiana was unable to verify subsequent compliance through the EIS database for referral to IFSP date for Clusters G & J. The review for referrals received from July 1, 2010 through September 30, 2010 demonstrated that while Clusters G and J are at a level of compliance >99%, neither was able to demonstrate 100% compliance with timely IFSPs. (See Table 7.3 Subsequent Correction of Non-Compliance.) Cluster G had 3 of 761 IFSPs exceeding 45 days. One IFSP was developed on the 59th day from referral due to an oversight by the ED Team scheduler. The other two were the result of human error on the part of two different Intake Coordinators. Cluster J has 2 IFSPs that exceeded 45 days. One was determined to be an exceptional family circumstance in that the family was not at home for 2 of the scheduled appointments and failed to return several phone calls. The Service Coordinator was able to schedule and complete development of the IFSP with the family on the 48th day. The second instance was due to a SPOE staff error when they recorded 9/21/10 instead of 9/2/10 as the referral date. That IFSP was completed on the 53rd day. While neither cluster was able to demonstrate 100% compliance, no systemic issues were identified.

Table 7.3: Subsequent Correction of Non-Compliance for FFY09

| | Total IFSPs | % ≤ 45 days, including EFC | # ≥ 45 days | Exceptional Family Circumstances EFC | System Issues | For System Issues, the number of days until IFSP was developed |
|------------------|-------------|----------------------------|-------------|--------------------------------------|---------------|--|
| Cluster G | 761 | 99.6% (758/761) | 3 | 0 | 3 | 58, 52, 47 |
| Cluster J | 109 | 99.1% (108/109) | 2 | 1 | 1 | 53 |

OSEP Memorandum 09-02: - Correction of noncompliance from FFY2008: In FFY2008, Indiana reported five Clusters were issued findings. Each of these clusters achieved 100% compliance in the first quarter of FFY2009, based on a review of data from the state data system on January 14, 2010.

Table C7.4 Correction of FFY2008 Noncompliance

| Cluster SPOE | FFY08 Reported Data | FFY09 State Verified Correction of Non-Compliance Data | State Data Verification Date |
|--------------|---------------------|--|------------------------------|
| A | 99.6% (1064/1068) | 100% (242/242) | 01/14/2010 |
| B | 99.8% (909/911) | 100% (284/284) | 01/14/2010 |
| D | 99.8% (556/557) | 100% (137/137) | 01/14/2010 |
| G | 99.9% (2938/2940) | 100% (805/805) | 01/14/2010 |
| I | 99.8% (1073/1075) | 100% (270/270) | 01/14/2010 |

Correction of FFY 2008 Findings of Noncompliance (if State reported less than 100% compliance): FFY 2008 Indiana reported 99.89% (9657 of 9668) compliance. As noted in the FFY08 APR, every Cluster eventually corrected its noncompliance and met the 100% target within one year of the finding.

| | |
|---|----------|
| 1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009) | 5 |
| 2. Number of FFY 2008 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding) | 5 |
| 3. Number of FFY 2008 findings <u>not</u> verified as corrected within one year [(1) minus (2)] | 0 |

Correction of FFY 2008 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:

| | |
|---|----------|
| 4. Number of FFY 2008 findings not timely corrected (same as the number from (3) above) | 0 |
|---|----------|

| | |
|---|--|
| 5. Number of FFY 2008 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”) | |
| 6. Number of FFY 2008 findings <u>not</u> verified as corrected [(4) minus (5)] | |

Actions Taken if Noncompliance Not Corrected: Not applicable, all noncompliance was corrected within one year.

OSEP Memorandum 09-02: – Initial evaluation, assessment and IFSP meeting conducted for any child for whom the 45 day timeline was not met, unless the child is no longer within the jurisdiction of the EIS program:

As stated in the FFY2008 APR, all nine regional SPOE Clusters demonstrated a level of compliance of at least 99.5%. In the 11 identified delays due to a systems issue there were no specific systemic trends identified and each of the eleven children subsequently had an evaluation, assessment and IFSP meeting. The range for referral to IFSP development was 46 to 58 days. Specific reasons for delays in the development of the initial IFSPs were varied and included:

- Wrong date of referral written on referral form (3) or entered into the service coordinator tracking tool incorrectly (2). Service Coordinators thought they were within timeline due to error in recording/entering referral date.
- Rescheduled ED team evaluations/assessments due to family cancellations or no shows (2). One Cluster did not insure that evaluation/assessment was completed in time to meet 45 day timeline (1).
- Rescheduled initial IFSP meetings (2). The initial IFSP meeting date was initially scheduled within the 45 day timeline, but was delayed because of Service Coordinator illness (1) or family cancellations (1) that were not determined to be at the level of an exceptional family circumstance.
- Intake/Service Coordinator error (1). The assigned Intake/Service Coordinator overlooked the 45-day timeline.

Verification of Correction of FFY 2008 noncompliance or FFY 2008 findings (either timely or subsequent): Indiana has documented timely correction for the 5 SPOEs that were reported as noncompliant in FFY2008. The state verifies correction of noncompliance from the centralized SPOE database. All SPOE Clusters are required to submit a Delay of ISFP form for every initial IFSP meeting that exceeds 45 days from the date of referral. The Delay of IFSP form provides date of referral, date of evaluation/assessment and date of IFSP. The reason for the delay must be identified. The form is signed by the service coordinator and the parent. Parents are informed of their rights and a statement of the family’s right to a timely IFSP meeting is included in the form. Forms are sent to the Quality Review contractor. An initial IFSP meeting report is run from the centralized SPOE database to identify all referral to initial IFSP meeting dates that exceed 45 days. The QR contractor insures that a Delay of IFSP form was submitted, if no Delay of IFSP form was submitted the QR contractor notifies the SPOE and state staff. The QR contractor, in consultation with state staff, makes the determination of whether the delay represented a systems issue or an exceptional family circumstance. If the Delay of IFSP form does not provide sufficient information to make this determination, additional documentation is requested and reviewed. In all circumstances, the actual days to the initial IFSP meeting, although late, are reported.

Correction of Remaining FFY 2007 Findings of Noncompliance (if applicable): Not applicable

Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable): Not applicable

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY2009: Indiana continues to demonstrate compliance in the 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. Initiatives directed at achieving 100% compliance include:

1. A review of factors contributing to delays – Each regional Cluster self-monitors the 45-day timeline through SPOE data reports on a monthly basis. SPOEs monitor dates from referral to intake, referral to evaluation and referral to IFSP. This information allows the SPOEs to drill down to identify where delays are occurring in the process. This is an ongoing activity; there have been no changes in FFY2008 to the SPOE policies or procedures to monitor 45 day timeline.
2. To monitor each Cluster's performance in conducting initial IFSP meetings within 45 days of referral, the SPOEs must provide written documentation (Delay of IFSP form) to explain circumstances under which any initial IFSP exceeds 45 days to the QR contractor on a quarterly basis. These reports are used to identify trends and Cluster training needs.
3. Any Cluster not demonstrating 100% compliance is required to develop and implement corrective action plans to achieve full compliance as soon as possible, but no later than one year from identification. Clusters provide quarterly progress reports. Data used in the quarterly progress reports are validated by the Quality Review contractors, before any state issued letters of compliance are written. This is an ongoing activity - Clusters are required to develop improvement plans and to submit quarterly progress reports. Once a Cluster has demonstrated compliance for a period of one quarter, the state verifies the correction and issues a letter of compliance.
4. Performance based standards - A performance based standard is written into the SPOE Request for Funding (RFF) contracts requiring each local SPOE office to ensure initial IFSPs are completed within 45 days. SPOE funding was linked to the achievement of this standard and is reviewed semi-annually. SPOEs not meeting the 100% target may not be eligible for incentive funding of up to 1% annually. In FFY09, all SPOEs received incentive funding for substantial compliance.

The State publishes regional and statewide performance information on the 45-day timeline compliance at (<http://www.utsprokids.org/firststepsinfo.asp>).

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable): While Indiana did not meet the 100% target for this indicator, the state continues to be consistently above 99% for indicator for the past five years. The state has reviewed its improvement activities and revisions to the SPP have been made. The 100% target for this indicator will continue through FFY2012. Additionally, evaluation teams

(EDTs) have moved under the supervision of the Cluster SPOE. This provides better coordination for the referral, intake, evaluation, assessment and initial IFSP meetings. Since Cluster ED Teams do not provide ongoing direct services, there are no conflicts of interest in their service recommendations to the IFSP team. ED Teams will participate in annual eligibility and IFSP meetings, and in IFSP services change recommendations throughout the IFSP year.

Part C State Annual Performance Report (APR) for FFY 2009

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.

| FFY | Measurable and Rigorous Target |
|------|---|
| 2009 | 100% 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. |

Actual Target Data for FFY 2009:

99.95% (1979/1980) 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.

8A. 99.95% (1979/1980) of eligible children had IFSPs with transition steps and services.

In FFY2009, the state demonstrated a compliance with meeting the target for 8A of 100% of IFSPs with transition steps and services. Indiana utilizes a standard IFSP form that includes a section on transition steps and services that is completed during the initial IFSP meeting and revised as needed at the six month review and annual IFSP. To validate the completion of the IFSP transition steps and services page in the IFSP, a sample of early intervention record were reviewed, for children with an active IFSPs in FFY2009. The record reviews were conducted by the Quality Review – Focused Monitoring Team and through state-verified, quarterly progress data provided by the Clusters for their Cluster Performance Plan progress reports. Only those IFSPs with written transition outcomes, activities and timelines are considered in compliance.

A list of randomly selected early intervention records was compiled for each of the 10 Cluster SPOEs. Each record pull list included a minimum of 2 records per Service Coordinator. The early intervention records used were reviewed to ensure that the sample was representative of all children exiting First Steps. The following procedure was utilized:

- The Sample Size was determined by using a sampling calculator made available from the website (<http://www.raosoft.com/samplesize.html>) by Raosoft, Inc. The cumulative total of children served in the Part C program during FFY2009 was 19,798 (IDEA 618 data report). A sample of at least 643 reflects a confidence level of 99%, with a confidence interval of +/- 5%. The sampling stratification process employed a random selection process based on gender and ethnicity. The purpose of using these two categories was to ensure adequate representation of all children exiting First Steps. The data collection strategy also included at least two records for every Service Coordinator in each of the ten regional Clusters to ensure obtaining records from all areas of the state and the Cluster region.

Children Exiting Part C who Received Timely Transition Planning:

| | |
|--|---------------|
| 1. Number of children exiting Part C who have an IFSP with transition steps and services | 1979 |
| 2. Number of children exiting Part C | 1980 |
| 3. 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) | 99.95% |

| | # of IFSPs reviewed | % of IFSPs reviewed with documented transition steps & services |
|------------------|----------------------------|--|
| State | 1980 | 99.95% (1979/1980) |
| Cluster A | 191 | 100% (191/191) |
| Cluster B | 180 | 100% (180/180) |
| Cluster C | 107 | 100% (107/107) |
| Cluster D | 191 | 100% (191/191) |
| Cluster E | 158 | 100% (158/158) |
| Cluster F | 189 | 99.5% (188/189) |
| Cluster G | 478 | 100% (478/478) |
| Cluster H | 76 | 100% (76/76) |
| Cluster I | 154 | 100% (154/154) |
| Cluster J | 184 | 100% (184/184) |

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY09: Indiana demonstrated progress in the number of children who received timely transition planning to support transition to preschool and other appropriate services, increase from 99.7% to 99.95%. The state continues to demonstrate a high level of compliance (99.95%) for this indicator. In FFY2008, Indiana also demonstrated an increase of 0.2% for this indicator.

- The statewide IFSP template for Indiana includes a section on transition planning. Regardless of the child’s age, Service Coordinators are trained to assist the family in identifying supports and strategies for transition into, within and from Part C. The transition section provides prompts for supports, timelines and person(s) responsible. SPOE data entry staff are trained to review the IFSP to ensure that the transition planning page is completed prior to data entry.
- Indiana’s focused monitoring looks at the quality of transition outcomes, steps and services. To that end, Indiana has provided additional training and support through the Unified Training System (UTS). An article on Transition Outcome writing was published in the November 2009 Training Times. It can be reviewed at <http://www.utsprokids.org/Newsletter/TT%20vol%205%20no4%20November%2009.pdf> page 6 and 7.
- In FFY09, UTS developed an online training, *Understanding and Implementing Positive Transitions for Children and Families in Early Intervention*. This self-study module is now part of the First Steps Core Training series that is available to all providers at the UTS website: <http://utsprokids.org>.

Subsequent compliance documentation: Only one cluster was found to be out of compliance for documentation of IFSP transition steps and services. Cluster F failed to document transition steps and services in 1 of the 189 EI records reviewed. During the annual on-site focused monitoring review on October 28, 2010, Cluster F did demonstrate correction by documenting transition steps and services in each of the 86 files reviewed. These included initial, annual and transition file reviews.

| Table 8A.2: Subsequent correction - IFSPs with Transition Steps & Services | | | |
|--|---------------------|---|----------------------|
| | # of IFSPs reviewed | % of IFSPs reviewed with documented transition steps & services | Date of verification |
| Cluster F | 86 | 100% (86/86) | 10/28/10 |

OSEP Memorandum 09-02: Correction of FFY 2008 Findings of Noncompliance (if State reported less than 100% compliance): Level of compliance (actual target data) State reported for FFY 2008 for this indicator: 99.7%

| | |
|---|----------|
| 1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009) | 5 |
| 2. Number of FFY 2008 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding) | 5 |
| 3. Number of FFY 2008 findings <u>not</u> verified as corrected within one year [(1) minus (2)] | 0 |

| | |
|--|----------|
| Correction of FFY 2008 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected: | |
| 4. Number of FFY 2008 findings not timely corrected (same as the number from (3) above) | 0 |
| 5. Number of FFY 2008 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”) | |
| 6. Number of FFY 2008 findings <u>not</u> verified as corrected [(4) minus (5)] | 0 |

OSEP Memorandum 09-02: IFSP is written that includes transition steps and services for each child, unless the child is no longer within the jurisdiction of the EIS program: For all children who remained in the jurisdiction of the EIS, the state verified subsequent correction of the non-compliance for Indicator 8A. In FFY2008, 5 Cluster SPOEs were issued findings for noncompliance with IFSP transition steps and services which represented 7 individual children. At the time of the chart review, the SPOE Director is provided a completed file review for each record. The review form provides name of the child and service coordinator. SPOEs are instructed to provide child and family transition steps for all children who have not yet exited the program. 4 of the 7 children were still within the system and received appropriate transition planning prior to exiting the system. 3 of 7 children had exited the system. Further monitoring was conducted to insure ongoing compliance for this indicator within the year. This included state-directed focused monitoring and state-verified cluster progress reports. For progress reports 1 (Jul. – Sept 2009) that were state-verified on 10/13/09 and progress report 2 (Oct-Jan. 2010), that were state-verified on 01/15/10, all five clusters demonstrated 100% compliance with IFSP transition steps and services.

Table 8A.1: OSEP Memo 09-02 - Verification of Correction of Non-Compliance

| Cluster SPOE | FFY08 Reported Data | Child Level Correction of Non-Compliance | FFY09 State Verified Correction of Non-Compliance Data | State Verification Dates |
|--------------|---------------------|---|--|--------------------------|
| B | 98.75% (158/160) | 2 children subsequently received transition planning prior to their 3 rd birthday. | Continued system monitoring: Period 1 100% (59/59) Period 3 100% (67/67) | 10/13/09, 1/15/10 |
| C | 99.37% (315/317) | Unable to correct at child level - one record as child exited program, second file child/family received transition planning prior to child's 3 rd birthday. | Continued system monitoring: Period 1 100% (72/72) Period 2 100% (55/55) | 10/13/09, 1/15/10 |
| E | 99.38% (161/162) | One record corrected prior to child's 3 rd birthday. | Continued system monitoring: Period 1 100% (49/49) Period 2 100% (52/52) | 10/13/09, 1/15/10 |
| G | 99.76% (409/410) | Unable to correct at child level - as child exited the system. | Continued system monitoring: Period 1 100% (131/131) Period 2 100% (142/142) | 10/13/09, 1/15/10 |
| I | 99.56% (285/286) | Unable to correct at child level - as child exited the system. | Continued system monitoring: Period 1 100% (57/57) Period 2 100% (33/33) | 10/13/09, 1/15/10 |

Actions Taken if Noncompliance Not Corrected: Not applicable

Correction of Remaining FFY 2007 Findings of Noncompliance (if applicable): Not Applicable

Verification of Correction of Remaining FFY 2007 findings: Not Applicable

Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2007: Not Applicable

Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable): Not Applicable

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2009: Indiana completed development of the online self-study module, *Understanding & Implementing Positive Transitions for Children & Families in Early Intervention*. Indiana's First Steps service coordinators and direct service providers have demonstrated a solid understanding of the transition guidelines and timeframes and the importance of meeting them. Most often, these guidelines and timeframes are centered on children and families exiting the First Steps System.

Equally important is looking at transition from a quality perspective as children and families move into and within the First Steps System. Quality pertains to the experience the family has during the transition and the short- and long-term effect the transition has on the children and families. Children and families' likelihood of having quality transitions increases when their transition needs are recognized and when effective transition outcomes are written. This training will prepare participants to:

1. understand the concept of transition in relation to change
2. understand the importance of creating positive transition processes for families and children in the early intervention system
3. learn to use effective interviewing skills to determine the family's needs, priorities, and concerns
4. learn the importance of communicating with the IFSP Team to identify transition needs and write effective transition outcomes that increase the likelihood of positive transition experiences for children and family
5. learn the importance of documenting the follow-up activities and progress toward transition outcomes

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable): The rigorous and measurable targets for this indicator must be 100%. Indiana has revised the SPP to extend it through FFY2012. Indiana will continue with the SPP improvement activities and timelines.

Part C State Annual Performance Report (APR) for FFY 2009

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:

A 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 the 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 |
|------|--|
| 2009 | 100% of all children exiting Part C will have Notification to LEA, if child potentially eligible for Part B. |

Actual Target Data for FFY 2009:

100% (5836/5836) of all children who exited Part C services in FFY2008 had notification to LEA, if child potentially eligible for Part B.

Children Exiting Part C who Received Timely Transition Planning (Notification to LEA):

| | |
|--|------|
| 1. Number of children exiting Part C and potentially eligible for Part B where the notification to the LEA occurred | 5836 |
| 2. Number of children exiting Part C who were potentially eligible for Part B | 5836 |
| 3. 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) | 100% |

Since 2005, Indiana has notified the appropriate LEA utilizing an electronic data transfer of child identifying information (name, date of birth, address) from the SPOE to the LEA for children who met the date of birth cut-off date. The electronic transfer is sent semi-annually in April and October. Indiana did not adopt a written notice or opt-out policy.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY09: Indiana has not adopted a written notice and opt-out policy. Indiana provides child name, date of birth, and parent contact information to the appropriate school district (LEA) based on the address of the child’s residence, semi-annually in October and April. This procedure has enabled Indiana to provide accurate notification the LEA of children potentially eligible for Part B services. Additionally, service coordinators with parental consent, invite the LEA and other community partners (Head Start and local preschool representatives) to the transition meeting. These efforts are increasing LEA and other community partner attendance at the Part C Transition meetings. In a sample of transition record reviews for FFY09, 81.5% (259/318) of invited LEA representatives attended the Part C transition meeting.

Correction of FFY 2008 Findings of Noncompliance (if State reported less than 100% compliance): Level of compliance (actual target data) State reported for FFY 2008 for this indicator: **100%**

| | |
|---|----------|
| 1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009) | 0 |
| 2. Number of FFY 2008 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding) | |
| 3. Number of FFY 2008 findings <u>not</u> verified as corrected within one year [(1) minus (2)] | 0 |

Correction of FFY 2008 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:

| | |
|---|----------|
| 4. Number of FFY 2008 findings not timely corrected (same as the number from (3) above) | 0 |
| 5. Number of FFY 2008 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”) | |
| 6. Number of FFY 2008 findings <u>not</u> verified as corrected [(4) minus (5)] | 0 |

Actions Taken if Noncompliance Not Corrected: Not applicable

Verification of Correction of FFY 2008 noncompliance or FFY 2008 findings (either timely or subsequent): Not applicable

Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2008: Not applicable

Correction of Remaining FFY 2007 Findings of Noncompliance (if applicable): Not applicable

Verification of Correction of Remaining FFY 2007 findings: Not applicable

Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2007: Not applicable

Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable): Not applicable

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): Not applicable

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2009: Indiana achieved 100% compliance. For every child in Part C services, Indiana provides child name, date of birth, and parent contact information to the appropriate school district (LEA) based on family address, semi-annually in October and April. **Indiana has not adopted a written notice and opt-out policy.**

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable): The rigorous and measurable targets for this indicator must all be 100%. Indiana has revised the SPP to extend it through FFY2012. Indiana will continue with the SPP improvement activities and timelines.

Part C State Annual Performance Report (APR) for FFY2009

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 children exiting Part C and potentially eligible for Part B where the transition conference occurred) divided by the (# of children 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 |
|------|--|
| 2009 | 100% of children exiting Part C and potentially eligible for Part B where the transition conference occurred |

Actual Target Data for FFY 2009:

99.9% (1357/1358) of children exiting Part C and potentially eligible for Part B where the transition conference occurred

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

| | |
|--|-------|
| 1. Number of children exiting Part C and potentially eligible for Part B where the transition conference occurred | 1357 |
| 2. Number of children exiting Part C who were potentially eligible for Part B | 1358 |
| 3. 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) | 99.9% |

The data source for this indicator was the review of a sample of early intervention records of children who exited Part C in FFY2009. The review was conducted by the Quality Review – Focused Monitoring Team and through state-verified, quarterly progress data provided by the Clusters for their Cluster Performance Plan progress reports. This review demonstrated that 99.9% of the sample reviewed (1357/1358) had evidence of a transition meeting, within 90 to 270 days of the child’s third birthday. Indiana continues to maintain a high level of compliance for this indicator.

A list of randomly selected early intervention records was compiled for each of the 10 Cluster SPOEs. Each record pull list included a minimum of 2 records per Service Coordinator. The early intervention records used were reviewed to ensure that the sample was representative of all children exiting First Steps. The following procedure was utilized:

- The Sample Size was determined by using a sampling calculator made available from the website (<http://www.raosoft.com/samplesize.html>) by Raosoft, Inc. The cumulative total of children served in the Part C program during FFY2009 was 19,798 (IDEA 618 data report). A sample of at least 643 reflects a confidence level of 99%, with a confidence interval of +/- 5%. The sampling stratification process employed a random selection process based on gender and ethnicity. The purpose of using these two categories was to ensure adequate representation of all children exiting First Steps. The data collection strategy also included at least two records for every Service Coordinator in each of the ten regional Clusters to ensure obtaining records from all areas of the state and the Cluster region.

| Table 8C.1: FFY09 - Timely Transition Meetings | | |
|---|----------------------------|--|
| | # of IFSPs reviewed | % of total EI Records with documented transition meeting, 90-270 days prior to third birthday |
| State | 1358 | 99.9% (1357/1358) |
| Cluster A | 300 | 100% (300/300) |
| Cluster B | 88 | 100% (88/88) |
| Cluster C | 52 | 100% (52/52) |
| Cluster D | 136 | 100% (136/136) |
| Cluster E | 75 | 100% (75/75) |
| Cluster F | 92 | 100% (92/92) |
| Cluster G | 258 | 100% (258/258) |
| Cluster H | 75 | 100% (75/75) |
| Cluster I | 105 | 99% (104/105) |
| Cluster J | 134 | 100% (134/134) |

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY09: Indiana has demonstrated 99.9% compliance with Indicator 8C. Only 1 of the 1,358 records reviewed did not have evidence of a transition meeting. In that record, the service coordinator did not conduct a transition meeting prior to the child leaving the First Steps System. In the Cluster Performance Plan, Cluster I provided the following corrective action plan:

We will achieve 100% compliance within one year.

We are working to strengthen relationships with LEAs. The Managers and Lead LPCC Coordinator are scheduling training meetings to be held with each LEA to review local processes. IC and SC staff are required to attend. Families and Providers are being invited as well.

The Cluster has a policy regarding transition conferences to which Staff are expected to adhere:

***POLICY:** A Transition meeting will be held for every enrolled child at least 90 days but no more than 270 days prior to the child’s third birthday.*

Progress will be measured by the Program Standards Coordinator using EI record review. This data will be provided to the Director and Managers.

Subsequent compliance documentation: During the annual on-site focused monitoring review on December 1, 2010, Cluster I did demonstrate correction by documenting timely transition meetings in each of the 29 files reviewed.

| Table 8C.1: Subsequent Correction of Non-compliance for Timely Transition Meetings | | | |
|---|----------------------------|--|---|
| | # of IFSPs reviewed | % of total EI Records with documented transition meeting, 90-270 days prior to third birthday | Date of verification of correction |
| Cluster I | 28 | 100% (28/28) | December 1, 2010 |

Other continuing improvement activities include:

- A data field was added to the SPOE electronic database to capture the actual transition meeting date for all children in Part C.
- The state developed a transition packet and checklist for use by Service Coordinators to plan, implement and document all requirements for transition.
- Service Coordinators are provided with a spreadsheet program that calculates all critical Part C timelines for every child in their caseload, including 6 month reviews, annual IFSPs, and transition meetings (within 270 to 90 days before the child’s 3rd birthday). These spreadsheets assist the Service Coordinator in planning appropriately to convene the transition meeting.
- Service Coordinators are now employed and supervised by the local Cluster SPOE to ensure high quality and consistent supervision.
- Annual statewide training on transition is provided, in addition to transition articles in the Training Times Newsletter for all First Steps providers.
- A transition training DVD was developed and distributed to all Clusters.
- Focused monitoring quality reviews specific to transition are conducted annually. Clusters not meeting targets are required to develop Cluster Performance Plans to include activities and strategies to meet the indicator targets. Quarterly progress updates are required
- The LPCC/SPOE Request for Funds included a requirement for transition committees. The transition committees must include representation from First Steps families, providers, Service Coordinators, LEA representatives, and Head Start. Additionally, all Clusters must have Memoranda of Agreement (MOAs) with the LEA, Head Start, Healthy Families and other community resources.
- Indiana has revised its Service Coordinator and Direct Service Provider Orientation Modules. The modules include specific information focused on transition.

- New for FFY09 – The development of an online training, *Understanding & Implementing Positive Transitions for Children & Families in Early Intervention*.

OSEP Memorandum 09-02: Correction of FFY 2008 Findings of Noncompliance

Correction of FFY 2008 Findings of Noncompliance (if State reported less than 100% compliance): Level of compliance (actual target data) State reported for FFY 2008 for this indicator: **99.38%** (1764/1775)

| | |
|---|----------|
| 1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009) | 3 |
| 2. Number of FFY 2008 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding) | 3 |
| 3. Number of FFY 2008 findings <u>not</u> verified as corrected within one year [(1) minus (2)] | 0 |

FFY 2008 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:

| | |
|---|----------|
| 4. Number of FFY 2008 findings not timely corrected (same as the number from (3) above) | 0 |
| 5. Number of FFY 2008 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”) | |
| 6. Number of FFY 2008 findings <u>not</u> verified as corrected [(4) minus (5)] | 0 |

Actions Taken if Noncompliance Not Corrected: Not Applicable

Verification of Correction of FFY 2008 noncompliance or FFY 2008 findings (either timely or subsequent):

OSEP Memo 09-02: Verification of program compliance and documentation of transition meeting, although late, unless child is no longer within the jurisdiction of the EIS Program.

| Cluster SPOE | FFY08 Reported Data | Child Level Correction of Non-Compliance | FFY09 State Verified Correction of Non-Compliance Data | State Verification Dates |
|--------------|---------------------|--|---|--------------------------|
| C* | 98% (193/197) | 4 records; 2 children no longer in system and 2 children with late transition meetings after 33 months (35months and 34 months). | Monitoring follow up: Progress report #1 (100% 43/43) Progress Report #2 (100% 26/26) | 1/15/10 6/15/10 |
| H | Not Reported for | | Monitoring follow up: Progress report #2 | 6/15/10 |

| | | | | |
|----------|--------------------|--|---|--------------------|
| | FFY08 | | (100% 25/25) | |
| D | 99.5% (416/418) | 2 records; 2 children no longer in system. | Monitoring follow up: Progress report #1 (100% 54/54) Progress Report #2 (100% 36/36) | 1/15/10 6/15/10 |
| I | 98.6% (141/143) | 2 records; 1 child no longer in system and 1 child had a subsequent meeting at 35 months | Monitoring follow up: Progress report #1 (100% 41/41) Progress Report #2 (100% 36/36) | 1/15/10 |

*On April 1, 2010, Cluster CH was split into 2 separate clusters C & H.

Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2008: For all children who remained in the jurisdiction of the EIS, the state verified subsequent correction of the non-compliance for Indicator 8C. In FFY2008, 3 Cluster SPOEs were issued findings of noncompliance with timely IFSP transition meetings which represented 8 individual children. At the time of the chart review, the SPOE Director was provided a completed file review for each record. The review form provides name of the child and service coordinator. SPOEs are instructed to provide child and family transition meeting documentation for all children who have not yet exited the program. 3 of the 7 children were still within the system and received appropriate transition meetings prior to exiting the system. 4 of 7 children had exited the system. Further monitoring was conducted to ensure ongoing compliance for this indicator within the year. This included state-directed focused monitoring and state-verified cluster progress reports. For progress reports 1 (Jan – Mar 2010), and 2 (Mar. – June 2010) all four clusters demonstrated 100% compliance with IFSP transition steps and services. (It should be noted that findings were issued to 3 clusters (CH, D and I), but four clusters were required to complete corrections. Cluster CH was split into Clusters C & H in April 2010.

Correction of Remaining FFY 2007 Findings of Noncompliance (if applicable):Not applicable

Verification of Correction of Remaining FFY 2007 findings: Not applicable

Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2007: Not applicable

Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable): Not applicable

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None Requested

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2009: In FFY08, Indiana revised the monitoring time frame for transition meeting reviews. Reviews are now conducted before the child reaches 33 months to ensure time for a transition meeting, albeit late, if none were documented in the record. This process did allow for late correction for 3 of the 7 children whose records did not contain

documentation of a timely transition meeting. However 4 of the 7 children were no longer in the jurisdiction of the Part C system and individual correction for them was not possible.

Ongoing QR monitoring did find that nine of ten clusters were able to meet 100% compliance for all of FFY09 and only one reviewed record failed to document a timely transition meeting.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable): The rigorous and measurable targets for this indicator must all be 100%. Indiana has revised its SPP to extend the targets, improvement activities and timeline through FFY2012.

Part C State Annual Performance Report (APR) for FFY 2009

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 9: General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification.

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

Measurement:

Percent of noncompliance corrected within one year of identification:

- a. # of findings of noncompliance.
- b. # of corrections completed as soon as possible but in no case later than one year from identification.

Percent = [(b) divided by (a)] times 100.

States are required to use the “Indicator C 9 Worksheet” to report data for this indicator (see Attachment A).

| FFY | Measurable and Rigorous Target |
|------|---|
| 2009 | 100% of noncompliance corrected within one year of identification |

Actual Target Data for FFY 2009:

97.37% (74/76) of noncompliance identified in FFY08 was corrected within one year of identification.

Describe the process for selecting EIS programs for Monitoring: Indiana continues to monitor each EIS Program annually. There are now 10 regional cluster System points of Entry with the division of Cluster CH into separate offices on April 1, 2010. Indiana has a comprehensive general supervision system that includes the statewide data system, a statewide quality review-focused monitoring system, local quality review committees and an ongoing research initiative on program outcomes performed by the Indiana Institute on Disability and Community (IIDC) at Indiana University. A description of each component is provided below.

1. Indiana’s computerized data system was developed in 1994. A data file is created for every child referred to the First Steps system. Data for children found eligible include fields for child/family/provider information (date of birth, referral, intake, evaluation, IFSP, termination with reason; child demographic data; and provider information). Data for each Cluster System Point of Entry (SPOE) can be reviewed at any time by state and/or the local Cluster. The Cluster SPOEs can generate preset reports for use by their Local Planning and Coordinating Councils. State administrators can access all Cluster SPOE data and can generate preset and ad hoc reports. These data are used by the state as a

source for ongoing desk audits of the system. The Central Reimbursement Office (CRO) data include child/family authorization and claims data.

2. The Data Warehouse (A state contracted entity that uses state provided data to develop 618 data and state profile reports) provides the state with county, cluster SPOE and statewide data reports. These reports are used by the state and Cluster SPOEs to monitor trends over time. The profiles of the state and Cluster SPOEs are posted on the state website for public access. They can be viewed at <http://www.in.gov/fssa/ddrs/2812.htm>.
3. In 1998, Indiana initiated Peer Monitoring as a component of its general supervision system. Through technical assistance provided by NCSEAM, Indiana revised its general supervision system to incorporate a focused monitoring (FM) approach in 2004. The state First Steps System contracts with three entities to provide quality review coordination, on-site reviews and local technical assistance. Indiana has nine Cluster SPOEs that serve as the local entity for referrals to Part C. The SPOEs maintained the early intervention record and since 2006 have employed all Service Coordinators. Each of the ten Clusters receives quarterly technical assistance visits and an annual verification visit. These visits are led by the Quality Review team leader responsible for the Cluster. Additional team members include state staff, peers from other Clusters, providers and parents. To provide public reporting of the Cluster performance, Cluster report cards were developed in 2006. The reports were revised in 2007 to mirror the Part C State Performance Plan (SPP) indicators. In addition to the annual verification visits, the SPOEs provide quarterly quality review reports and progress updates through their Cluster Performance Plans (CPP). The CPP serves as the Cluster's quality monitoring plan and includes strategies to correct any findings issued by the State, as soon as possible, but no later than one year. Clusters must submit progress data to demonstrate compliance. Once the cluster SPOE has demonstrated compliance for a reporting period, the data are verified by the state, the finding is verified corrected and the state issues a letter of compliance.
 - a. In January of 2008, findings were issued to each Cluster SPOE. While all Clusters were found to meet requirements, each Cluster SPOE received a findings table which listed all noncompliance requiring correction. The Cluster SPOEs were directed to demonstrate 100% compliance for indicators 1, 7, 8, and 9, along with the other related areas of noncompliance (annual IFSPs completed prior to expiration, timely 6 month reviews, 10 day written prior notice, income and insurance documentation) as soon as possible, but no later than one year from the date of the finding. Utilizing the information from the findings table, each Cluster SPOE was required to develop a CPP that identified activities, strategies and timelines for correction of any noncompliance. SPOEs were required to provide periodic progress data and narrative updates to demonstrate compliance with the indicators at 6 months, 9 months and 11 months from the date of the finding. In FFY2008, there were a total of 76 findings. Twenty-one findings were for noncompliance with State Performance Plan indicators and 55 findings were for other related areas of noncompliance, including 17 findings against direct service providers for inappropriate/undocumented use of funds (billing issues).
 - b. In response to clarifications received during the OSEP Verification Visit of October of 2008, Indiana has re-evaluated the timeframe in which it issues findings and determination letters. Indiana had been conducting annual verification visits in one fiscal year, while issuing findings in the next fiscal year. For FFY2009, Indiana is reporting on all findings made in FFY2008 which were corrected in FFY2009. In

FFY2008 Indiana issued 59 findings to local Clusters through the monitoring system and 18 findings to individual providers (17 billing issues and one confidentiality breach). Written notification of these findings was sent directly to the providers.

Since the October 2008 OSEP verification visit, Indiana has modified its quality review- focused monitoring onsite visit schedule so that data can be provided to state staff in a more timely manner that will allow the state to issue findings within the current federal fiscal year. Quality Review-Focused Monitoring (QRFM) visits for FFY2009 were conducted in the months of October through December, 2009, with findings issued by the state to the Cluster within 90 days of the visit. Any additional findings noted during the 2009 QRFM visits and/or desk audits were added to the previously issued findings of January 2009. All findings for FFY2008 were required to be corrected by October 2009, to allow time for state data verification and to ensure that all findings have been corrected as soon as possible, but in no case later than one year.

4. Cluster SPOEs and LPCCs are funded through a grant process by the state. The Request for Funds (RFF) includes specific outcomes to be achieved by the SPOE and LPCC and through the provision of service coordination. These outcomes are tied to financial incentives of up to 10% of the Cluster’s annual funding. The Cluster must demonstrate achievement of or progress towards the achievement of the outcomes in order to access the incentive funds. Cluster SPOEs must submit outcome progress documentation, semiannually in October and January.
5. In November 2008, Indiana Institute on Disability and Community (IIDC) completed the First Steps audit and issued the Evaluation of Indiana’s First Steps Early Intervention System Report. This study was requested by a summer study committee of the Indiana General Assembly. It involved an external audit of all components of the First Steps System, specifically looking at the effects of legislative changes enacted in 2006. The initial data collection was performed by the IIDC at Indiana University. The external review was completed by Carl Dunst, Ph.D., Research Scientist at the Orelena Hawks Puckett Institute at Ashville, North Carolina. A copy of the report can be found at [http://www.in.gov/fssa/files/First Steps Evaluation and Audit 2008.pdf](http://www.in.gov/fssa/files/First_Steps_Evaluation_and_Audit_2008.pdf).

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that Occurred for FFY 2009: Indiana demonstrates a high level of compliance with this indicator [97.37% (74/76)]. This represents an improvement from the three previous annual progress reports of 96.7% for FFY02008, 91.18% for FFY2007, 85.7% for FFY06 and 72% for FFY05.

Timely Correction of FFY 2008 Findings of Noncompliance (corrected within one year from identification of the noncompliance):

| | |
|---|------------------|
| <p>1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009) (Sum of Column a on the Indicator C 9 Worksheet)</p> | <p>76</p> |
| <p>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 C 9 Worksheet)</p> | <p>74</p> |

| | |
|--|----------|
| 3. Number of findings <u>not</u> verified as corrected within one year [(1) minus (2)] | 2 |
|--|----------|

Correction of FFY 2008 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:

| | |
|---|----------|
| 4. Number of FFY 2008 findings not timely corrected (same as the number from (3) above) | 2 |
| 5. Number of FFY 2008 findings the State has verified as corrected beyond the one-year timeline (“subsequent correction”) | 0 |
| 6. Number of FFY 2008 findings <u>not</u> yet verified as corrected [(4) minus (5)] | 2 |

Actions Taken if Noncompliance Not Corrected: 1) Cluster D failed to demonstrate correction of its noncompliance of timely services (indicator #1) within one year of identification. In the past year, this cluster has shown improvement from 94.5% for FFY08 to 97.4% for FFY09. While the Cluster remains below 100% compliance, it is now at a level of compliance which is greater than 96%. The state did require written outcomes and strategies to address the non-compliance. The state monitors the Cluster’s Performance Plan and quarterly progress reports to assure that they are making progress (see summary under Indicator #1)

2) Cluster G failed to demonstrate correction of its non-compliance for a procedural safeguard (documentation in the EI record of written prior notice) within one year of identification. Cluster G’s total for FFY08 was 99.46% (743/747) and for FFY09 was 99% (969/979). While the state found no trends related to this finding, it did require written outcomes and strategies to address the non-compliance. The state continues to monitor the Cluster’s Performance Plan and quarterly progress reports to assure that they are making progress towards compliance.

Verification of Correction of FFY 2008 noncompliance or FFY 2008 findings (either timely or subsequent):

Indicator 1: As reported in the FFY08 APR, Indiana was able to demonstrate subsequent correction of non-compliance and state verification of correction for eight of nine clusters, as reported in the FFY08 APR.

Table C1.3 Indicator 1: Timely Services - Correction of FFY2008 Noncompliance

| Cluster SPOE | FFY 2008 Reported Data | State Verified Correction of Non-Compliance Data | State Verification Dates |
|--------------|------------------------|--|----------------------------|
| A | 97.16% (308/317) | 100% (113/113) | 09/28/09 |
| B | 97.41% (301/309) | 100% (133/133) | 09/29/09 |
| CH | 98% (981/1001) | 100% (207/207) | 10/21-22/09 |
| D* | 94.5% (257/272) | 97.4% (300/308) | 10/13/09, 1/15/10, 6/15/10 |
| E | 93.88% (261/278) | 100% (131/131) | 10/8/09 |
| F | 98.5% (266/270) | 100% (160/160) | 10/6/09 |
| G | 98% (581/592) | 100% (130/130) | 11/13/09 |
| I | 99.6% (478/480) | 100% (295/295) | 11/17/09 |

**D failed to demonstrate subsequent compliance in FFY09.*

Indicator 7: In FFY2008, Indiana reported five Clusters were issued findings. The state has verified that each of these clusters has achieved 100% compliance in the first quarter of FFY2009, based on a review of the state data system. Additionally, the state has verified that each of the eleven children subsequently had an evaluation, assessment and IFSP meeting. The range for referral to IFSP development was 46 to 58 days.

Table C7.4 Indicator 7 – 45 day Timeline - Correction of FFY2008 Noncompliance

| Cluster SPOE | FFY08 Reported Data | FFY09 State Verified Correction of Non-Compliance Data | State Data Verification Date |
|--------------|---------------------|--|------------------------------|
| A | 99.6% (1064/1068) | 100% (242/242) | 01/14/2010 |
| B | 99.8% (909/911) | 100% (284/284) | 01/14/2010 |
| D | 99.8% (556/557) | 100% (137/137) | 01/14/2010 |
| G | 99.9% (2938/2940) | 100% (805/805) | 01/14/2010 |
| I | 99.8% (1073/1075) | 100% (270/270) | 01/14/2010 |

Indicator 8A: In FFY2008, Indiana reported three Clusters were issued findings of non-compliance. The state has verified that each of these clusters subsequently achieved 100% compliance in FFY2009, based on state-verified, focused monitoring review of a random sample of EI records. For the seven children identified, 4 were active in the EIS and received appropriate transition planning prior to exiting the system. Three were no longer under the jurisdiction of the EIS.

Table 8A.1: OSEP Memo 09-02 - Verification of Correction of Non-Compliance

| Cluster SPOE | FFY08 Reported Data | Child Level Correction of Non-Compliance | FFY09 State Verified Correction of Non-Compliance Data | State Verification Dates |
|--------------|---------------------|--|---|--------------------------|
| B | 98.75% (158/160) | 2 children subsequently received transition planning prior to their 3 rd birthday. | Continued monitoring: Period 1 100% (59/59) Period 3 100% (67/67) | 10/13/09, 1/15/10 |
| C | 99.37% (315/317) | Unable to correct one record as child exited program, second file child/family received transition planning prior to child's 3 rd birthday. | Continued monitoring: Period 1 100% (72/72) Period 2 100% (55/55) | 10/13/09, 1/15/10 |
| E | 99.38% (161/162) | One record corrected prior to child's 3 rd birthday. | Continued monitoring: Period 1 100% (49/49) Period 2 100% (52/52) | 10/13/09, 1/15/10 |

| | | | | |
|----------|---------------------|---|---|--------------------------|
| G | 99.76% (409/410) | Unable to correct as child exited the system. | Continued monitoring: Period 1 100% (131/131) Period 2 100% (142/142) | 10/13/09, 1/15/10 |
| I | 99.56% (285/286) | Unable to correct as child exited the system. | Continued monitoring: Period 1 100% (57/57) Period 2 100% (33/33) | 10/13/09, 1/15/10 |

Indicator 8C: In FFY2008, Indiana reported three Clusters were issued findings (CH was one combined Cluster at the time). The state has verified that each of these clusters subsequently achieved 100% compliance in FFY2009, based on state-verified, focused monitoring review of a random sample of EI records. For the eight children identified, 3 were active in the EIS and received a transition meeting prior to exiting the system. Five were no longer under the jurisdiction of the EIS.

OSEP Memo 09-02: Verification of program compliance and documentation of transition meeting, although late, unless child is no longer within the jurisdiction of the EIS Program.

| Cluster SPOE | FFY08 Reported Data | Child Level Correction of Non-Compliance | FFY09 State Verified Correction of Non-Compliance Data | State Verification Dates |
|--------------|------------------------|--|---|--------------------------|
| C* | 98% (193/197) | 4 records; 2 children no longer in system and 2 children with late transition meetings after 33 months (35months and 34 months). | Monitoring follow up: Progress report #1 (100% 43/43) Progress Report #2 (100% 26/26) | 1/15/10 6/15/10 |
| H | Not Reported for FFY08 | | Monitoring follow up: Progress report #2 (100% 25/25) | 6/15/10 |
| D | 99.5% (416/418) | 2 records; 2 children no longer in system. | Monitoring follow up: Progress report #1 (100% 54/54) Progress Report #2 (100% 36/36) | 1/15/10 6/15/10 |
| I | 98.6% (141/143) | 2 records; 1 children no longer in system and 1 child late at 35 months | Monitoring follow up: Progress report #1 (100% 41/41) Progress Report #2 (100% 36/36) | 1/15/10 |

*On April 1, 2010, Cluster CH was split into 2 separate clusters C & H.

Correction of Remaining FFY 2007 Findings of Noncompliance (if applicable)

Not Applicable

Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable)
Not Applicable

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable): The rigorous and measurable targets for this indicator must all be 100%. Indiana has revised its SPP to extend the targets, improvement activities and timeline through FFY2012.

INDICATOR C-9 WORKSHEET

| Indicator/Indicator Clusters | General Supervision System Components | # of EIS Programs Issued Findings in FFY 2008 (7/1/08 through 6/30/09) | (a) # of Findings of noncompliance identified in FFY 2008 (7/1/08 through 6/30/09) | (b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification |
|---|--|--|--|--|
| 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 | 8 | 8 | 7 |
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |
| 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 | 0 | 0 | 0 |
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |
| 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 | 0 | 0 | 0 |
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |
| 4. Percent of families participating in Part C who report that early intervention services have helped the family | Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other | 0 | 0 | 0 |

| Indicator/Indicator Clusters | General Supervision System Components | # of EIS Programs Issued Findings in FFY 2008 (7/1/08 through 6/30/09) | (a) # of Findings of noncompliance identified in FFY 2008 (7/1/08 through 6/30/09) | (b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification |
|--|--|--|--|--|
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |
| 5. Percent of infants and toddlers birth to 1 with IFSPs 6. Percent of infants and toddlers birth to 3 with IFSPs | Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other | 0 | 0 | 0 |
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |
| 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. | Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other | 5 | 5 | 5 |
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |
| 8. 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; | Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other | 5 | 5 | 5 |
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |
| 8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other | Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other | 0 | 0 | 0 |

| Indicator/Indicator Clusters | General Supervision System Components | # of EIS Programs Issued Findings in FFY 2008 (7/1/08 through 6/30/09) | (a) # of Findings of noncompliance identified in FFY 2008 (7/1/08 through 6/30/09) | (b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification |
|--|--|--|--|--|
| <p>appropriate community services by their third birthday including:</p> <p>B. Notification to LEA, if child potentially eligible for Part B; and</p> | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |
| <p>8. 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:</p> <p>C. Transition conference, if child potentially eligible for Part B.</p> | Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other | 3 | 3 | 3 |
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |
| <p>OTHER AREAS OF NONCOMPLIANCE:</p> <p>34CFR §303.343(a) Annual IFSP written prior to expiration</p> | Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other | 2 | 2 | 2 |
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |
| <p>OTHER AREAS OF NONCOMPLIANCE:</p> <p>34CFR§303.342(b) Timely 6 month IFSP review</p> | Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other | 9 | 9 | 9 |
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |

| Indicator/Indicator Clusters | General Supervision System Components | # of EIS Programs Issued Findings in FFY 2008 (7/1/08 through 6/30/09) | (a) # of Findings of noncompliance identified in FFY 2008 (7/1/08 through 6/30/09) | (b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification |
|--|--|--|--|--|
| OTHER AREAS OF NONCOMPLIANCE: 639(a)(6) 470 IAC 3.1-13-2(a) Written Prior Notice | Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other | 9 | 9 | 8 |
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |
| OTHER AREAS OF NONCOMPLIANCE: 34CFR §303.460(a) Confidentiality of information | Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other | 0 | 0 | 0 |
| | Dispute Resolution: Complaints, Hearings | 1 | 1 | 1 |
| OTHER AREAS OF NONCOMPLIANCE: IC12-12.7-2-17 Cost participation plan; income documentation | Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other | 9 | 9 | 9 |
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |
| OTHER AREAS OF NONCOMPLIANCE: IC12-12.7-2-17 Cost participation plan; insurance documentation | Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other | 8 | 8 | 8 |
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |

| Indicator/Indicator Clusters | General Supervision System Components | # of EIS Programs Issued Findings in FFY 2008 (7/1/08 through 6/30/09) | (a) # of Findings of noncompliance identified in FFY 2008 (7/1/08 through 6/30/09) | (b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification |
|--|--|--|--|--|
| OTHER AREAS OF NONCOMPLIANCE: 637 (b)(6) 470 IAC 3.1-3-4(5)(c) Appropriate use of funds for provider services | Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other | 17 | 17 | 17 |
| | Dispute Resolution: Complaints, Hearings | 0 | 0 | 0 |
| Sum the numbers down Column a and Column b | | 76 | 76 | 74 |

Percent of noncompliance corrected within one year of identification = 97.37% (74/76)

Part C State Annual Performance Report (APR) for FFY2009

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 10: Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.

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

Measurement: Percent = [(1.1(b) + 1.1(c)) divided by 1.1] times 100.

| FFY | Measurable and Rigorous Target |
|---------|--|
| FFY2009 | 100% of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint. |

Actual Target Data for FFY2009:

100% (3/3) signed written complaints with reports issued that were resolved within 60-day timeline.

Indiana received three (3) signed written complaints in FFY2009 (OSEP Table 4 is attached.) Two of the three signed, written complaints were found to be unsubstantiated and were resolved without findings. One signed written complaint was substantiated and was resolved within the 60-day timeline. That complaint resulted in a corrective action plan that was completed by the provider. Written complaints are also included in the state’s non-compliance for the FFY2009, which is located in Indicator 9.

| Date | Complaint | Findings of Fact | Resolution Date |
|-----------|---|--|---|
| 7/2/2009 | A parent alleged that a provider violated confidentiality by discussing the child’s services and personal matters with other therapists | Personal issues were discussed, but the information exchanged was for the purpose of meeting the requirement of the early intervention system under FERPA. Other providers involved with the family already had written consent to access information and records showing the child/family history, concerns, and the child’s diagnoses. | 8/30/2009 (59 days) Unsubstantiated and no further action required. |
| 9/28/2009 | A parent alleged a provider violated Procedural Safeguards by failing to provide information | Provider did not provide the required 10 day written prior notice to family and SC before discharging child from services. Provider did not respond to parents’ request for additional information. | 11/23/2009 (56 days) Corrective Action Plans |

| | | | |
|------------|---|--|---|
| | regarding a child's discharge from her services and by failing to respond to parent requests for information. | | ordered. Provider satisfactorily completed the CAP. |
| 12/15/2009 | A parent alleged a provider violated confidentiality by providing the family's phone number to another family without permission. | Could not be substantiated due to lack of evidence. Family statement did not provide sufficient details and family did not respond to repeated phone attempts by investigator. | 2/12/2010 (59 days) Unsubstantiated |

*Citations for findings issued:

Sec. 639: Procedural Safeguards

(6) Written prior notice to the parents of the infant or toddler with a disability whenever the State agency or service provider proposes to initiate or change, or refuses to initiate or change, the identification, evaluation, or placement of the infant or toddler with a disability, or the provision of appropriate early intervention services to the infant or toddler.

470 IAC 3.1-13-2 Prior notice; native language

Sec. 2. (a) Written notice must be given to the parent of a child eligible for early intervention services at least ten (10) days before an early intervention service provider proposes, or refuses, to initiate or change:

- (1) the identification, evaluation, or placement of the child; or
- (2) the provision of appropriate early intervention services to the child and the child's family.

(b) The notice must be in sufficient detail to inform the parent about the following:

- (1) The action that is being proposed or refused.
- (2) The reasons for taking the action.
- (3) All procedural safeguards that are available.
- (4) The state complaint procedures under sections 470 IAC 3.1-14-1, including a description of how to file a complaint and the timelines under those procedures.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY2009: Indiana has not experienced any significant year-to-year changes in its Table 4: Dispute Resolutions. State Part C personnel from the Bureau of Child Development Services are assigned to complaints and hearing requests. A complaint and hearing log is maintained. Indiana, through the Division of Disability and Rehabilitative Services - Bureau of Child Development Services, also maintains a contract with a special education attorney to assist with due process hearings. The attorney provides the state staff with assistance in the development and implementation of policies and procedures regarding due process, complaints, mediations and hearings.

Written complaints can be submitted directly to the state First Steps office. Concerns and complaints may also be directed to the Local Planning and Coordinating Council. Concerns may be investigated and resolved locally by the Local Planning and Coordinating Council, while

complaints must be forwarded to the designated state staff within 2 days. The state staff will then investigate the complaint and issue a finding to all involved parties within 60 days. LPCCs maintain concern and complaint logs which are submitted electronically to the designated state staff to insure that all complaints have been received.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY2010: This is a compliance indicator and the target is set at 100%. The SPP for this indicator has been revised to extend the target, improvement activities and timelines to 2012.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested.

| | | | |
|---|---|----|--|
| U.S. DEPARTMENT OF EDUCATION OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES OFFICE OF SPECIAL EDUCATION PROGRAMS | TABLE 4 | | PAGE 1 OF 1 |
| | REPORT OF DISPUTE RESOLUTION UNDER PART C, OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT 2009-10 | | OMB NO.: 1820-0678 |
| | | | FORM EXPIRES: xx/xx/xxxx |
| | STATE: | | IN - INDIANA HI - HAWAII ID - IDAHO IL - ILLINOIS IN - INDIANA |
| SECTION A: WRITTEN, SIGNED COMPLAINTS | | | |
| (1) Total number of written, signed complaints filed | | 3 | |
| (1.1) Complaints with reports issued | | 3 | |
| (a) Reports with findings of noncompliance | | 1 | |
| (b) Reports within timeline | | 3 | |
| (c) Reports within extended timelines | | 0 | |
| (1.2) Complaints pending | | 0 | |
| (a) Complaints pending a due process hearing | | 0 | |
| (1.3) Complaints withdrawn or dismissed | | 0 | |
| SECTION B: MEDIATION REQUESTS | | | |
| (2) Total number of mediation requests received | | 1 | |
| (2.1) Mediations held | | 0 | |
| (a) Mediations held related to due process complaints | | 0 | |
| (i) Mediation agreements related to due process complaints | | 0 | |
| (b) Mediations held not related to due process complaints | | 0 | |
| (i) Mediation agreements not related to due process complaint | | 0 | |
| (2.2) Mediations pending | | 0 | |
| (2.3) Mediations not held | | 1 | |
| SECTION C: Due Process Complaints | | | |
| (3) Total number of due process complaints filed (for all States) | | 0 | |
| (3.1) Resolution meetings (applicable ONLY for states using Part B due process hearing procedures) | | -9 | |
| (a) Written settlement agreements reached through resolution meetings | | -9 | |
| (3.2) Hearings (fully adjudicated) (for all States) - | | 0 | |
| (a) Complete EITHER item (1) OR item(2), below as applicable. | | | |
| (1) Decisions within timeline - <u>Part C</u> Procedures | | 0 | |
| (2) Decisions within timeline - <u>Part B</u> Procedures | | -9 | |
| (b) Decisions within extended timeline (applicable ONLY if using Part B due process hearing procedures) | | -9 | |
| (3.3) Hearing pending (for all States) | | 0 | |
| (3.4) Due process complaint withdrawn or dismissed (including resolved without a hearing) (for all States) | | 0 | |

Part C State Annual Performance Report (APR) for FFY2009

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 11: Percent of fully adjudicated due process hearing requests that were fully adjudicated within the applicable timeline.

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

Measurement: Percent = [(3.2(a) + 3.2(b)) divided by 3.2] times 100.

| FFY | Measurable and Rigorous Target |
|-------|--|
| FFY09 | 100% of fully adjudicated due process hearing requests that were fully adjudicated within the applicable timeline. |

Actual Target Data for FFY09: Actual Target Data for FFY2009: Indiana did not receive any due process hearing requests in FFY2009.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY2009: Indiana Part C assigns a state staff member from the Bureau of Child Development Services to monitor and resolve complaint and hearing requests. A complaint and hearing log is maintained. Indiana, through the Division of Disability and Rehabilitative Services - Bureau of Child Development Services, also maintains a contract with a special education attorney to assist with due process hearings. The attorney provides the Bureau staff with assistance in the development and implementation of policies and procedures regarding due process, complaints, mediations and hearings.

Indiana First Steps continues to fund Family-to-Family support staff through a state grant to the Indiana Institute on Disability and Community at Indiana University. Family-to-Family support staff is assigned to each Cluster SPOE. They provide parent-to-parent support and information. Family-to-Family staff training includes procedural safeguards. The Family-to-Family staff may assist families in the process of written complaints or in requesting hearings. Revisions to the booklet, “A Family’s Guide to Procedural Safeguards” were completed in FFY2008. A new online core training module on Procedural Safeguards was also completed in FFY2008. Indiana also offers annual training on IDEA Part B and C rules, regarding procedural safeguards and transition.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY2010: This is a compliance indicator and the target is set at 100%. The SPP for this indicator has been revised to extend the target, improvement activities and timelines to 2012.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested.

Part C State Annual Performance Report (APR) for FFY2009

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 |
|-------|---|
| FFY09 | Not Applicable - Indiana has not adopted Part B due process hearing procedures. |

Actual Target Data for FFY2009: This indicator is not applicable, as Indiana has not adopted Part B due process hearing procedures.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY2009: Not applicable, as Indiana has not adopted Part B due process hearing procedures.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY2010: Indiana has not set targets for this indicator, as the state has not has not adopted the Part B due process hearing procedures under 34 CFR § 303.420.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested.

Part C State Annual Performance Report (APR) for FFY2009

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 |
|-------|--|
| FFY09 | NOT APPLICABLE – Indiana has not set targets for this indicator, as it has not met the minimum threshold of 10 mediation requests. |

Actual Target Data for FFY2009: There was one mediation request in FFY2009. A child was denied First Steps coverage for orthotics. The family requested a mediation hearing. Prior to the hearing, the child received the requested orthotics, which were paid for by Indiana Medicaid. The family was contacted by the mediation specialist and later withdrew their request.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY2009: Indiana, through the Division of Disability and Rehabilitative Services - Bureau of Child Development Services, maintains a contract with a special education attorney to assist with mediations. The attorney provides the Bureau staff with assistance in the development and implementation of policies and procedures regarding due process, complaints, mediations and hearings. Once final IDEIA, Part C regulations are available, the attorney will address any needed revisions to the current policies and procedures.

The Service Coordinator and Direct Service Provider orientation trainings were revised and each provides expanded sections on procedural safeguards. Revisions to the booklet, “A Family’s Guide to Procedural Safeguards” was completed in FFY2008. A new core training module on Procedural Safeguards was also completed in FFY2008.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY2009: Indiana has never received a minimum of 10 mediation requests therefore; no targets have been set for this indicator. The SPP for this indicator has been revised to extend the improvement activities and timelines to 2012.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested.

Part C State Annual Performance Report (APR) for FFY2009

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 |
|-------------|---|
| 2009 | 100% of state reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate. |

Actual Target Data for FFY2008: 100% of the required state reported data, including 618 data, SPP and APR were submitted by the dates due and are accurate. (Self Calculating Data Rubric for Table 14 is attached.)

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY2006: Indiana has an excellent history of submitting accurate and timely data to OSEP. The state is confident in the accuracy of its comprehensive data system. Data from the IFSP are entered directly by the Cluster SPOE and claims information is entered by the Central Reimbursement Office (CRO). Missing data elements on IFSPs are returned to Service Coordinators for completion. Indiana’s data system contains numerous self audits to prevent the input of invalid data (for example, a referral date cannot be entered prior to the birth date or IFSP date cannot be prior to the eligibility date). Other validations include multiple sources for most data elements. SPOE data are validated annually by on-site focused monitoring verification visits to each of the ten Cluster SPOEs. The dynamic nature of the system requires constant validation of data and on-going training. Training is conducted regarding requirements and procedures for collecting and reporting data for individuals who perform data entry functions at the Cluster SPOEs.

The SPP and APR are posted on the state training website (<http://www.utsprokids.org/firststepsinfo.asp>), in addition to the public report on the

performance of programs in comparison to State SPP targets for indicators 1, 2, 3, 4, 5, 6, 7, and 8.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY2008: This is a compliance indicator and the target is set at 100%. The SPP for this indicator has been revised to extend the target, improvement activities and timelines to 2012.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable): None requested.

FFY 2009 APR INDIANA

| Indicator 14 - SPP/APR Data | | | |
|------------------------------|---|---------------------|-------|
| APR Indicator | Valid and reliable | Correct calculation | Total |
| 1 | 1 | 1 | 2 |
| 2 | 1 | 1 | 2 |
| 3 | 1 | 1 | 2 |
| 4 | 1 | 1 | 2 |
| 5 | 1 | 1 | 2 |
| 6 | 1 | 1 | 2 |
| 7 | 1 | 1 | 2 |
| 8A | 1 | 1 | 2 |
| 8B | 1 | 1 | 2 |
| 8C | 1 | 1 | 2 |
| 9 | 1 | 1 | 2 |
| 10 | 1 | 1 | 2 |
| 11 | 1 | 1 | 2 |
| 12 | NA | NA | 0 |
| 13 | 1 | 1 | 2 |
| | | Subtotal | 28 |
| APR Score Calculation | Timely Submission Points - If the FFY 2009 APR was submitted on-time, place the number 5 in the cell on the right. | | 5 |
| | Grand Total – (Sum of subtotal and Timely Submission Points) = | | 33 |

| 618 Data – Indicator 14 | | | | | |
|---|--------|---------------|-------------------------------------|---------------------------------|-------|
| Table | Timely | Complete Data | Passed Edit Check | Responded to Date Note Requests | Total |
| Table 1 – Child Count Due Date: 2/1/10 | 1 | 1 | 1 | N/A | 3 |
| Table 2 – Program Settings Due Date: 2/1/10 | 1 | 1 | 1 | N/A | 3 |
| Table 3 – Exiting Due Date: 11/1/10 | 1 | 1 | 1 | N/A | 3 |
| Table 4 – Dispute Resolution Due Date: 11/1/10 | 1 | 1 | 1 | N/A | 3 |
| | | | | Subtotal | 12 |
| 618 Score Calculation | | | Grand Total (subtotal x 2.5) | | 30 |

| Indicator #14 Calculation | |
|--|--------------|
| A. APR Grand Total | 33.00 |
| B. 618 Grand Total | 30.00 |
| C. APR Grand Total (A) + 618 Grand Total (B) = | 63.00 |
| Total N/A in APR | 2.00 |
| Total N/A in 618 | 5.00 |
| Base | 63.00 |
| D. Subtotal (C divided by Base*) = | 1.000 |
| E. Indicator Score (Subtotal D x 100) = | 100.0 |

* Note any cell marked as N/A will decrease the denominator by 1 for APR and 2.5 for 618