

# ANNUAL PERFORMANCE REPORT

IDEA Part C

FFY 2008 (2008 – 2009)

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State of Wisconsin

Wisconsin Department of Health Services

Bureau of Long Term Support

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**TABLE 1: APR Results and Comparison of FFY 2008 and FFY 2007**

<b>Monitoring Priorities and Indicators</b>	<b>Target</b>	<b>Results 2008/2009</b>	<b>Results 2007/2008</b>
1. Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner. [Compliance Indicator]	100%	98.49%	97.59%
2. Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or programs for typically developing children. [Results Indicator]	96%	94.68%	93.98%
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. [Results Indicator]	Baseline Year Statement 1 Statement 2  Statement 1 Statement 2  Statement 1 Statement 2	72.5% 74%  78.2% 58.9%  76.7% 74%	NA
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. [Results Indicator]	88%  93%  93%	73.65%  87.25%  90.65%	80.36%  89.47%  85.09%
5. Percent of infants and toddlers birth to 1 with IFSPs compared to national data: [Results Indicator]	1.16%	0.86%	0.91%
6. Percent of infants and toddlers birth to 3 with IFSPs compared to national data. [Results Indicator]	2.84%	2.72%	2.62%
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. [Compliance Indicator]	100%	96.10%	94.83%

<b>Monitoring Priorities and Indicators</b>	<b>Target</b>	<b>Results 2008/2009</b>	<b>Results 2007/2008</b>
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:  IFSPs with transition steps and services; [Compliance Indicator]	100%	96.45%	95.48%
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 service by their third birthday including:  Notification to LEA, if child potentially eligible for Part B; and [Compliance Indicator]	100%	95.46%	95.59%
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:  Transition conference, if child potentially eligible for Part B. [Compliance Indicator]	100%	96.87%	95.39%
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. [Compliance Indicator]	100%	86.11%	100%
10. Percent of signed written complaints with reports issued that were resolved within 60 days [Compliance Indicator]	100%	NA	NA
11. Percent of fully adjudicated due process hearing requests that were fully adjudicated within the applicable timeline [Compliance Indicator]	100%	NA	NA
12. Percent of hearing requests that went to resolution sessions that were resolved through settlement agreements [Compliance Indicator]	100%	NA	NA
13. Percent of mediations held that resulted in mediation agreements [Compliance Indicator]	100%	0%	NA
14. State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate. [Compliance Indicator]	100%	100%	100%
Fiscal Audit Findings	100%	NA	NA

## Part C State Annual Performance Report (APR) for 2008

### Overview of the Annual Performance Report Development:

County agencies, families, advocates and the Wisconsin Interagency Coordinating Council (ICC) are among the broad array of stakeholders in Wisconsin's early intervention system. These groups have historically and continually provided input into all major components of Wisconsin's Part C Program, including the State Performance Plan (SPP), priorities and practices related to outcomes for children and families, targets for all Part C indicators, and Annual Performance Reports (APR). The ICC has diverse membership and connects with a variety of workgroups and committees related to early intervention services in Wisconsin. In 2002, prior to the 2004 reauthorization of the Individuals with Disabilities Act (IDEA), the ICC adopted a set of Birth to 3 Program Outcomes and developed corresponding indicators to measure the progress related to each outcome. Each year, the Department of Health Services (DHS-formerly DHFS) has provided data to the ICC on the status of these outcomes. Subsequently, the ICC has made data-driven recommendations to the Department regarding strategies for improvement related to these outcomes. In addition, the information has been broadly disseminated to key stakeholders through an annual report. These outcomes closely align with the indicators developed under IDEA. The process of the ICC advising the DHS on salient priorities and recommendations, followed frequently by DHS implementation, demonstrates Wisconsin's ongoing practice of securing and acting on stakeholder input for improvement of the Birth to 3 Program.

The SPP is posted to the DHS website (<http://DHS.wisconsin.gov/bdds/birthto3/reports/index.htm>) and the Annual Performance Report (APR) is also posted on the same DHS website upon submission to the U.S. Department of Education. Both documents are available in printed format and alternate formats upon request. The Department provides information to the public regarding accessing the Wisconsin SPP and APR through list serves, e-mails, trainings, teleconferences, regional meetings, and local county outreach. The DHS meets the requirement for public reporting of early intervention services by county through its website via a link to the North Central Regional Resource Center (NCRRC). Performance results are currently displayed in a dashboard format, allowing interested readers to compare different counties' compliance on any of the first eight federal indicators. The link to NCRRC and these data is <http://northcentralrrc.org/wisconsin/>

This link can also be accessed through the DHS website at <http://DHS.wisconsin.gov/bdds/birthto3/reports/index.htm>. These activities fulfill the state's responsibility to report annually to the public on the performance of each early intervention service (EIS) program located in the state on the targets in the SPP under IDEA section 616 (b)(C)(ii)(1) and 642.

In the State of Wisconsin, Early Intervention Services (EIS) responsibilities are contracted to the 72 counties in the state. Wisconsin's counties are fully informed of the SPP and the resulting outcome data in the APR. Data analysis charts are mailed to each county in February after the submittal of the APR, identifying each county's compliance percentages for the eight indicators counties must track. Counties are expected to analyze their performance on each of the indicators. On June 15, 2009, the State of Wisconsin received the third Determination from the Office of Special Education Programs (OSEP), for the FFY 2007 ending the previous summer on June 30, 2008. Wisconsin was determined to "meet the requirements of Part C of the Individuals with Disabilities Act (IDEA)". Counties received their notification of determination status for FFY 2007 on June 25, 2009. Wisconsin has a long-standing history and commitment to quality services for young children and their families. County agencies are key partners in the process through the delivery of effective early intervention services in partnership with families and community providers. Wisconsin has seen increased attention being paid to the data collection and reporting process. Counties have done an exemplary job this year in carefully attending to data documentation requirements and demonstrating through the data the excellent practices in providing early intervention services to children in the Birth to 3 system.

Once county programs receive their data and Determination status, they are then responsible for sharing their data with local advisory groups and using other communication strategies to share data within their communities. RESource staff (Wisconsin's technical assistance and monitoring partner) also meets with each county to discuss and analyze local performance on each indicator and to develop improvement strategies through use of the Program In Partnership Plan (PIPP).

Routinely, each of the 72 counties is monitored with an on-site review on a four-year cycle. In addition, a data analysis is performed annually at the end of the FFY, which may result in an issuance of non-compliance if the county's data is not at 100 percent. Also, a Self Assessment process was piloted in FFY 2006 and implemented statewide in FFY 2007. Counties are required to use data from their PPS summary reports, file reviews and other internal processes for completing the annual Self Assessment process and the on-site review processes. The Self Assessment process results in a report to DHS. Data in this report are clarified with a telephone call or on-site visit from the RESource staff as well as DHS staff, if warranted. If these actions do not clarify data, then a targeted review is conducted to resolve findings and develop any indicated compliance plans. The RESource staff work with the county to develop a plan to correct any issues of non-compliance and technical assistance is provided as described in the plan. RESource also tracks progress toward correction of non-compliance in its database. Reports of non-compliance and progress toward correcting non-compliance are provided quarterly to DHS.

In November of 2008, Wisconsin replaced the former Human Service Reporting System (HSRS) database with a user-friendly web-based Program Participation System (PPS) that employs technology to improve the comprehensiveness and accuracy of data collection for reporting on indicators. The new PPS system allows counties to report and monitor their own progress and slippage around Federal Indicators, as well as allowing state and RESource staff to monitor data on a routine basis to ensure timeliness, accuracy, and progress toward indicator compliance and targets. All FFY 2008 data entered into the Human Services Reporting System (HSRS) from July 1, 2008 through September 31, 2008 were transferred into the new data system in the month of October, 2008. Counties were required to hold any data for the month of October 2008 and enter that data into the new PPS when the web-based application of PPS went live in November. DHS prioritized the Birth to 3 Program for this department-wide data system change with some assistance from funds through the General Supervision and Enhancement Grant (GSEG) awarded by OSEP to Wisconsin. The Human Services Reporting System (HSRS) was the DHS statewide mainframe data collection system. The Department of Health Services (DHS) and Department of Public Instruction (DPI) collaborated in developing the Birth-to-3 module of the Program Participation System (PPS) whose purpose is six-fold:

1. Reduce the effort involved in collecting reliable and timely information that meets state and federal reporting rules;
2. Utilize information collected to seek enhanced funding in the future for the Birth to 3 Program.
3. Provide more orderly transition of children from Birth to 3 to a functional school setting or other community placement.
4. Provide a tool for Birth to 3 providers to better track their children and provide information to the county and state.
5. Provide better consistency in program administration across the state's Birth to 3 program and the Local Education Agencies.
6. Provide a web-based system that is easy to use, can be integrated with Counties' current work flow, and is an effective system for the Birth to 3 and LEA structure.

Ongoing intense collaboration also exists between the Part C, Birth to 3 Program and Part B, Section 619, Early Childhood Special Education Program through the Inter-Department Early Childhood Workgroup, which is comprised of key staff from DHS, Department of Public Instruction (DPI), and training and technical assistance providers from both systems. The group has cross-membership with the Wisconsin Birth to 3 ICC and includes a parent member. In response to IDEA 2004 reauthorization, the workgroup has actively implemented a work plan to address mutual or inter-related program enhancements with specific emphasis on early childhood outcomes and transitions.

DPI and DHS collaboratively accessed technical assistance through a variety of national and federal forums to address the non-compliance issues around Part B Indicator 12 and Part C Indicator 8 in FFY 2007. Wisconsin has demonstrated excellent progress on these two Indicators, and attributes this progress to the intense focus on utilizing these nationally-available TA resources. The North Central Regional Resource Center (NCRRC) and the National Early Childhood Technical Assistance Center (NECTAC) have been particularly helpful, as have the resources available from the National Early Childhood Transition Initiative (NECTC). The monthly OSEP TA calls with Ruth Ryder have provided clarification on accountability and

reporting requirements. The State's progress can also be attributed to sharing those resources with local education agencies (LEAs) and county Birth to 3 Programs. Results follow from collaborative cross system analysis of state and local challenges that have impeded earlier progress in this area.

The DHS will distribute the APR via a comprehensive list serve immediately upon submission to the U.S. Department of Education. The department will also post the APR on the DHS website at <http://DHS.wisconsin.gov/bdds/birthto3/reports/index.htm>. These results will be comprehensively reviewed by the ICC at the April 2010 meeting and will be the focus topic for the Spring 2010 Regional Meetings with county Birth to 3 Programs scheduled for April 2010. These forums will provide an opportunity to review progress and slippage related to the SPP targets as well as broad-based input related to areas of improvement. Local Early Intervention Service (EIS) providers will in turn share both state and local data as appropriate with county advisory groups and other interagency committees related to children and families.

## Part C State Annual Performance Report (APR) for 2008

### Overview of the Annual Performance Report Development:

#### 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 =  $\left[ \frac{\text{(\# of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner)}}{\text{(total \# of infants and toddlers with IFSPs)}} \right] \times 100$ .

Account for untimely receipt of services, including the reasons for delays.

FFY	Measurable and Rigorous Target
2008 (2008-2009)	100%
Results	98.49%

#### Actual Target Data for FFY 2008:

Children with IFSPs	Number of Children with Services	%
1. Received timely services	11869	98.49%
2. System Delays in delivery of services over 30 days	182	1.51%
Total of 1 & 2	12051	100%

Table C1 Data Source: Wisconsin Program Participation System (PPS) data system July 1, 2008-June 30, 2009

The Human Services Reporting System (HSRS), the DHS statewide mainframe data collection system until FFY 2008, was used to collect the FFY 2008 data until the new data system, Program Participation System (PPS) was launched in November, 2008. All data were transferred from the HSRS system to the PPS system during the month of October, 2008. In November, counties entered any relevant data from October of 2008, and verified the accuracy of the transfer of data from HSRS. The initial IFSP date and the start date for each service are data elements reported in PPS. The PPS enables DHS to track statewide, county, and larger system issues by analyzing patterns and delays in service start dates within each county. PPS calculates the difference in days between the IFSP and the service start date, and requires documentation of reason codes for any service that started beyond the 30-day timeline. These reason codes documented exceptional family circumstances, family preference, or early intervention team recommendations, including agreement from families. There is also a reason code to capture system or staffing issues to indicate an unacceptable response.

For FFY 2008, Wisconsin had 98.49 percent of IFSP services provided in a timely manner from July 1, 2008 through June 30, 2009. The chart below outlines children who have been receiving ongoing services in a timely manner since their initial IFSP, as well as children who have had services added with subsequent IFSPs during the FFY 2008. Included in the calculation for timely services are 746 children whose services were initiated beyond the 30-day timeline due to exceptional family circumstances. 396 of those 746 children experienced a delay that was intentionally planned by the IFSP team, including the family, to allow some services of a lower frequency to be documented on the IFSP, such as audiology appointments or other consultative or coaching services. These children were included in both the numerator and denominator. Wisconsin continues to define the time period from the IFSP initiation date established by the IFSP team, including the parent, as thirty (30) days from the initiation of the IFSP to the actual service start date.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2008:**

These data demonstrate that Wisconsin has an increase of 0.9 per cent in compliance of timely services as compared to FFY 2007, Wisconsin continues to be very invested in ensuring that all children receive services in a timely fashion 100 percent of the time. One of the reasons that 396 children experienced a planned delay beyond the 30 days results from changes in approaches by some county programs. In response to mounting evidence for the importance for relationship-based intervention that may be accomplished with a primary provider approach, some Wisconsin county programs are beginning to shift practices from a discipline specific to a more integrated approach that emphasizes access to personnel with skills to meet the child and family's highest priority needs and to build a relationship with the family. Under this approach, there are sound reasons for delaying the start of additional coaching provided through other disciplines in tandem with the primary provider while the primary provider gets to know the child better (ongoing assessment) and builds a relationship with the family and other primary caregivers. When the team including the family agree to this approach at the IFSP meeting, it is most efficient to intentionally plan for added services at the initial IFSP. To safeguard that this approach is not utilized to relieve the program of providing sufficient timely services, IFSP monitoring through the Self-Assessment and Program Review processes will focus on the fit between IFSP outcomes, family information, and the service commitments included in the IFSP. In addition, training and technical assistance on approaches to intervention, including the primary provider approach will be the emphasis of professional development and technical assistance in FFY 2010, particularly with the use of ARRA funds to support comprehensive training around coaching and teaming in the provision of early intervention services, with Shelden and Rush providing national expertise through a year long training initiative around these evidence based practices. This work will be approached from a systems perspective, examining policies, funding, service practices, professional association position papers and materials, and family perspectives and priorities.

**Correction of FFY 2007 Findings of Noncompliance (if State reported less than 100% compliance):**

Level of compliance (actual target data) State reported for FFY 2007 for this indicator: 97.59%

1. Number of findings of noncompliance the State made during FFY 2007 (the period from July 1, 2007, through June 30, 2008)	<b>2</b>
2. Number of FFY 2007 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	<b>2</b>
3. Number of FFY 2007 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>0</b>

**Correction of FFY 2007 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance):**

4. Number of FFY 2007 findings not timely corrected (same as the number from (3))	<b>0</b>
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above)	
5. Number of FFY 2007 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	0
6. Number of FFY 2007 findings <u>not</u> verified as corrected [(4) minus (5)]	0

#### **Verification of Correction (either timely or subsequent):**

Two (2) findings of non-compliance were identified in FFY 2007 through on-site reviews, both of which were corrected within 12 months. In FFY 2008, one (1) finding of non-compliance was identified, and corrected. Correction is verified through an analysis of a minimum of two months of data as reported in PPS with the expectation that the program must demonstrate 100 percent compliance as evidence of correct implementation of the regulatory requirement, as well as an analysis of the child specific non-compliance to ensure that the service did start, albeit late. Desk audits are also used as a demonstration of correction of non-compliance.

#### **Ongoing Improvement Activities:**

**Clarify Policies and Procedures; Program in Partnership Plan (PIPP):** Timely services receive considerable attention in the State Supervision System. RESource staff have provided targeted follow-up with counties whose data indicate compliance with timely services as an issue. The focus on timely services is further addressed with these counties through their Program in Partnership Plan (PIPP). The PIPP lists specific timelines and target measures for improvement. Ongoing status is reported in the RESource database to track the progress of each county in remedying non-compliance of timely initial and subsequent IFSPs. There are also statewide data available regarding the types of services that were most often delayed so state and local planners can develop ways to improve the access to and the timeliness of specific service delivery. Since Wisconsin is still below the 100 percent target, RESource staff will provide technical assistance to individual counties that will result in the timely correction of non-compliance.

**Improved Data Collection and Reporting:** In November of 2008, Wisconsin replaced the former Human Service Reporting System (HSRS) database with a user-friendly web-based Program Participation System (PPS) that employs technology that allows counties to monitor their own progress and slippage on Federal Indicators. The new PPS database has improved the comprehensiveness and accuracy of data collection for reporting on Indicator 1. DHS formally notified counties that were non-compliant and monitored their corrective action progress on the PIPP and through the RESource database. PPS provides real time compliance reports to the counties to track their improvement efforts on moving closer to the 100 percent target. Counties must demonstrate a minimum of two months at 100 percent compliance to document correction of the non-compliance, as well as child-specific correction

**Targeted Technical Assistance:** Targeted technical assistance is being provided, as state and local systems are examining current practices and strategies for improvement. Two of Wisconsin's biggest counties are receiving additional technical assistance and monitoring, with the Birth to 3 Program Part C coordinator providing direct oversight and support to each of these counties. County administrative staff have met with the state Birth to 3 team to examine more precise ways to provide monitoring oversight to the agencies that are contracted by those counties to provide early intervention services. Wisconsin's largest county began linking contracts with provider agencies to performance on the indicators. As a part of this strategy, provider agencies within this county provided monthly data reports and analysis to examine their progress or slippage on this Indicator. The county as a whole then provided monthly data reports and analysis on progress or slippage to DHS. The DHS Technical Assistance and Monitoring partner, RESource, worked with each provider agency within this county to develop a Program in Partnership Plan (PIPP) identifying strategies to correct any non-compliance issues, which would allow progression towards the required target of 100 percent.

**Improved Systems Administration, County Self Assessment and Ongoing Monitoring:** In addition to the actual on-site review performed in each county on a four-year cycle, Wisconsin is improving system

administration and monitoring to provide counties more opportunities to self-monitor in addition to their on-site review by the state Birth to 3 team. This includes the new Self Assessment process piloted in FFY 2006 and implemented statewide in FFY 2007. Each county completes a Self Assessment and submits a report to the State for review yearly. As part of the Self Assessment, each county reviews their program and reports on their process to ensure timely delivery of services identified on any IFSP. A comprehensive file review of 10 percent of the children in each county identifies which services were not delivered in a timely manner, and documents the specific reason. If the reason identifies a system or staffing issue, further evaluation of the necessary policy and system changes is required. When a Self Assessment indicates ongoing issues with compliance necessitating more state oversight, an additional focused monitoring visit is scheduled for more precise evaluation and technical assistance to that county.

**Provision of Training and Technical Assistance:** DHS offered Data Discussion Wisline Training sessions throughout the year. Orientation to Best Practices to Early Intervention, held twice a year (September and March) routinely includes information about Indicator 1 and addresses relevant practice topics for achieving compliance with this indicator, including a demonstration of routines based on interviewing, functional outcome writing, and reviewing service options that are most appropriate for establishing a relationship with the family and addressing IFSP outcomes. A Wisline entitled "Providing EI Services Using the Primary Service Provider Approach" was held on July 10, 2008 with 24 counties in attendance and 55 participants.

**Program Development:** In addition to training on the requirements of provision of timely services, many counties have requested additional supports around implementation of new approaches to services. Two Wislines were provided by Dr. Arianna Keil of the Waisman Center in 2008 to present service delivery options using a primary service provider approach that builds relationships with families and ensures a high level of collaboration amongst team members in assessment of the child's developmental strengths and areas of need, the development of appropriate functional outcomes on the IFSP, and the identification of the most pertinent discipline to provide services, with the support and continued consultation of the rest of the team. The first, [\*Primary Service Provider Approach—an Introduction to What Is Occurring Now\*](#), was presented on May 8, 2008, and featured several programs in Wisconsin that are currently utilizing or exploring how they will utilize the Primary Service Provider approach. The second, held on July 10, 2008, [\*Providing Early Intervention Services Using the Primary Service Provider Approach: Team Member Roles and Considerations\*](#), featured an overview of the elements of trans-disciplinary practices and the position statements and materials from key professional organizations (i.e., Division for Early Childhood, American Speech-Language Association, American Occupational Therapy Association, American Physical Therapy Association) on these practices. The emphasis was on identifying similarities in messages across the disciplines with the goal of demystifying perceived barriers by individual disciplines.

This approach offers a range of possible options and services to a child that can be very easily individualized, depending on a child's level of need and the ability of the individuals working with the family to build a supportive relationship with the family in building the capacity of the parents to understand and support the child's developmental trajectory. Continued work in this area is the highest priority in the WDPDP contract to the Waisman Center for FFY 2008 and 2009. To effectively determine how services may be provided more timely and more effectively within a primary service provider approach, a systems approach which focuses on supporting policies, funding options, training and technical assistance and materials development is required. In addition, René Forsythe, the Northeastern WI RESource staff member, attended Boot Camp with Robin McWilliams during the summer of 2008 to develop and refine her skills as a practitioner and trainer for Routines-Based Interventions. Wisconsin is bringing national experts M'Lisa Shelden and Dathan Rush to Wisconsin during 2010 with the use of American Recovery and Reinvestment (ARRA) funds to initiate a comprehensive training towards evidence-based practice to incorporate coaching and teaming strategies, including primary service provider and relationship-based practices throughout the state.

#### **Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2008:**

Although the target was not met, no revisions are suggested at this time due to the progress made this year and anticipation that the ongoing Improvement Activities will help Wisconsin achieve the targets in the coming year.

## Part C State Annual Performance Report (APR) for 2008

### Overview of the Annual Performance Report Development:

#### 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)

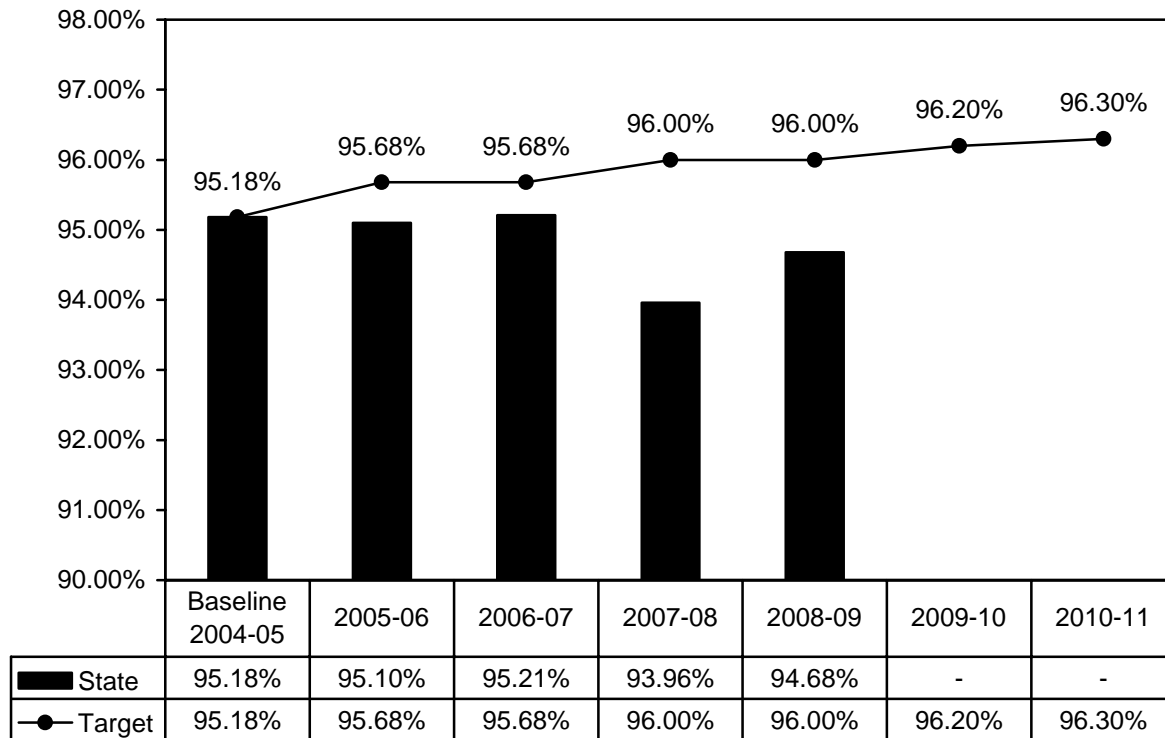
**Measurement:** Percent = [(# of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings) divided by the (total # of infants and toddlers with IFSPs)] times 100.

FFY	Measurable and Rigorous Target
2008 (2008-2009)	96%
Results	94.68%

### Actual Target Data for FFY 2008 (2008/2009):

Results of data for FFY 2008 (2008-09) indicate that 94.68percent of infants and toddlers received early intervention services in the home or programs designed for typically developing children. The following figure presents the State baseline and target data. The data presented are from the statewide data systems (HSRS and PPS).

Figure C2.1 Percent of Early Intervention Services Provided in Natural Environments.



*Data source:* Wisconsin State Performance Plan 2004; Wisconsin 618 Settings Table, FFY 2005 (2005-2006); Wisconsin 618 Settings Table, FFY 2006 (2006-2007) FFY 2007 and FFY 2008. Wisconsin State Annual Performance Report, FFY 2007 (2007-2008), Settings Table FFY 2008 (2008-2009)

Table C2.1 Percent of Wisconsin early intervention services provided in the settings defined by the 618 Settings Table, FFY 2008 (2008-2009)

Natural Environments	Number	Percentage
Home	5427	90.75%
Community-Based Settings for typically developing children	235	3.93%
Other Settings	318	5.32%
Total	5980	100%

*Data Source:* Wisconsin 618 Settings Table, FFY 2008 (2008-2009)

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2008:**

Results of the data indicate that 94.68 percent of infants and toddlers received early intervention services in the home or programs designed for typically developing children. Wisconsin did not meet its measurable and rigorous target this year of 96 percent. The target was missed by 1.32 percentage points. The data demonstrate progress from the previous year.

One finding of non-compliance was issued in FFY 2007, and corrected within FFY 2008.

Wisconsin has embraced a model of providing services to children in the natural environment. The commitment to natural environments is illustrated in Figure C2.1. Of particular note, Wisconsin's largest urban county demonstrated progress from serving 76 percent of children in natural environments in FFY 2007 to 87.67 percent in March of 2009.

**Improve Data Collection and Reporting; Analysis of County-Specific Data:** The percentage of children being served in the natural environment was calculated from the 618 data one day count on October 1, 2008. On this day, the majority of counties provided services to children in a natural environment more than 95 percent of the time.

In November of 2008, Wisconsin replaced the former Human Service Reporting System (HSRS) database with a user-friendly web-based Program Participation System (PPS) that employs technology that allows counties to monitor their own progress and slippage on Federal Indicators. The new PPS database is improving the comprehensiveness and accuracy of data collection for reporting on Indicator 2.

**Provision of Technical Assistance:** In accordance with the OSEP response table, Wisconsin continues to monitor services provided in natural environments to ensure that IFSP teams make individualized decisions regarding the settings in which infants and toddlers receive early intervention services. Milwaukee County received targeted assistance on this Indicator. Milwaukee County completes a Self Assessment and participates in an on-site visit from state staff yearly. In addition, the following targeted and focused improvement activities were conducted in Milwaukee County:

Milwaukee County has made a large investment in clarifying expectations to each of the nine provider agencies in the county. Technical Assistance provided by RESource around this indicator clarified the expectations and encouraged a paradigm shift towards providing services in natural environments. One of the largest agencies began a process of change evolving from a philosophical shift to align their practices with a primary service provider approach and routines based interventions within community settings. All nine provider agencies spent time developing a PIPP (Programs in Partnership Plan) that clarified changes in expected practice and set benchmarks for progressing towards targets. In the past, there was only one PIPP for the county rather than individualized PIPP for the nine agencies.

**Clarification of Policies and Procedures through Bulletin:** Wisconsin has a history of encouraging services in the natural environment. In 2003, DHS revised and disseminated a Bulletin on natural environments, "Putting the Guiding Principles into Practice in Natural Environments", stressing the benefits of incorporating intervention services into the child's and family's daily life. This is available on the Wisconsin Birth to 3 Training and Technical Assistance website at:  
<http://www.waisman.wisc.edu/birthto3/index.html>

**Provision of Training and Professional Development:** DHS training and technical assistance efforts move providers beyond the idea of the natural environment as a location and toward involving the parents or child care providers in continuation of the strategies for enhancing the child's development within typically occurring routines and activities of the family. Natural environments policies and best practices are also integrated into other technical assistance materials, including those provided in the bulletin, "Putting the Guiding Principles into Practice in Natural Environments". Natural environments has been a professional development priority in Wisconsin since the IDEA 1997 reauthorization. It is a key component of the "Orientation to Best Practices in Early Intervention," offered at least twice a year by WPDP. This session addresses strategies for planning interventions in natural environments, including routines-based intervention. Many state and county staff also have participated in training with Dr. Robin McWilliams from Vanderbilt University on Routines-Based Intervention. In addition, all orientation materials are on the WPDP website mentioned above for supervisors to use with new employees,

including service coordinators. These materials are also an ongoing “at your fingertips” resource for all providers, administrators and parents.

**Collaboration and Coordination:** Wisconsin’s Birth to 3 Program has had the fortunate opportunity to partner with the Wisconsin Medicaid Infrastructure Grant for Employment, Youth Project on Natural Supports. This unlikely partnership developed out of the recognition of the pivotal role of early intervention in introducing concepts of natural supports to families when they first enter the service system. The Natural Supports work has focused on CORE conversations with families: CORE: C (Community), O (Opportunity), R (Reciprocity), and E (Enjoyment). This includes guidance for discussions that help families (1) understand that formal disability-specific services are only one source of support for their family (2) describe their child as an individual and not a disability, and (3) identify who is “ready, willing and able” to support their family within their community. This project is coordinated through with Waisman Center and integrated into WPDP activities under Dr. Linda Tuchman-Ginsberg’s leadership.

As a result of this partnership, these activities have occurred:

- 1) A Wisline, *Helping Families Think About Natural Supports*, was held on January 10, 2008 to introduce concepts of natural supports and foreshadow future opportunities for Birth to 3 providers.
- 2) At least one Natural Supports session was held in each of the five RESource regions during calendar year 2008 that reached 95 providers including service coordinators, program coordinators, and some therapists.
- 3) A document, *CORE: A Guide to Conversations for a Good Life*, was developed from these regional sessions and disseminated early in 2009 and posted on the Birth to 3 Training and Technical Assistance website ([www.waisman.wisc.edu/birthto3/](http://www.waisman.wisc.edu/birthto3/)).
- 4) In 2009 mini-grants were offered to three county programs to pilot and evaluate practices identified in the CORE guide. These CORE pilots will be expanded through the use of ARRA funding in 2010.

**Improve Systems Administration and Monitoring; Self Assessment:** The county Self Assessment process described earlier includes a section on natural environments. The Self Assessment report includes a description of how each county program reviews and reports on its process to make individualized decisions regarding the settings in which infants and toddlers receive early interventions services. As described above, the Self Assessment document is reviewed and monitored by state and RESource staff. Both parties provide technical assistance to improve practices that result in delivery of services in natural environments.

**Inclusion in Determinations Decisions:** In addition, when issuing Determinations to county programs this past year, compliance with Indicator 2 was included in the decision process. This continues to demonstrate the high priority of natural environments for the ICC and other stakeholders

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2008:**

During FFY 2008, the ICC examined the targets, and considered revision to reflect OSEP’s statement in the Response Table from June 15, 2008 that “there is no expectation that an increase in percentage (above 95%) is necessary”. At this time, the targets have not been revised, but more vigilant scrutiny is being paid to individualization for children reflected by outcomes on IFSPs that may require appropriate delivery of services in multiple environments, including those that would not be considered natural environments.

## Part C State Annual Performance Report (APR) for 2008

### Overview of the Annual Performance Report Development:

#### 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:

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

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

If a + b + c + d + e does not sum to 100%, explain the difference.

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

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

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.

If a + b + c + d + e does not sum to 100%, explain the difference.

C. Use of appropriate behaviors to meet their needs:

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 the (# 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 the (# 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 the (# 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 the (# of infants and toddlers with IFSPs assessed)] times 100.

If a + b + c + d + e does not sum to 100%, explain the difference.

FFY	Measurable and Rigorous Target
<b>2008 (2008-2009)</b>	<i>(Insert Measurable and Rigorous Target.)</i>

**Indicator 3 is reported in the SPP template as Appendix B on pages 63-75.**



## Part C State Annual Performance Report (APR) for 2008

### Overview of the Annual Performance Report Development:

#### 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	
<b>2008</b> <b>(2008-2009)</b>	<b>TARGETS</b>	<b>RESULTS</b>
	Measurement A = 88%	Measurement A = 73.65%
	Measurement B = 93 %	Measurement B = 87.25%
	Measurement C = 93%	Measurement C = 90.65%

#### Actual Target Data for FFY 2008:

**Indicator 4A: 73.65 percent** of families report B-3 helped them to know their rights

**Indicator 4B: 87.25 percent** of families report B-3 helped them to effectively communicate their child's needs

**Indicator 4C: 90.65 percent** of families report B-3 helped the family help their child develop and learn

Wisconsin distributed the ECO Family survey to a sample set of 722 families active in the Birth to 3 Program in August 2008. The surveys were distributed to each family by the agency providing their child's early intervention services. The sampling methodology as approved by OSEP is described in more detail in the SPP, covering the entire four-year cycle of county reviews. Each year 21 of the 72 counties are sampled. Milwaukee, Waukesha, Dane, and Racine counties administer the four largest Birth to 3 Programs; a random sample of families from each of these counties is selected and surveyed each year. These programs are over-sampled to some extent, compared to other counties, as described in the section on sample sizes. Families are sampled without replacement; a family selected to receive a survey in a given year will not be surveyed in subsequent years.

The reason for including families from these counties each year is that these are the largest Birth to 3 Programs in Wisconsin and these counties, particularly Milwaukee, Dane, and Racine, serve higher than average percentages of non-white families. Therefore, in order to ensure that the overall sample of families surveyed each year is representative of the entire state's racial/ethnic composition, it is important to include a sufficient number of families from these programs among those families surveyed each year.

The number of surveys distributed was 722, with a final return of 151. This is a return rate of 21 percent. Of those returned, 23 percent of the surveys were completed by non-white families. This is within 6 percentage points of the 29 percent of Wisconsin families who are non-white as represented in the Wisconsin 618 Settings Table, FFY 2008 (2008-2009). Most race or ethnic categories represented in the survey were within 0-2 percentage points of the same race/ethnic category from the Wisconsin 618 Settings Table, FFY 2008 (2008-2009). Of some concern, however, was the largest difference; a -3.07 percent difference in returns from Hispanic respondents. DHS completed additional follow-up with Hispanic families from the original sample, calling them individually to support survey completion, to try to increase Wisconsin's response rate for this group of families. Wisconsin was within 1.23 percentage points of having the same distribution of male and female respondents as in the general Birth to 3 program statewide population. Over half of the respondents (55 percent) had entered Birth to 3 when the child was under one year old and over half the respondents (69 percent) completed the survey when their child was older than two. Eight percent of the respondents completed the survey after their child had already turned three years old and exited the Birth to 3 program.

To ensure validity and reliability of the data, each survey was identified by the child's PPS identifier to assure that each family only completed one survey. Each survey was also matched to the child's PPS number to permit analysis by demographic and other relevant characteristics. Agencies providing child services had no access to the completed surveys. The data were carefully entered into a web-based survey by neutral professionals from WPDP from paper surveys returned directly to the DHS by families. A DHS Birth to 3 staff reviewed the summarized data resulting from the data entered into the web-based survey.

Results of the survey responses were compiled and summarized and a percent of compliance for each question was sent to the county for their own analysis and inclusion in their annual Self Assessment report. Counties were given the number of surveys distributed and the number returned unless they distributed fewer than ten. Family comments were tallied according to four categories with no specific comments sent to staff at the county level.

The results are as follows:

**Indicator 4 A:**

**16. To what extent has the Birth to 3 Program helped your family *know and understand your rights*?**

	Frequency	Percent
1 Birth to 3 has not helped us know about our family's rights	1	1%
2	1	1%
3 Birth to 3 has done a few things to help us know about our rights	20	14%
4	17	11%

**5 Birth to 3 has provided good help so that we know our family's rights**

37 25%

**6**

17 11%

**7 Birth to 3 has done an excellent job of helping us know about our family's rights**

55 37%

148 100%

Percent Agree  
(5, 6, 7)

**74%**

The responses of 5, 6 and 7 were the categories utilized to establish a score for families participating in Part C who report that early intervention services have helped the family to know and understand their rights. The return for the surveys is 148. The number of surveys distributed was 722. This is a return rate of 21 percent. This results in 74 percent of families who stated that the Birth to 3 Program staff helped their family to know and understand their rights. This demonstrates slippage from the baseline of 82.4 percent and last year's results of 80 percent. Wisconsin's target for FFY 2008 of 88 percent was not met.

**Indicator 4B:**

**17. To what extent has the Birth to 3 Program helped your family *effectively communicate your child's needs*?**

	Frequency	Percent	
1 Birth to 3 has not helped us effectively communicate our child's needs	1	1%	
2	1	1%	
3 Birth to 3 has done a few things to help us effectively communicate our child's needs	11	7%	
4	6	4%	
<b>5 Birth to 3 has done a good job of helping us effectively communicate our child's needs</b>	36	24%	
<b>6</b>	29	19%	
<b>7 Birth to 3 has done an excellent job of helping us effectively communicate our child's needs</b>	65	44%	Percent Agree (5, 6, 7) <b>87%</b>
	149	100%	

The responses of 5, 6 and 7 were combined to establish a score for families participating in Part C who report that early intervention services have helped the family to effectively communicate their children's needs. The return for the surveys is 149. The number of surveys distributed was 722. This is a return rate of 21 percent. This results in 87 percent of families who stated that Birth to 3 Program staff helped their family to communicate about their child's needs. This demonstrates slippage from the baseline of 89.1 percent and last year's data of 89 percent. Wisconsin's target for FFY 2008 of 93 percent was not met.

**Indicator 4C:**

**18. To what extent has the Birth to 3 Program helped your family be able to *help your child develop and learn*?**

	Frequency	Percent
1 Birth to 3 has not helped us help our child develop and learn	0	0%
2	1	0%
3 Birth to 3 has done a few things so that we can help our child develop and learn	8	6%
4	4	3%
<b>5 Birth to 3 has done a good job of</b>	29	21%

helping us help our child develop and learn

6

24

17%

7 Birth to 3 has done an excellent job of helping us help our child develop and learn

73

53%

139

100%

Percent Agree  
(5, 6, 7)

**91%**

The responses of 5, 6 and 7 were combined to establish a score for families participating in Part C who report that early intervention services have helped the family to help their children develop and learn. The return for the surveys is 139. The number of surveys distributed was 722. This is a return rate of 21 percent. This results in 91 percent of families who stated that Birth to 3 Program staff helped their family to help their child develop and learn. This demonstrates progress from the baseline of 90.4 percent and last year's data of 85 percent. Wisconsin's target for FFY 2008 of 93 percent was not met.

#### Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2008:

Wisconsin is pleased with the increase of 5.86 percent to ninety-one (91) percent for Indicator 4C but is very concerned that there is slippage on Indicator 4A and 4B. 4A indicated a slippage of -6.71 percent, and 4B indicated a slippage of -2.22 percent. Increased attention was paid in FFY 2008 to advising providers on additional ways to ensure families are educated about their rights, and on distribution of dispute resolution materials to parents from the DHS. The increased focus appeared to be successful with a notable increase in phone calls to the DHS for clarification on Birth to 3 requirements resulting in several requests for mediation. There is a possibility that the low rate of return from the sample of families, versus disseminating the survey to the entire population of Birth to 3 families, may suggest lower satisfaction from families than is actually occurring. A number of counties choose to distribute their ECO Family Survey to all enrolled families, rather than just the sample that is analyzed by DHS. Please note the improvement on percentages for those counties for all of Indicator 4, but particularly Indicator 4A and 4B when all of the returned surveys are analyzed:

**Table C 4 Summary of returned surveys from counties that distributed to census rather than sample**

Total number of surveys returned in 26 counties	4A Measurement	4B Measurement	4C Measurement
303	78.08%	89.23%	92.14%

In FFY 2007, one finding of non-compliance was issued, which had been corrected in the same FFY. In FFY 2008, there were no findings of non-compliance for Indicator 4.

Wisconsin increased the rate of return in this year's surveys by 5% over last year, however, the state is still disappointed with the low rate of return. Wisconsin speculates that part of this is due to an emphasis placed on monitoring with the focus on the compliance indicators. State resources were utilized to attempt to elicit more responses, particularly from the Hispanic families participating in the Birth to 3 Program.

With only 21 percent of the surveys completed and returned, Wisconsin also showed some slippage in the percentage of families with positive responses to the first two family outcomes. Wisconsin anticipates better results in the current FFY 2009, utilizing the following ongoing strategies:

#### **Improve Data Collection/Reporting or Systems:**

Wisconsin's return rate for the family surveys was 21 percent (151) compared to 34 percent when the baseline data were gathered, 20 percent in FFY 2006 and 16 percent in FFY 2007. The return rate of 151 of

the 722 surveys distributed can be attributed to various factors. Many counties reported that many of the families chosen to participate in August had moved or already exited Birth to 3 when the surveys were distributed. Counties also report the ECO Family Survey is not family-friendly and is too long for families to take the time to complete. A Wisline was held in January 2009 with counties to discuss the low return and lack of representativeness of the returned surveys. Follow-up activities to continue with families were discussed along with a plan to target key families in the sample to increase the Hispanic response rate. Follow up to Hispanic families from the original sample did occur in April and May 2009 to request and support additional survey returns.

Starting in FFY 2008, a shift was made to distribute the family surveys in August of a given year to allow families time to complete the survey before the holidays and allow data to be used during county Self Assessments in the coming year. By doing this, the ECO Family survey is distributed during the FFY covered in the APR report.

Since FFY 2007, Wisconsin Family Assistance Center for Education, Training, and Support, (FACETS) had been contracted to assist families with oral translation and support in completing the survey. Great Lakes Inter-tribal Council (GLITC) followed up with tribal families to assist in an increased rate of return, in addition to helping families complete the survey. Both of these entities had contracts to assist with the 2008-2009 distribution of the ECO Family Survey. An individual was hired to contact the Hispanic families in April and May 2009 to gather additional responses.

#### **Improve Systems Administration and Monitoring:**

The majority of families continue to report that the Birth to 3 Program assists them in understanding their rights (74 percent), communicating their child's special needs (87 percent) and helping their child develop and learn (91 percent).

Families unable to be contacted by the Birth to 3 Program influenced Wisconsin's return and continues to be a factor, particularly in Wisconsin's largest county, Milwaukee, where mobility occurs frequently for families.

Wisconsin promotes family-centered services with a focus on parent participation and involvement in the child's learning of skills, which promotes the family outcomes. Wisconsin's technical support project, RESource, worked with individual counties to plan continued progress toward family-centered practice. Each county's plan for this progress is documented on their PIPP. Professional development experiences were provided this past FFY to support knowledge of family-centered practices; three trainings had occurred in 2008, with one additional one in 2009.

#### **Provide Training/Professional Development:**

DHS provided two Wislines open to all county program Birth to 3 staff, focusing on Family Outcomes. The first Wisline in August 2008 focused on methods of collecting family input and was attended by 27 counties. The second in September 2008, discussed how the ECO Family Survey process in Wisconsin worked to gather the data which will assist counties in assessing their ability to meet the Family Outcomes, was attended by 24 different counties. A Wisline in January of 2009 focused on successful ways to encourage a better return rate from families for both the current data and the upcoming distribution of surveys in August 2009. Another Wisline will be scheduled in 2010 to emphasize the importance of ongoing conversations with families around their rights, and multiple opportunities for sharing dispute resolutions materials.

#### **Provision of Technical Assistance:**

DHS, as part of the annual Self Assessment process, has each program assess their performance on meeting the Family Outcomes. If Family Outcomes are identified for a county as an area of improvement, due to low percent of family report in meeting the indicator or an unclear process for assessing program performance, strategies are added to the county's PIPP to help them focus on improving practice so families reach the goals identified through the Family Outcome indicators. Through the Self Assessment process, several counties in the past year have added strategies to their PIPP around improving Family Outcomes.

#### **Clarify/Examine Policies and Procedures:**

DHS continues to look at materials developed to inform and educate families on their rights, the program, and available resources. Birth to 3 materials are used and reviewed by several entities including WPDP

partners, DHS forms development department staff, state Birth to 3 staff and county programs. When a need for a change is identified, the Department works to implement the change as soon as possible. The Mediation and Options for Resolving Conflict brochures for families was updated in the spring of 2008. Incorporating input from stakeholders is a key step in Wisconsin processes. All Birth to 3 materials will be reviewed and updated in the coming year or two, with the added assistance of American Recovery and Reinvestment Act (ARRA) funding.

**Collaboration/Coordination:**

The Governor-appointed ICC will continue to utilize Parent Forums to gather input from families. One of the focus areas for gathering information for the ICC during these Parent Forums is how Birth to 3 programs are supporting families in meeting the Family Outcomes.

**Evaluation:**

DHS annually evaluates the processes and practices of meeting the Family Outcomes in two ways. The Self Assessment process used by Wisconsin is an annual way for counties to determine, based upon set criteria, how they are doing at meeting the requirements for Birth to 3 programs. A section of the Self Assessment focuses on Family Outcomes. Each county completes the Self Assessment every calendar year. The SA report is reviewed by the TA staff, RESource, and the State lead to determine areas on which to focus. Family Outcomes is one of the areas reviewed. If this is an identified area in a county, due to low percent of family report in meeting the indicator or an unclear process for assessing program performance, strategies are added to the county's PIPP to help them focus on improving practice so families reach the goals identified in the Family Outcome indicators. At the State level, the process of gathering Family Outcome data is assessed each time the ECO Family Survey is distributed. Factors influencing the return and response rate are analyzed to determine how to improve. Due to low returns in the fall of 2008, a special Wisline was held in January 2009 with counties to discuss best ways to distribute and follow-up on Family Survey returns and how to increase the current distribution response.

In 2009 DHS explored, with input from parents at one of the ICC focus groups, the need and usefulness of a webcast about rights for families in the Birth to 3 program to be developed as a resource for county programs to use with families. DHS intends to develop a webcast and supporting materials in 2010.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2008**

No revisions are suggested for FFY 2009, but the ICC will examine the possibility of distributing surveys to all families within Birth to 3 rather than surveying a sample of families from a sample of counties, in the preparation of a new SPP for FFY 2010. With the low return from the sample of families, there is concern that the results are not truly representative of the larger population of families.

## Part C State Annual Performance Report (APR) for 2008

### Overview of the Annual Performance Report Development:

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

**Indicator 5:** Percent of infants and toddlers birth to 1 with IFSPs compared to national data.

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

**Measurement:**

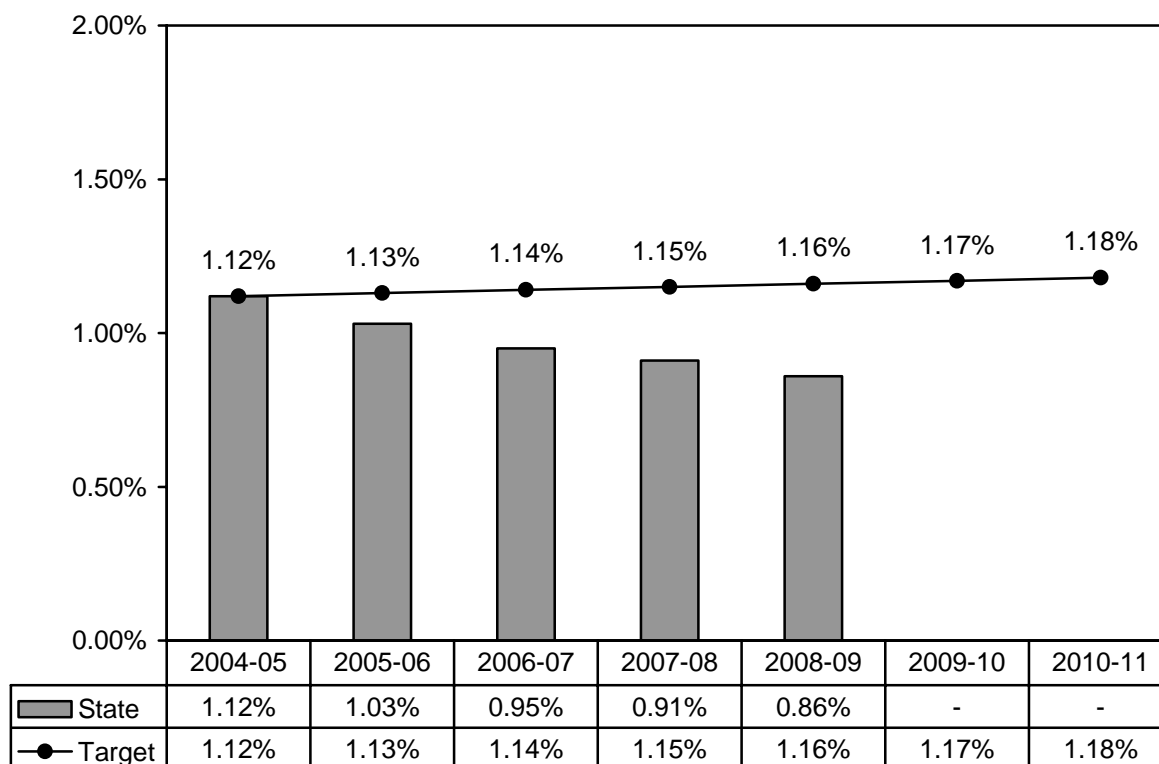
Percent = [(# of infants and toddlers birth to 1 with IFSPs) divided by the (population of infants and toddlers birth to 1)] times 100 compared to national data.

FFY	Measurable and Rigorous Target
2008 (2008-2009)	1.16% infants and toddlers birth to one with IFSPs
Results	0.86%

**Actual Target Data for 2008:**

Results of data for FFY 2008 indicate that 0.86 percent of Wisconsin infants and toddlers birth to one had IFSPs. According to Wisconsin's one-day count on October 1, 2008, 639 children ages zero to one were enrolled. The following figure presents State baseline and target data. (This figure does not include a comparison to other states with similar eligibility.)

Figure C5.1 Baseline, target, and performance of percentage of infants and toddlers birth to 1 with IFSPs in Wisconsin



*Data Source:* Wisconsin SPP 2005-2011; Wisconsin Human Services Reporting System (HSRS); U.S. Department of Education, Office of Special Education Programs, Data Analysis System (DANS), "Report of infants and toddlers receiving early intervention services in accordance with Part C," 2008. Data updated as of July 15, 2009.

**Comparison of Wisconsin to National data.** The National percent of the population of birth to one infants and toddlers who received Part C services was 1.04 percent. The Wisconsin percent of the population of birth to one year old infants and toddlers who received Part C services was 0.86 percent. This is a difference of -0.18 percent.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2008 (2008-09):**

Results of data for FFY 2008 (2008-09) indicate that Wisconsin served 0.86 percent infants and toddlers birth to one year olds with IFSPs. Wisconsin performed below the national average of 1.04 percent and below the state's measurable and rigorous target of 1.16 percent. Wisconsin is concerned that the efforts the Birth to 3 system have taken to increase the early identification of children under the age of one has not yet resulted in an increase in numbers of children served under age one. However, many of the new initiatives for increasing focus on referrals for children under age one are beginning to show success. Though on October 1, 2008 only 639 children under the age of one were receiving services, on October 1, 2009 the count of children under age one had increased by 77 children to 716. It is expected that the percentage of children served under the age of one will be higher in the FFY 2009 APR. As a part of analysis of trends discovered in reporting the data, of particular interest was the recognition that the percentage of children served in 2004 when targets were set demonstrated an unusual spike from 0.90 percent in 2003 to 1.12 percent in 2004. The ICC is discussing if justification for reducing the targets should be considered in FFY 2009, due to the unusual data in FFY 2004. Of the 72 counties in Wisconsin, 22 counties served more than the national average of 1.04 percent of infants and toddlers birth to one with IFSPs.



**Provision of Technical Assistance:**

An emphasis was placed on child find in FFY 2008.

1. Counties reporting less than one (1) percent of the children birth to age 1 population served received technical assistance. Counties that served less than one (1) percent of the age group were asked to report, in their annual Self Assessment, child find efforts and local factors that may influence their child count percentages. Counties that served less than half (0.5) percent of the age group were asked to report, in their annual Self Assessment, child find efforts and local factors that may influence child count percentages and create an action plan in their PIPP to improve child find.
2. Some improvement strategies identified by counties were to build or improve partnerships with local hospitals and physicians. These actions allowed the DHS and RESource staff to provide targeted regional technical assistance including facilitating communication with neighboring counties concerning shared local resources for identifying children.
3. The state-hosted Spring 2008 Regional Meetings featured a two-hour session on child find. Counties with child find activities and outreach activities that led to increased referrals and awareness in their communities were asked to share their experiences. In addition, information was provided on collaborative statewide efforts related to physician outreach training related to developmental screening and referral to early intervention and the new collaborative website, Early Identification of Developmental Concerns was previewed. This website, which has an entry point for early childhood professionals, health care professionals, and families, is now of part of the Wisconsin Early Childhood Collaborating Partners and can be viewed at this site:  
<http://www.collaboratingpartners.com/EarlyID/index.htm>

**Examination of Policies and Procedures:**

The ICC convened a workgroup to explore Wisconsin's target of 1.16 percent child find and make suggestions for improved technical assistance from the state. This group has been meeting throughout FFY 2007 and FFY 2008 and is chaired by the physician who directs the Children and Youth with Special Health Care Needs (CYSHCN) Program. One priority of this group has been to develop a Universal Referral Form, adapted from the guidance of the OSEP funded TRACE Center, that can be used by physicians to make referrals to Birth to 3 and schools. This form was expanded to include school referrals as part of Wisconsin's commitment to creating a more coordinated Birth to six system.

**Program Development:**

Wisconsin has several state initiatives to improve the number of infants and toddlers being served. Some key initiatives that specifically address early referral include:

**Wisconsin CYSHCN Program: The following lists some initiatives of the WI Children and Youth with Special Health Care Needs (CYSHCN) Program to promote developmental screening and referral to Birth-3 and other community resources by primary care providers**

- **Practice Based Developmental Screening-**(July 2008-August 2009)-This CYSHCN initiative was a partnership with the Regional Centers for CYSHCN, Birth to 3 Programs, primary care professionals, and the Waisman Center to increase the use of developmental screening during well child visits. In February, 2009, primary care providers (PCP) from 15 practices, representing the five RESource/CYSHCN Regions participated in a Trainer of Trainers event on developmental screening and referral. Subsequently these providers conducted one or more regional trainings in collaboration with Regional Center staff as well as local Birth to 3 providers for other primary care providers within their region.

**Connections Initiative:** (September 2008-August 2011) Wisconsin is one of six states initially selected for a three year federal Maternal Child Health Bureau grant, as part of the Combating Autism Act Initiative, whose purpose is to strengthen the state's infrastructure to improve services for children with ASD and other developmental disabilities. In year one of the grant regional trainings on general developmental screening and ASD were conducted in each of the WI Department of Health Services regions. In year two a series of webcasts for primary care providers will be made available. The webcasts will cover a range of Medical

Home topics including developmental screening using the ASQ, screening for autism spectrum disorders (ASD) using the M-CHAT, early identification in the primary care setting and referral to services including Birth-3. Open Forum Technical Assistance Calls will be available in conjunction with the Webcast series giving primary care providers an opportunity to get technical assistance with questions related to the Webcast topics

#### **Collaboration and Coordination:**

**Great Lakes Inter-tribal Council:** The Wisconsin Birth to 3 Program is partnering with the Great Lakes Inter-tribal Council (GLITC) to increase outreach to families who are Native American and build or strengthen relationships between county Birth to 3 Programs and local Tribal partners. A member of the GLITC attends each onsite county review where there is a Tribal Nation. A portion of the onsite review is designated to discuss partnerships between the county and the tribe. A member of the GLITC is also a member of the State Birth to 6 Leadership Team. During the creation of the new computer data collection system, the state collaborated with the GLITC to identify data collection elements and reports that will be available, or possible enhancements to the system in the future.

**BadgerCare Plus** is Wisconsin's Medicaid reform initiative developed to create a comprehensive health care safety net that will serve all children. This initiative was implemented in February 2008. A key component of BadgerCare Plus is implementation of a Benchmark Plan for the expansion population – primarily children in families with incomes over 200 percent of the federal poverty level (FPL) and pregnant women up to 300 percent of FPL. One of the benefits in the Benchmark Plan is early childhood developmental services – defined as developmental surveillance, screening, and assessment services; developmentally-based health promotion and education; developmentally-based interventions; and care coordination. The policy supporting these benefits will greatly enhance the ability to identify children early who may need early intervention services and connect families to the Birth to 3 Program.

**Project 3D:** Research Topic of Interest Grant: Wisconsin's Waisman Center was one of three states to receive a two-year grant from the Centers for Disease Control and the Association for University Centers on Disabilities (AUCD) in September 2008 to provide training and technical assistance to up to 15 family physicians on the use of validated developmental screening tools and early referrals to Birth to 3. This was implemented in partnership with the CYSYCN Program, Birth to 3 Program, and the Wisconsin Association of Family Physicians

#### **Wisconsin Sound Beginnings (WSB) and Wisconsin Educational Services Program for the Deaf and Hard of Hearing**

The Wisconsin Birth to 3 Program and Waisman Center are partners with Wisconsin Sound Beginnings (WSB) and the Wisconsin Educational Services Program for the Deaf and Hard of Hearing (WESPDHH) for child find activities used to identify children under the age of one who are deaf and hard of hearing. Wisconsin will continue efforts to identify children prior to their first birthday through linkages with Wisconsin Early Hearing Detection and Intervention Tracking and Referral Coordination system (WE-TRAC) database and the children with Special Health Care Needs Medical Home initiatives

- **Early Hearing Detection and Intervention (EHDI) Quality Improvement Learning Collaborative** – in a child find effort, the state Birth to 3 is a partner in the efforts of WSB to bring local community providers and parents together to identify barriers to identifying children with a hearing loss by one month of age, confirmation of a hearing loss by three months of age and referral a child to a county Birth to 3 Program by six months of age. Regional learning collaboratives were held in 2007-2008 and continued into 2009 to improve identification and referral of infants and toddlers with a hearing loss. In addition, in fall of 2009 the WE-TRAC system integrated an online referral process for audiologists utilizing the Birth to 3 new data system, PPS. Careful attention is being paid in 2010 to track this referral process for children who are deaf and hard of hearing to ensure prompt delivery of services.

- **Family Surveys** – In an effort to improve quality of service, Birth to 3 is a partner with WSB to survey families with children who are deaf and hard of hearing regarding their experience within the Birth to 3 system. Information gathered will be used to improve outreach and transition to and from the program.
- **AEIOU Project (Assessment of Early Intervention Outcomes)** – Sound Beginnings is partnering with the University of Wisconsin-Madison, Waisman Center and the University of Colorado at Boulder to evaluate outcomes for children who are deaf and hard of hearing at 18 months and at 30 months. The information gathered will be used to identify effective treatment strategies in the Birth to 3 system and spread the knowledge throughout the state.

**CAPTA Referrals** - The Birth to 3 Program at the state and local level continues efforts in public awareness, community linkages and outreach to the medical community, primarily physicians. Local Birth to 3 Programs continue to work with Child Protective Services (CPS) in regards to CAPTA referrals. This ongoing work will allow more conversations about child development, with a focus on early referrals for children with suspected developmental delays.

**Improve Data Collection and Reporting:** In November of 2008, Wisconsin replaced the former Human Service Reporting System (HSRS) database with a user-friendly web-based Program Participation System (PPS) that employs technology that allows counties to monitor their own progress and slippage on Federal Indicators. The new PPS database has improved the comprehensiveness and accuracy of data collection for reporting on Indicators 5 and 6. A Child Enrollment Report will allow counties to access a list of the children in the Birth to 3 Program at any time, including the birth dates and ages of the children. A county interested in observing the progress or slippage of child find efforts would be able to closely monitor the numbers of children under the age of one, or all children in the program. In addition, in 2008 Child Count/Child Find analysis memos were sent to counties with requests to review and reflect on the data, local trends and unique demographics that might influence a county's improvement strategies.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2008:**

The ICC Early Identification and Child Find Work Group referenced above will be examining targets for possible revisions, and evaluating the current improvement strategies as well as identifying additional improvement strategies. This will include an evaluation of expected changes demonstrated from the training initiatives with pediatricians, family physicians and other medical professionals around early developmental screening and identification. Furthermore, the PPS will allow Wisconsin to track the number of referrals to Birth to 3 Programs relative to the number of children who are found eligible and have IFSPs. This will provide data on the impact of the outreach training with health care professionals as well as the outcome of referrals.

## Part C State Annual Performance Report (APR) for 2008

### Overview of the Annual Performance Report Development:

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

**Indicator 6:** Percent of infants and toddlers birth to 3 with IFSPs compared to national data.

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

#### Measurement:

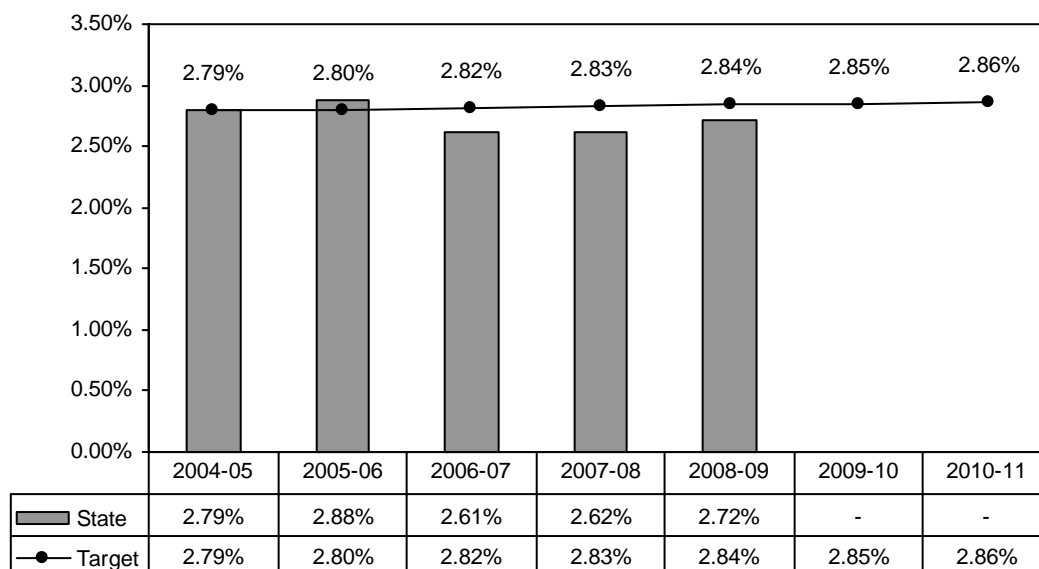
Percent = [(# of infants and toddlers birth to 3 with IFSPs) divided by the (population of infants and toddlers birth to 3)] times 100 compared to national data.

FFY	Measurable and Rigorous Target
2008 (2008-2009)	2.84% of infants and toddlers birth to three with IFSPs
Results	2.72%

#### Actual Target Data for 2008:

Results of data for FFY 2008 (2008-2009) indicate that Wisconsin served 2.72 percent infants and toddlers birth to age three with IFSPs. According to Wisconsin's one-day count on October 1, 2008, 5,980 children were enrolled. The following figure presents the state's baseline and target data. Figure C6.1 identifies the Wisconsin baseline, target and performance of the percentage of infants and toddlers birth to age three with IFSPs from FFY 2004 (2004-05) to the present.

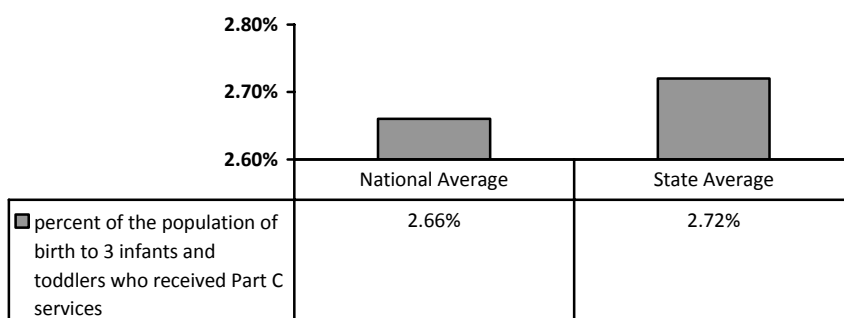
Figure C6.1 Baseline, target, and performance of percentage of children from Birth to Three Years Participating in Wisconsin Birth to 3



*Data Source:* Wisconsin SPP 2005-2011; Wisconsin Human Services Reporting System (HSRS); U.S. Department of Education, Office of Special Education Programs, U.S. Department of Education, Office of Special Education Programs, Data Analysis System (DANS), "Report of infants and toddlers receiving early intervention services in accordance with Part C," 2008. Data updated as of July 15, 2009.

**Comparison of Wisconsin to National data.** The Wisconsin percent of the population of infants and toddlers birth to age three with IFSPs was 2.72 percent. The National percent of the population of infants and toddlers birth to age three with IFSPs was 2.66 percent. Wisconsin is above the national average. Figure C6.3 compares Wisconsin's results with the National Average for the percent of the population of infants and toddlers birth to age three with IFSPs.

Figure C6.3 Comparison - Wisconsin Results with the National Average for the Percent of the Population of Birth to Three Infants and Toddlers who Received Part C Services.



#### Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2008:

Although Wisconsin did not meet its target of 2.84 percent, the 2.72 percent result for FFY 2008 is above the national mean. For the FFY 2008 data, the nation as a whole served an average of 2.66 percent of the infants and toddlers birth to age three. Wisconsin exceeds the national average.

In FFY 2007, one finding of non-compliance was issued, which was corrected. In FFY 2008 no findings of non-compliance were issued, and in FFY 2009 one finding has been issued.

Of the 72 counties in Wisconsin, in FFY 2008, twenty-eight (28) counties served at or above Wisconsin's target of 2.84 percent. Thirty-five (35) counties, including Wisconsin's largest urban county, served the

statewide average of 2.72 percent or above (Milwaukee County served 2.72 percent). Thirty-six (36) counties served above the national average of 2.66.

**Provision of Technical Assistance:**

An emphasis was placed on technical assistance for child find in FFY 2008.

1. Counties reporting less than 2.5 percent of the population served received technical assistance. Counties that served less than 2.5 percent of the age group were asked to report in their annual Self Assessment child find efforts and local factors that may influence their child count percentages.
2. Counties that served less than 2.0 percent of the age group were asked to report in their annual Self Assessment child find efforts and local factors that may influence child count percentages and create an action plan in their PIPP to improve child find.
3. Some improvement strategies identified by counties were to improve child find efforts for families where English is not the primary language spoken in the home; build or improve partnerships with Native American Tribal health departments and clinics; and build or improve relationships with local hospitals and physicians. These actions allowed the DHS and RESource staff to provide targeted regional technical assistance including facilitating communication with neighboring counties concerning shared local resources for identifying children.
4. State-hosted Spring 2008 Regional Meetings featured a two-hour session on child find. Counties with child find activities and outreach activities that led to increased referrals and awareness in their communities were asked to share their experiences. In addition, information was provided on collaborative statewide efforts related to physician outreach training related to developmental screening and referral to early intervention and the new collaborative website, Early Identification of Developmental Concerns was previewed. This website which has an entry point for early childhood professionals, health care professionals, and families is now of part of the Wisconsin Early Childhood Collaborating Partners and can be viewed at this site:  
<http://www.collaboratingpartners.com/EarlyID/index.htm>

**Examination of Policies and Procedures:**

The ICC convened a workgroup to explore Wisconsin's target of 2.84 percent child find and make suggestions for improved technical assistance from the state level. One priority of this group has been to develop a Universal Referral Form, adapted from the guidance from the OSEP funded TRACE Center, that can be used by physicians to make referrals to Birth to 3 and schools. This form was expanded to include school referrals as part of Wisconsin's commitment to creating a more coordinated Birth to six system.

**Collaboration and Coordination:**

In addition to these steps, the Birth to 3 Program is involved in a wide variety of collaborative activities to improve the early identification of children who may benefit from early intervention services. The following activities demonstrate the abundant partnerships which the Wisconsin Birth to 3 Program has established and the numerous activities to which Birth to 3 staff have provided leadership.

**Great Lakes Intertribal Council---** Wisconsin is working in collaboration with the Great Lakes Intertribal Council (GLITC) to build relationships between the counties and the local tribes. A representative from GLITC is participating in on-site county reviews

**Wisconsin Early Childhood Collaborating Partners (WECCP) Healthy Children Work Group—** The WECCP Healthy Children Workgroup recently convened to develop a statewide system of screening for children prior to school entry. The Workgroup is developing a periodicity schedule of screenings and tools to assist communities in creating a system of screening.

**National Medical Home Autism Initiative (NMHAI)—**The University of Wisconsin's Waisman Center supports implementation of office-based developmental surveillance and screening by primary care practices. NMHAI has collaborated with eight practices to promote developmental screening in Wisconsin.

**Wisconsin CYSHCN Program Medical Home Initiative**—The WI CYSHCN (Children and Youth with Special Health Care Needs) program has a number of existing initiatives that will complement and support the proposed developmental screening efforts as described earlier under Indicator 5.

The Birth to 3 Program at the state level and local level continues efforts in public awareness, community linkages and outreach to the medical community, primarily physicians. Counties will continue to assess their child find efforts during annual Self Assessment.

**BadgerCare Plus** is Wisconsin's Medicaid reform initiative developed to create a comprehensive health care safety net that will serve all children. This initiative was implemented in February 2008. A key component of BadgerCare Plus is implementation of a Benchmark Plan for the expansion population – primarily children in families with incomes over 200 percent of the federal poverty level (FPL) and pregnant women up to 300 percent of FPL. One of the benefits in the Benchmark Plan is early childhood developmental services – defined as developmental surveillance, screening, and assessment services; developmentally-based health promotion and education; developmentally-based interventions; and care coordination. The policy supporting these benefits will greatly enhance the ability to identify children early who may need early intervention services and connect families to the Birth to 3 Program.

**Project 3D:** Research Topic of Interest Grant: Wisconsin's Waisman Center was one of three states to receive a 2 year grant from the Centers for Disease Control and the Association for University Centers on Disabilities (AUCD) in September 2008 to provide training and technical assistance to up to 15 family physicians on the use of validated developmental screening tools and early referrals to Birth to 3. This was implemented in partnership with the CYSYCN Program, Birth to 3 Program, and the Wisconsin Association of Family Physicians

#### **Wisconsin Sound Beginnings and Wisconsin Educational Services Program for the Deaf and Hard of Hearing**

The Wisconsin Birth to 3 Program and Waisman Center are partners with Wisconsin Sound Beginnings (WSB) and the Wisconsin Educational Services Program for the Deaf and Hard of Hearing (WESPDHH) for child find activities used to identify children under the age of one who are deaf and hard of hearing. Wisconsin will continue efforts to identify children prior to their first birthday through linkages with Wisconsin Early Hearing Detection and Intervention Tracking and Referral Coordination system (WE-TRAC) database and the children with Special Health Care Needs Medical Home initiatives

- **Early Hearing Detection and Intervention (EHDI) Quality Improvement Learning Collaborative** – in a child find effort, the State Birth to 3 is a partner in the efforts of Sound Beginnings to bring local community providers and parents together to identify barriers to identifying children with a hearing loss by one month of age, confirmation of a hearing loss by 3 months of age and referral a child to a county Birth to 3 Program by 6 months of age. Regional learning collaboratives were held in 2007-2008 and have continued into 2009 to improve identification and referral of infants and toddlers with a hearing loss.
- **Family Surveys** – In an effort to improve quality of service, Birth to 3 is a partner with Sound Beginnings to survey families with children who are deaf and hard of hearing regarding their experience within the Birth to 3 system. Information gathered will be used to improve outreach and transition to and from the program.
- **AEIOU Project (Assessment of Early Intervention Outcomes)** – Sound Beginnings is partnering with the University of Wisconsin-Madison, Waisman Center and the University of Colorado at Boulder to evaluate outcomes for children who are deaf and hard of hearing at 18 months and at 30 months. The information gathered will be used to identify effective treatment strategies in the Birth to 3 system and spread the knowledge throughout the state.

**CAPTA Referrals:** The Birth to 3 Program at the state and local level continues efforts in public awareness, community linkages and outreach to the medical community, primarily physicians. Local Birth to 3 Programs continue to work with Child Protective Services (CPS) in regards to CAPTA referrals. This ongoing work will allow more conversations about child development, with a focus on early referrals for children with suspected developmental delays.

**Improve Data Collection and Reporting:** In November of 2008, Wisconsin replaced the former Human Service Reporting System (HSRS) database with a user-friendly web-based Program Participation System (PPS) that employs technology that allows counties to monitor their own progress and slippage on Federal Indicators. The new PPS database will improve the comprehensiveness and accuracy of data collection for reporting on Indicator 5 and 6. A Child Enrollment Report will allow counties to access a list of the children in the Birth to 3 Program at any time, including the birth dates and ages of the children. A county interested in observing the progress or slippage of child find efforts would be able to closely monitor the numbers of children under the age of one, or all children in the program. In addition, in 2008 Child Count/Child Find analysis memos were sent to counties with requests to review and reflect on the data, local trends and unique demographics that might influence a county's improvement strategies.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2008:** Although the target was not met, no revisions are suggested at this time due to the progress made this year and anticipation that the ongoing Improvement Activities will help Wisconsin achieve the targets in the coming year.



## Part C State Annual Performance Report (APR) for 2008

### Overview of the Annual Performance Report Development:

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

**Indicator 7:** Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.

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

#### Measurement:

Percent = [(# of infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline) divided by the (# of infants and toddlers with IFSPs evaluated and assessed for whom an initial IFSP meeting was required to be conducted)] times 100.

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

FFY	Measurable and Rigorous Target
FFY 2008 (2008-2009)	100%
Results	96.10%

#### Actual Target Data for 2008:

**Table C 7.1 Children with an IFSP within the 45-Day Timeline**

Total number of children with initial evaluation, assessment and IFSP	Total number of children that received initial evaluation, assessment and IFSP within 45-day timeline	Resulting Percentage FFY2007
5891	5661(includes 625 with delay due to exceptional family circumstances)	96.10%

Data Source: Program Participation System (PPS) July 1, 2008-June 30, 2009

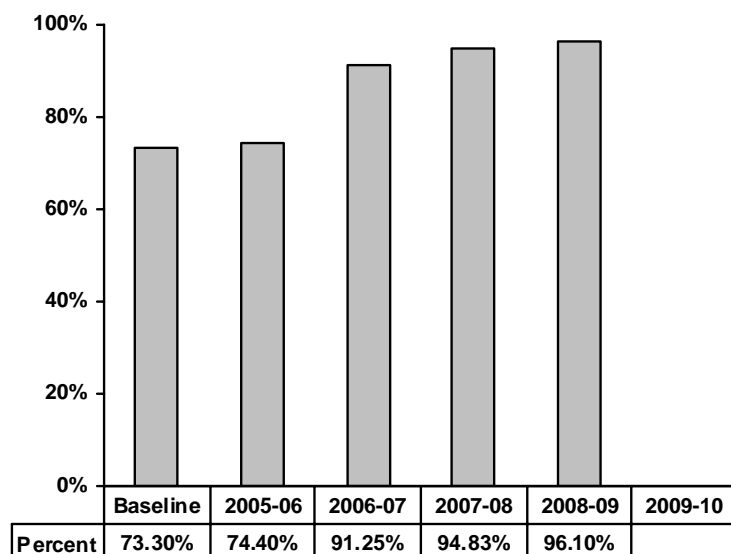


Figure C 7.1 exhibits data demonstrating percentage of children receiving the initial IFSP and evaluation within the 45 day timeline. Data Source: Wisconsin SPP 2005-2011; Wisconsin Program Participation System (PPS) July 1, 2008-June 30, 2009

#### Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2008:

Progress was seen this year with 96.10 percent of children receiving an evaluation and initial IFSP within the 45 day timeline, with a total of 5661 of 5891 children for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline, or experienced exceptional family circumstances justifying the delay. This represents progress of 1.27 percent from the 94.83 percent reported in the FFY 2007 APR. Of those 5661 children, 625 children did experience a delay due to exceptional family circumstances. These children are included in both the numerator and denominator. One (1) finding of non-compliance was issued in FFY 2008, and has already been corrected.

All of the counties received technical assistance on accurately reporting and developing intake and evaluation service systems that assured timelines would be met to support improved performance with this indicator. Accurate reporting of referral date was a common challenge that was easily corrected. Counties also experienced other challenges such as staffing shortages that are not as easily corrected and which tend to account for the inability of programs to report compliance. One area of technical assistance has been establishing more stable staffing patterns and developing strategies to meet timelines when there are changes in staff availability.

#### Correction of FFY 2007 Findings of Noncompliance (if State reported less than 100% compliance):

Level of compliance (actual target data) State reported for FFY 2007 for this indicator: 94.83%

1. Number of findings of noncompliance the State made during FFY 2007 (the period from July 1, 2007, through June 30, 2008)	9
2. Number of FFY 2007 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	8
3. Number of FFY 2007 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	1

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**Correction of FFY 2007 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance):**

4. Number of FFY 2007 findings not timely corrected (same as the number from (3) above)	1
5. Number of FFY 2007 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	1
6. Number of FFY 2007 findings <u>not</u> verified as corrected [(4) minus (5)]	0

**Verification of Correction (either timely or subsequent):**

In FFY 2007, nine (9) findings of non-compliance were identified, eight (8) of which were corrected within the 12 month timeline. The remaining finding of non-compliance resulted in a CAP and enforced monthly analysis of data and desk audits for the county in question, and was corrected within the next five months, including correction of the child-specific non-compliance. Correction is verified through an analysis of a minimum of two months of data as reported in PPS with the expectation that the program must demonstrate 100 percent compliance as evidence of correct implementation of the regulatory requirement, as well as an analysis of the child specific non-compliance to ensure that the assessment and initial IFSP were provided, albeit late. Desk audits are also used to verify the child-specific correction.

**State Technical Assistance Accessed:** As outlined in the letter from OSEP dated June 15, 2008, Wisconsin was required to access technical assistance and report on the actions taken as a result of that assistance. Wisconsin accessed technical assistance resources in order to better analyze the barriers impeding counties from achieving the 100 percent compliance expected for this Indicator. The "Investigative Questions for Part C Indicator 7" available at the RRC site <http://spp-apr-calendar.rfcnetwork.org/explorer/view/id/345> were a helpful analytic tool to assist counties in addressing system challenges to arrive at solutions. Meeting the 45 day timeline was one of the key challenges that resulted in ten counties demonstrating systemic non-compliance in FFY 2005 that continued beyond the 12 month timeline allowed for correction. The document "Local Corrective Action Plans; Collection of Valid and Reliable Data for Determining Factors Contributing to Non-Compliance" was a helpful resource in facilitating conversations with counties who were out of compliance (available at [http://www.nectac.org/~pdfs/topics/transition/noncompliance\\_contributing\\_factors.pdf](http://www.nectac.org/~pdfs/topics/transition/noncompliance_contributing_factors.pdf)) The OSEP National Early Childhood Conference in December 2007 provided helpful sessions on the use of Corrective Action Plan templates to record sequential steps designed to systematically outline the categories of corrective action and strategies to be implemented to resolve the problem. The document entitled "Part C: Corrective Action Plan (CAP) Template to Address Systemic Non-compliance for SPP/APR Indicator of C-7 (45 Day Timeline)" was adapted for Wisconsin to use with the counties out of compliance for more than 12 months, aligning the Corrective Action categories with the categories utilized in the Program in Partnership Plan (PIPP) described earlier in the APR. Wisconsin DHS also attended the National Accountability Leadership Conferences in August of 2008 and May of 2009 and the OSEP National Early Childhood Conferences in December of 2008 to obtain valuable technical assistance and resources.

**Improved Data Collection Systems and Reporting:**

As described earlier throughout this document, to improve the comprehensiveness and accuracy of data collection for reporting on indicators, in November of 2008 DHS replaced the former Human Service Reporting System database with PPS which employs the technology that allows counties to monitor their own progress and slippage around Federal Indicators. The new PPS database has improved the comprehensiveness and accuracy of data collection for reporting on indicators, and also collects reasons why an IFSP is not completed within the 45-day timeline. The new data system requires a county to enter the reason an IFSP was not timely for any initial IFSP that exceeds the 45 day timeline, and calculates compliance for Indicator 7 on a real time basis, available in a PDF format report for the county or state to access at any time.

**Improve System Administration and Monitoring:**

DHS has significantly increased the focus and importance of the timeliness of IFSPs in Wisconsin. DHS and RESource staff have been actively addressing issues related to the timeliness of IFSPs on both a local program and a regional basis. Regional meetings, as well as cluster groups, provide an opportunity to clarify requirements and to promote sharing of best practices between programs. The date of the referral and the date for the 45-day timeline are on the front cover of the state sample IFSP, which was completed in spring 2006. This requires county programs to keep track of the 45-day timeline data and assure that they meet requirements for each child. Counties are also now required to track and report reasons that the 45-day timeline was not met.

Wisconsin is improving system administration and monitoring to provide counties more opportunities to self-monitor in addition to their on-site review by the state Birth to 3 team. A Self Assessment process was piloted in FFY 2006 and implemented statewide in FFY 2007. Each county completed a Self Assessment report that is submitted to the state for review yearly. As part of the Self Assessment, each county program reviews and reports on their process to ensure timely evaluation and completion of the initial IFSP. A comprehensive file review of 10 percent of the children in each county identifies which children did not receive this initial evaluation and IFSP in a timely manner, and documents the specific reason. If the reason identifies a system or staffing issue, further evaluation of the necessary policy and system changes is required. Counties are also now required to track and document all reasons for any delay for all children referred to Birth to 3 for evaluation of eligibility.

**Clarify Policies and Procedures; Consistent Approach to Determining Eligibility:**

The Eligibility Workgroup created and launched consistent, statewide standards for eligibility determination in November 2005. The *Guidelines for Determining Eligibility* provide a consistent approach to gathering and processing information through the evaluation process. The *Guidelines for Eligibility Determination* were presented through a statewide video conference that also stressed data accuracy, and the importance of documenting contacts with families and family-based circumstances that caused delay in meeting the 45-day timeline. These guidelines and video conference are currently available in the WPDP website at: <http://www.waisman.wisc.edu/birthto3/index.html>.

**Issues with Increasing FTE; Analysis of Staffing Concerns:**

Counties are specifically concerned about the diminishing number of discipline-specific professionals available to perform appropriate evaluations. Of gravest concern is the increased scarcity of speech pathologists throughout the state. Many counties, in particular our largest county, report increased exodus of the speech pathologists to the school districts and health care organizations. There is also a more recent concern regarding scarcity of early childhood special educators.

**Provision of Training on Family Centered Practices:**

Training efforts to assist counties in the best use of available professionals continue. For new staff, there were two "Orientation to Best Practices in Birth to 3" events in FFY 2008, one in November 2008, and the other in March 2009. Emphasis is placed on orienting new staff throughout the state to the federal and state requirements and to understanding family centered services and best practices. In total, 92 early intervention professionals and parents from 26 counties attended the orientation sessions and reported increased understanding of federal and state requirements, including timelines for completing IFSPs and the purpose of Wisconsin's Birth to 3 Program in supporting families to enhance their child's development.

**Provision of Targeted Technical Assistance:**

More targeted technical assistance is being provided as state and local systems are examining current practices and strategies for improvement. Wisconsin's largest county is receiving additional technical assistance and monitoring oversight, with the Birth to 3 Program Part C coordinator providing direct support to this county. County administrative staff have met with the state Birth to 3 team to examine more precise ways to provide monitoring oversight to the agencies that are contracted by those counties to provide early intervention services, and to tie upcoming contracts to compliance on these indicators. This county was required to provide monthly data reports and analysis examining progress or slippage on this Indicator. County C was also monitored directly by the Birth to 3 Program Part C coordinator, and submitted monthly

analysis of data examining progress or slippage, resulting in 100 percent compliance in April of 2009, indicating positive results of this targeted approach.

DHS offered Data Discussion Wisline Training sessions throughout the year. The Data Discussion focused on assessment and IFSP practices occurred on November 4, 2008, with 12 counties attending.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2008:** Although the target was not met, no revisions are suggested at this time due to the progress made this year and anticipation that the ongoing Improvement Activities will help Wisconsin achieve the targets in the coming year.

## Part C State Annual Performance Report (APR) for 2008

### Overview of the Annual Performance Report Development:

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

**Indicator 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;
- B. Notification to LEA, if child potentially eligible for Part B; and
- C. Transition conference, if child potentially eligible for Part B.

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

#### Measurement:

- A. Percent =  $\left[ \frac{\text{(\# of children exiting Part C who have an IFSP with transition steps and services)}}{\text{(\# of children exiting Part C)}} \right] \text{ times } 100.$
- B. Percent =  $\left[ \frac{\text{(\# of children exiting Part C and potentially eligible for Part B where notification to the LEA occurred)}}{\text{(\# of children exiting Part C who were potentially eligible for Part B)}} \right] \text{ times } 100.$
- C. Percent =  $\left[ \frac{\text{(\# of children exiting Part C and potentially eligible for Part B where the transition conference occurred)}}{\text{(\# of children exiting Part C who were potentially eligible for Part B)}} \right] \text{ times } 100.$

Account for untimely transition conferences, including reasons for delays

FFY	Measurable and Rigorous Target
<b>2008</b> <b>(2008-2009)</b>	<b>100%</b>
<b>Results</b>	<b>Indicator 8a: 96.45%</b> <b>Indicator 8b: 95.46%</b> <b>Indicator 8c: 96.87%</b>

#### Actual Target Data for FFY 2008:

As required from the Office of Special Education Program's response table and letter dated June 15, 2009, Wisconsin is working to ensure timely transition planning to support the child's transition from Part C services to Part B and/or other services by a child's third birthday, including an Individualized Family Service Plan

(IFSP) with transition steps and services, notification to the local education agency (LEA) and holding of transition conference as mandated in statute.

Examining the practice of transition to school district services as documented through data collected around Indicator 8 became a primary area of collaboration and focus between the Department of Health Services (DHS) and the Department of Public Instruction (DPI) over this FFY. This has been the major area of provision of technical assistance across the two systems.

**Indicator 8A: Percent of children exiting part C who have IFSPs with Transition Steps and Services:**

**Table C8.1: Children With an IFSP with Transition Steps and Services**

Children expected, by age, to have an IFSP with Transition Steps	Children with an IFSP With Transition Steps	Percentage
3637	3508	96.45%

*Data Source:* Wisconsin Program Participation System (PPS) for 7/1/08-6/30/09

Wisconsin launched a shared data system with DPI in November of 2008, the Program Participation System (PPS). PPS is able to collect data on IFSPs that include transition steps for FFY 2008. These data were analyzed through the PPS data from July 1, 2008 through June 30, 2009. . As detailed in the chart below, 96.45 percent of children expected to have an IFSP with transition steps have the required documentation in their IFSPs. This indicates almost one percent (0.97) progress from the 95.48 percent reported in the former FFY APR 2007. Improvement strategies, described below, will continue moving Wisconsin towards 100% compliance.

During the FFY 2007 program monitoring process, two programs were issued a finding of non-compliance, one of which was corrected. The remaining county has a CAP in place and is demonstrating substantial progress. See summary of enforcement action taken for this county under discussion of progress and slippage below. Correction is verified through an analysis of a minimum of two months of data as reported in PPS with the expectation that the program must demonstrate 100 percent compliance as evidence of correct implementation of the regulatory requirement, as well as an analysis of the child specific non-compliance to ensure that the transition steps were included on the IFSP, unless the child is no longer within the jurisdiction of EIS program.. During the FFY 2008 twenty (20) counties were issued findings of non-compliance, with all of these findings already corrected. Extensive focus on the transition process has occurred throughout the year and is described more fully below in the Improvement Strategy section.

**Indicator 8B: Percent of children exiting Part C and potentially eligible for Part B where notification to the LEA occurred:**

**Table C8.2 Percent of Children Exiting Part C and Potentially Eligible for Part B where Part B Notification to LEA Occurred**

Potentially Eligible for Part B	LEA Notification	Percentage
3483	3325	95.46%

*Data Source:* Program Participation System (PPS) for 7/1/08-6/30/09, paper notification lists and desk audit

Wisconsin received approval from OSEP on December 3, 2009 to implement an Opt-Out Policy, permitting families to opt out of the referral within a specified period of time, should they object to the referral.

Wisconsin intends to implement this policy beginning January 1, 2010. Please see Appendix A -on pages 61-62 for Opt Out Policy. The new PPS system, documenting LEA notification for the FFY 2008, sent electronic notification including the child's date of birth to the school district, but did not provide complete information, including the child's name and parent contact information. Wisconsin received clarification from OSEP on April 30, 2009 that the new data system must include these elements to be considered a complete LEA notification. PPS was modified in June of 2009 to include the additional required information. DHS required counties to send paper notification including the required details during the interim in which PPS did not supply the complete information, and to provide DHS with copies of each of these lists. For data analysis prior to April 30, 2009, only children who had a complete referral for a special education evaluation sent through PPS, also including child's name and parent contact information, were counted in the numerator of the measurement for this indicator. Wisconsin wishes to highlight the rapid responsiveness to the adaptation of the new PPS data system to comply with requirements. Data for indicator 8B, percent of children exiting

Part C and potentially eligible for Part B where notification to the LEA occurred including the child's name, DOB, and parent contact information are 95.46 percent.

During the FFY 2007 program monitoring process, two programs were issued findings of non-compliance, one of which was corrected within the twelve month timeline. The remaining county has a CAP in place and is demonstrating progress. See summary of enforcement action taken for this county under discussion of progress and slippage below. Extensive focus on the transition process has occurred throughout the year, and is described more fully below in the Improvement Strategy section. Nineteen (19) findings of non-compliance were issued in FFY 2008, and have already been corrected. Correction is verified through an analysis of a minimum of two months of data as reported in PPS with the expectation that the program must demonstrate 100 percent compliance as evidence of correct implementation of the regulatory requirement, as well as an analysis of the child specific non-compliance to ensure that the notification to the LEA did occur, unless the child is no longer within the jurisdiction of EIS program.

#### **Indicator 8C: Percent of children exiting Part C and potentially eligible for Part B where the transition conference occurred:**

**Table C8.3: Percent of Children Exiting Part C and Potentially Eligible for Part B where the Transition Conference Occurred**

Potentially Eligible for Part B	Families who provided approval	Children with TPC	Percentage
3483	3067	2971	96.87%

*Data Source:* Program Participation System (PPS) and desk audit for 7/1/08-6/30/09

2971 of the 3067 children (with parental approval) exiting Part C and potentially eligible for Part B did have a transition planning conference (TPC), resulting in 96.87 percent. Wisconsin demonstrated progress of almost two percent from the 95.39 percent reported in FFY 2007. Of children who received a TPC, this number includes 697 children who experienced some delay due to exceptional family circumstance. These children were included in both the numerator and denominator. 416 families did not provide approval and were not included in these calculations. Of some interest, 104 children were referred to the Birth to 3 Program less than 90 days before their third birthday, which also results in a delay in the TPC being held, and nine (9) children exited before the TPC was required.

**Table C 8.4: Children with Transition Planning Conferences Held >90 Days Prior to the Child's 3<sup>rd</sup> Birthday**

Children with TPC	TPC was held >90 days prior to child's 3rd birthday	TPC held < 90 days
2971	2713	258
96.86%	91.32%	8.68%

*Data Source:* Wisconsin Program Participation System for 7/1/08-6/30/09

During the FFY 2007 program monitoring process, six counties received findings of non-compliance around Indicator 8C, five of which were corrected within the twelve month timeline. A CAP is in place for the sixth county, and progress is being made in achieving the 100 percent compliance required. See summary of enforcement action taken for this county under discussion of progress and slippage below. During the FFY 2008 twenty (20) counties were issued findings of non-compliance, with all of these findings already corrected.

Correction is verified through an analysis of a minimum of two months of data as reported in PPS with the expectation that the program must demonstrate 100 percent compliance as evidence of correct implementation of the regulatory requirement, as well as an analysis of the child specific non-compliance to ensure that the timely transition did occur, albeit late, unless the child is no longer within the jurisdiction of the EIS program. Desk audits are also used as a demonstration of correction of non-compliance. Extensive focus on the transition process has occurred throughout the year, and is described more fully below in the Improvement Strategy section.

#### **Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that Occurred for FFY 2008:**

As required in the letter from OSEP dated June 15, 2009, and the Response Table, Wisconsin is diligently evaluating and implementing its improvement strategies. The DPI and DHS are committed to a joint effort to improve the transition of children between Part C and Part B 619. These efforts include activities which range



from state infrastructure and policy initiatives, to support and professional development at the local level. As described in each sub-section above, Wisconsin demonstrated almost one percent improvement on Indicator 8A at 96.45 percent, just over one percent slippage on 8B at 95.46 percent, and almost two percent improvement on 8C at 96.87 percent. Wisconsin is pleased with the outcome of the improvement strategies implemented in moving closer to 100 percent compliance.

In FFY 2008 fifty-nine (59) findings were issued, and are already corrected. The ICC has taken a firm stance on issuing findings of non-compliance when data indicates less than 100 percent even if a county has already corrected the non-compliance at the time the earlier data are analyzed, as a means towards emphasizing the critical nature of timely transitions in the lives of the young children leaving Part C and going on to Part B.

**Correction of FFY 2007 Findings of Noncompliance (if State reported less than 100% compliance):**

7. Number of findings of noncompliance the State made during FFY 2007 (the period from July 1, 2007, through June 30, 2008)	<b>10</b>
8. Number of FFY 2007 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	<b>7</b>
9. Number of FFY 2007 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>3</b>

**Correction of FFY 2007 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance):**

10. Number of FFY 2007 findings not timely corrected (same as the number from (3) above)	<b>3</b>
11. Number of FFY 2007 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	<b>0</b>
12. Number of FFY 2007 findings <u>not</u> verified as corrected [(4) minus (5)]	<b>3</b>

**Actions Taken if Noncompliance Not Corrected:**

In FFY 2007, a total of ten findings of non-compliance were identified for Indicator 8A, 8B, and 8C, of which seven were corrected within the twelve months. The three remaining findings were all issued to one county. Enforcement action has been taken with the county, including ongoing targeted technical assistance and focused monitoring, contract evaluation, and monthly data analysis requirements. Contract evaluation with the county has occurred, and the county has instituted contract requirements identifying potential monetary sanctions for the nine provider agencies, contingent on compliance with the federal indicators. The county is also required to share provider specific data analysis on a monthly basis. Of interest, Milwaukee County has demonstrated significant improvement, as evidenced in the table below:

<b>Indicator</b>	<b>8a</b>	<b>8b</b>	<b>8c</b>
<b>7/1/08-6/30/09</b>	94%	90.89%	94%
<b>7/1/07-6/30/08</b>	84.47%	88.53%	89.54%
<b>7/1/06-6/30/07</b>	57.38%	72.63%	47.53%

Milwaukee County Analysis of Data

**Verification of Correction (either timely or subsequent):**

Correction is verified through an analysis of a minimum of two months of data as reported in PPS with the expectation that the program must demonstrate 100 percent compliance as evidence of correct implementation of the regulatory requirement, as well as an analysis of the child specific non-compliance to ensure that the timely transition did occur, albeit late, unless the child is no longer within the jurisdiction of EIS program. Desk audits are also used to verify child-specific correction of non-compliance.

**State Technical Assistance Accessed:** As outlined in the letter from OSEP dated June 15, 2008, Wisconsin was required to access technical assistance and report on the actions taken as a result of that assistance. DPI and DHS collaboratively accessed technical assistance through a variety of national and federal forums to address the non-compliance issues around Part B Indicator 12 and Part C Indicator 8. The North Central Regional Resource Center (NCRRC) and the National Early Childhood Technical Assistance Center (NECTAC) have been particularly helpful, as have the resources available from the National Early Childhood Transition Initiative (NECTC). The monthly OSEP TA calls with Ruth Ryder have provided clarification on accountability and reporting requirements. Wisconsin took full advantage of the National Accountability Leadership Conference in August of 2008 and June of 2009, as well as the Data Manager's Meeting in May of 2008 and June of 2009, attending these conferences collaboratively with DPI and DHS staff. Wisconsin DHS also attended the OSEP National Early Childhood Conferences in December of 2008 and 2009 to obtain valuable technical assistance and resources. Wisconsin had numerous contacts with NCRRC and NECTAC for access to national materials and individualized technical assistance. Wisconsin has participated in the NCRRC teleconference series, sent a team of 5-7 people to participate in the annual NCRRC meetings held in June 2007 (Philadelphia, PA) and 2008 (Grand Rapids, MI), and accessed individualized State technical assistance. At Wisconsin's November 2007 Leadership Event, Sharon Walsh of Walsh Taylor, Inc. and the Infant Toddlers Coordinators Association provided a national perspective on OSEP accountability demonstrating the implications for program improvement at the local level, and Ann Bailey, North Central Regional Resource Center, demonstrated data-based decisions-making strategies using materials from the Improvement Tool Kit (IT Kit), developed by the NCRRC. On March 12, 2009, a Wisline entitled "Communication Around Transition from Birth to 3 to LEAs with PPS in Place" was scheduled for key Part C and Part B, 619 training and technical assistance providers with NECTAC and NCRRC. Twenty (20) counties participated on this Wisline. The purpose of this call was to increase national perspectives and strategies in addressing Wisconsin's highest priorities related to Indicator 8 (Part C) and 12 (Part B). Wisconsin has demonstrated excellent results in the progress demonstrated on these two Indicators, and attributes this progress to the intense focus on utilizing these nationally available TA resources and sharing those with local LEAs and County Birth to 3 providers, and the collaborative cross system analysis of state and local challenges that have impeded earlier progress in this area.

**Improve Data Collection/Reporting or Systems:**

As mentioned on several occasions earlier in the APR, in November of 2008, Wisconsin replaced the former HSR database with a web-based user-friendly Program Participation System (PPS) which employs technology that allows counties to monitor their own progress and slippage around Federal Indicators. The PPS database has improved the comprehensiveness and accuracy of data collection for reporting on indicators. The system was created by DHS under the leadership of a cross-department technology and program workgroup. This system is built upon a transition tracking form that will enable the Birth to 3 program to enter information about a child preparing for transition, including the date notification to the LEA was sent, the date transition steps are recorded on the IFSP, and the date of the Transition Planning Conference. In addition to PPS sending electronic notification to the LEA with parent contact information, once a parent grants consent to send the complete referral, this shared data system allows the LEA to access referrals on a child through PPS, and an e-mail alerts the LEA to the referral in the system. If the parent grants consent for the sharing of additional information, the system will also allow the LEA access to the child's outcomes ratings at exit and view the IFSP dates and services the child has received while in Birth to 3. As the LEA moves through the eligibility determination process, they will enter information regarding eligibility status and date of IEP implementation for children determined to be eligible. The system will generate both monitoring and summary reports for both DHS and DPI. Launching this system required clarification of policies and efficiencies across systems such as identifying personnel to receive the referring e-mail and clarifying that the date an e-mail is received, is the date of the referral to the LEA.

**Improve Systems Administration and Monitoring; Corrections of Non-Compliance:**

Enforcement actions and improvement strategies were implemented in FFY 2008, including amendment of corrective actions to include monthly data reporting and analysis for progress or slippage, additional targeted technical assistance to adapt corrective action plans, and additional focused monitoring.

Sanctions were imposed in collaboration with DPI that included developing a joint approach for programs that were not complying with the requirements of creating a smooth transition for children. These sanctions included required participation in Fall Regional Meetings held in October of 2008 to provide training on the use of the new data system and the requirements of IDEA across the Part C and Part B systems, as well as required development of local interagency agreements that specifically address the steps in the transition process. Data are being monitored monthly to determine that the process is being followed and that children have IEPs implemented by their third birthday, an outcome that is dependent upon LEA notification, transition planning, and the transition planning conference and referral.

**Monitoring and Self Assessment**

DHS requires that all Birth to 3 programs conduct an annual Self Assessment beginning in 2008. This Self Assessment includes SPP data elements from a sample of 10 percent of the enrolled children. During the SPP cycle, all Birth to 3 Programs will receive a minimum of one on-site monitoring visit by their RESource staff member and a state Birth to 3 staff member. Based on the Self Assessment or other data additional on-site monitoring visits can be scheduled at any time during the SPP cycle. For counties scheduled to have a Program Review in the current calendar year, the Self Assessment data provides a source of data for the Review. Data from all counties are reviewed yearly for issuance of findings of non-compliance. Data were analyzed in August, 2008 so that findings of non-compliance could be identified and notification could be sent at the same time counties received their Determination letters. Birth to 3 programs are required to correct non-compliance as soon as possible, but no later than one year from identification. DHS verifies correction through the data system and on-site visits conducted by the RESource technical assistance staff.

**Collaboration/Coordination; Cross Department Transition Team:**

In response to the analysis of data related to transition from 2005-2006, DPI and DHS created the Cross Department Transition Team. Membership on this team includes leadership from both departments. One function of this joint team is to review transition data and coordinate local improvement efforts. For example, determination letters from both departments encourage local programs to communicate and jointly plan improvement strategies. Both DPI and DHS have included expectations for their contracted training and technical assistance staff to include facilitating local interagency agreements and professional development on early childhood transition as a part of their ongoing work. This team also includes partners from the Waisman Center with contracts for system building and professional development from both DHS, Birth to 3 Program (e.g., WPDP) and DPI (e.g., Early Childhood Hub of the State Personnel Development Grant).

Districts that did not meet the expected target of 100 percent for this indicator were required to submit a plan to improve their performance. These required plans included the district analysis of the reason for delays in the transition process, local strategies to correct timeliness, and requests for technical assistance. The Cross Department Transition Team met to review and summarize these plans and to develop a coordinated approach to improvement activities.

Districts were required to work with their local Birth to 3 program to take action to improve the transition process. These actions include the following:

- Reviewing, revising, and committing to follow interagency agreements.
- Improving referral processes such as making referrals at 120 days prior to the third birthday, through the use of the PPS electronic referral process, and assigning district staff to monitor referrals on a regular basis.
- Working to support parents in making decisions about referral and providing consent, developing better materials to inform and support parents and logging parent contacts.
- Providing teachers and other staff from Birth to 3 and early childhood special education more information about the transition process and their involvement in the process.
- Conducting joint child find activities to further enhance the connection between programs and the sense of continuity for parents.

The action plans contained requests for technical assistance either from state departments or regional technical assistance providers including the Cooperative Education Service Agencies (CESAs) staff (i.e., Early Childhood Program Support Teachers and Regional Service Network staff), local school district Early Childhood Program Support Teachers, and the Birth to 3 Technical Assistance and Monitoring Project (RESource). These requests included the following:

- Facilitate interagency agreement development.
- Clarify policy and practice including consideration of referrals at the Transition Planning Conference, reporting transition data, clarifying IEP implementation, summer birthdays, late referrals, and child moves during the eligibility determination process.
- Continued technical assistance on the use the PPS electronic data sharing system.

RESource TA staff were able to facilitate LEA/Birth to 3 Interagency Agreement sessions with thirty-one (31) counties in FFY 2008.

#### **Provide Training and Professional Development:**

The Cross Department Transition Team is also working to deliver common expectations regarding timely referral from Part C to B, participation of LEA in the transition planning conferences, IFSPs with transition steps, and LEA notification. One strategy for creating these common expectations and understanding of IDEA 2004 requirements is through the network of training and technical assistance providers. This network includes the Birth to 3 RESource regional staff, early childhood program support teachers and Regional Support Network staff located in larger school districts and the CESAs. This network facilitates local meetings of Birth to 3, LEAs, and other community programs such as child care and Head Start as they develop interagency agreements. This network also coordinates the delivery of the *Ready, Set, Go* trainings that are always presented by a team that includes representation from parents, Birth to 3, and LEAs.

Wisconsin utilizes the Early Childhood Collaborating Partners website

(<http://www.collaboratingpartners.com/transition/index.htm>) as a central point of information for transition agreement examples, Ready Set Go training power points and handouts, and other resources related to transition. The revised materials reflect the changes to IDEA 2004. Other materials to support training and technical assistance are posted on both department websites: DHS Birth to 3 Program, <http://dhs.wisconsin.gov/bdds/birthto3/ta/index.htm>, and DPI, Indicator 12 web page: <http://dpi.wi.gov/sped/spp-tran-presch.html>

A comprehensive training initiative was planned jointly between DHS, DPI and the Waisman Center as the Early Childhood Hub for the Wisconsin DPI's State Personnel Development Grant, and through WPDP for Birth to 3. The training was directed to both LEAs and County Birth to 3 providers in an overview of the new PPS database and the unique attributes within the new data system in managing both electronic notification and referrals to school districts. Five Regional Meetings held in October 2008 offered this training to a total of 71 Counties and 243 LEAs, with 471 people in attendance. Advance webinar presentations demonstrating the use of the new data system were viewed by attendees prior to the meeting, and can be viewed at the following web-site: <http://dhs.wisconsin.gov/bdds/birthto3/ta/index.htm>. These webinars are available for future viewing for new professionals in the Birth to Six system. The new data system and required training were seen as an opportunity to provide joint training across systems to clarify requirements on transition across Part B and Part C, revisit interagency agreements between the two systems, and deliver common messages about expectations for transition within the state of Wisconsin. The DHS Birth to 3 Program Supervisor and the Assistance Special Education Director for DPI co-presented key expectations at these trainings, demonstrating cross department collaboration at the state level.

In preparation for the Fall Regional Birth to 6 Transition meetings, a meeting was held on September 10, 2008, for the network of training and technical assistance providers (58 participants) who will be supporting local transition activities. The purpose of this meeting was to familiarize these key partners with national and state technical assistance materials and resources, increase their understanding of the PPS, discuss strategies for working collaboratively across systems in the provision of local technical assistance, and obtain input for the Regional meetings. Participants included all Birth to 3 state staff, RESource, and WPDP staff as well as Early Childhood Program Support Teachers from CESAs and large local school districts, staff from the CESA based Regional Service Networks, and parent representatives from Wisconsin's PTI, FACETS.

In addition, Wisconsin counties participated in Data Discussions planned throughout the year to clarify expectations on data accountability and expected practices for all the Federal Indicators. Transition

requirements were addressed on March 12 and May 5<sup>th</sup> through these Data Discussions. A total of 38 counties attended these two events. During the Data Discussion presentation, counties received information from DHS staff about expected requirements of IDEA, documentation of practice through data and accountability expectations, and strategies for addressing challenges presented by three different county Birth to 3 Administrators

#### **Provide Technical Assistance:**

All 72 counties were given Regional opportunity to focus on Indicator 8 with their LEA partners in fall of 2008. This opportunity included experience with data clarification, analysis and data driven decision making. All counties and LEA partners were given tools to replicate this activity with their local data. Following this intense data experience, counties met in smaller collaborative groups across the state to explore and create Transition Agreements with community partners. 80 percent of Wisconsin Counties requested and received technical assistance related to Transition (Indicator 8). An example to illustrate how this occurred includes TA provided in the Western Region of the state. In order to assure seamless transitions from Part B to Part C for children and families in the Western Region of Wisconsin the TA facilitator encouraged the 18 Western counties and their LEA partners to create and implement functional Transition Agreements based on data and practice related to the federal indicators (8a, b, and c). Ten of 18 Western counties met face to face with LEA representatives and LEA Technical Assistance system personnel to write functional agreements for transition from Part B to Part C. These collaborative meetings also included other community partners such as Head Start Programs and the Tribes. These collaborative meetings resulted in ten new functional working agreements as well as positive relationships between programs. In six other Western counties these collaborative meetings focused on reevaluating and updating previously established Transition Agreements. Two of the Western counties are in the early stages of Transition Agreement development; focusing on a systematic look at the current practices related to transition. Fourteen of the fifteen Northern counties participated in Interagency Agreement meetings, as well as fourteen of the seventeen Northeastern counties eight out of eight Southeastern counties and eleven out of fourteen Southern counties.

#### **Clarify/Examine Policies and Procedures:**

The Interagency Agreement Workgroup, with members from DPI and DHS, is preparing a new state interagency agreement that describes the responsibilities of each department specific to implementing IDEA 2004 and state policy. The transition of children between Birth to 3 and LEAs including LEA notification and transition planning conferences are major components of the revised agreement. Drafts of the Agreement are ready and will be finalized based upon issuance of Part C final regulations. During the past year, the group has gathered input from local school districts and Birth to 3 programs, including tribal programs, regarding suggested content for the new interagency agreement. The departments plan to issue a joint bulletin/memo to county Birth to 3 programs and LEAs when the interagency agreement is finalized in early 2010. The intent is to utilize the state agreement as a template for local early intervention and early childhood special education programs to develop local agreements. The departments have also supported the adaptation of national technical assistance materials specific for Wisconsin, including the document, *Investigative Questions to Explore Infrastructure and Practice Birth to 6 Transitions: Part C (SPP Indicator 8a, b, c) Part B (SPP Indicator 12)*. All policy and supporting materials are posted on both department websites: DHS Birth to 3 Program, <http://dhs.wisconsin.gov/bdds/birthto3/ta/index.htm>, and DPI, Indicator 12 web page: <http://dpi.wi.gov/sped/spp-tran-presch.html>. The activities associated with transition between programs including referral, transition planning conferences, and development and implementation of an IEP by the child's third birthday are important aspects of the interagency agreements.

#### **Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2008:**

Wisconsin is pleased with the success of the improvement activities implemented in FFY 2008 and will continue utilizing these strategies working towards full compliance of 100 percent.

## Part C State Annual Performance Report (APR) for 2008

### Overview of the Annual Performance Report Development:

#### 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.

For any noncompliance not corrected within one year of identification, describe what actions, including technical assistance and/or enforcement that the State has taken.

FFY	Measurable and Rigorous Target
2008 (2008-2009)	100%
Results	86.11%

#### Actual Target Data for FFY 2008:

During FFY 2007, thirty-six (36) findings of non-compliance were issued, and thirty-one (31) of those were corrected within one year. A more stringent Corrective Action Plan (CAP) was initiated for the five remaining counties that did not correct findings of non-compliance within a year. One of the findings of non-compliance was corrected within six months of the implementation of the CAP, and another was corrected within five months. The remaining non-compliance, all around Indicator 8 for one county continues to have a CAP in place. Enforcement action has been taken with this county, including ongoing targeted technical assistance and focused monitoring, contract evaluation, and monthly data analysis requirements. Contract evaluation with the county has occurred, and the county has instituted contract requirements identifying potential monetary sanctions for the nine provider agencies, contingent on compliance with the federal indicators. The county is also required to share provider specific data analysis on a monthly basis with each of the contracted providers, monitoring continued progress towards compliance. If Indicator 8 findings were issued "by county" rather than by Indicator, the fact that one county received three findings around the same Indicator would change the percentage of compliance from 86.11 percent to 90.62 percent. DHS is disappointed in performance on Indicator 9 for FFY 2008 but Wisconsin will be able to demonstrate 100 percent compliance on Indicator 9 in FFY 2009, since all sixty (60) findings issued in FFY 2008 have now been corrected. For correction of findings for any compliance indicator verification was documented by 100 percent compliance within the PPS data system for at least two months to demonstrate correction of current

practice in correctly implementing the specific regulatory requirements, and data review and/or desk audits to ensure that child-specific non-compliance for timely services, initial assessment and IFSP, or transition to Part B verified correction for that child, unless the child was no longer within the jurisdiction of the EIS program. Correction of performance indicators and/or related requirements was documented primarily via desk audit processes, and data analysis within the PPS system if applicable. See self calculating worksheet for Indicator 9 on page 79-83, Appendix D.

Table C 9.1 Findings of Non-Compliance and Percentage of Correction in 12 Months

Indicator	General Supervision System Component	# of Programs Issued Findings in FFY 2007	a. # of Findings of Noncompliance	b. # of Findings Corrected in 12 Months	% of Findings Corrected in 12 Months
1. Timely Services	On-site monitoring, Data Review	2	2	2	100%
2. Natural Environments	On-site monitoring, Data Review	1	1	0	0%
3. Child Outcomes		NA			NA
4. Family Outcomes	On-site monitoring, Data Review	1	1	1	100%
5/6 Child Find.	On-site monitoring, Data Review	1	1	1	100%
7. 45 Days	On-site monitoring, Data Review	9	9	8	89%
8. Transition	On-site monitoring, Data Review, Desk Audits	6	10	7	70%
14. Valid and Reliable Data	On-site monitoring, Desk Audits	10	10	10	100%
Related Requirements	On-site monitoring, Desk Audits	2	2	2	100%
Sum of Column a and b and %			36	31	86.11%

Data Source: HSRS and On Site Review Records

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2008:**

In FFY 2007, thirty-six (36) findings of non-compliance were issued, thirty-one (31)) of which were corrected within twelve months. Of the five that were not corrected within twelve months, two were corrected in May of 2009. The three remaining findings of non-compliance around Indicator 8 were for the County of Milwaukee. A CAP has been in place the last two years for Milwaukee. Please refer to the chart below that demonstrates the consistent improvement over the course of the CAP. Wisconsin DHS worked closely with Milwaukee over the course of the CAP to institute contract requirements with all nine provider agencies tying funding to demonstration of compliance on the Indicators, as one enforcement action taken by both DHS and Milwaukee County. Wisconsin DHS has also required Milwaukee to analyze data on a monthly basis, and meet with each provider agency around the agency specific data to monitor continued progress towards 100 percent compliance. Though Wisconsin DHS recognizes that Milwaukee has not yet reached compliance, and has taken enforcement action requiring ongoing monthly data analysis, conditions on contracts with the nine provider agencies, and required technical assistance, DHS also recognizes the complexity of the Milwaukee County Birth to 3 system and commends Milwaukee for the demonstration of ongoing progress.

## Milwaukee County Data

Indicator	8a	8b	8c
7/1/08-6/30/09	94%	90.89%	94%
7/1/07-6/30/08	84.47%	88.53%	89.54%
7/1/06-6/30/07	57.38%	72.63%	47.53%

### State Technical Assistance Accessed:

As outlined in the letter from OSEP dated June 15, 2008, Wisconsin was required to access technical assistance and report on the actions taken as a result of that assistance. The document "Local Corrective Action Plans; Collection of Valid and Reliable Data for Determining Factors Contributing to Non-Compliance" was a helpful resource in facilitating conversations with counties who were out of compliance (available at [http://www.nectac.org/~pdfs/topics/transition/noncompliance\\_contributing\\_factors.pdf](http://www.nectac.org/~pdfs/topics/transition/noncompliance_contributing_factors.pdf)) The National Accountability Conference in December, 2007 provided helpful sessions on the use of Corrective Action Plan templates to record sequential strategies designed to systematically outline the categories of corrective action and strategies to be implemented to resolve the problem. The document entitled "Part C: Corrective Action Plan (CAP) Template to Address Systemic Non-compliance" was adapted by Wisconsin for use with counties who were out of compliance for more than 12 months, aligning the Corrective Action categories with the categories utilized in the Program in Partnership Plan (PIPP) described earlier in the APR. This also led the ICC to re-examine Wisconsin's enforcement and sanction process and resulted in the Enforcement Pyramid described on the next page. The monthly OSEP TA calls with Ruth Ryder have provided clarification on accountability and reporting requirements. Wisconsin took full advantage of the National Accountability Leadership Conference in August of 2008 and June of 2009, as well as the Data Manager's Meeting in June of 2009, attending these conferences collaboratively with DPI and DHS staff. Wisconsin DHS also attended the OSEP National Early Childhood Conferences in December of 2008 and 2009 to obtain valuable technical assistance and resources.

### Improve Data Collection and Reporting; Regular Data Review and Analysis:

In addition to the increased intensity of program monitoring through the Self Assessment and the on-site Program Review monitoring process, DHS is monitoring programs through targeted data analysis and data verification. As referenced in each indicator throughout this APR, DHS has finalized and launched the next system of statewide data reporting, the Program Participation System (PPS). This system was active as of November 2008. All data collected for FFY 2008 in the earlier HRS version of the data system were transferred into PPS during the month of October, 2008, and counties were required to enter any data collected in the month of October into PPS in November when the PPS web application went live. This new system allows increased access to data and real time compliance reports at the local level, with built-in editing capacity, to improve accuracy of reporting and timely data reports to monitor progress regularly at both the state and local levels.

State staff and RESource staff assisted programs in analyzing the data and determining if they were maintaining compliance or reaching benchmarks. The state DHS issued findings of non-compliance as indicated through the data review, Self Assessment, and/or on-site review process. Corrective action plans are developed with the county program, state staff, and RESource utilizing the Program in Partnership Plan (PIPP) when non-compliance is identified. A more stringent and formalized individual corrective action plan is developed for each Indicator where systemic non-compliance lasting more than 12 months was identified. These counties must report monthly to the DHS team until the non-compliance is resolved. A CAP is written as a part of a formal meeting with each county and the Birth to 3 DHS state contact and the RESource TA. The state team also sponsored quarterly 'Data Discussion' Wislines allowing local programs to receive information about the data collection process and to ensure accuracy and consistency in the data collection process. For example, a Wisline, "Program Participation System; Over-all Data Requirements" was held on



March 3, 2008, followed by a Special Annual Wisline on June 12, 2008, [Data Collection Changes in the Upcoming Year](#). These discussions also emphasized the importance of compliance and timely correction of any non-compliance identified. Updates were clarified during another Wisline, “PPS: How’s It Working” on November 13, 2008.

#### **Clarify/Examine/Develop Policies and Procedures:**

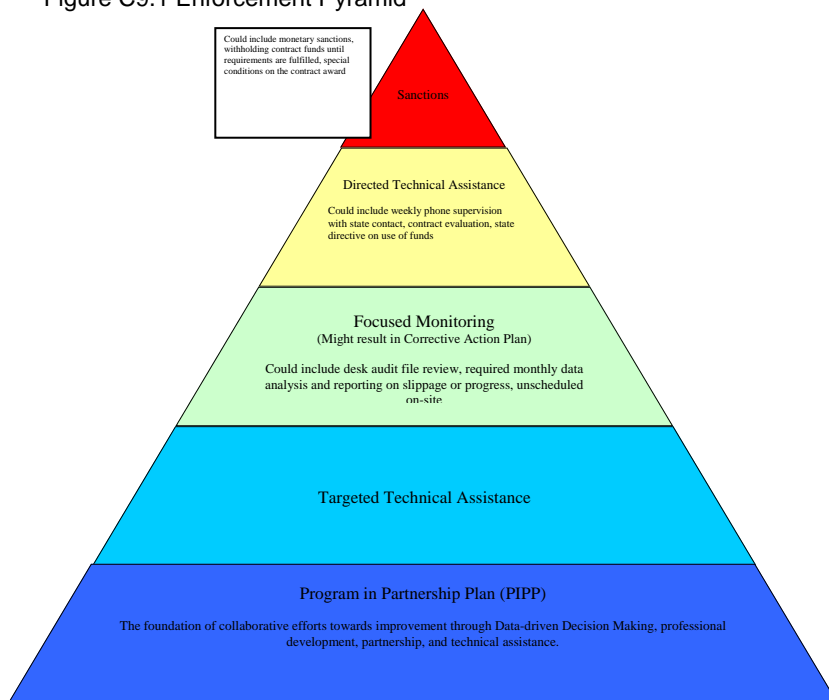
During FFY 2008, a more precise definition of the process for issuing findings of non-compliance was disseminated to all counties and provider agencies through Regional Meetings. Each county participates in an annual Self Assessment process, which includes examination of the county’s ability to meet the requirements of IDEA. As a part of the Self Assessment, counties must review several data sources to verify compliance with federal indicators, including a review of data in the Program Participation System (PPS), , and a check of data in a random sample of children’s files. The TA partner (RESource) to the Birth to 3 State team assists the county with this self assessment, and identifies any compliance concerns that require follow-up. The county, Birth to 3 state lead and the TA partner participate in a follow-up teleconference with the county to summarize the results of the Self Assessment, and to determine if additional focused monitoring may be necessary if problems are identified. Every county also receives an on-site review once every four years. The on-site review includes a validity check of data via a random sample of the children’s files. There is also an annual data check point, when the FFY closes at the end of June, where data are analyzed and notifications of non-compliance are issued. The end of the year data are the same data used in the APR for that year, and later for the issuance of Determination status. A review of the dispute resolution protections, including hearings, complaints, and mediations is another potential time when non-compliance may be identified. With the implementation of an improved data system in November of 2008, findings are now issued for any Compliance Indicator below 100 percent at the annual data check point. Performance indicators under the expected target at the annual data check point result in more careful analysis of those indicators during the annual self assessment, or possibly via focused monitoring if there are critical concerns with the data. For the performance indicators and related requirements, if data results have fallen below the target at the time of an on-site review or self assessment, a careful analysis of the processes and policies influencing the low performance could result in a finding. At that time, the finding of non-compliance will outline the activities required of the county to demonstrate correction.

#### **Improve System Administration and Monitoring; Establishment of a Systematic Enforcement Pyramid:**

Wisconsin DHS worked closely with the ICC during the winter of 2007 to carefully consider Wisconsin’s enforcement and sanction process for identified non-compliance that continues uncorrected past twelve months. Wisconsin prides itself on providing an exemplary Birth to 3 Program throughout the state. The foundation of these services is the collaborative partnerships between the state, counties, providers, and the children and families they serve. This is based on a premise of professional development and technical assistance. Wisconsin stakeholders invest soundly in the philosophy that the platform for providing quality services lies on this strong foundation of supports and technical assistance to enhance the capacity of professionals to deliver quality services. However, it became clear that a precise definition of sequential steps was necessary for EIS programs that required more focused monitoring around compliance issues. When an early intervention program shows non-compliance with federal requirements over a period of time, such as when non-compliance is not corrected within one year, this may result in the implementation of further enforcement activities or sanctions, as described below.

The Enforcement Pyramid below in Figure C9.1 represents Wisconsin’s philosophical portrayal of sequenced enforcement activities, with emphasis being placed on the collaborative partnership foundation and technical assistance preceding any more targeted TA or focused monitoring activities, and directed technical assistance and sanctions being reserved for the most severe evidence of systemic non-compliance over a period of time.

Figure C9.1 Enforcement Pyramid



Enforce this part consistent with §303.704, using appropriate enforcement mechanisms, which must include, if applicable, the enforcement mechanisms identified in §303.704(a)(1) (technical assistance) and (a)(2) (conditions on the lead agency's funding of EIS programs), (b)(2)(i) (corrective action or improvement plan) and (b)(2)(iv) (withholding of funds, in whole or in part by the lead agency), and (c)(2) (withholding of funds, in whole or in part by the lead agency).

### Evaluation; Analysis of system of general supervision and monitoring:

When data indicate slippage, or areas of concern or problems around compliance, a county undergoes more vigilant monitoring. This could result in an un-scheduled focused monitoring visit or desk audit during any year, outside of the typical four year cycle. The database is used to track progress towards compliance once a finding of non-compliance has been issued, to allow verification of a minimum of two full months of 100 percent compliance on a compliance indicator and demonstrate timely correction. The monthly review of indicators through the database in this instance is essential. The data system can also reveal trends with state-wide compliance issues. When broad non-compliance issues surface, such as the state-wide difficulty demonstrated in FFY 2008 around Indicator 8, focused monitoring around Indicator 8 non-compliance was instituted until corrected at each local level, including tracking of progress or slippage in each county utilizing the PPS Indicator 8 report for each county, and implementation of targeted technical assistance including joint training between Birth to 3 Administrators and LEA Special Education Directors was instituted by both DPI and DHS with lead state personnel guiding the training and the development of interagency agreements.

Wisconsin has designed a systemic approach to general supervision and monitoring. The systemic approach recognizes that quality child and family services are dependent upon quality program administration, planning and self assessment, communication, record-keeping and reporting, human resources, and fiscal resources. Unless management systems are a part of the solution for any identified problem, the problem will likely reappear because systems are needed to maintain changes. This system includes components that operate at the local program level, regional level and state level. As the term system implies, communication including sharing data across all levels is a critical component.

In describing the Wisconsin system for General Supervision and Monitoring, Wisconsin follows a model developed by the National Center for Special Education Accountability Monitoring (NCSEAM). This model has been used by the Office of Special Education Programs (OSEP) in supporting states in designing their

systems and it incorporates all components required in the State Performance Plan and other obligations described in the Individual with Disabilities Education Act 2004.

This model is based on the following three expectations of an effective general supervision system:

- Supports practices that improve educational results and functional outcomes
- Uses multiple methods to identify and correct noncompliance within one year
- Has mechanisms to encourage and support improvement and to enforce compliance

The following critical components are a part of the WI General Supervision system:

- SPP and State Outcomes with Measurable Targets;
- Effective Policies; Procedures, and Practices;
- Data on Processes and Results;
- Targeted Technical Assistance and Professional Development;
- Effective Dispute Resolution;
- Integrated On-Site and Off-Site Monitoring Activities, including a focus on selected priorities;
- Improvement and Corrective Action Planning;
- Incentives and Sanctions;
- and Fiscal Management

**Collaboration and Coordination; Partnership with Part B:**

DHS and the Part B 619 staff from the Department of Public Instruction have put in place joint improvement activities, including a shared data system and collaborative training and technical assistance, to address compliance issues related to preschool transition. The Indicator 8 narrative thoroughly describes these activities.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2008: No revisions are proposed.**

**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.

**Percent of Signed, Written Complaints Resolved within the 60-Day Timeline**

FFY	Measurable and Rigorous Target
2008 (2008-2009)	100%

**Actual Target Data for FFY 2008**

FFY Year	Complaints Received.	Resolved in 60-day timeline	Findings of non-compliance
2008 2008-2009	None	NA	NA

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2008:**

**Evaluation:** The Wisconsin Birth to 3 Program experienced no complaints from parents or others concerned that a program has violated the requirements of state and federal law related to early intervention. The Birth to 3 Program Review Process assists DHS in assessing areas of strength and need in regards to the policies, procedures and services in place to support families in the program. One method of collecting parent feedback is through surveying parents during the Program Review Process. The surveys collected from July 2008-June 2009 indicate that parents understood their rights in the program and understood whom to contact when there was a problem.

**Collaboration/Coordination:** DHS reviewed and updated its complaint procedures to assure prompt resolution. The Birth to 3 mediation website page that discussed Options to Resolving Conflict was updated to ensure clear information on this helpful process for both county provider agencies and families when disagreements are encountered and difficult to resolve. Families or providers who contacted the state with questions regarding concerns were encouraged to review and access the various dispute options available.

**Clarify/Examine/Develop Policies and Procedures:** Birth to 3 Programs continue to address the priority of procedural safeguards for families participating in the program. Information gathered through the Self Assessment and Program Review Process, namely through interviews with families, file review checklists and parent surveys assist the county and state teams in identifying potential issues and opportunities to clarify a family's rights related to procedural safeguards. Birth to 3 Programs must also share information with families regarding procedures for resolving disputes through the processes of mediation, hearings or complaints. Current strategies to assist counties with this process include reviewing current county policies regarding the distribution of information to families. The IFSP signature page reminds Birth to 3 Program teams to share written parental rights and to review with families to ensure their understanding of their rights in the Birth to 3 Program.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2008:** No revisions are proposed.

**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
2008 (2008-2009)	100%

**Actual Target Data for FFY 2008:**

No hearings were requested in FFY 2008.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2008:** Not applicable. No hearing requests in 2008.

**Clarify/Examine/Develop Policies and Procedures:** The WI Birth to 3 Program uses the Part C requirements. All materials discussing due process hearings were updated to reflect Part C requirements. Birth to 3 Programs continue to address the priority of procedural safeguards for families in the program and share information with families regarding procedures for resolving disputes through the processes of mediation, hearings or complaints. Current strategies to assist counties with this process include reviewing current county policies regarding the distribution of information to families.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2008:** No revisions are proposed.

**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
2008 (2008-2009)	100%

**Actual Target Data for FFY 2008:**

Wisconsin will use Part C requirements and will not use Part B due process procedures. DHS encourages county programs to attempt to resolve disputes with parents at the local level, but reminds counties and providers that any local procedures cannot take the place of State level early intervention procedures available to families.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2008:** Not applicable.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2008:** No revisions are proposed.

**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
2008 (2008-2009)	100%
Results	0%

**Actual Target Data for FFY 2008:** Two mediations were held, but no agreements were reached.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2008:** Two mediations were held in FFY 2008. Neither of the mediations resulted in an agreement. Both mediations were reported by the mediation intake person as appropriate mediation requests. One of the mediations involved a family who reported, via the exit survey, a decision's impact would be limited due to the short time frame between the end of the mediation and the child turning three and leaving the Birth to 3 program. Six of the seven participants (in the two mediations) agreed they would use mediation again to help resolve a dispute. From FFY 2004 to FFY 2007, DHS had one mediation request. WI Birth to 3 programs have always focused on sharing and explaining parental rights with families and this continues to be a focus in WI. Materials have been updated in the past two years to support the concentration on practices that inform families of their rights. This recent emphasis resulted in the two mediation requests. With the Family Outcomes (Indicator 4), there is a renewed interest in assuring families understand their various rights and how to utilize them.

**Clarify/Examine/Develop Policies and Procedures:** Birth to 3 Programs continue to address the priority of procedural safeguards for families in the program and share information with families regarding procedures for resolving disputes through the processes of mediation, hearings or complaints. Current strategies to assist counties with this process include reviewing current county policies regarding the distribution of information to families.

**Collaboration/Coordination:** In FFY 2008, DHS continued to contract with the mediation service, Burns Mediation Services, LLC, to offer a neutral party to receive the request for mediation. DHS wanted to be sure that calling "the State" was not stopping parents or county Birth to 3 Programs from making requests for mediation services. DHS has promoted mediation as a tool to resolve conflict, not a tool the State requires because the county Birth to 3 Program did not "do their job" right. The intake person at Burns Mediation Services, LLC, is a trained dispute resolution professional who can answer all preliminary questions potential parties might have as they think about requesting mediation or as they submit the request. The Birth to 3 mediation website was updated to ensure clear information on this helpful process for both county provider agencies and families when disagreements are encountered. Families or providers who contact the state with questions regarding disputes are encouraged to review and access the mediation services available.



**Provision of Training and Professional Development:** The Mediation and Options for Resolving Conflict brochures for families were updated. Mediation is an option for families to resolve conflict over their child's services with the county Birth to 3 program. Since July 1, 2008, more than five families have contacted DHS with questions about their children's services and mediation services were shared as an option for the family to pursue, as well as the other dispute resolution procedures available. When the annual training session for the mediators occurred, a DHS Birth to 3 staff person attended to learn more about the mediation process and share basic information about Birth to 3. To learn more about Wisconsin's mediation process, families, providers and the public can access [www.wib3ms.us](http://www.wib3ms.us). Specific outreach activities are planned for the FFY 2009 to promote this process for families and Birth to 3 Programs to utilize.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2008:**

The State Performance Plan (SPP) was updated to reflect new information described above about the mediation contract, on page 66 of the SPP.

**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, personnel, 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

FFY	Measurable and Rigorous Target
2008 (2008-2009)	100%
Results	100%

**Actual Target Data for FFY 2008:**

All reports were submitted on or before due dates, demonstrating 100 percent compliance with this indicator. The data were accurate per required standards. The Indicator 14 Data Rubric (Appendix C, pages 76-78) was utilized to determine compliance, the valid and reliable data reported for each indicator, complete data submitted for Table 1, 2, 3 and 4 to WESTAT, including passing edit checks and response to data notes.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2008.**

Data were submitted in a timely manner and requested clarifications were provided. All reports were timely. Ten (10) findings of non-compliance around Indicator 14 were issued in FFY 2007 to counties, as Wisconsin places more attention on timely data as recorded in the former HSRS system and the new PPS system, all of which were corrected within 12 months. One finding was issued in FFY 2008, and has been corrected.

**Improved Data Collection and Reporting:**

As described throughout this document in November of 2008, Wisconsin replaced the former Human Service Reporting System database with PPS. The new PPS database has improved the comprehensiveness and accuracy of data collection for reporting on indicators,

**Provision of Training:**

A Wisconsin Birth to 3 Leadership Conference called *Quality Decision-Making: Using Data to Create Opportunities* was held on November 29, 2007. The focus of this event was on data gathering and accountability as part of a quality improvement process. The emphasis of the event was to place the OSEP Indicators and other accountability activities in the context of program improvement based on data-driven decision making. Sharon Walsh of Walsh Taylor, Inc. and the Infant Toddlers Coordinators Association provided a national perspective on OSEP accountability demonstrating the implications for program

improvement at the local level. Ann Bailey, North Central Regional Resource Center, demonstrated data-based decisions-making strategies using materials from the Improvement Tool Kit (IT Kit), developed by the NCRRRC. Data-driven decision making processes have unfolded from these earlier training events that continue to take precedence throughout the Wisconsin supervision system and within county Birth to 3 programs.

**Provision of Technical Assistance:** Leadership to counties continued to occur throughout the year as documented throughout this report. Monthly Wislines, Data Wislines, Birth to 3 and Birth to 6 Regional meetings, and Orientation to Best Practices have provided ongoing opportunities to support leaders in the timely and accurate reporting of data. For example, a Special Annual Wisline on June 12, 2008, [Data Collection Changes in the Upcoming Year](#), offered updates for the FFY 2008.

**Clarification of Policies and Procedures:** Data requirements clarification processes continue to be a major focus. These were supported with a series of Data Discussion Wislines as described below:

2009 Data Discussion Schedule

Date	Time	Topic	Wisline Information
Wednesday March 18	9am – 10am	PPS overall	To join the Wisline, dial 608-316-0022 (local for the Madison area) or toll-free 888-677-9189, sign in code 2862#
Tuesday May 5	9am – 10am	Transition	
Tuesday June 2	9am – 10am	PPS changes in the coming year	
Tuesday August 4	9am – 10am	Child & Referral Information Page: Child Count data (Indicators 5 & 6)	
Tuesday September 1	9am – 10am	Screening/Evaluation Page: Indicator 7	
Tuesday November 3	9am – 10am	Service Planning Page: Indicators 1, 2, & 3	
Tuesday December 1	9am – 10am	Transition/Program Exit Page: Indicators 8	

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2007: No revisions proposed.**

Appendix A

Opt Out Policy

**WISCONSIN OPT OUT POLICY**    Approved by OSEP: December 3, 2009

IDEA section 637(a)(9)(A)(ii) requires States to have policies and procedures that ensure a smooth transition for children receiving Part C early intervention services to Part B preschool or other appropriate services. Policies and procedures also must include how the Part C lead agency will notify the local education agency (LEA) for the area in which each child resides that the child will shortly reach the age of eligibility for preschool services under Part B, as determined by State law.

The WI Birth to 3 Program ensures that each child in the Birth to 3 Program has LEA Notification sent to the local education agency (LEA) in which the child resides as the child closely approaches the age of eligibility for Part B services which for the State of Wisconsin is three years old. LEA Notification is sent to the LEA with the child's name, date of birth, and parent's name and contact information, unless the parents "opt out". This information is sent to the LEA unless the parent indicates in writing on the "Opting Out of LEA Notification" form that they "opt out" of the LEA receiving identifying information. This policy and the "Opting Out of LEA Notification" form is given to the family when a child is determined to be eligible for the Birth to 3 program, after an initial Individualized Family Service Plan (IFSP) is developed. If the parent-signed "Opting Out of LEA Notification" form is not received at the county Birth to 3 Program by the time a child is 27 months old, LEA Notification is sent to the LEA when the child is 27 months old. If the child is referred to Birth to 3 after 27 months of age, the family is asked to return the signed "Opting Out of LEA Notification" form within 10 days after the receipt of the "Opting Out of LEA Notification" form. If a child's initial eligibility is determined within the nine-month period before the third birthday, the county administrative agency will notify the LEA as soon as possible after determining the child's eligibility for Part C, unless the family signs the "Opting Out of LEA Notification" form and returns it within the specified ten days.

In addition, during the Transition Planning Conference or meeting to determine eligibility for preschool special education services through the LEA, if the family chooses to provide consent for the transfer of additional information in the child's record, the family will sign a release that authorizes what additional information is to be shared, which could include (at the family's discretion):

1. services child received while in the Birth to 3 program
2. where the Birth to 3 program provided those services
3. exit data on child outcomes
4. the developmental concerns the Birth to 3 program has regarding the child
5. The Individualized Family Service Plan (IFSP)
6. Progress Reports/Plan of Care
7. Evaluation Reports from: speech therapists, occupational therapists, physical therapists, special education teachers and others, as indicated

## Appendix B

## Indicator 3 SPP Template

FFY 2007 template to work from for FFY 2008 Outcomes---will need to update SSP AND write a section for the APR

*Overview of the State Performance Plan Development:*

**Monitoring Priority: Infant and Toddler Outcomes**

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 USC 1416(a)(3)(A) and 1442)

**Measurement:**

- A. Positive social-emotional skills (including social relationships):
  - a. Percent of infants and toddlers who reach or maintain functioning at a level comparable to same-aged peers = # of infants and toddlers who reach or maintain functioning at a level comparable to same-aged peers divided by # of infants and toddlers with IFSPs assessed times 100.
  - b. Percent of infants and toddlers who improve functioning = # of infants and toddlers who improved functioning divided by # of infants and toddlers with IFSPs assessed times 100.
  - c. 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.

If children meet the criteria for a, report them in a. Do not include children reported in a in b or c. If

a + b + c does not sum to 100%, explain the difference.

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

- a. Percent of infants and toddlers who reach or maintain functioning at a level comparable to same-aged peers = # of infants and toddlers who reach or maintain functioning at a level comparable to same-aged peers divided by # of infants and toddlers with IFSPs assessed times 100.
- b. Percent of infants and toddlers who improved functioning = # of infants and toddlers who improved functioning divided by # of infants and toddlers with IFSPs assessed times 100.
- c. 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.

If children meet the criteria for a, report them in a. Do not include children reported in a in b or c. If a + b + c does not sum to 100%, explain the difference.

C. Use of appropriate behaviors to meet their needs:

- a. Percent of infants and toddlers who reach or maintain functioning at a level comparable to same-aged peers = # of infants and toddlers who reach or maintain functioning at a level comparable to same-aged peers divided by # of infants and toddlers with IFSPs assessed times 100.
- b. Percent of infants and toddlers who improved functioning = # of infants and toddlers who improved functioning divided by # of infants and toddlers with IFSPs assessed times 100.
- c. 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.

If children meet the criteria for a, report them in a. Do not include children reported in a in b or c. If a + b + c does not sum to 100%, explain the difference.

Overview of Issue: **Green highlights indicate a revision in the SPP from the submission in February 2008.**

Wisconsin will use the OSEP child outcomes indicators for both Part C and Part B, section 619 of IDEA as a resource to enhance State-level collaboration and to ensure a consistent knowledge-base across all programs that serve children from birth to age six years especially in the area of ongoing assessment and data-based decision-making..

Wisconsin's Birth to 3 Program is built upon a process of strong team decision-making, with assessment and IFSPs resulting in a plan of services to achieve outcomes prioritized by the family. This process of utilizing information from multiple sources **and environments** will be used to design

family-guided services and to further strengthen the early intervention process by creating systems to support both local and state decision-making based on progress toward OSEP outcomes. It is imperative to integrate and enhance the current process rather than create a new system. DHS is committed to supporting assessments and decision-making strategies for reporting on child outcomes that enhance, rather than detract from, the intervention and planning processes. The goal is three-fold: (1) to prevent an increased burden on local programs (2) to achieve quality services for children and families, and (3) to increase the capacity for data-based decisions. Achieving these goals is challenging since programs that serve young children are administered by a variety of departments and operate under differing sets of federal and state guidelines.

Wisconsin has worked for over ten years to create a coordinated system of services for all young children. One of these efforts included development of the Wisconsin Model Early Learning Standards (WMELS). Although the original standards were designed for the age three to six population, the interagency team that developed the standards included professionals with expertise related to children from birth to three years of age. Currently, the standards have been revised to incorporate the standards for children ages birth to six and are being promoted as the foundation for the WI Birth to 3 Program and Early Childhood Special Education Program collaborative child outcomes accountability system. These standards are also being used by other community partners including Head Start and child care. The WMELS team is committed to:

1. Providing training statewide on the current and revised standards;
2. Promoting alignment of WMELS with early childhood curriculum and assessment tools; and
3. Providing structure for accountability focus areas that are aligned with IDEA and general education.

#### *Description of Child Outcome Reporting System and Processes:*

In June 2005 key staff from the Birth to 3 Program and DPI Early Childhood, including two members of the ICC, attended a working meeting sponsored by the North Central Regional Resource Center (NCRRC). This group participated in a planning session facilitated by staff from the National Early Childhood Technical Assistance Center (NECTAC). The result of the meeting was a proposal to develop a cross-department, collaborative approach to designing and implementing a birth to six child outcomes system in Wisconsin.

In August 2005, the group reconvened with upper-level management support from DHS and DPI to further develop a plan that outlined our processes, steps, timeline, partners and external resources. The result of this meeting was the inception of the IDEA Outcomes Steering Committee. In addition to strong representation from Birth to 3 Program and Early Childhood state staff, the committee also included local providers, ICC members, Birth to 3 Program technical assistance contractors, parents and representatives from Head Start and child care. Also in August 2005, the Wisconsin members of the team attended the OSEP Summer Institute. Members gathered information, networked with colleagues and made further contact with national technical assistance resources.

In October 2005, a day-long information and planning meeting was facilitated by NECTAC for the IDEA Outcomes Steering Committee. The meeting resulted in discussion of the criteria used to choose data sources, an explanation of the new rating tool being developed to support teams in reviewing existing data, determining the status of a child's progress, and a review of possible outcome and assessment tools.

On November 10, 2005, the Wisconsin Early Childhood Collaborating Partners (WECCP) sponsored a videoconference designed to facilitate statewide participation through a number of sites across the state. Participants included Birth to 3 Program staff, early childhood special



education, preschool, Head Start, child care, family resource centers and other early childhood professionals. The goal was to develop guiding principles of assessment and accountability systems including best practices for children, qualifications of staff, support for local efforts, processes for different settings, and community partnerships. Dr. Sam Meisels, an expert in early childhood assessment and accountability, provided a framework for participants by discussing strategies for gathering assessment information. He presented examples of appropriate use of information and issues to avoid. Following this presentation, participants at each site then discussed the principles they wanted to see utilized as part of the accountability framework as it continues to be developed. The following principles were compiled from the top principles submitted from each of the sites:

#### Top Principles of Assessment

- Parents are the most important, primary caregivers and should be collaboratively involved in their children's education and development. They must be supported and encouraged to be partners in this process.
- Success is measured using a valid evidence-based method incorporating observations of growth and development, considering individual learning styles and differences, and utilizing all the environments (home, culture, community) in which the child lives and learns. Strength-based functional assessment in natural environments utilizing natural supports and everyday relationships are important. Developmental expectations must be culturally, linguistically, and developmentally-appropriate, as well as research-based.
- Assessment is on-going, continuous and linked to a fixed timeline. Holistic approaches to assessment (all life areas) using multiple sources over time should be used since there is no single way to demonstrate accountability. Assessments will bring about benefits for children, programs and families. They will not add undue burden to families, providers, or local and state administrators.
- Consistent accountability system measures within local communities that distinguish between program standards and child outcomes are needed.
- Quality of staff knowledge, skills and efficacy of implementation with emphasis of continual staff development is important.
- Adequate and equitable resources are needed to meet the intent of these Guiding Principles and to enable all children to participate equally in a range of services to meet their unique needs.

The DHS/DPI IDEA Outcome Steering Committee had also been considering the systemic implementation of collection and analysis of child outcome data. With decreasing financial resources and increasing requirements for reporting, the team was motivated to develop a response to the General Supervision Enhancement Grant (GSEG) request for proposal. A proposal for an early childhood project was submitted in October 2005 that resulted in the development of the PPS described in the FFY 2007 APR. The PPS included a component for the Birth to 3 Program to report data on the OSEP Child Outcomes Indicators. The approach builds upon the work of Milwaukee County and the University of Wisconsin-Milwaukee in developing a technology-based system to support tracking program information. Through resources of the GSEG, Wisconsin proposes to expand this system to collect and aggregate outcomes data.

On December 5, 2005, the IDEA Outcomes Steering Committee participated in a day-long meeting facilitated by Mary McLean a national expert on state-wide accountability systems. The meeting included a historical perspective, IDEA requirements for accountability systems, assessment tools and strategies currently utilized in Wisconsin for children ages birth to six years, and recommend pilot strategies and sites for reporting child outcomes.

In February, 2006, DPI and DHS partnered to train staff in the selected pilot sites in using the rating scale developed by the Early Childhood Outcomes (ECO) Center. This training prepared participants for utilizing this tool to gather data on families that entered the program in the first

quarter of 2006. The initial use of this tool was based on the current information that programs have on children. We learned from this experience ways to enhance the process through utilization of additional assessment tools or processes.

In May 2006, Cooperative Education Service Agency (CESA) 1 sponsored a statewide conference on assessment, outcomes and accountability. The planning committee included staff from DPI and DHS, as well as practitioners. This conference was designed for programs serving children between birth and six years of age. Participants included program coordinators, providers, teachers, and state staff. The purpose of the conference was to provide an overview of multiple assessment processes and guidelines for choosing and using an assessment tool.

In April 2007, a training of trainers was sponsored in collaboration with DPI and CESA Early Childhood Program Support Teachers to train technical assistance staff to support counties to collect child outcomes on all children entering the Birth to 3 Program beginning July 1<sup>st</sup>, 2007. A standard curriculum and supporting materials were developed for and disseminated at these meetings. These materials are posted on the Child Outcomes section of the Wisconsin Early Childhood Collaborating Partners, found at: <http://www.collaboratingpartners.com/OSEP/forms.htm>. This includes the use of the Child Outcomes Summary Form adapted for Wisconsin from the ECO Center. Since this event, these trainers have been providing training to local programs (birth to 3 and LEAs), using and refining the original set of materials

In July 2007, WI DPI funded a Child Outcomes Coordinator with discretionary grant funds. While this position has primary responsibilities for LEA training and technical assistance, time is also allocated to support the Early Childhood Program Support Teachers as well as REsource staff in developing the Birth to 6 Child Outcomes System. This includes the facilitation of monthly Indicator calls that started in the Fall of 2008 to provide ongoing support for Child Outcomes and other Indicators (e.g., transitions). This person also maintains the Child Outcomes technical assistance websites:

1. [http://www.collaboratingpartners.com/OSEP/Early\\_OSEP.htm](http://www.collaboratingpartners.com/OSEP/Early_OSEP.htm)
2. <http://www.collaboratingpartners.com/OSEPtrng/Index.html>

Throughout 2007 and 2008 the Cross Department Child Outcomes Workgroup consisting of staff from WDHS (Part C) and WDPI (Part B) and the Child Outcomes coordinator met to develop common expectations and understanding of child outcomes requirements and to assure a “Birth to Six” perspective. Collaboration was demonstrated by the development of an electronic data reporting system (PPS), development and period review of a question/answer document, data analysis, state access of OSEP technical assistance, and training and technical assistance, available at the web sites referenced above.

Throughout the Spring 2008, five regional technical assistance trainings provided by the state Outcomes Coordinator were offered. These trainings were open to both Part B and Part C providers. Each training included the seven part module, available in it's entirety at <http://www.collaboratingpartners.com/OSEPtrng/Index.html>.

Also available throughout the year were WISline “Data Discussion” three of which dealt specifically with Child Outcomes. Those discussions were held on February of 2008, “Indicator Walkthrough” , November 2008, “On-Going Assessment” and December 2008, “Determining Child Outcomes”

During the summer of 2008 the Wisconsin Birth to 3 program in collaboration with the Wisconsin Department of Public Instruction began the roll out a new data collection system known as the Program Participation System (PPS), a web based system intended to replace the older non web-based application Human Service Reporting System (HSRS). Several aspects of this new data collection system are significant improvements over HSRS, including anytime accessibility to a County's data for both the State B-3 team and each County service provider. PPS allows counties to enter their own Child Outcome "entry" and "exit" ratings and "sources of information". PPS also increases the State B-3's overall data accuracy by not allowing a child to be exited or closed from a County without proper child outcome information being entered into PPS. Finally, the PPS data system allows each Birth to 3 program to share, with parent permission, child outcome exit status ratings with their respective LEA

Wisconsin Birth to 3 and the Wisconsin Department of Public Instruction continue to work collaboratively to enhance the Birth to Six Child Outcomes system through two Outcomes related committees including Birth to 6 Cross Departmental and the Child Outcomes Workgroup, both of which continue to meet on a bi-monthly basis to review existing materials, recommend assessments and determine roles and responsibilities among committee members and across departments. During 2009 the Early Child Outcomes workgroup initiated two projects designed to first, improve the efficiency of the Child Outcomes reporting process by reducing a program's paperwork burden while not jeopardizing the accuracy of the reporting and second, designed a self assessment process to support and encourage programs to analyze and improve their Child Outcomes practices. The first initiative aimed at reducing the paperwork burden involved integrating the Child Outcomes Summary Form (COSF) into the IFSP. This IFSP allows for a more fluid and seamless process of gathering both Child Outcomes information and developing an IFSP. Previously, programs identified the Child Outcomes process as disconnected from IFSP development and created additional and duplicative paperwork requirements. However, programs still have the option to continue to use the COSF. The Child Outcomes workgroup also revised portions of the COSF to make it more user friendly (Second initiative, developing a Child Outcomes Fidelity Self Assessment, continues to evolve, change and improve as Wisconsin receives feedback from Child Outcomes workgroup committee members and TA staff. The Child Outcomes Fidelity Assessment is voluntary, however there are discussions within the Program Self Assessment committee on whether to require this process during a program on site year.

#### *Baseline Data:*

Baseline data for FFY 2008 are presented in the tables below. These data were derived from children exiting Birth to Three between June 30, 2008 and July 1, 2009.

The sources of information used to obtain accurate Child Outcome ratings for each child includes a variety of instruments which are listed below. In addition to utilizing formal assessments to obtain accurate and reliable data, other sources of information including parent interview; observation in a variety of settings and/or environments including community setting and childcare are taken into consideration when developing child entry and exit ratings. Other commonly used resources include a review of medical records, information from previous B-3 county records, foster parent input, and professional judgment. The following instruments were reported as commonly used assessment tools: Battelle Developmental Inventory Second Edition; Hawaii Early Learning Profile; Brigance Inventory of Early Development II; Greenspan Social-Emotional Scale; Early Learning Accomplishment Profile; Rosetti Infant Toddler Language Scale; Ages and Stages Developmental Screener; Preschool Language Scale 3 & 4; Peabody Developmental Motor Scales; Goldman-Fristoe Test of Articulation; Bayley Scales of Infant Toddler Development; Early Intervention Developmental Profile; Assessment, Evaluation and Programming System (AEPS); Rhode Island Test of Language Structure; Alberta Infant Motor Scale; Emergent Language Test; Receptive Expressive Emergent Language Scale-3; Winn Dunn Sensory Profile; Ages and Stages

## APR – Part C (4)

State of Wisconsin

SE Questionnaire; Birth to Three Assessment and Intervention System-2; Brief Infant Toddler Social Emotional Assessment; Vineland Adaptive Behavioral Scale; The New Portage Guide Birth to Six; Degangi Infant-Toddler Symptom Checklist; Carolina Curriculum; M-Chat; Mullen Scale of Early Learning; Infant Toddler Sensory Profile; TABS Scale; Early Language Milestones; Beckman Oral Motor Evaluation; Developmental Assessment of Young Children; Coulee Children's Center Fine Motor and Feeding Checklists; Ready, Set, Grow; Infant Developmental Screen Scale; Carolina Developmental Profile; CDHH Normal Speech Development Checklist; WPS; Penfield Developmental Scales and Developmental Profile II; Auditory Skills Checklist; Ling 6 Sound Test; Toddler Sensory Motor Checklist; Infant Toddler Developmental Assessment; High Scope Preschool Child Observation Record for Infants and Toddlers; Developmental Pre-Feeding Checklist; Pediatric Early Developmental Inventory; and the WeeFIM.

### OSEP Category Totals

Outcome 1	Number	Percentage
a: Children who did not improve functioning	27	1%
b: Children who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	394	13%
c: Children who improved functioning to a level nearer to same-aged peers but did not reach it	363	12%
d: Children who improved functioning to reach a level comparable to same-aged peers	729	24%
e: Children who maintained functioning at a level comparable to same-aged peers	1501	50%
total	3014	100%

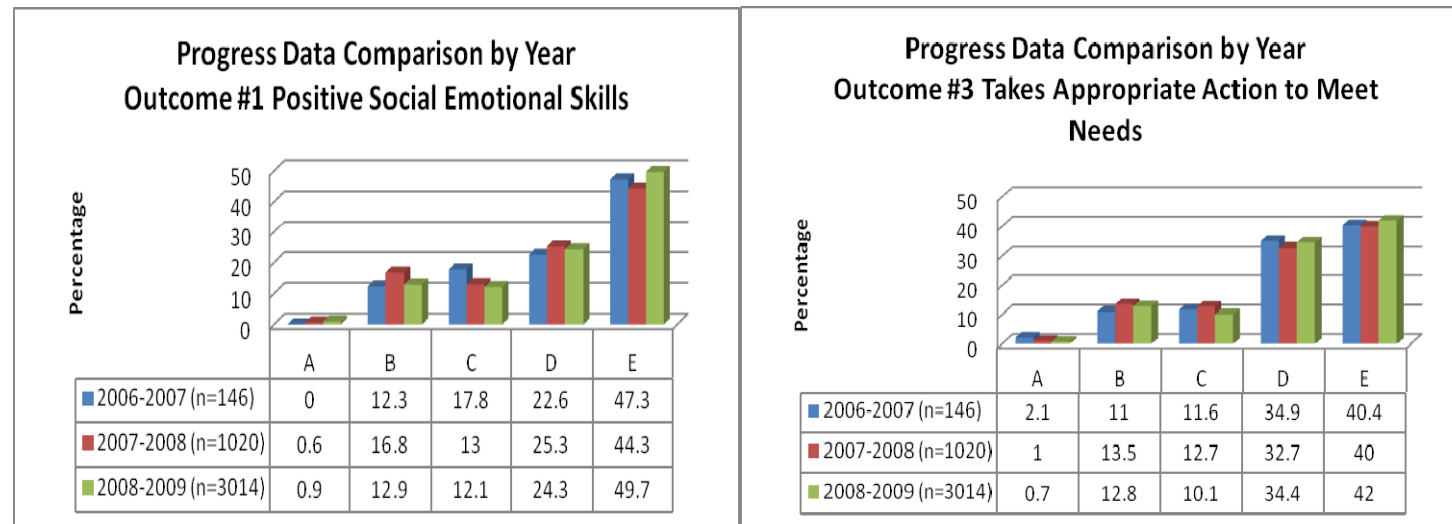
Outcome 2	Number	Percentage
a: Children who did not improve functioning	19	1%
b: Children who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	506	17%
c: Children who improved functioning to a level nearer to same-aged peers but did not reach it	711	24%
d: Children who improved functioning to reach a level comparable to same-aged peers	1170	39%
e: Children who maintained functioning at a level comparable to same-aged peers	608	20%
total	3014	100%

Outcome 3	Number	Percentage
a: Children who did not improve functioning	20	1%
b: Children who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	390	13%

c: Children who improved functioning to a level nearer to same-aged peers but did not reach it	304	10%
d: Children who improved functioning to reach a level comparable to same-aged peers	1029	34%
e: Children who maintained functioning at a level comparable to same-aged peers	1271	42%
total	3014	100%

#### Discussion of Baseline Data:

Progress data for children exiting in FFY 2009 is presented in the tables above. There will not be a full three year cohort of children until July 1, 2010. Although the data represented in this years table appears skewed slightly toward the “e” rating for Outcomes one and three (as shown in the charts below) they are, however, relatively consistent with the previous two years “e” rating; FFY 2006 Outcome one “e” totaled 47% compared to FFY 2007 which was 44% and for Outcome three both FFY 2006 and FFY 2007 totaled 40% for the “e” rating. WDPI reports similar results in their Child Outcomes data. With this in mind, the new data collection system known as the Program Participation System (PPS), which was designed in collaboration with WDPI, will support and encourage the accountability in both the quantity and quality of data collection and aggregation. The result of the PPS data system will improve administration & overall ease of monitoring at both the State and local level.



## Summary Statements

		Social Emotional Skills		Acquiring and Using Knowledge and Skills		Taking Appropriate Action to Meet Needs	
		Enter # of Children	% of Children	Enter # of Children	% of Children	Enter # of Children	% of Children
a.	Percent of infants and toddlers who did not improve functioning	27	0.9	19	0.6	20	0.7
b.	Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	394	13.1	506	16.8	330	12.9
c.	Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach	363	12	711	23.6	304	10.1
d.	Percent of infants and toddlers who improved functioning to reach a level compared to same aged peers	729	21.2	1170	38.8	1029	34.1
e.	Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers	1501	49.8	608	20.2	1271	42.2
TOTAL		3014	100.0%	3014	100.0%	3014	100.0%
<b>SUMMARY STATEMENTS</b>							
1.	Of those children who entered the program below age expectations in [outcome], the percent that substantially increased their rate of growth in [outcome] by the time they exited.	72.2%		78.2%		76.5%	
2.	Percent of children who were functioning within age expectations in [outcome], by the time they exited.	74%		59%		76.3%	

Another collaborative effort between the two departments, WDHS and WDPI, PPS allows, with prior signed consent, entry and exit outcome data to be readily available to the receiving LEA (Part B) program. There is an additional effort being considered within the Childhood Outcomes work group to further improve reliability of exit/entry ratings during a child's transition from Part C to Part B and further strengthen collaborative efforts between Birth to 3, LEA's and families. The process includes Birth to 3 staff becoming a formal part of the IEP meeting. All members of the IEP meeting including family, Part B and Part C discuss the child's present level of performance and develop the goals of the IEP. During the IEP discussion the necessary information needed to complete the Child Outcomes Summary will be revealed. As part of this process the use of the Early Childhood Outcomes "Decision Tree" (with numbered ratings removed) will be utilized. The information shared during the IEP process can be documented on the Child Outcomes Summary Form, including ratings, immediately following the IEP and formally recorded in the Program Participation System (PPS) data system. To further support and inform programs, both Birth to 3 and LEA's, a Child Outcome's WISline was held on September 10, 2009 <http://dhs.wisconsin.gov/bdds/b3etn/2009/200909/index.htm>

Also as part of Wisconsin's continued collaborative efforts, quarterly regional training and professional development for both service providers and administrative staffs are currently in the development stages. Areas of emphasis will be the "validity and reliability in the team decision making process of determining child outcomes ratings", "on-going assessment" and continued training on Child Outcomes and the new PPS data collection system. Wisconsin B3 recommended evaluation instruments; Q&A documents and corresponding materials will be continually updated and accessible through the Collaborating Partners website; <http://www.collaboratingpartners.com/index.html>. Among other Technical Assistance downloads can be found at; <http://www.collaboratingpartners.com/OSEP/assessment.htm>.

As implementation of collection of entry outcomes for all children begins on July 1<sup>st</sup>, 2007, it is anticipated the progress data reported in the February 2009 APR will include a much larger number of children who have both entry data and received 6 months of services prior to exiting.

#### *Measurable and Rigorous Targets*

- Target setting for the two summary statements for each of the three child outcomes was determined during the January 2010 State ICC meeting. Wisconsin State ICC has a broad representation of individuals including parents, providers, Medicaid, State Insurance, Personnel Preparation, Public Health, Department of Public Instruction (Part B), Mental Health, McKinney-Vento Program, Child Care, Foster Care, Head Start and other members-at-large. Following a PowerPoint presentation highlighting specific Indicator 3 topics including OSEP requirements and timelines, child progress categories, child outcomes data, summary statements and target setting the ICC engaged in a thoughtful discussion. A key consideration was setting targets that are representative of the Birth to 3 Program mission to enhance development and improve the development trajectory of Wisconsin's young children with disabilities during the next several years of careful data analysis and continued training around validity and fidelity of processes in place to measure child outcomes.

## APR – Part C (4)

State of Wisconsin

Summary Statement Targets	Baseline for FFY 2009 (% of children)	Targets for FFY 2010 (% of children)	Targets for FFY 2011	Targets for FFY 2012
<b>Outcome 1: Positive social-emotional skills including social relationships</b>				
<b>S.S.1</b> <i>Of those children who entered the program below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they exited the program.</i>	72.5%	72.5%	72.6%	72.7%
<b>S.S.2</b> <i>The percent of children who were functioning within age expectations in each Outcome by the time they exited the program.</i>	74.0%	74.0%	74.10%	74.20%

Summary Statement Targets	Baseline for FFY 2009 (% of children)	Targets for FFY 2010 (% of children)	Targets for FFY 2011	Targets for FFY 2012
<b>Outcome 2: Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>				
<b>S.S.1</b> <i>Of those children who entered the program below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they exited the program.</i>	78.2%	78.2%	78.3%	78.4%
<b>S.S.2</b> <i>The percent of children who were functioning within age expectations in each Outcome by the time they exited the program.</i>	58.9%	58.9%	59.0%	59.10%

Summary Statement Targets	Baseline for FFY 2009 (% of children)	Targets for FFY 2010 (% of children)	Targets for FFY 2011	Targets for FFY 2012
<b>Outcome 3: Use of Appropriate behaviors to meet their needs.</b>				
<b>S.S.1</b> <i>Of those children who entered the program below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they exited the program.</i>	76.7%	76.7%	76.8%	76.9%
<b>S.S.2</b> <i>The percent of children who were functioning within age expectations in each Outcome by the time they exited the program.</i>	76.4%	76.4%	76.5%	76.6%

*Improvement Activities/Timelines/Resources:*



Year 1, Wisconsin plans to collect entry data during the months of June, July and August 2006. All children starting Birth to 3 Program services who were less than 30 months of age between February 1, 2006 and April 30, 2006 will be assessed using information from multiple sources and status information on each individual child will be recorded on the ECO Center Child Outcomes Summary Form by August 31, 2006. This data will be aggregated and provided in the Annual Performance Report (APR) due in February 2007. DHS will collaborate with the 619 program at DPI to provide training on the use of the Child Outcomes summary form in February 2006. DHS will also partner with CESA 1 to prepare training on May 6 and 7, 2006 related assessment tools and techniques.

Year 2, Wisconsin DHS will require that all counties to use the Outcomes Summary Form during the time period described above as a way of getting broad baseline data and of introducing all counties to these concepts. Some counties will have a great deal more work to do to reach this standard than others. Therefore, DHS will pilot the progress portion of this indicator only in those counties already using appropriate assessment tools and strategies. Beginning in August 2006, any child exiting the program in the pilot counties for whom status data was obtained, will have their progress assessed. Wisconsin intends to collect the five ECO recommended categories of progress, as data regarding children who make sufficient progress to move closer to typical development is important to track. All six counties will collect entry status data on all children starting Birth to 3 Program services who are less than 30 month July 1, 2007. Progress data on the first group of children will establish the progress data reported in the APR due February 2008.

Year 3, based on the experience with the pilot counties regarding the integration of this process into current practices, Wisconsin has made a decision to collect entry data on all children entering the Birth to 3 Program beginning July 2007 and exit data on those children, who have entry data and received 6 months of services beginning January, 2008. This data will be reported in the APR due February 2009.

During the summer of 2008 the Wisconsin Birth to 3 program in collaboration with the Wisconsin Department of Public Instruction began the roll out a new data collection system known as the Program Participation System (PPS), a web based system intended to replace the older non web-based application Human Service Reporting System (HSRS). Several aspects of this new data collection system are significant improvements over HSRS, including anytime accessibility to a County's data for both the State B-3 team and each County service provider. PPS allows counties to enter their own Child Outcome "entry" and "exit" ratings and "sources of information". PPS also increases the State B-3's overall data accuracy by not allowing a child to be exited or closed from a County without proper child outcome information being entered into PPS. Finally, the PPS data system allows each Birth to 3 program to share, with parent permission, child outcome exit status ratings with their respective LEA

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1. [http://www.collaboratingpartners.com/OSEP/Early\\_OSEP.htm](http://www.collaboratingpartners.com/OSEP/Early_OSEP.htm)
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Five regional technical assistance trainings provided by the state Outcomes Coordinator were offered throughout the spring of 2008. These trainings were open to both Part B and Part C providers. Each training included the seven part module, available in it's entirety at <http://www.collaboratingpartners.com/OSEPtrng/Index.html>.

Also available throughout the year were WISline "Data Discussion" three of which dealt specifically with Child Outcomes. Those discussions were held on February of 2008, "Indicator Walkthrough" , November 2008, "On-Going Assessment" and December 2008, "Determining Child Outcomes"

Year 4 through year 6, DHS will continue to implement the collection of entry and exit data on all children in the program. There will not be a full 3 year cohort of children until July 1, 2010.

## Appendix C Indicator 14 Rubric

SPP/APR Data - Indicator 14				
APR Indicator	Valid and Reliable	Correct Calculation	Followed Instructions	Total
1	1	1	1	3
2	1	1	1	3
3	1	1	1	3
4	1	1	1	3
5	1	1	1	3
6	1	1	1	3
7	1	1	1	3
8a	1	1	1	3
8b	1	1	1	3
8c	1	1	1	3
9	1	1	1	3
10	1	1	1	3
11	1	1	1	3
12	1	1	1	3
13	1	1	1	3
			<b>Subtotal</b>	45
<b>APR Score Calculation</b>		<b>Timely Submission Points</b> - If the FFY2006 APR was submitted on-time, place the number 5 in the cell on the right.		5

	<b>Grand Total</b> - (Sum of subtotal and Timely Submission Points) =	50
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618 Data - Indicator 14					
Table	Timely	Complete Data	Passed Edit Check	Responded to Data Note Requests	Total
Table 1 - Child Count Due Date: 2/1/07	1	1	1	1	4
Table 2 - Program Settings Due Date: 2/1/07	1	1	1	1	4
Table 3 - Exiting Due Date: 11/1/07	1	1	1	NA	4
Table 4 - Dispute Resolution Due Date: 11/1/07	1	1	1	NA	4
				<b>Subtotal</b>	16
<b>618 Score Calculation</b>			<b>Grand Total</b> (Subtotal X 3) =		48

Indicator #14 Calculation	
A. APR Grand Total	50
B. 618 Grand Total	48
C. APR Grand Total (A) + 618 Grand Total (B) =	98

## APR – Part C (4)

State of Wisconsin

Total NA or N/A in APR	0
Total NA or N/A in 618	2
<b>Base</b>	<b>98</b>
D. Subtotal (C divided by Base*) =	1.000
E. Indicator Score (Subtotal D x 100) =	100.0

Appendix D Indicator 8 Rubric **INDICATOR C-9 WORKSHEET**

Indicator	General Supervision System Components	# of Programs Monitored	(a) # of Findings of noncompliance identified in FFY 2007 (7/1/07 – 6/30/08)	(b) # of Findings 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.	<b>Monitoring:</b> (Self-Assessment/ Local APR, Data Review/Desk Audit/On-Site Visit, etc.)		2	2
	<b>Dispute Resolution</b> (Complaints, due process hearings)		0	0
2. Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	<b>Monitoring:</b> (Self-Assessment/ Local APR, Data Review/Desk Audit/On-Site Visit, etc.)		1	0

	<b>Dispute Resolution</b> (Complaints, due process hearings)		0	0
3. Percent of infants and toddlers with IFSPs who demonstrate improved outcomes	<b>Monitoring:</b> (Self-Assessment/ Local APR, Data Review/Desk Audit/On-Site Visit, etc.)		0	0
	<b>Dispute Resolution</b> (Complaints, due process hearings)		0	0
4. Percent of families participating in Part C who report that early intervention services have helped the family	<b>Monitoring:</b> (Self-Assessment/ Local APR, Data Review/Desk Audit/On-Site Visit, etc.)		1	1
	<b>Dispute Resolution</b> (Complaints, due process hearings)		0	0

## APR – Part C (4)

State of Wisconsin

<p>5. Percent of infants and toddlers birth to 1 with IFSPs</p> <p>6. Percent of infants and toddlers birth to 3 with IFSPs</p>	<p><b>Monitoring:</b> (Self-Assessment/ Local APR, Data Review/Desk Audit/On-Site Visit, etc.)</p>		1	1
	<p><b>Dispute Resolution</b> (Complaints, due process hearings)</p>		0	0
<p>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.</p>	<p><b>Monitoring:</b> (Self-Assessment/ Local APR, Data Review/Desk Audit/On-Site Visit, etc.)</p>		9	8
	<p><b>Dispute Resolution</b> (Complaints, due process hearings)</p>		0	0



## APR – Part C (4)

State of Wisconsin

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;	<b>Monitoring:</b> (Self-Assessment/ Local APR, Data Review/Desk Audit/On-Site Visit, etc.)				
				2	1
	<b>Dispute Resolution</b> (Complaints, due process hearings)			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:  B. Notification to LEA, if child potentially eligible for Part B	<b>Monitoring:</b> (Self-Assessment/ Local APR, Data Review/Desk Audit/On-Site Visit, etc.)			2	1
	<b>Dispute Resolution</b> (Complaints, due process hearings)			0	0

## APR – Part C (4)

State of Wisconsin

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:	<b>Monitoring:</b> (Self-Assessment/ Local APR, Data Review/Desk Audit/On-Site Visit, etc.)			
			6	5
Additional findings: Indicator 14 (accurate and timely data) and related requirements			12	12
The worksheet automatically sums Column a and b			36	31

Percent of noncompliance corrected within one year of identification =	86.11%
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