

Part C Annual Performance Report for FFY 2010**Overview of the Annual Performance Report (APR) for 2010-2011**

The Oklahoma Early Intervention Program (SoonerStart) developed the Annual Performance Report (APR) in accordance with the detailed procedures prescribed by the Secretary of the United States Department of Education (USDE). SoonerStart incorporated input from the Individuals with Disabilities Education Act (IDEA) Part C Interagency Coordinating Council (ICC). It is important to note that stakeholders reviewed all indicators where Oklahoma did not report 100% compliance. Those indicators are 1, 7, 8a, 8b, 8c, and 9. The following groups assisted in the development of and will participate in improvement activities, timelines, and resources associated with the APR:

- Assistive Technology Committee;
- Data Accountability Center (DAC/Westat)
- Early Childhood Outcomes (ECO) Center;
- Early Childhood Outcomes Stakeholder Group
- Interagency Coordinating Council (ICC);
- ICC Funding Committee;
- ICC Policy Committee;
- Infant Mental Health Committee;
- Low Incidence / Autism Committee;
- National Early Childhood Technical Assistance Center (NECTAC);
- Oklahoma Assistive Technology Center (OATC);
- Oklahoma Commission on Children and Youth (OCCY);
- Oklahoma Family Network;
- Oklahoma Parent Training Center;
- Oklahoma State Department of Education – Early Childhood Education;
- Oklahoma State Department of Health (OSDH);
- Oklahoma State Department of Human Services (OKDHS);
- Oklahoma State University – Assisting Brighter Living with Enabling Technology (OSU-ABLE Tech);
- Southeast Regional Resource Center (SERRC);
- University of Oklahoma Health Science Center (OUHSC) – Tolbert Center for Developmental Disabilities;
- University of Oklahoma Health Science Center (OUHSC) – Child Study Center;

SoonerStart will make available and report statewide data to the public regarding progress and/or slippage in meeting the measurable and rigorous targets identified in the APR. The SPP and APR along with the SoonerStart Data Profiles can be located on the OSDE-SES Web site at <<http://www.sde.state.ok.us>>, in addition the state will report disaggregated data based on the performance of each SoonerStart site on the targets in the APR. SoonerStart will deliver the APR to all SoonerStart sites and the ICC. The APR will be posted on the Oklahoma State Department of Education (OSDE), Special Education Services (SES), Web site at <<http://www.sde.state.ok.us>> for public viewing and will be shared at open public meetings, such as the ICC Meeting. Input from the ICC, a broad group of stakeholders, and other interested parties was used for each of the 14 indicators in the APR. These groups will serve as the resources used for the improvement activities for each of the 14 indicators.

Although decreased funding has resulted in significant staff shortages, SoonerStart has explored ways to better meet timelines and provide services to eligible infants and toddlers in Oklahoma. In FFY 2010, the pre-IFSP process was streamlined and the evaluation for eligibility now occurs at the first contact with the family to assist the SoonerStart team in meeting the 45 day timeline. Training has been provided on Transition planning and requirements for meeting timelines. All staff also received training on procedural safeguards and some service providers are also providing service coordination to the families they serve. Various dedicated service coordinators have received intensive training on evaluation, assessment and service provision and are providing early intervention services in limited areas. SoonerStart will continue to expand the role of the service coordinator to be early intervention providers. As part of General Supervision activities, the Program Managers provide written technical assistance and verification visit follow-up reports to Oklahoma State Department of Education and Oklahoma State Department of

Health administrative staff as well as SoonerStart staff. Training on chart documentation is planned for the coming year.

The ODSE-SES has received intensive technical assistance from the Data Accountability Center (DAC), the Southeastern Regional Resource Center (SERRC), the National Early Childhood Technical Assistance Center (NECTAC), the Early Childhood Outcomes Center and the United States Department of Education (USDE), Office of Special Education Programs (OSEP). OSDE-SES met with SERRC and DAC on July 25-27th to review our Critical Elements Analysis Guide (CrEAG), General Supervision Process, and to get started on our Results Topic Discussion in order to prepare for the USDE-OSEP Verification/Results onsite visit. Oklahoma also sent four representatives to the OSEP Leadership Conference and DAC Results Workshop August 1-4, in Washington D.C. Additionally, four staff members attended the Early Childhood Outcomes Conference in New Orleans, September 19th-23rd, and received phone, email, and onsite consultation from DAC and SERRC during the month of October. In November four Oklahoma team members attended the SERRC Regional Conference in Dallas.

SERRC, DAC, and ECO all participated in our onsite Verification/Results visit and have continued to support Oklahoma in its efforts to improve Early Childhood Outcomes (ECO). The OSDE-SES continues to work with the Interagency Coordinating Council (ICC), the IDEA Part B Advisory Board, the Oklahoma Parents Center, the Oklahoma Family Network, the ECO Stakeholder Task Force and other state agencies such as the Oklahoma State Department of Health (OSDH), and the Oklahoma Department of Human Services (OKDHS).

Part C State Annual Performance Report (APR) for FFY 2010**Monitoring Priority: Early Intervention Services in Natural Environments-Timely Services**

Indicator 1: Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.

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

Measurement:

Percent = [(# of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner) divided by the (total # of infants and toddlers with IFSPs)] times 100.

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

FFY	Measurable and Rigorous Target
<i>FFY 2010</i>	In FFY 2010, 100% of infants and toddlers with IFSPs will receive the early intervention services on their IFSPs within 15 working days from the date of parent consent for services (i.e., the date on the initial IFSP).

Actual Target Data for FFY 2010:

In FFY 2010, 98.95% (3,314 of 3,373) of records indicated that SoonerStart services were provided within 15 working days from the date of parent consent for services (i.e., the date on the initial IFSP). This includes 10 children for whom delays were due to exceptional family circumstances.

Oklahoma utilizes a statewide online data system to collect data for monitoring Indicator 1. Any data that are missing from the data system are verified at the local site. Any data that do not meet the 15 day timeline are verified at the local site to determine if exceptional family circumstances or other issues affecting the timeline are applicable. Oklahoma includes in its calculation (in both the numerator and the denominator) the number of children for whom SoonerStart has identified the cause for the delay as a documented exceptional family circumstances.

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

a. Number of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	3,314
b. Total number of infants and toddlers with IFSPs	3,373
Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner (Percent = [(a) divided by (b)] times 100)	98%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

These data represent progress from the FFY 2009 data of 97.53%. SoonerStart did not meet its FFY 2010 target of 100%. One reason for the significant progress in this area is the monitoring consistency provided by the new Program Managers as well as the technical assistance they provide to the local teams. Oklahoma believes this data is valid and reliable with less than 2% of all infants and toddlers with IFSPs not receiving early intervention services in a timely manner. Per actual record reviews in each SoonerStart site the predominant reason for non-compliance (i.e., the reason for delay) was due to illness of the provider or the provider's family member. It was also noted that SoonerStart providers are diligent in completing appropriate documentation outlining the reasons for missing the timely services timeline. The Program Managers continue to provide clarification that SoonerStart timely service is classified as 15 working days not calendar days. Working days provide teams with five additional days to get services to families.

On-going and Revised Improvement Activities FFY 2010:

Status	Activity	Timeline	Resources
On-going	OSDE will request individual service provider productivity reports from OSDH in order to ensure service provider resources are maximized.	FFY 2008-2013	Data report
On-going	SoonerStart is evaluating staff shortages and how best to address this problem statewide. The OSDE continues to work with the OSDH to identify service providers from the urban areas that are willing to serve children in the more rural areas of the state.	FFY 2008-2013	Data System
On-going	SoonerStart utilized monitoring data collected from all 26 early intervention sites. Teams that scored less than 100.00% provided SoonerStart corrective action plans. These corrective action plans included activities such as requests for additional technical assistance regarding timeliness of IFSP services. As a result, SoonerStart provided technical assistance and training opportunities to staff.	FFY 2008-2013	Data System, Corrective Action Plans, Technical Assistance, Training
On-going	The SoonerStart Data Analyst added edit checks and reports to the online system used by SoonerStart personnel. These additional checks and reports aid staff with scheduling by creating target dates for each report required to be submitted by personnel (e.g., IFSPs).	FFY 2008-2013	Data System, Data Analyst
On-going	SoonerStart is in the process of changing team roles. Service coordinators will be trained this year on how to provide evaluation, assessment and IFSP services. In turn service providers will be trained in service coordination. SoonerStart is planning a new process and system but implementation has been delayed due to budgeting constraints.	FFY 2009-2013	Training Materials and Technical Assistance
On-going	Resource Coordinator Technical Assistance Workshops will be scheduled to provide updates on Policies and Procedures as well as service coordination activities.	FFY 2009-2013	OSDE-SES Staff

Correction of FFY 2009 Findings of Noncompliance (if State reported less than 100% compliance):

Note: For this indicator, report data on the correction of findings of noncompliance the State made during FFY 2009 (July 1, 2009 through June 30, 2010) and verified as corrected as soon as possible and in no case later than one year from identification.

Timely Correction of FFY 2009 Findings of Noncompliance (corrected within one year from identification of the noncompliance):

a. Number of findings of noncompliance the State made during FFY 2009 (the period from July 1, 2009, through June 30, 2010) (Sum of column a on the Indicator C 9 Worksheet)	24
b. Number of findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS programs of the finding) (Sum of column b on the Indicator C 9 Worksheet)	24
c. Number of findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Correction of FFY 2009 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:

a. Number of FFY 2009 findings not timely corrected (same as the number from (3) above)	0
b. Number of FFY 2009 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	0
c. Number of FFY 2009 findings <u>not</u> yet verified as corrected [(4) minus (5)]	0

Actions Taken if Noncompliance Not Corrected

For FFY 2009 findings for which the State has not yet verified correction, explain what the State has done to identify the root cause(s) of continuing noncompliance, and what the State is doing about the continued lack of compliance, including, as appropriate, enforcement actions taken against an EIS program that continues to show noncompliance.

Oklahoma issued no child level findings in FFY 2009. Oklahoma ensures that every child receives the required IFSP, early intervention service or transition services. If an activity did occur after the timeline, resulting in noncompliance, it is corrected before a finding can be issued.

Verification of Correction of FFY 2009 findings (either timely or subsequent)

During FFY 2010 all sites received a quarterly review of the SoonerStart database as well as an on-site verification visit by the Program Manager if a site level finding was issued until compliance is indicated for three consecutive months. Technical assistance was provided informally as well as in a written follow-up report. Oklahoma verifies correction of non-compliance at the site level and at the child level in accordance with OSEP Memorandum 09-02. Quarterly on-site verification visits by Program Managers ensure that the local site is correctly implementing the policies and procedures for each child in the SoonerStart program.

Describe the specific actions that the State took to verify the correction in FFY 2010 of findings of noncompliance identified in FFY 2009

The Program Manager reviewed the SoonerStart database to determine sites requiring verification visits. On-site visits involved reviewing the SoonerStart database Target Date Report for the site to determine the charts to review for the indicator monitored. Oklahoma monitored each applicable chart within a three month period at each site to determine correction at the child level. The Program Manager verified that all services, even if late, were initiated

and that the appropriate documentation was completed stating the reason for missing any timelines. See the Oklahoma State Performance Plan for detailed monitoring procedures.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable):

Statement from the Response Table	State's Response
<p>The State must demonstrate, in the FFY 2010 APR due February 1, 2012, that the State is in compliance with the timely service provision requirements in 34 CFR §§303.340(c), 303.342(e), And 303.344(f)(1). Because the State reported less than 100% compliance for FFY 2009, the State must report on the status of correction of noncompliance reflected in the data the State reported for this indicator.</p>	<p>During FFY 2009 there were no findings of noncompliance issued at the child level. All specific incidents of non-compliance were corrected at the child level before a finding could be issued, and each eligible infant and toddler subsequently received the promised IFSP service or was no longer within the jurisdiction of the SoonerStart program. Because all children received services, although late, or were no longer within the jurisdiction of the SoonerStart program, the 24 findings issued to the sites were corrected within one year of identification.</p>

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable):N/A

Part C Annual Performance Report for FFY 2010

Monitoring Priority: Natural Environments

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

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

Measurement:

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

FFY	Measurable and Rigorous Target
<i>FFY 2010</i>	In FFY 2010, 95.81% of all infants and toddlers with IFSPs primarily receive early intervention services in the home or community based settings.

Actual Target Data for FFY 2010:

In FFY 2010, 2,677 of 2,770 (96.64%) of all infants and toddlers with IFSPs primarily receive early intervention services in the home or community based settings.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

SoonerStart exceeded its FFY 2010 target of 95.81% for the provision of Part C services in natural environments. These data are consistent with the data of 97.21% from FFY 2009. IDEA provides flexibility for services in other settings due to children’s and families’ needs. To ensure meeting a child’s individualized developmental needs and IFSP priorities, progress in this indicator may not always be warranted. SoonerStart is committed to providing exceptional services to children and families in their natural environments. Training opportunities continue to emphasize the need to reach children and families in natural environments. Training is designed to expand current thinking when considering natural environments when writing an IFSP. The natural environment does not always equal a home environment. Improvement activities definitely made a difference in the range of natural environments staff now consider when serving infants and toddlers.

Improvement Activities Completed in FFY 2010:

OSDE-SES added two program managers who are responsible for monitoring and technical assistance statewide.
Program Managers monitor IFSPs locally, to ensure services are being provided in natural environments. Additionally, SoonerStart uses 618 data and the SoonerStart data system to further verify services are being provided in natural environments.
Childcare facilities and family childcare homes are routinely considered and utilized as natural environment locations as well as other caregivers’ participation incorporated in the IFSP services.
The SoonerStart Data Analyst added edits checks and reports to the online system used by SoonerStart personnel.

These additional checks and reports aid staff with scheduling by creating target dates for each report required to be submitted by personnel (e.g., IFSPs).

New and Revised Improvement Activities:

Status	Activity	Timeline	Resources
On going	SoonerStart continues the process of changing team roles. Selected service coordinators have been trained this year in providing evaluations, assessments and IFSP services. In turn, some service providers have been trained in service coordination. SoonerStart plans to continue the new process and system throughout 2012.	FFY 2009-2012	Training Materials and Technical Assistance

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable):N/A

Part C Annual Performance Report for FFY 2010

Monitoring Priority: Early Intervention Services in Natural Environments-Early Childhood Outcomes

Indicator C3: Percent of infants and toddlers with IFSPs who demonstrate improved;

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

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

Measurement: (As defined by the Individuals with Disabilities Education Act [IDEA] and the Office of Special Education Programs)

Positive social-emotional skills (including social relationships):

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.

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

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

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.

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

- d.** 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.

Use of appropriate behaviors to meet their needs:

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.

- e.** 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.
- f.** 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.
- g.** 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.
- h.** 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.

New Baseline and Target data for FFY 2010:

Oklahoma received a Verification/Results Visit from the USDE-OSEP in September of 2011. As part of the preparation activities Oklahoma had the opportunity to pick a “Results Topic” designed to add emphasis to improvement in any one area. After a review of data and two years of Focused Monitoring in both Part C and B, Oklahoma determined that ECO improvement continues to be an area of need in Oklahoma.

Oklahoma has had three stakeholder meetings as of January 2012. At the last meeting stakeholders from both Part C and B gathered to review the Oklahoma ECO Plan for Improvement, review all ECO data from 2006 to present, and review and revise targets as needed. The revised targets are outlined below. The group decided to use FFY 2010 data as our new baseline data and revise the targets for the next two years by rounding up the first year and moving up to the next integer the second year. Oklahoma will meet with the ECO stakeholder group soon to begin working on the implementation of the improvement plan.

A. Positive social-emotional skills (including social relationships):	Number of children	% of children
a. Percent of children who did not improve functioning	34	2.4%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	239	16.6%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	379	26.4%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	567	39.5%

e. Percent of children who maintained functioning at a level comparable to same-aged peers	217	15.1%
Total	N=1,436	100%
B. Acquisition and use of knowledge and skills (including early language/communication):	Number of children	% of children
a. Percent of children who did not improve functioning	33	1.60%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	217	10.70%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	635	31.40%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	993	49.10%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	143	7.10%
Total	N=1,436	100%
C. Use of appropriate behaviors to meet their needs:	Number of children	% of children
a. Percent of children who did not improve functioning	20	1.4%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	114	10.0%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	500	34.8%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	678	47.2%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	94	6.5%
Total	N=1,436	100%

Summary Statements	Targets FFY 2010 (% of children)	Actual FFY 2010 (% of children)
Outcome A: Positive social-emotional skills (including social relationships)		
1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they exited the program	New baseline	77.60%
2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program	New baseline	54.60%
Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)		
1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program	New baseline	88.60%
2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	New baseline	60.50%
Outcome C: Use of appropriate behaviors to meet their needs		

1	Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they exited the program	New baseline	87.80%
2.	The percent of children who were functioning within age expectations in Outcome C by the time they exited the program	New baseline	53.80%

Discussions of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

Indicator C3: A) Percent of infants and toddlers with IFSPs who demonstrate improved positive social-emotional skills (including social relationships).

Oklahoma reported that 77.60% of those children who entered or exited the program below age expectations substantially increased their rate of growth in this outcome by the time they exited the program. Oklahoma revised targets this year with the Early Childhood Outcomes Stakeholder Group therefore this is new baseline data.

The percent of children who were functioning within age expectations in this outcome by the time they exited the program was 54.60%. Oklahoma revised targets this year with the Early Childhood Outcomes Stakeholder Group. Therefore this is new baseline data.

Indicator C3: B) Percent of infants and toddlers with IFSPs who demonstrate improved acquisition and use of knowledge and skills (including early language/communication and early literacy).

Oklahoma reported that 88.60% of those children who entered or exited the program below age expectations substantially increased their rate of growth in this outcome by the time they exited the program. Oklahoma revised targets this year with the Early Childhood Outcomes Stakeholder Group. Therefore this is new baseline data.

The percent of children who were functioning within age expectations in this outcome by the time they exited the program was 60.50%. Oklahoma revised targets this year with the Early Childhood Outcomes Stakeholder Group. Therefore this is new baseline data.

Indicator C3: C) Percent of infants and toddlers with IFSPs who demonstrate use of appropriate behaviors to meet their needs.

Oklahoma reported that 87.80% of those children who entered or exited the program below age expectations substantially increased their rate of growth in this outcome by the time they exited the program. Oklahoma revised targets this year with the Early Childhood Outcomes Stakeholder Group. Therefore this is new baseline data.

The percent of children who were functioning within age expectations in this outcome by the time they exited the program was 53.80%. Oklahoma revised targets this year with the Early Childhood Outcomes Stakeholder Group. Therefore this is new baseline data.

Oklahoma uses the Child Outcome Summary Form (COSF) developed by the Early Childhood Outcomes Center statewide for both B and C. Oklahoma Part C uses the Battelle Developmental Inventory, Second Edition (BDI-2) statewide and is one of the tools used to assist providers in comparing children to same aged peers. Any other assessment tools are acceptable including child observation and parent report. Oklahoma does not serve children who are at risk of having a developmental delay.

In FFY 2010 the improvement activities completed were focused on improving the quality of data and data collecting. Training was provided on Early Childhood Outcomes This training focused on the purpose and importance of ECOs as well as explanations of the individual ratings. The statewide ECO data was reviewed with SoonerStart Regional Coordinator staff to provide them a better understanding of how each site contributes information and the importance of accurate and timely completion of the COSF. SoonerStart sites were also provided technical assistance on developing procedures to ensure that the COSF is completed and the results entered into the statewide database. In collaboration with OSDH, OSDE made several requests to local sites to complete data checks to ensure that data entry is accurate and timely. Oklahoma continues to work on improving the validity

and reliability of ECO data as well as moving toward providing technical assistance and training to service providers on activities to improve child outcomes.

New and Revised Improvement Activities:

Status	Activity	Timeline	Resources
Ongoing	Collaborate with Part B personnel to develop strategies for recruiting and maintaining Part C service personnel (such as speech language pathologists, physical therapists, occupational therapists, and other providers with specialized skills by December 2007).	FFY 2007 – FFY 2013	Preschool Coordinator and local SoonerStart staff
Ongoing	Request additional technical assistance and information from SERRC on strategies for improving child outcomes or policies from other states.	FFY 2007- 2013	OSDE-SES consults on a regular basis with SERRC
Ongoing	Request additional technical assistance and information from the ECO Center, NECTAC, and other agencies, stakeholder groups, taskforces, and technical assistance providers.	FFY 2007- 2013	Get updated information from TA centers as needed
On-going	Provide early childhood outcome data to each site, ICC, and stakeholders.	FFY 2008- 2013	Data validation and verification results
On-going	SoonerStart sites will be provided technical assistance for developing procedures to ensure that the COSF is administered and entered.	FFY 2008- 2013	Data validation and verification results
On-going	Entry and Exit ECO Target Date reports will be added to the SoonerStart database. SoonerStart supervisors will review data reports to ensure that COSFs are completed timely.	FFY 2009- 2013	Data validation and verification results
On-going	SoonerStart will incorporate the COSF in the materials packets used in the evaluation/assessment process.	FFY 2009- 2013	Data validation and verification results
On-going	SoonerStart will schedule training on Routines Based Intervention by Robin McWilliams for all SoonerStart team leaders to improve quality of services and ultimately improve child outcomes.	FFY 2009- 2013	Data validation and verification results
On-going	Resource Coordinator Technical Assistance Workshops will be scheduled to provide updates on Policies and Procedures as well as service coordination activities.	FFY 2009- 2013	OSDE-SES Staff
New	Oklahoma developed a new group of Early Childhood Outcome Stakeholders.	FFY 2010- 2013	OSDE-SES Staff and Stakeholder Group

New	Oklahoma has developed plan to improve ECO's. (See ECO plan attached).	FFY 2010-2013	OSDE-SES Staff and Stakeholder Group
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Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable):N/A

Part C Annual Performance Report for FFY 2010

Monitoring Priority: Early Intervention Services in Natural Environments-Parent Involvement

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

Measurement:

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

Target Data and Actual Target Data for FFY 2010:

Target Data and Actual Target Data	FFY 2010 Target	FFY 2009 Actual	
<i>A. Know their rights</i>	93.35%	254	96.95%
<i>B. Effectively communicate their children's needs</i>	95.35%	253	97.78%
<i>C. Help their children develop and learn</i>	93.95%	255	97.33%

Response Rate and Representativeness of the Response Group

For FFY 2010, 261 surveys were returned to SoonerStart. 2,770 children are on IFSPs for the FFY 2010 Child Count and this count is used to determine response rate. For FFY 2010, the family survey response rate is 9.42%. This represents significant progress from the FFY 2009 response rate of 5.84%.

Only 201 of the 261 surveys (77.01%) returned had a SoonerStart site identified. These surveys came from only 23 of the 26 SoonerStart sites. Because several sites were not adequately represented, it is difficult to determine if the racial/ethnic breakdown is an accurate portrait of the SoonerStart population. Also, the racial and ethnic categories were the greatest number of missing values: families chose not to identify their racial/ethnic categories.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

Indicator 4a: Percent of families participating in Part C who report that early intervention services have helped the family: Know their rights.

Oklahoma reported in FFY 2010 (254 of 262) 96.95% of families participating in Part C reported that SoonerStart helped the family know their rights. This met the target of 93.35% and showed slight slippage from FFY 2009 data of 97.78%.

Indicator 4b: Percent of families participating in Part C who report that early intervention services have helped the family: Effectively communicate their children's needs.

Oklahoma reported in FFY 2010 (253 of 262) 97.78% of families participating in Part C reported that SoonerStart helped the family communicate their children's needs. This met the target of 95.35% and did not change from FFY 2009 data of 97.78%.

Indicator 4c: Percent of families participating in Part C who report that early intervention services have helped the family: Help their children develop and learn.

Oklahoma reported in FFY 2010 (255 of 262) 97.33% of families participating in Part C reported that SoonerStart helped the family help their children develop and learn. This met the target of 93.95% and slight showed progress from FFY 2009 data of 97.22%.

SoonerStart's data for this indicator demonstrated very little change from FFY 2009 data. Overall, SoonerStart staff does a good job working with children and families. These data are consistent with previous years data of a high rate of satisfaction for families regarding early intervention services.

Improvement Activities Completed in FFY 2010:

All families received the survey at the annual IFSP review. Families are provided a cover letter explaining the survey, the survey, and a postage-paid envelope. The survey is available in English, Spanish and Vietnamese.
SoonerStart contracted with Scantron, Inc., to better calculate, distribute, and code the family survey. Scantron coded, printed, and mailed the survey to all 26 SoonerStart sites, and provided training to OSDE staff as to how to use the scanning machine purchased as part of the contract. SoonerStart believes this will reduce data entry errors and save time for local staff responsible for getting the survey to each family.
SoonerStart requested assistance from the SERRC on strategies for improving family outcomes or policies from other states.
SoonerStart State Directors provided technical assistance to SoonerStart sites on methods of facilitating parental involvement through team leader meetings, STARS trainings, and other personnel development activities.
Provided an article to the Oklahoma Family Network for their newsletter informing parents of the survey.
Added a question to the Annual Comprehensive Desk Audits that each site completes that includes checking for documentation that the family survey was provided to the family at the annual review.
OSDE has implemented new monitoring procedures to ensure local, State, and federal compliance.
OSDE-SES added two program managers who are responsible for monitoring and technical assistance statewide.

New and Revised Improvement Activities:

Status	Activity	Timeline	Resources
On-Going	Explore revising IFSP to include a question about the family survey in order to remind staff to provide the survey to each parent at the annual review. This activity was not completed for 2008-2009; therefore SoonerStart will continue to work on this activity.	FFY 2008-2013	IFSP
On-going	Provide an article to the Oklahoma Family Network for their newsletter informing parents of the survey.	FFY-2008-2013	OSDE-SES staff
On-going	Added a question to the Annual Comprehensive Desk Audits each site completes to that includes checking for documentation that the family survey was provided to the family at the annual review.	FFY-2008-2013	OSDE-SES staff
On-going	SoonerStart is in the process of changing team roles. Service coordinators will be trained on how to provide evaluation, assessment and IFSP services. In turn service providers will be trained in service coordination. SoonerStart is planning a new process and system but implementation has been delayed due to budgeting constraints.	FFY 2009-2013	Training Materials and Technical Assistance
New	Provide updated training to all SoonerStart personnel on Procedural Safeguards and Parent Rights.	FFY 2009-2013	OSDE-SES Staff
New	Resource Coordinator Technical Assistance Workshops will be scheduled to provide updates on Policies and Procedures as well as service coordination activities.	FFY 2009-2013	OSDE-SES Staff
New	SoonerStart will explore ways to provide families an incentive to complete the survey.	FFY 2010-2013	OSDE-SES Staff
New	SoonerStart will consider using the Family Survey developed by the ECO Center.	FFY 2010-2013	OSDE-SES Staff

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 [If applicable]: N/A

Part C Annual Performance Report for FFY 2010

Monitoring Priority: Child Find (Birth to One)

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

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

FFY	Measurable and Rigorous Target
<i>FFY 2010</i>	In FFY 2010, 1.30% of infants (0-1) with IFSPs will receive early intervention services.

Actual Target Data for FFY 2010:

In FFY 2010, the national percent of the population birth to 1 receiving services in the IDEA Part C early intervention program was 1.03%. In FFY 2010, Oklahoma served 454 of 51,949 (.87%) of this population.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

For FFY 2010, SoonerStart’s data showed slippage from its FFY 2009 data of 1.18% and did not meet its target of 1.30% for serving infants birth to 1. Oklahoma’s population of children ages birth to one decreased from 54,677 in FFY 2009 to 51,949 in FFY 2010 (approximately 5%). Oklahoma continues to face challenges in increasing the number of children served due to restraints on State and local funds and the narrow eligibility requirements in Oklahoma. In some areas of the state, local sites have been without dedicated service providers for extended periods of time, depending on assistance from neighboring EI units. Local referral sources are aware of the shortage of service providers and have referred infants and toddlers to other community programs. SoonerStart continues to experience a higher than expected number of families declining referrals or failing to follow through with the eligibility process since the economic downturn over the past several years. Many families choose to postpone services or activities that require any actions outside of those absolutely necessary to meet their basic needs – food, shelter and clothing. Regional Coordinators continue to lead each of the 26 sites in completing an annual Public Awareness Plan. The Public Awareness Plan is designed to target specific areas of need in ensuring that all eligible children are found and served including children with disabilities that are Indian, or homeless, or in foster care.

Improvement Activities Completed in FFY 2010:

Each SoonerStart site completed a data-driven, public awareness plan. These plans document activities specifically designed to promote early identification and referral of children birth to age one. For example, as a result of these plans, SoonerStart developed stronger partnerships with hospitals and other medical centers (e.g., tribal medical clinics) to provide information to families discharged from their care.

Each SoonerStart site partnered with local Department of Human Services (DHS) offices to ensure that all children with substantiated cases of abuse and/or neglect (including drug exposure) were referred to the SoonerStart program.

SoonerStart partner agencies worked together with the OSDH to refer all potentially eligible children on the Birth Defect Registry (BDR) to SoonerStart.

The OFN provided technical assistance to Neonatal Intensive Care Unit (NICU) staff and local SoonerStart sites to ensure effective dissemination of public awareness materials and processes to link families with early intervention services.
The SoonerStart Public Awareness Committee collaborated to develop recommendations to the OSDE-SES and the SoonerStart partner agencies to promote early identification and referrals. As a result of this collaboration, SoonerStart created a "Born to Learn" initiative which promoted awareness of services to all children birth to one. Born to Learn materials were provided to all Oklahoma School districts, including special education teachers, and placed in most county health departments.
SoonerStart completed a statewide public service announcement for television.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2009 in the Oklahoma State Performance Plan (SPP; 2010):

New and Revised Improvement Activities:

Status	Activity	Timeline	Resources
On-going	SoonerStart is in the process of piloting a fax back referral form with pediatricians at the Oklahoma University Health Sciences Center, Child Study Center in order to facilitate better communication with pediatricians. If the pilot is successful SoonerStart will distribute the form statewide. Data is still being collected so the form has not yet gone statewide.	FFY 2008-2012	SoonerStart Fax Back Pilot Form
On-going	Each SoonerStart site completed a data-driven, public awareness plan. These plans document activities specifically designed to promote early identification and referral of children birth to age 1. For example, as a result of these plans, SoonerStart developed stronger partnerships with hospitals and other medical centers (e.g., tribal medical clinics) to provide information to families discharged from their care.	FFY 2008-2012	Local Public Awareness Plans
On-going	Each SoonerStart site partnered with local Department of Human Services (DHS) offices to ensure that all children with substantiated cases of abuse and/or neglect (including drug exposure) were referred to the SoonerStart program.	FFY 2008-2012	Data system report
On-going	SoonerStart partner agencies worked together with the OSDH to refer all potentially eligible children on the Birth Defect Registry (BDR) to SoonerStart.	FFY 2008-2012	Birth Defects Registry
New	OSDE has developed additional public awareness materials for statewide distribution to promote early identification of developmental disabilities.	FFY 2010	Public Awareness Materials
New	SoonerStart has partnered with Oklahoma Parent Center and Oklahoma Family Network to disseminate information through their websites, conferences, communications, etc. about the SoonerStart program.	FFY 2010	OK Parent Center, OK Family Network

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 [If applicable]: N/A

Part C Annual Performance Report for FFY 2010**Monitoring Priority: Child Find (Birth to Three)**

Indicator 6 - Percent of infants and toddlers birth to three with IFSPs compared to national data.

Measurement:

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

FFY	Measurable and Rigorous Target
FFY 2010	In FFY, 2010, 2.20% of infants and toddlers (0-3) will receive early intervention services.

Actual Target Data for FFY 2010:

In FFY 2010, the national percent of the population birth to three receiving services in the IDEA Part C early intervention program was 2.82% In FFY 2010, Oklahoma served 2,770 of 157,953 (1.75%) of this population.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

For FFY 2010, SoonerStart's data showed slippage from its FFY 2009 data of 1.85% and did not meet its target of 2.20% for serving infants birth to three. Oklahoma's population of children ages birth to three decreased from 165,496 in FFY 2009 to 157,953 in FFY 2010 (approximately 5%). Oklahoma continues to face challenges in increasing the number of children served due to restraints on State and local funds and the narrow eligibility requirements in Oklahoma. In some areas of the state, local sites have been without dedicated service providers for extended periods of time, depending on assistance from neighboring EI units. Local referral sources are aware of the shortage of service providers and have referred infants and toddlers to other community programs. SoonerStart continues to experience a higher than expected number of families declining referrals or failing to follow through with the eligibility process since the economic downturn over the past several years. Many families choose to postpone services or activities that require any actions outside of those absolutely necessary to meet their basic needs – food, shelter and clothing. Regional Coordinators continue to lead each of the 26 sites in completing an annual Public Awareness Plan. The Public Awareness Plan is designed to target specific areas of need in ensuring that all eligible children are found and served including children with disabilities that are Indian, or homeless, or in foster care.

Improvement Activities Completed in FFY 2010:

Each SoonerStart site completed a data-driven, public awareness plan. These plans document activities specifically designed to promote early identification and referral of children birth to age one. For example, as a result of these plans, SoonerStart developed stronger partnerships with hospitals and other medical centers (e.g., tribal medical clinics) to provide information to families discharged from their care.

Each SoonerStart site partnered with local Department of Human Services (DHS) offices to ensure that all children with substantiated cases of abuse and/or neglect (including drug exposure) were referred to the SoonerStart program.

<p>The SoonerStart Public Awareness Committee collaborated to develop recommendations to the OSDE-SES and the SoonerStart partner agencies to promote early identification and referrals. As a result of this collaboration, SoonerStart created a “Born to Learn” initiative which promoted awareness of services to all children birth to one. Born to Learn materials were provided to all Oklahoma School districts, including special education teachers, and placed in most county health departments.</p>
<p>SoonerStart completed a statewide public service announcement for television.</p>

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2009 in the Oklahoma State Performance Plan (SPP; 2010):

New and Revised Improvement Activities:

Status	Activity	Timeline	Resources
On-going	SoonerStart is in the process of piloting a fax back referral form with pediatricians at the Oklahoma University Health Sciences Center, Child Study Center in order to facilitate better communication with pediatricians. If the pilot is successful SoonerStart will distribute the form statewide.	FFY 2008-2012	SoonerStart Fax Back Pilot Form
On-going	Each SoonerStart site completed a data-driven, public awareness plan. These plans document activities specifically designed to promote early identification and referral of children birth to age 1. For example, as a result of these plans, SoonerStart developed stronger partnerships with hospitals and other medical centers (e.g., tribal medical clinics) to provide information to families discharged from their care.	FFY 2008-2012	Local Public Awareness Plans
On-going	Each SoonerStart site partnered with local Department of Human Services (DHS) offices to ensure that all children with substantiated cases of abuse and/or neglect (including drug exposure) were referred to the SoonerStart program.	FFY 2008-2012	Data system report
On-going	SoonerStart partner agencies worked together with the OSDH to refer all potentially eligible children on the Birth Defect Registry (BDR) to SoonerStart.	FFY 2008-2012	Birth Defects Registry
New	OSDE has developed additional public awareness materials for statewide distribution to promote early identification of developmental disabilities.	FFY 2010	Public Awareness Materials
New	SoonerStart has partnered with Oklahoma Parent Center and Oklahoma Family Network to disseminate information through their websites, conferences, communications, etc. about the SoonerStart program.	FFY 2010	OK Parent Center, OK Family Network

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 [If applicable]: N/A

Part C State Annual Performance Report FFY 2010

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 2010	For FFY 2010, 100.00% of eligible infants and toddlers with IFSPs will have an evaluation, assessment, and initial IFSP meeting within Part C's 45-day timeline.

Actual Target Data for FFY 2010:

For FFY 2010, 1,303 of 1,663 records reviewed (78.35%) of eligible infants and toddlers with IFSPs had an evaluation, assessment, and initial IFSP meeting conducted within Part C's 45-day timeline. Of those, 136 IFSPs were past the timeline due to exceptional family circumstances. These cases were included in the state's calculation.

There were 360 children who did not have an evaluation, assessment, and initial IFSP meeting within Part C's 45-day timeline. Of the 360 children who did not receive a timely evaluation, assessment and IFSP, 218 (61%) were found in the Oklahoma County SoonerStart site. With the elimination of the data results from Oklahoma County site, Oklahoma's results for this indicator would be 89% which demonstrated significant progress from FFY 2009's results of 83.72%.

Oklahoma utilizes a statewide online data system to collect data for monitoring Indicator 7. Any data that are missing from the data system are verified at the local site. Any data that do not meet the 45 day timeline are verified at the local site to determine if exceptional family circumstances or other issues affecting the timeline are applicable. Oklahoma includes in its calculation (in both the numerator and the denominator) the number of children for whom SoonerStart has identified the cause for the delay as documented exceptional family circumstances.

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

a. Number of infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline	1,303
b. Number of infants and toddlers with IFSPs evaluated and assessed for whom an initial IFSP meeting was required to be conducted	1,663
Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline (Percent = [(a) divided	78.35%

by (b) times 100)

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2010:

These data represent slippage from the FFY 2009 data of 83.72%. SoonerStart did not meet its FFY 2010 target of 100%. One reason for the slippage in this area is due to the significant number of children who did not receive a timely evaluation, assessment and initial IFSP in the state's largest SoonerStart site. With an average caseload of 850 clients, the Oklahoma County site was plagued by several natural disasters resulting in loss of office space, loss of records, and displacement of staff. A near-by tornado resulted in a rain event that collapsed the roof on the Oklahoma County facility and flooded the office. Many client records were destroyed. A hailstorm followed and all attempts to salvage the building were abandoned. SoonerStart staff were divided and housed throughout the city for the remainder of the year. This course of events resulted in extreme difficulties coordinating early intervention services and maintaining records. Oklahoma County has not yet recovered from physical limitations that impact timely services. New office space has been acquired and SoonerStart staff hopes to be reunited under one roof with on-site records in the Spring of 2012.

If the data results for the Oklahoma County site are eliminated from the rest of the state's results for Indicator #7, Oklahoma could report that 89% of all children receive timely evaluations, assessments and IFSPs. This would be more than a 5% increase over last year's results. This 5% increase in compliance (as well as the 5% increase realized last year), is believed to be the result of the monitoring consistency provided by the Program Managers as well as the technical assistance they provide to the local teams. Oklahoma believes that the approximately 10% increase in 45 day timeline compliance over the past two years (with the exception of the Oklahoma County site) is a result of local sites using all available resources to meet timelines. Staff utilized data reports to track target dates. Service providers previously designated as site administrators began participating in multidisciplinary evaluations and IFSP development. The pre-IFSP process was streamlined and the evaluation for eligibility now occurs at the first contact with the family to assist the SoonerStart team in meeting the 45 day timeline. All staff received training on procedural safeguards and some service providers are also providing service coordination to the families they serve. Select dedicated service coordinators have received intensive training on evaluation, assessment and service provision and are providing early intervention services in limited areas. SoonerStart continues to expand the role of the service coordinator to be early intervention providers. As part of General Supervision activities, the Program Managers provide written technical assistance and verification visit follow-up reports to Oklahoma State Department of Education and Oklahoma State Department of Health in addition to the supervising staff at each site. Per actual record reviews in each SoonerStart site, staff continues to identify staff shortages as adversely affecting scheduling eligibility evaluations and IFSPs.

Improvement Activities Completed in FFY 2010:

Status	Activity	Timeline	Resources
On-going	SoonerStart utilizes a streamlined process from referral to eligibility as part of a statewide mandatory corrective action plan in the Fall 2010 in order to meet the 45 day IFSP development timeline.	FFY 2009-2012	Staff and Supervision, Program Managers
Completed	Resource Coordinator and service provider trainings were scheduled to provide updates on Policies, Parents' Rights and Procedural Safeguards.	FFY 2009-2012	OSDE-SES Staff

New and Revised Improvement Activities:

Status	Activity	Timeline	Resources
On-going	OSDE will request individual service provider productivity reports from OSDH in order to ensure service provider	FFY 2008-2012	Data report

	resources are maximized.		
On-going	SoonerStart is evaluating staff shortages and how best to address this problem statewide. Select dedicated service coordinators have received intensive training on evaluation, assessment and service provision and are providing early intervention services in limited areas	FFY 2008-2012	Data System
On-going	SoonerStart utilized monitoring data collected from all 26 early intervention sites. Teams that scored less than 100.00% provided SoonerStart corrective action plans. These corrective action plans included activities such as requests for additional technical assistance regarding timeliness of IFSP services. As a result, SoonerStart provided technical assistance and training opportunities to staff.	FFY 2008-2012	Data System, Corrective Action Plans, Technical Assistance, Training
On-going	The SoonerStart Data Analyst added edit checks and reports to the online system used by SoonerStart personnel. These additional checks and reports aid staff with scheduling by creating target dates for each report required to be submitted by personnel (e.g., IFSPs).	FFY 2008-2012	Data System, Data Analyst
On-going	SoonerStart is in the process of changing team roles. Service coordinators will be trained on how to provide evaluation, assessment and IFSP services. In turn service providers will be trained in service coordination. SoonerStart is planning a new process and system but implementation has been delayed due to budgeting constraints.	FFY 2009-2012	Training Materials and Technical Assistance
New	Monies from funded staff vacancies have been made available for contracts with service providers in rural areas of the state through OSDH.	FFY 2009-2012	OSDH Contracts
New	Oklahoma utilizes OSEP Memorandum 09-02 to monitor compliance at both the child level and the site level. Oklahoma's interpretation of this directive resulted in reporting of site level findings and correction in FFY 2008 and FFY 2009. For FFY 2010 and subsequent APRs, Oklahoma is reporting child level findings and correction.	FFY 2010-2012	OSDE Data Manager, Program Managers

Correction of FFY 2009 Findings of Noncompliance (if State reported less than 100% compliance):

Level of compliance (actual target data) State reported for FFY 2009 for this indicator: 83.72%

a. Number of findings of noncompliance the State made during FFY 2009 (the period from July 1, 2009, through June 30, 2010)	24
b. Number of FFY 2009 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	24
c. Number of FFY 2009 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Correction of FFY 2009 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:

a. Number of FFY 2009 findings not timely corrected (same as the number from (3) above)	0
b. Number of FFY 2009 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	0

c. Number of FFY 2009 findings <u>not</u> verified as corrected [(4) minus (5)]	0
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Oklahoma utilizes OSEP Memorandum 09-02 to monitor compliance at both the child level and the site level. Oklahoma's interpretation of this directive resulted in reporting of site level findings and correction in FFY 2008 and FFY 2009. For FFY 2010 and subsequent APRs, Oklahoma is reporting child level findings and correction. There were no child level findings in FFY 2009. All incidents of noncompliance were corrected or the child was no longer within the jurisdiction of the SoonerStart program before a child level finding could be issued. Oklahoma issued 24 site level findings for Indicator 7 in FFY 2009 when a site was determined to have missed the target timeline for the required IFSP.

Actions Taken if Noncompliance Not Corrected:

All noncompliance in FFY 2009 have been verified as corrected. Correction of non-compliance for FFY 2009 is 100%.

Verification of Correction of FFY 2009 noncompliance or FFY 2009 findings (either timely or subsequent):

Oklahoma verifies correction of noncompliance at the site level and at the child level in accordance with OSEP Memorandum 09-02. Quarterly review of the SoonerStart database and on-site verification visits, ensure that the local site is correctly implementing the 45 day timeline requirement for each child in the SoonerStart program unless the child is no longer within the jurisdiction of the EIS program.

Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2009:

There were no child level findings of non-compliance for Indicator 7 issued in FFY 2009. All incidences of noncompliance were corrected or the child no longer within the jurisdiction of the SoonerStart program before a child level finding could be issued. Compliance was verified with an on-site visit and chart review. Since all incidences of noncompliance at the child level were corrected before a finding could be issued, subsequently all sites found to be in noncompliance for IFSPs past the target timeline were determined as corrected.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable):

Statement from the Response Table	State's Response
<p>The State must demonstrate, in the FFY 2010 APR, that the State is in compliance with the 45-day timeline requirements in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a). Because the State reported less than 100% compliance for FFY 2009 the State must report on the status of correction of noncompliance reflected in the data the State reported for this indicator.</p>	<p>During FFY 2009 there were no findings of noncompliance issued at the child level. All specific incidents of non-compliance were corrected at the child level before a finding could be issued, and each eligible infant and toddler subsequently had an IFSP or was no longer within the jurisdiction of the SoonerStart program. Because all children had IFSPs, although late, or were no longer within the jurisdiction of the SoonerStart program, the 24 findings issued to the sites were corrected within one year of identification.</p>
<p>If the State does not report 100% compliance in the FFY 2010 APR, the State must review its improvement activities and revise them, if necessary.</p>	<p>In FFY 2010, the pre-IFSP process was streamlined and the evaluation for eligibility now occurs at the first contact with the family to assist the SoonerStart team in meeting the 45 day timeline. OSDE-SES Program managers provide onsite monitoring and technical assistance statewide. Additional FFY 2009 APR</p>

	improvement activities are ongoing.
<p>When reporting the correction of noncompliance, the State must report, in its FFY 2010 APR, that it has verified that each EIS program with noncompliance reflected in the FFY2009 data the State reported for this indicator (1) is correctly implementing 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has conducted the initial evaluation, assessment, and IFSP meeting, although late, for any child for whom the 45-day timeline was not met, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02. In the FFY 2010 APR, the State must describe the specific actions that were taken to verify the correction.</p>	<p>Oklahoma utilizes data from its statewide database to determine that all eligible infants and toddlers in the SoonerStart program receive an initial IFSP within 45 days of referral. In the instances where data is missing or does not appear to be in compliance, the Program Manager completes an on-site verification visit and monitors all charts within the specified time frame that require data verification. Program managers do not limit verification to a sample of the total clients at a local site, but review each chart that does not appear to be in compliance. Chart documentation is examined to determine if exceptional family circumstances prevented the timely completion of the IFSP. Individual chart monitoring assists the Program Manager in determining if the site is correctly implementing 34 CFR §§303.321(3)(2), 303.322(e)(1), and 303.342(a).</p>

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable):

Part C State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Indicator 8A: Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including:

A IFSPs with transition steps and services

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

Measurement:

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

FFY	Measurable and Rigorous Target
FFY 2010	In FFY 2010, 100.00% of all children exiting Part C will receive timely transition planning to support their transitions to preschool and other appropriate community services by their third birthdays, including IFSPs with transition steps and services.

Actual Target Data for FFY 2010:

In FFY 2010, 1,667 of 1,738 (95.91%) children exiting Part C received timely transition planning to support their transitions to preschool and other appropriate community services by their third birthdays, including IFSPs with transition steps and services. This includes two children for whom delays were due to exceptional family circumstances.

Oklahoma utilizes a statewide online data system to collect data for monitoring Indicator 8a. Any data that are missing from the data system are verified at the local site. Any data that do not appear to meet the requirement of an IFSP with transition steps and services are verified at the local site to determine if exceptional family circumstances or other issues affecting the requirement are applicable.

Children Exiting Part C who Received Timely Transition Planning:

a. Number of children exiting Part C who have an IFSP with transition steps and services	1667
b. Number of children exiting Part C	1738
Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday (Percent = [(a) divided by (b)] times 100)	95.91%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2010:

These data represent slippage for Indicator 8a from the FFY 2009 data of 98.60%. SoonerStart did not meet its FFY 2010 target of 100% for this indicator.

One reason for the slippage that SoonerStart has experienced in meeting the requirements of Indicator 8a is due to the significant issues that impacted transition planning and services in Oklahoma County, the state's largest SoonerStart site. With over 400 clients requiring timely transition steps and services on their IFSPs in FFY 2010, the Oklahoma County site experienced multiple events that resulted in delayed services or lack of documentation to verify that services had occurred. The Oklahoma County SoonerStart office facility suffered a collapsed roof due to a rain event caused by a near-by tornado. Many client records were destroyed. A hailstorm followed and all attempts to salvage the building were abandoned. SoonerStart staff were divided and housed throughout the city for the next 20 months. This course of events resulted in extreme difficulties coordinating early intervention services and maintaining records. Many records suffered water damage. Those records salvaged were determined contaminated with mold and destroyed. During data verification visits, over 100 client records could not be located. Oklahoma County has not yet recovered from the physical limitations that impact timely services. New office space has been acquired and SoonerStart staff hopes to be reunited under one roof with on-site records in the spring of 2012.

Another factor that negatively impacted meeting the timeline for Indicator 8a was the lack of SoonerStart Education staff (service coordinators and supervisor) to guide families and children through the transition process. Again, the major impact of limited staff was seen in Oklahoma County. With the limitations and stressors of the office relocation, displacement of staff and less than optimal working conditions, many Resource Coordinators in Oklahoma County chose to resign or accept early retirement offered by the State of Oklahoma. Originally budgeted for 16 Resource Coordinators, the Oklahoma County site had ten vacancies during FFY 2010 which could not be re-hired during that time due to budget constraints. The Regional Early Intervention Coordinator, who supervised these staff members, was also on extended medical leave for over 12 months before resigning her position. OSDE has hired a new supervisor for the Oklahoma County site and is seeking funding for half of the vacant positions in an effort to recover from this series of unforeseen events.

Improvement Activities Completed in FFY 2010:

Status	Activity	Timeline	Resources
Completed	Resource Coordinator Technical Assistance Workshops were scheduled to provide updates on Policies and Procedures as well as service coordination activities. Transition Policies and Procedures Training was provided for all SoonerStart staff.	FFY 2009-2012	OSDE-SES Program Managers

New and Revised Improvement Activities:

Status	Activity	Timeline	Resources
On-going	OSDE will seek funding to fill vacancies in critical SoonerStart sites to reduce the impact of staff shortages on required early intervention services.	FFY 2008-2012	OSDE
On-going	SoonerStart staff collaborated with Part B personnel to provide training to Local Educational Agencies (LEAs) and Part C staff regarding smooth transitions from Part C to Part B. Trainings included examples of effective collaboration between Part C and Part B, as well as strategies for including local communities (e.g., preschool programs, Head Start, and other preschool options).	FFY 2008-2012	Training and Technical Assistance
On-going	SoonerStart utilized monitoring data collected from all 26 early intervention sites. Teams that scored less than 100.00% provided SoonerStart corrective action plans. These corrective action plans included activities such as requests for additional	FFY 2008-2012	Data Reports and Program Managers

	technical assistance regarding Transition activities and meeting timelines.		
New	SoonerStart will revise the <i>Transition at Age Three: Steps for Success</i> transition guide that is disseminated to all families at the initiation of transition planning. Revisions will include new Part C Regulations published in September 2011. The guide includes examples of transition services, timelines for transition planning, procedural safeguards regarding transition, Part B contact information and strategies, and other useful transition information.	FFY 2011-2012	Transition at Three Guide
On-going	SoonerStart is in the process of changing team roles. Service coordinators will be trained on how to provide evaluation, assessment and IFSP services. In turn service providers will be trained in service coordination activities including Transition planning. SoonerStart is planning a new process and system but implementation was delayed due to budgeting constraints.	FFY 2009-2012	Training Materials and Technical Assistance
New	Oklahoma utilizes OSEP Memorandum 09-02 to monitor compliance at both the child level and the site level. Oklahoma's interpretation of this directive resulted in reporting of site level findings and correction in FFY 2008 and FFY 2009. For FFY 2010 and subsequent APRs, Oklahoma is reporting child level findings and correction.	FFY 2010-2012	OSDE Data Manager, Program Managers

Correction of FFY 2009 Findings of Noncompliance (if State reported less than 100% compliance):

Level of compliance (actual target data) State reported for FFY 2009 for this indicator: 98.60%

a. Number of findings of noncompliance the State made during FFY 2009 (the period from July 1, 2009, through June 30, 2010)	18
b. Number of FFY 2009 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	18
c. Number of FFY 2009 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Correction of FFY 2009 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:

a. Number of FFY 2009 findings not timely corrected (same as the number from (3) above)	0
b. Number of FFY 2009 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	0
c. Number of FFY 2009 findings <u>not</u> verified as corrected [(4) minus (5)]	0

Oklahoma utilizes OSEP Memorandum 09-02 to monitor compliance at both the child level and the site level. Oklahoma's interpretation of this directive resulted in reporting of site level findings and correction in FFY 2008 and FFY 2009. For FFY 2010 and subsequent APRs, Oklahoma is reporting child level findings and correction. There were no child level findings in FFY 2009. All incidents of noncompliance were corrected or the child was no longer within the jurisdiction of the SoonerStart program before a child level finding could be issued. Oklahoma issued 18 site level findings for Indicator 8a in FFY 2009 when a site was determined to have missed the target timeline for the required Transition Steps and Services on the IFSP.

Actions Taken if Noncompliance Not Corrected:

All noncompliance in FFY 2009 have been verified as corrected. Correction of non-compliance for FFY 2009 is 100%.

Verification of Correction of FFY 2009 noncompliance or FFY 2009 findings (either timely or subsequent):

Oklahoma verifies correction of non-compliance at the site level and at the child level in accordance with OSEP Memorandum 09-02. Quarterly review of the SoonerStart database and on-site verification visits insure that the local site is correctly implementing the Transition Steps and Services on the IFSP requirement for each child in the SoonerStart program unless the child is no longer within the jurisdiction of the EIS program.

Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2009:

There were no child level findings of non-compliance for Indicator 8a issued in FFY 2009. All incidences of noncompliance were corrected or the child no longer within the jurisdiction of the SoonerStart program before a child level finding could be issued. Compliance was verified with an on-site visit and chart review. Since all incidences of noncompliance at the child level were corrected before a finding could be issued, subsequently all sites found to be in noncompliance for Steps and Services on the IFSP past the target timeline were determined as corrected.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable):

Statement from the Response Table	State's Response
<p>Because the State reported less than 100% compliance for FFY 2009, the State must report on the status of correction of noncompliance reflected in the data the State reported for this indicator.</p>	<p>During FFY 2009 there were no findings of noncompliance issued at the child level. All specific incidents of non-compliance were corrected at the child level before a finding could be issued, and each eligible infant and toddler subsequently had Transition Steps and Services on an IFSP or was no longer within the jurisdiction of the SoonerStart program. Because all children had Transition Steps and Services on their IFSPs, although late, or were no longer within the jurisdiction of the SoonerStart program, the 18 findings issued to the sites were corrected within one year of identification.</p>
<p>If the State does not report 100% compliance in the FFY 2010 APR, the State must review its improvement activities and revise them, if necessary</p>	<p>OSDE has implemented new monitoring procedures to ensure local, State, and federal compliance. OSDE-SES added two program managers who are responsible for monitoring and technical assistance statewide.</p> <p>Transition Policies and Procedures Training was provided for all SoonerStart staff.</p> <p>OSDE is seeking funding to fill vacancies in critical areas to address staff shortages impacting timely services.</p>
<p>When reporting the correction of noncompliance, the State must report, in its FFY 2010 APR, that it has verified that each EIS program with noncompliance reflected in the data the State reported for this indicator,</p>	<p>Oklahoma utilizes data from its statewide database to determine that all children in the SoonerStart program have Transition Steps and Services on an IFSP when applicable. The Program Manager reviewed the</p>

<p>and noncompliance findings identified in FFY 2007: (1) is correctly implementing 34 CFR §§303.148(b)(4) and 303.344(h) and 20 U.S.C. 1436(a)(3) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has developed an IFSP with transition steps and services for each child, unless the child is no longer within the jurisdiction of the EIS program (i.e., the child has exited the State's Part C program due to age or other reasons), consistent with OSEP Memo 09-02. In the FFY 2009 APR, the State must describe the specific actions that were taken to verify the correction.</p>	<p>Transition target date report for the site to determine the children who had reached the age of thirty months and required an IFSP with Transition steps and services during a specified time period (quarterly reviews). For each child meeting the age requirement within the time period, the chart was reviewed to verify that the child's IFSP contained Transition Steps and Services, even if completed past the target timeline or that the child was no longer within the jurisdiction of the SoonerStart program. At the site level, SoonerStart local sites are required to develop a corrective action plan to verify that they are correctly implementing 34 CFR §§303.148(b)(4) and 303.344(h) and 20 U.S.C. 1436(a)(3) in completing the Transition Steps and Services on the IFSP in a timely manner.</p>
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Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable):

Part C State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Indicator 8B: Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including:

A Notification to LEA, if child potentially eligible for Part B;

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

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

FFY	Measurable and Rigorous Target
<i>FFY 2010</i>	In FFY 2010, 100.00% of all children exiting Part C will receive timely transition planning to support their transitions to preschool and other appropriate community services by their third birthdays, including notification to the LEA, if they are potentially eligible for IDEA Part B services.

Actual Target Data for FFY 2010:

In FFY 2010, 995 of 1,145 (86.90%) children exiting Part C received timely transition planning to support their transitions to preschool and other appropriate community services by their third birthdays including notification to the LEA, if they were potentially eligible for IDEA Part B services. This includes 95 children for whom delays were due to exceptional family circumstances.

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

a. Number of children exiting Part C and potentially eligible for Part B where the notification to the LEA occurred	995
b. Number of children exiting Part C who were potentially eligible for Part B	1145
Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday (Notification to LEA) (Percent = [(a) divided by (b)] times 100)	86.90%

Oklahoma utilizes a statewide online data system to collect data for monitoring Indicator 8b. Any data that are missing from the data system are verified at the local site. Any data that do not appear to meet the requirement of Notification to the LEA are verified at the local site to determine if exceptional family circumstances or other issues affecting the requirement are applicable.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2010:

These data represent slippage for Indicator 8b from the FFY 2009 data of 99.69%. SoonerStart did not meet its FFY 2010 target of 100% for this indicator.

One reason for the slippage that SoonerStart has experienced in meeting the requirements of Indicator 8b is due to the significant issues that impacted transition planning and services in Oklahoma County, the state's largest SoonerStart site. With over 250 potentially eligible clients for Part B requiring timely notification to the LEA in FFY 2010, the Oklahoma County site experienced multiple events that resulted in delayed services or lack of documentation to verify that services had occurred. The Oklahoma County SoonerStart office facility suffered a collapsed roof due to a rain event caused by a near-by tornado. Many client records were destroyed. A hailstorm followed and all attempts to salvage the building were abandoned. SoonerStart staff were divided and housed throughout the city for the next 20 months. This course of events resulted in extreme difficulties coordinating early intervention services and maintaining records. Many records suffered water damage. Those records salvaged were determined contaminated with mold and destroyed. During data verification visits, over 100 client records could not be located. Oklahoma County has not yet recovered from the physical limitations that impact timely services. New office space has been acquired and SoonerStart staff hopes to be reunited under one roof with on-site records in the spring of 2012.

Another factor that negatively impacted meeting the timeline for Indicator 8b was the lack of SoonerStart Education staff (service coordinators and supervisor) to guide families and children through the transition process. Again, the major impact of limited staff was seen in Oklahoma County. With the limitations and stressors of the office relocation, displacement of staff and less than optimal working conditions, many Resource Coordinators in Oklahoma County chose to resign or accept early retirement offered by the State of Oklahoma. Originally budgeted for 16 Resource Coordinators, the Oklahoma County site had ten vacancies during FFY 2010 which could not be re-hired during that time due to budget constraints. The Regional Early Intervention Coordinator, who supervised these staff members, was also on extended medical leave for over 12 months before resigning her position. OSDE has hired a new supervisor for the Oklahoma County site and is seeking funding for half of the vacant positions in an effort to recover from this series of unforeseen events.

Improvement Activities Completed in FFY 2010:

Status	Activity	Timeline	Resources
Completed	Resource Coordinator Technical Assistance Workshops were scheduled to provide updates on Policies and Procedures as well as service coordination activities. Transition Policies and Procedures Training was provided for all SoonerStart staff.	FFY 2009-2012	OSDE-SES Program Managers

New and Revised Improvement Activities:

Status	Activity	Timeline	Resources
On-going	OSDE will seek funding to fill vacancies in critical SoonerStart sites to reduce the impact of staff shortages on required early intervention services.	FFY 2008-2012	OSDE
On-going	SoonerStart staff collaborated with Part B personnel to provide training to Local Educational Agencies (LEAs) and Part C staff regarding smooth transitions from Part C to Part B. Trainings included examples of effective collaboration between Part C and Part B, as well as strategies for including local communities (e.g., preschool programs, Head Start, and other preschool options).	FFY 2008-2012	Training and Technical Assistance
On-going	SoonerStart utilized monitoring data collected from all 26 early intervention sites. Teams that scored less than 100.00%	FFY 2008-2012	Data Reports and Program

	provided SoonerStart corrective action plans. These corrective action plans included activities such as requests for additional technical assistance regarding Transition activities and meeting timelines.		Managers
New	SoonerStart will revise the <i>Transition at Age Three: Steps for Success</i> transition guide that is disseminated to all families at the initiation of transition planning. Revisions will include new Part C Regulations published in September 2011. The guide includes examples of transition services, timelines for transition planning, procedural safeguards regarding transition, Part B contact information and strategies, and other useful transition information.	FFY 2011-2012	Transition at Three Guide
On-going	SoonerStart is in the process of changing team roles. Service coordinators will be trained on how to provide evaluation, assessment and IFSP services. In turn service providers will be trained in service coordination activities including Transition planning. SoonerStart is planning a new process and system but implementation was delayed due to budgeting constraints.	FFY 2009-2012	Training Materials and Technical Assistance
New	Oklahoma utilizes OSEP Memorandum 09-02 to monitor compliance at both the child level and the site level. Oklahoma's interpretation of this directive resulted in reporting of site level findings and correction in FFY 2008 and FFY 2009. For FFY 2010 and subsequent APRs, Oklahoma is reporting child level findings and correction.	FFY 2010-2012	OSDE Data Manager, Program Managers

Correction of FFY 2009 Findings of Noncompliance (if State reported less than 100% compliance):

Level of compliance (actual target data) State reported for FFY 2009 for this indicator: 99.69%

a. Number of findings of noncompliance the State made during FFY 2009 (the period from July 1, 2009, through June 30, 2010)	1
b. Number of FFY 2009 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	1
c. Number of FFY 2009 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Correction of FFY 2009 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:

a. Number of FFY 2009 findings not timely corrected (same as the number from (3) above)	0
b. Number of FFY 2009 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	0
c. Number of FFY 2009 findings <u>not</u> verified as corrected [(4) minus (5)]	0

Oklahoma utilizes OSEP Memorandum 09-02 to monitor compliance at both the child level and the site level. Oklahoma's interpretation of this directive resulted in reporting of site level findings and correction in FFY 2008 and FFY 2009. For FFY 2010 and subsequent APRs, Oklahoma is reporting child level findings and correction. There were no child level findings in FFY 2009. All incidents of noncompliance were corrected or the child was no longer within the jurisdiction of the SoonerStart program before a child level finding could be issued. Oklahoma issued one site level findings for Indicator 8b in FFY 2009 when a site was determined to have missed the target

timeline for the required Notification to the LEA. However, the appropriate notification was determined to have occurred past the timeline.

Actions Taken if Noncompliance Not Corrected:

All noncompliance in FFY 2009 have been verified as corrected. Correction of non-compliance for FFY 2009 is 100%.

Verification of Correction of FFY 2009 noncompliance or FFY 2009 findings (either timely or subsequent):

The Program Manager reviewed the statewide online database to determine sites requiring verification visits. On site visits involved reviewing the specific Transition Date Report for the site to determine the number of clients who are in the timeframe for the LEA to be notified. The chart is reviewed for documentation of notification to LEA. Oklahoma verifies correction of non-compliance at the site level and at the child level in accordance with OSEP Memorandum 09-02. Quarterly review of the SoonerStart database and on-site verification visits insure that the local site is correctly implementing the Notification to the LEA requirement for each child in the SoonerStart program unless the child is no longer within the jurisdiction of the EIS program.

Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2009:

There were no child level findings of non-compliance for Indicator 8b issued in FFY 2009. All incidences of noncompliance were corrected or the child was no longer within the jurisdiction of the SoonerStart program before a child level finding could be issued. Compliance was verified with an on-site visit and chart review. Since all incidences of noncompliance at the child level were corrected before a finding could be issued, subsequently all sites found to be in noncompliance for Notification to the LEA past the target timeline were determined as corrected.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable):

Statement from the Response Table	State's Response
Because the State reported less than 100% compliance for FFY 2009 the State must report on the status of correction of noncompliance reflected in the data the State reported for this indicator.	During FFY 2009 there were no findings of noncompliance issued at the child level. All specific incidents of non-compliance were corrected at the child level before a finding could be issued, and each eligible child subsequently was provided notification to the LEA or was no longer within the jurisdiction of the SoonerStart program. Because all required notification to the LEA took place, although late, the one finding issued to the site was corrected within one year of identification.
If the State does not report 100% compliance in the FFY 2010 APR, the State must review its improvement activities and revise them, if necessary.	OSDE has implemented new monitoring procedures to ensure local, State, and federal compliance. OSDE-SES added two program managers who are responsible for monitoring and technical assistance statewide. Transition Policies and Procedures Training was provided for all SoonerStart staff. OSDE is seeking funding to fill vacancies in critical areas to address staff shortages impacting timely Transition services.
When reporting the correction of noncompliance, the State must report, in its FFY 2010 APR, that it has verified that each EIS program with	Oklahoma utilizes data from its statewide database to determine that all children in the SoonerStart program have received the notification to the LEA when

<p>noncompliance reflected in the data the State reported for this indicator (1) is correctly implementing 34 CFR §303.148(b)(1) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through onsite monitoring or a State data system; and (2) has provided notification to the LEA for each child, unless the child is no longer within the jurisdiction of the EIS program (i.e., the child has exited the State’s Part C program due to age or other reasons), consistent with OSEP Memo 09-02. In the FFY 2010 APR, the State must describe the specific actions that were taken to verify the correction.</p>	<p>applicable. The Program Manager reviewed the SoonerStart database Transition target date report for the site to determine the potentially eligible children who had reached the age of 33 months and required notification to the LEA during a specified time period (quarterly reviews). For each child meeting the age requirement within the time period, the chart was reviewed to verify that the LEA had been notified even if completed past the target timeline or that the child was no longer within the jurisdiction of the SoonerStart program. At the site level, SoonerStart local sites are required to develop a corrective action plan to verify that they are correctly implementing 34 CFR §303.148(b)(1) in notifying the LEA in a timely manner.</p>
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Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable):

Part C State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Indicator 8C: Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including:

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

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

Measurement:

Percent = [(# of children exiting Part C and potentially eligible for Part B where the transition conference occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.

Account for untimely transition conferences, including reasons for delays.

FFY	Measurable and Rigorous Target
FFY 2010	In FFY 2010, 100.00% of all children exiting Part C will receive timely transition planning to support their transitions to preschool and other appropriate community services by their third birthdays, including a transition conference, if they are potentially eligible for IDEA Part B services.

Actual Target Data for FFY 2010:

In FFY 2010, 855 of 1,054 (81.12%) children exiting Part C received timely transition planning to support their transitions to preschool and other appropriate community services by their third birthdays including transition conference, if they were potentially eligible for IDEA Part B services. This includes 119 children for whom delays were due to exceptional family circumstances.

Oklahoma utilizes a statewide online data system to collect data for monitoring Indicator 8c. Any data that are missing from the data system are verified at the local site. Any data that do not appear to meet the requirement of an IFSP with transition steps and services are verified at the local site to determine if exceptional family circumstances or other issues affecting the requirement are applicable.

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

a. Number of children exiting Part C and potentially eligible for Part B where the transition conference occurred	855
b. Number of children exiting Part C who were potentially eligible for Part B	1054
Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday (Transition Conference) (Percent = [(a) divided by (b)] times 100)	81.12

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred in FFY 2010:

These data represent slippage for Indicator 8c from the FFY 2009 data of 85.46%. SoonerStart did not meet its FFY 2010 target of 100% for this indicator.

One reason for the slippage that SoonerStart has experienced in meeting the requirements of Indicator 8c is due to the significant issues that impacted transition planning and services in Oklahoma County, the state's largest SoonerStart site. With almost 200 clients requiring timely Transition Planning Conferences in FFY 2010, the Oklahoma County site experienced multiple events that resulted in delayed services or lack of documentation to verify that services had occurred. The Oklahoma County SoonerStart office facility suffered a collapsed roof due to a rain event caused by a near-by tornado. Many client records were destroyed or blown away. A hailstorm followed and all attempts to salvage the building were abandoned. SoonerStart staff were divided and housed throughout the city for the next 20 months. This course of events resulted in extreme difficulties coordinating early intervention services and maintaining records. Many records suffered water damage. Those records salvaged were determined contaminated with mold and destroyed. During data verification visits, over 100 client records could not be located. Oklahoma County has not yet recovered from the physical limitations that impact timely services. New office space has been acquired and SoonerStart staff hopes to be reunited under one roof with on-site records in the Spring of 2012.

Another factor that negatively impacted meeting the timeline for Indicator 8c was the lack of SoonerStart Education staff (service coordinators and supervisor) to guide families and children through the transition process. Again, the major impact of limited staff was seen in Oklahoma County. With the limitations and stressors of the office relocation, displacement of staff and less than optimal working conditions, many Resource Coordinators in Oklahoma County chose to resign or accept early retirement offered by the State of Oklahoma. Originally budgeted for 16 Resource Coordinators, the Oklahoma County site had ten vacancies during FFY 2010 which could not be re-hired during that time due to budget constraints. The Regional Early Intervention Coordinator, who supervised these staff members, was also on extended medical leave for over 12 months before resigning her position. OSDE has hired a new supervisor for the Oklahoma County site and is seeking funding for half of the vacant positions in an effort to recover from this series of unforeseen events.

Improvement Activities Completed in FFY 2010:

Status	Activity	Timeline	Resources
Completed	Resource Coordinator Technical Assistance Workshops were scheduled to provide updates on Policies and Procedures as well as service coordination activities. Transition Policies and Procedures Training was provided for all SoonerStart staff.	FFY 2009-2012	OSDE-SES Program Managers

New and Revised Improvement Activities:

Status	Activity	Timeline	Resources
On-going	OSDE will seek funding to fill vacancies in critical SoonerStart sites to reduce the impact of staff shortages on required early intervention services.	FFY 2008-2012	OSDE
On-going	SoonerStart staff collaborated with Part B personnel to provide training to Local Educational Agencies (LEAs) and Part C staff regarding smooth transitions from Part C to Part B. Trainings included examples of effective collaboration between Part C and Part B, as well as strategies for including local communities (e.g., preschool programs, Head Start, and other preschool options).	FFY 2008-2012	Training and Technical Assistance

On-going	SoonerStart utilized monitoring data collected from all 26 early intervention sites. Teams that scored less than 100.00% provided SoonerStart corrective action plans. These corrective action plans included activities such as requests for additional technical assistance regarding Transition activities and meeting timelines.	FFY 2008-2012	Data Reports and Program Managers
New	SoonerStart will revise the <i>Transition at Age Three: Steps for Success</i> transition guide that is disseminated to all families at the initiation of transition planning. Revisions will include new Part C Regulations published in September 2011. The guide includes examples of transition services, timelines for transition planning, procedural safeguards regarding transition, Part B contact information and strategies, and other useful transition information.	FFY 2011-2012	Transition at Three Guide
On-going	SoonerStart is in the process of changing team roles. Service coordinators will be trained on how to provide evaluation, assessment and IFSP services. In turn service providers will be trained in service coordination activities including Transition planning. SoonerStart is planning a new process and system but implementation was delayed due to budgeting constraints.	FFY 2009-2012	Training Materials and Technical Assistance
New	Oklahoma utilizes OSEP Memorandum 09-02 to monitor compliance at both the child level and the site level. Oklahoma's interpretation of this directive resulted in reporting of site level findings and correction in FFY 2008 and FFY 2009. For FFY 2010 and subsequent APRs, Oklahoma is reporting child level findings and correction.	FFY 2010-2012	OSDE Data Manager, Program Managers

Correction of FFY 2009 Findings of Noncompliance (if State reported less than 100% compliance):

Level of compliance (actual target data) State reported for FFY 2009 for this indicator: 85.46%

a. Number of findings of noncompliance the State made during FFY 2009 (the period from July 1, 2009, through June 30, 2010)	15
b. Number of FFY 2009 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	15
c. Number of FFY 2009 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

FFY 2009 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:

a. Number of FFY 2009 findings not timely corrected (same as the number from (3) above)	0
b. Number of FFY 2009 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	0
c. Number of FFY 2009 findings <u>not</u> verified as corrected [(4) minus (5)]	0

Oklahoma utilizes OSEP Memorandum 09-02 to monitor compliance at both the child level and the site level. Oklahoma's interpretation of this directive resulted in reporting of site level findings and correction in FFY 2008 and FFY 2009. For FFY 2010 and subsequent APRs, Oklahoma is reporting child level findings and correction. There were no child level findings in FFY 2009. All incidents of noncompliance were corrected or the child was no longer within the jurisdiction of the SoonerStart program before a child level finding could be issued. Oklahoma

issued 15 site level findings for Indicator 8c in FFY 2009 when a site was determined to have missed the target timeline for the required Transition Planning Conference.

Actions Taken if Noncompliance Not Corrected:

All noncompliance in FFY 2009 have been verified as corrected. Correction of non-compliance for FFY 2009 is 100%.

Verification of Correction of FFY 2009 noncompliance or FFY 2009 findings (either timely or subsequent):

The Program Manager reviewed the statewide online database to determine sites requiring verification visits. On site visits involved reviewing the specific Transition Date Report for the site to determine the clients who were requires to have a timely Transition Planning Conference (TPC). The chart is reviewed for documentation of the TPC. Oklahoma verifies correction of non-compliance at the site level and at the child level in accordance with OSEP Memorandum 09-02. Quarterly on-site verification visits ensure that the local site is meeting timelines in completing TPC’s for children who are potentially eligible for Part B services unless the child is no longer within the jurisdiction of the EIS program.

Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2009:

There were no child level findings of non-compliance for Indicator 8c issued in FFY 2009. All incidences of noncompliance were corrected or the child no longer within the jurisdiction of the SoonerStart program before a child level finding could be issued. Compliance was verified with an on-site visit and chart review. Since all incidences of noncompliance at the child level were corrected before a finding could be issued, subsequently all sites found to be in noncompliance for the TPC past the target timeline were determined as corrected.

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable):

Statement from the Response Table	State’s Response
<p>Because the State reported less than 100% compliance for FFY 2009, the State must report on the status of correction of noncompliance reflected in the data the State reported for this indicator.</p>	<p>During FFY 2009 there were no findings of noncompliance issued at the child level. All specific incidents of non-compliance were corrected at the child level before a finding could be issued, and each eligible child subsequently had a TPC or was no longer within the jurisdiction of the SoonerStart program. Because all children had Transition Planning Conferences, although late, or were no longer within the jurisdiction of the SoonerStart program, the 15 findings issued to the sites were corrected within one year of identification.</p>
<p>If the State does not report 100% compliance in the FFY 2010 APR, the State must review its improvement activities and revise them, if necessary</p>	<p>OSDE has implemented new monitoring procedures to ensure local, State, and federal compliance. OSDE-SES added two program managers who are responsible for monitoring and technical assistance statewide.</p> <p>Transition Policies and Procedures Training was provided for all SoonerStart staff.</p> <p>OSDE is seeking funding to fill vacancies in critical areas to address staff shortages impacting timely services.</p>

<p>When reporting the correction of noncompliance, the State must report, in its FFY 2010 APR, that it has verified that each EIS program with noncompliance reflected in the data the State reported for this indicator, and noncompliance findings identified in FFY 2007: (1) is correctly implementing 34 CFR §§303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has developed an IFSP with transition steps and services for each child, unless the child is no longer within the jurisdiction of the EIS program (i.e., the child has exited the State’s Part C program due to age or other reasons), consistent with OSEP Memo 09-02. In the FFY 2009 APR, the State must describe the specific actions that were taken to verify the correction.</p>	<p>Oklahoma utilizes data from its statewide database to determine that all children in the SoonerStart program have a TPC when applicable. The Program Manager reviewed the Transition target date report for the site to determine the children who had reached the age of thirty-three months and required a Transition Planning Conference during a specified time period (quarterly reviews). For each child meeting the age requirement within the time period, the chart was reviewed to verify that the child’s received a TPC even if completed past the target timeline or that the child was no longer within the jurisdiction of the SoonerStart program. At the site level, SoonerStart local sites are required to develop a corrective action plan to verify that they are correctly implementing 34 CFR §§303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)) in completing the Transition Planning Conference in a timely manner.</p>
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Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable)

Part C State Annual Performance Report (APR) for FFY 2010

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

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

Measurement:
 Percent of noncompliance corrected within one year of identification:
 a. # of findings of noncompliance.
 b. # of corrections completed as soon as possible but in no case later than one year from identification.
 Percent = [(b) divided by (a)] times 100.
States are required to use the “Indicator C 9 Worksheet” to report data for this indicator (see Attachment A).

FFY	Measurable and Rigorous Target
<i>FFY 2010</i>	In FFY 2010, 100.00% of noncompliance identified will be corrected within one year of identification.

Actual Target Data for FFY 2009:

In FFY 2010, **0** of **0** findings (**100%**) of noncompliance identified in FFY 2009 were corrected within one year of identification.

Describe the process for selecting EIS programs for Monitoring:

The Oklahoma SoonerStart program has 26 sites providing services to infants and toddlers and their families. All 26 sites receive an on-site monitoring and/or verification visit at least one time per year. Oklahoma utilizes data from its statewide database to review indicators for all infants and toddlers receiving Part C services. In the instances where data is missing or does not appear to be in compliance, the Program Manager completes an on-site verification visit and monitors all charts within the specified time frame that require data verification. Program managers do not limit verification to a sample of the total clients at a local site, but review each chart that does not appear to be in compliance.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that Occurred for FFY 2010:

SoonerStart’s FFY 2010 data of 100% correction of noncompliance represents progress from its FFY 2009 data of 81.91%.

Prior to FFY 2008 and FFY 2009, Oklahoma reported 100% correction on this indicator. With the issuance of OSEP Memorandum 09-02, Oklahoma interpreted this directive to require reporting those SoonerStart SITES that

missed timelines even if the noncompliance was corrected before a finding could be issued at the child level. Oklahoma's initial interpretation of timely correction led to the reporting for Indicator #9 that resulted in less than a 100% correction of non-compliance.

Oklahoma received a determination of Needs Assistance for the second consecutive year and was advised by the Secretary of available sources of technical assistance related to Indicator 9, Timely Correction. Per this directive, Oklahoma has sought technical assistance from Southeast Regional Resource Center (SERRC); the Data Accountability Center (DAC); the National Early Childhood Technical Assistance Center (NECTAC) website specifically pertaining to General Supervision; the IDEA Technical Assistance and Guidance website and the OSEP FAQ document on Identification and Correction (9.03.08). Based upon this assistance, Oklahoma has revised its data reporting for Oklahoma's Annual Performance Report.

In FFY 2010, Oklahoma is reporting 100% correction of noncompliance. There were no findings issued at the child level. All incidents of noncompliance (late IFSPs, late TPCs, etc) were corrected before a child level finding could be issued. This was determined by both database review and on-site verification.

Although every child in the SoonerStart program received the required service, if the service was past the timeline established by the IDEA, the site received a finding. These 82 findings required the site to develop a Corrective Action Plan to address the systemic issues that were preventing the activities for each child occurring in a timely manner. All sites were required to demonstrate three consecutive months of site level compliance. It should be noted that two of the 26 sites in Oklahoma – Tulsa County and Oklahoma County – comprise almost 60% of the state's caseload. With an average caseload of 750 clients, Tulsa County demonstrated compliance to all timeline indicators within one to two clients for three consecutive months. Before the site finding could be issued, the noncompliance had already been corrected at the child level. Oklahoma County, with an average caseload of 850 clients, was plagued by several natural disasters resulting in loss of office space, loss of records, and displacement of staff. A near-by tornado resulted in a rain event that collapsed the roof on the Oklahoma County facility and flooded the office. Many client records were destroyed. A hailstorm followed and all attempts to salvage the building were abandoned. SoonerStart staff were divided and housed throughout the city for the remainder of the year. This course of events resulted in extreme difficulties coordinating early intervention services and maintaining records. Oklahoma County has not yet recovered from physical limitations that impact timely services. However, no child level findings were ever issued because each child did subsequently receive the required service, although past the timeline.

All sites with site-level findings receive a quarterly review of the SoonerStart database as well as an on-site verification visit by the Program Manager until compliance is indicated for three consecutive months. Technical assistance is provided informally as well as in a written follow-up report.

Although decreased funding has resulted in significant staff shortages, SoonerStart has explored ways to better meet timelines and provide services to eligible infants and toddlers in Oklahoma. In FFY 2010, the pre-IFSP process was streamlined and the evaluation for eligibility now occurs at the first contact with the family to assist the SoonerStart team in meeting the 45 day timeline. Training has been provided on Transition planning and requirements for meeting timelines. All staff also received training on procedural safeguards and some service providers are also providing service coordination to the families they serve. Various dedicated service coordinators have received intensive training on evaluation, assessment and service provision and are providing early intervention services in limited areas. SoonerStart will continue to expand the role of the service coordinator to be early intervention providers. As part of General Supervision activities, the Program Managers provide written technical assistance and verification visit follow-up reports to Oklahoma State Department of Education and Oklahoma State Department of Health administrative staff as well as SoonerStart staff. Training on chart documentation is planned for the coming year.

Note: For this indicator, report data on the correction of findings of noncompliance the State made during FFY 2009 (July 1, 2009 through June 30, 2010) and verified as corrected as soon as possible and in no case later than one year from identification.

Timely Correction of FFY 2009 Findings of Noncompliance (corrected within one year from identification of the noncompliance):

a. Number of findings of noncompliance the State made during FFY 2009 (the period from July 1, 2009, through June 30, 2010) (Sum of Column a on the Indicator C 9 Worksheet)	82
b. Number of findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS programs of the finding) (Sum of Column b on the Indicator C 9 Worksheet)	82
c. Number of findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Correction of FFY 2009 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:

a. Number of FFY 2009 findings not timely corrected (same as the number from (3) above)	0
b. Number of FFY 2009 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	0
c. Number of FFY 2009 findings <u>not</u> yet verified as corrected [(4) minus (5)]	0

Actions Taken if Noncompliance Not Corrected

All noncompliance in FFY 2009 have been verified as corrected. Correction of non-compliance for FFY 2009 is 100%.

Verification of Correction of FFY 2009 findings (either timely or subsequent)

During FFY 2010 all sites received a quarterly review of the SoonerStart database as well as an on-site verification visit by the Program Manager if a site level finding was issued until compliance is indicated for three consecutive months. Technical assistance was provided informally as well as in a written follow-up report. Oklahoma verifies correction of non-compliance at the site level and at the child level in accordance with OSEP Memorandum 09-02. Quarterly on-site verification visits by Program Managers ensure that the local site is correctly implementing the policies and procedures for each child in the SoonerStart program.

Describe the specific actions that the State took to verify the correction in FFY 2010 of findings of noncompliance identified in FFY 2009.

There were no child level findings of noncompliance issued in FFY 2009. The Program Manager reviewed the SoonerStart database to determine sites requiring verification visits. On-site visits involved reviewing the SoonerStart database Target Date Report for the site to determine the charts to review for the indicator monitored. Oklahoma monitored each applicable chart within a three month period at each site to verify correction at the child level. The Program Manager verified that all services, even if late, were initiated and that the appropriate documentation was completed stating the reason for missing any timelines. See the Oklahoma State Performance Plan for detailed monitoring procedures.

Correction of Remaining FFY 2008 Findings of Noncompliance (if applicable)

Oklahoma’s interpretation of reporting findings in FFY 2008 resulted in the reporting of 17 site level findings that were not corrected within in one year. These were not child level findings. There were not any child level findings or any children who did not receive the required services in FFY 2008. However, the Program Manager verified that the services, although late, were initiated and that the appropriate documentation was completed stating the reason for any missed timeline. The SoonerStart database and on-site chart review was used to verify correction at the site level.

If the State reported less than 100% for this indicator in its FFY 2008 APR and did not report that the remaining FFY 2008 findings were subsequently corrected, provide the information below:

All findings issued in FFY 2008 have been verified as corrected. Correction of non-compliance for FFY 2008 is 100%.

1. Number of remaining FFY 2008 findings noted in OSEP’s June 2010 FFY 2008 APR response table for this indicator	17
2. Number of remaining FFY 2008 findings the State has verified as corrected	17
3. Number of remaining FFY 2008 findings the State has NOT verified as corrected [(1) minus (2)]	0

INDICATOR C-9 WORKSHEET

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2009 (7/1/09 through 6/30/10)	(a) # of Findings of noncompliance identified in FFY 2009 (7/1/09 through 6/30/10)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
1. Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	24	24	24
	Dispute Resolution: Complaints, Hearings			

2. Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings			
3. Percent of infants and toddlers with IFSPs who demonstrate improved outcomes	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	N/A	N/A	N/A
	Dispute Resolution: Complaints, Hearings			
4. Percent of families participating in Part C who report that early intervention services have helped the family	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings			
5. Percent of infants and toddlers birth to one with IFSPs	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings			
6. Percent of infants and toddlers birth to three with IFSPs	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings			
7. Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	24	24	24
	Dispute Resolution: Complaints, Hearings			

<p>8. Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including:</p>	<p>Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other</p>	<p>18</p>	<p>18</p>	<p>18</p>
<p>A. IFSPs with transition steps and services;</p>	<p>Dispute Resolution: Complaints, Hearings</p>			
<p>8. Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including:</p>	<p>Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other</p>	<p>1</p>	<p>1</p>	<p>1</p>
<p>B. Notification to LEA, if child potentially eligible for Part B; and</p>	<p>Dispute Resolution: Complaints, Hearings</p>			
<p>8. Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including:</p>	<p>Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other</p>	<p>15</p>	<p>15</p>	<p>15</p>
<p>C. Transition conference, if child potentially eligible for Part B.</p>	<p>Dispute Resolution: Complaints, Hearings</p>			
<p>OTHER AREAS OF NONCOMPLIANCE:</p>	<p>Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other</p>			
	<p>Dispute Resolution: Complaints, Hearings</p>			

OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings			
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings			
Sum the numbers down Column a and Column b			82	82
Percent of noncompliance corrected within one year of identification = (column (b) sum divided by column (a) sum) times 100.			(b) / (a) X 100 =	100%

Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable):

Statement from the Response Table	State's Response
<p>The State must review its improvement activities and revise them, if appropriate, to ensure they will enable the State to provide data in the FFY 1010 APR demonstrating that the State timely corrected noncompliance identified in FFY 2009 in accordance with IDEA section 635(a)(10)(A), 34 CFR §303.501, and OSEP Memo 09-02.</p>	<p>The pre-IFSP process was streamlined and the evaluation for eligibility now occurs at the first contact with the family to assist the SoonerStart team in meeting the 45 day timeline.</p> <p>Training has been provided on Transition planning and requirements for meeting timelines.</p> <p>All staff received training on procedural safeguards.</p> <p>Some service providers are providing service coordination to the families they serve.</p> <p>Various dedicated service coordinators have received intensive training on evaluation, assessment and service provision and are providing early intervention services in limited areas.</p> <p>SoonerStart continues to expand the role of the service coordinator to be early intervention providers.</p> <p>Program Managers provide written technical assistance</p>

	<p>and verification visit follow-up reports to Oklahoma State Department of Education and Oklahoma State Department of Health administrative staff as well as SoonerStart staff.</p> <p>Training on chart documentation is planned for the coming year.</p> <p>Oklahoma utilizes OSEP Memorandum 09-02 to monitor compliance at both the child level and the site level. Oklahoma’s interpretation of this directive resulted in reporting of site level findings and correction in FFY 2008 and FFY 2009. For FFY 2010 and subsequent APRs, Oklahoma is reporting child level findings and correction</p>
<p>In reporting on correction of noncompliance in the FFY 2010 APR, the State must report that it verified that each EIS program with noncompliance identified in FFY 2009: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02. In the FFY 2010 APR, the State must describe the specific actions that were taken to verify the correction.</p>	<p>Oklahoma verifies correction of non-compliance at the site level and at the child level in accordance with OSEP Memorandum 09-02. Quarterly review of the SoonerStart database Target Date Report and on-site verification visits by Program Managers ensure that the local site is correctly implementing the policies and procedures for each child in the SoonerStart program. Program managers do not limit verification to a sample of the total clients at a local site, but review each chart that does not appear to be in compliance to determine if exceptional family circumstances are documented. Program Managers also verify that each child has received the required service, even if past the timeline.</p>
<p>In addition, in reporting on Indicator 9 in the FFY 2010 APR, the State must use the Indicator 9 Worksheet. Further, in responding to Indicators 1, 7, 8A, 8B, and 8C in the FFY 2010 APR, the State must report on correction of the noncompliance described in this table under those indicators.</p>	<p>See Indicators 1, 7, 8A, 8B and 8C</p>

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable):

Part C State Annual Performance Report for FFY 2010

Monitoring Priority: Formal Complaints

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.

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

FFY	Measurable and Rigorous Target
<i>FFY 2010</i>	For FFY 2010, 100.00% of signed written complaints with reports issued will be resolved and reports issued within a 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.

Actual Target Data for FFY 2010:

In FFY 2010, SoonerStart received one formal written complaint; it was withdrawn by the parent. SoonerStart met its FFY 2010 target of 100%.

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

Improvement Activities Completed in FFY 2010:

All staff received training in Parent Rights and Procedural Safeguards

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2008 in the *Oklahoma State Performance Plan (SPP; 2008)*:

New and Revised Improvement Activities:

Status	Activity	Timeline	Resources
On-going	SoonerStart will continue to monitor all formal complaints to ensure noncompliance is corrected.	FFY 2008-2010	New Brochure
On-going	All SoonerStart staff will participate in a statewide training on Procedural Safeguards in FFY 2010-2011.	FFY 2010-2013	Training Materials

Part C Annual Performance Report for FFY 2010

Monitoring Priority: Due Process Hearing Requests

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

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

Measurable and Rigorous Target:

For FFY 2010, 100% percent of fully adjudicated due process hearing requests that were fully adjudicated will be within the applicable timeline.

Actual Target Data for FFY 2010:

For FFY 2010, 0 of 0 due process hearing request.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

In FFY 2010, the OSDE-SES continued to contract with the Oklahoma State University (OSU) ABLE Tech to run the Special Education Resolution Center (SERC). The OSU-SERC is responsible for managing, directing, and operating the special education due process hearing system as required under the IDEA. Through the contract, the OSU-SERC also oversees the due process and resolution session system and provides information to the OSDE-SES regarding the number of due process request filed, resolution sessions (i.e., due process request not dropped by the complainant), settlement agreements reached through resolutions sessions, and findings of noncompliance of due process complaints that are not resolved through resolution sessions.

Improvement Activities Completed in FFY 2010:

SoonerStart staff at the OSDE-SES worked to revise the *Policies and Procedures for SoonerStart in Oklahoma 2009*).

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2010 in the Oklahoma State Performance Plan (SPP; 2009):

Status	Activity	Timeline	Resources
Completed	SoonerStart collaborated with the OSU-SERC to establish an advisory panel regarding the due process complaint system. The panel reviewed and updated the due process guidelines that were distributed to hearing and appeal officers, parents, SoonerStart Early Intervention staff, and other interested parties.	FFY 2009-2013	OSDE-SES staff
On-going	OSU-SERC provided training to hearing and appeal officers that emphasized the timeline requirements and acceptable	FFY 2009-2013	OSDE-SES staff and

	<p>reasons for granting extensions for due process complaints. The training (which was conducted by a leading national expert on special education law) also provided information regarding IDEA requirements that often lead to due process hearing requests.</p>		<p>OSU-SERC</p>
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Part C Annual Performance Report FFY 2010

Monitoring Priority: Due Process Resolution Sessions

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).

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

FFY	Measurable and Rigorous Target
<i>FFY 2010</i>	For FFY 2010, no targets have been established based on OSEP’s recommendation to the State of Oklahoma. (States are not required to establish baseline or targets if the number of mediations is less than 10).

Actual Target Data for FFY 2010:

For FFY 2010 0 of 0 hearing requests that went to resolution sessions were resolved through session settlement agreements.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

Because SoonerStart has not received any requests for mediation, no improvement activities have been proposed (as part of the *Oklahoma State Performance Plan, 2010*) or completed. In addition, no progress or slippage has occurred.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2010 in the *Oklahoma State Performance Plan (SPP; 2010)*:

Status	Activity	Timeline	Resources
	NA		

Part C Annual Performance Report for FFY 2010

Monitoring Priority: Mediation

Indicator 13 - Percent of mediations held that resulted in mediation agreements.

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

FFY	Measurable and Rigorous Target
<i>FFY 2010</i>	For FFY 2010, no targets have been established based on OSEP’s recommendation to the State of Oklahoma. (States are not required to establish baseline or targets if the number of mediations is less than 10).

Actual Target Data for FFY 2010:

For FFY 2010, 0 of 0 mediations held resulted in mediation agreements

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

Because SoonerStart has not received any requests for mediation, no improvement activities have been proposed (as part of the *Oklahoma State Performance Plan, 2010*) or completed. In addition, no progress or slippage has occurred.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2010 in the *Oklahoma State Performance Plan (SPP; 2010)*.

Status	Activity	Timeline	Resources
	NA		

Part C Annual Performance Report for FFY 2010

Monitoring Priority: State Reported Data are Timely and Accurate

Indicator 14 - State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.

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, including race and ethnicity, settings and November 1 for exiting, personnel, dispute resolution); and
 b. Accurate (describe mechanisms for ensuring accuracy).

Measurable and Rigorous Target:

For FFY 2010, 100% of state-reported data will be timely and accurate.

Actual Target Data for FFY 2010:

For FFY 2010, 100% of state-reported data were timely and accurate.

Indicator 14 - SPP/APR Data			
APR Indicator	Valid and reliable	Correct calculation	Total
1	1	1	2
2	1	1	2
3	1	1	2
4	1	1	2
5	1	1	2
6	1	1	2
7	1	1	2
8A	1	1	2
8B	1	1	2
8C	1	1	2
9	1	1	2
10	1	1	2
11	1	1	2
12	1	1	2
13	1	1	2
		Subtotal	30
APR Score Calculation	Timely Submission Points (5 pts for submission of APR/SPP by February 2, 2011)		5
	Grand Total		35

Indicator 14 - 618 Data					
Table	Timely	Complete Data	Passed Edit	Responded to Date	Total

			Check	Note Requests	
Table 1 – Child Count Due Date: 2/1/09	1	1	1	1	4
Table 2 – Settings Due Date: 2/1/09	1	1	1	1	4
Table 3 – Exiting Due Date: 11/1/09	1	1	1	NA	3
Table 4 – Dispute Resolution Due Date: 11/1/09	1	1	1	N/A	3
				Subtotal	14
			Weighted Total (subtotal X 2.5; round $\leq .49$ down and $\geq .50$ up to whole number)		35
Indicator # 14 Calculation					
			A. APR Total		35
			B. 618 Total		35
			C. Grand Total		70
Percent of timely and accurate data = (C divided by 70 times 100)			(C) / (70) X 100 =		100%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2009:

SoonerStart's data of 100% remains unchanged from its FFY 2008 data of 100% and SoonerStart met its FFY 2009 target of 100%. SoonerStart continues to keep its data system updated and adds edit checks continuously to ensure that data reported are valid and reliable.

Improvement Activities Completed in FFY 2010:

The SoonerStart Data Analyst provided training to all SoonerStart sites. These trainings included screen shots and step-by-step directions to ensure the validity and reliability of the data submitted by the site to the SoonerStart staff at the Oklahoma Department of Education (OSDE), Special Education Services (SES), from each of the 26 SoonerStart sites (and thus, from the OSDE-SES to the OSEP). The SoonerStart Data Analyst also provided on-site technical assistance to any team requesting assistance.
The SoonerStart Data Specialist reviewed all data to ensure accuracy. Any data that was considered questionable was referred to the Program Managers to review and resubmit if needed. Data concerns were also addressed by the SoonerStart Data Specialist at quarterly SoonerStart Regional Coordinator meetings.
A staff member from the OSDE-SES attended all meetings of the Education Information Management Advisory Consortium (EIMAC). In addition, SoonerStart staff members attended the OSEP/Westat Data Meeting. Attendance at these meetings is crucial to ensure the timeliness and accuracy of data required of SoonerStart sites to be submitted to the OSEP.
OSDE is reviewing and implementing new monitoring procedures to ensure local, state, and federal compliance.
SoonerStart Regional Coordinator staff will begin monthly monitoring on this indicator to verify correction of noncompliance.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2007 in the Oklahoma State Performance Plan (SPP; 2008):

FFY	Measurable and Rigorous Targets
FFY 2007 (2007-2008)	100% of state-reported data will be timely and accurate.
FFY 2008 (2008-2009)	100% of state-reported data will be timely and accurate.
FFY 2009 (2009-2010)	100% of state-reported data will be timely and accurate.
FFY 2010 (2010-2011)	100% of state-reported data will be timely and accurate.
FFY 2011 (2011-2012)	100% of state-reported data will be timely and accurate.
FFY 2011(2012-2013)	100% of state-reported data will be timely and accurate.

New and Revised Improvement Activities:

Status	Activity	Timeline	Resources
On-going	OSDE is reviewing and implementing new monitoring procedures to ensure local, state, and federal compliance.	FFY 2009-2013	Revised monitoring procedures
On-going	The SoonerStart Data Specialist provided training to all SoonerStart sites. These trainings included screen shots and step-by-step directions to ensure the validity and reliability of the data submitted by the site to the SoonerStart staff at the Oklahoma State Department of Education (OSDE), Special Education Services (SES), from each of the 26 SoonerStart sites (and thus, from the OSDE-SES to the OSEP). The SoonerStart Data Analyst also provided on-site technical assistance to any team requesting assistance.	FFY 2009-2013	Data report and Data Analyst
On-going	The SoonerStart Data Specialist reviewed all data to ensure accuracy. Any data that was considered questionable was referred to the Program Managers to review and resubmit if needed. Data concerns were also addressed by the SoonerStart Data Specialist at quarterly SoonerStart Regional Coordinator meetings.	FFY 2009-2013	Data report and Data Analyst
On-going	A staff member from the OSDE-SES attended all meetings of the Education Information Management Advisory Consortium (EIMAC). In addition, SoonerStart staff members attended the OSEP/Westat Data Meeting. Attendance at these meetings is crucial to ensure the timeliness and accuracy of data required of SoonerStart sites to be submitted to the OSEP.	FFY 2009-2013	Data report and Data Analyst

STATE:

Oklahoma

SECTION A: WRITTEN, SIGNED COMPLAINTS

(1) Total number of written, signed complaints filed	0
(1.1) Complaints with reports issued	0
(a) Reports with findings of noncompliance	0
(b) Reports within timeline	0
(c) Reports within extended timelines	0
(1.2) Complaints pending	0
(a) Complaints pending a due process hearing	0
(1.3) Complaints withdrawn or dismissed	0

SECTION B: MEDIATION REQUESTS

(2) Total number of mediation requests received	0
(2.1) Mediations held	0
(a) Mediations held related to due process complaints	0
(i) Mediation agreements related to due process complaints	0
(b) Mediations held not related to due process complaints	0
(i) Mediation agreements not related to due process complaints	0
(2.2) Mediations pending	0
(2.3) Mediations not held	0

SECTION C: Due Process Complaints

(3) Total number of due process complaints filed (for all States)	0
(3.1) Resolution meetings (applicable ONLY for states using Part B due process hearing procedures)	0
(a) Written settlement agreements reached through resolution meetings	0
(3.2) Hearings (fully adjudicated) (for all States) -	0
(a) Complete EITHER item (1) OR item(2), below as applicable.	
(1) Decisions within timeline - Part C Procedures	0
(2) Decisions within timeline - Part B Procedures	0
(b) Decisions within extended timeline (applicable ONLY if using Part B due process hearing procedures)	0
(3.3) Hearing pending (for all States)	0
(3.4) Due process complaint withdrawn or dismissed (including resolved without a hearing) (for all States)	0

