Part C State Annual Performance Report (APR) for FFY 2012

Overview of the Annual Performance Report (APR) for 2012-2013

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;
- Early Childhood Outcomes (ECO) Center;
- Early Childhood Outcomes Stakeholder Group;
- Interagency Coordinating Council (ICC);
- Infant Mental Health Committee;
- Early Childhood Technical Assistance Center (ECTA);
- Oklahoma Assistive Technology Center (OATC);
- Oklahoma Family Network;
- Oklahoma Parent Training Center;
- Oklahoma State Department of Education (OSDE)
- 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 web site at (Data/Reporting Part C | Oklahoma State Department of Education) 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.

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.

Part C State Annual Performance Report (APR) for FFY 2012

Monitoring Priority: Early Intervention Services In Natural Environments

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

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

Measurement:

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

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

FFY	Measurable and Rigorous Target
FFY 2012	In FFY 2012, 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 2012*

In FFY 2012, 99.26% (3,637 of 3,664) 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, annual or periodic IFSP). This includes 16 children for whom delays were due to exceptional family circumstances.

Oklahoma utilizes a statewide online data system to collect data for monitoring Indicator 1. The data reviewed for this indicator represents activity that occurred between July 1, 2012 and June 30, 2013. 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.

Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2012:

These data represent progress from FFY 2011 data of 98.91%. SoonerStart did not meet its FFY 2012 target of 100%. The monitoring consistency provided by the new Program Managers as well as the technical assistance they provide to the local teams is the main reason this indicator has increased over the last three years. Oklahoma believes this data is valid and reliable with less than 1% (27 out

of 3664) 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 services (15 working days from parental consent on the IFSP) apply to not only initial IFSPs but all subsequent IFSPs (periodic reviews and annual IFSPs).

Correction and Verification of FFY 2011 Findings of Noncompliance (if State reported less than 100% compliance):

Because the Oklahoma reported less than 100% compliance for FFY 2011, the State must report on the status of correction of noncompliance identified in FFY 2011 for this indicator. The 10 findings issued to SoonerStart sites for Indicator 1 in FFY 2011 were corrected within one year of identification.

a. Number of findings of noncompliance the State made during FFY 2011(the period from July 1, 2011, through June 30, 2012) (Sum of column a on the Indicator C 9 Worksheet)	**10**
b. Number of findings the State verified as timely corrected (corrected within one year from the date of notification to the Early Intervention Site (EIS) of the finding) (Sum of column b on the Indicator C 9 Worksheet)	**10**
c. Number of findings not verified as corrected within one year [(1) minus (2)]	**0**

During FFY 2011 all sites received a quarterly review of the SoonerStart database. On-site verification visits were conducted quarterly by the Program Manager if a 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.

The Program Manager reviewed the SoonerStart database and/or made on-site visits to verify correction for each site receiving a finding of noncompliance. Verification at the child level involved reviewing the SoonerStart database to determine if early intervention services were initiated timely following parental consent on the initial or subsequent IFSPs. If correction of noncompliance was unable to be determined through the SoonerStart database, an on-site visit to review the child's chart was completed. 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. Quarterly on-site verification visits or database reviews by Program Managers ensure that the local site is correctly implementing the policies and procedures for each child in the SoonerStart program. See the Oklahoma State Performance Plan (Data/Reporting Part C | Oklahoma State Department of Education) for detailed monitoring procedures.

All 10 findings were verified as corrected within one year from the date of notification to the Early Intervention Services (EIS) program of the finding. All noncompliance in FFY 2011 has been verified as corrected. Correction of noncompliance for FFY 2011 is 100%.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012*:* NONE

Part C State Annual Performance Report (APR) for FFY 2012

Monitoring Priority: Early Intervention Services In Natural Environments

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

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

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

FFY	Measurable and Rigorous Target
FFY 2012	In FFY 2012, 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 2012:

In FFY 2012, 2491 of 2612 **(95.36%)** of all infants and toddlers with IFSPs primarily receive early intervention services in the home or community based settings.

Oklahoma utilizes a statewide online data system to collect data for monitoring Indicator 2. The data reported in this indicator is consistent with the reported 618 data for Table 2.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2012

This data represents a slight increase from the FFY 2011 results of 95.20%. Oklahoma did not meet its target of 95.81% for the provision of Part C services in natural environments. 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. During 2011-12 SoonerStart staff was trained in the Routines-Based Interview approach for developing family IFSP outcomes. This approach promotes early intervention services in the family and child's natural environment. Additional follow up and training will continue and include "Seven Key Principles: Looks Like/Doesn't Look Like" developed by the Workgroup on Principles and Practices in Natural Environments. Technical assistance has been provided to encourage providers to expand their current thinking when considering natural environment options for early intervention services. Natural environment does not always equal a

home environment. Many sites have utilized the local Health Department Guidance Center staff due to shortage of early intervention service providers. Due to Guidance Center regulations, services must be at the provider's location which affects this indicator.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: NONE

Part C State Annual Performance Report (APR) for FFY 2012

Monitoring Priority: Early Intervention Services In Natural Environments

Indicator 3: Percent of infants and toddlers with IFSPs who demonstrate improved:

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

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

Measurement:

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

a. Percent of infants and toddlers who did not improve functioning = [(# of infants and toddlers who did not improve functioning) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

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

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

d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers = [(# of infants and toddlers who improved functioning to reach a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers = [(# of infants and toddlers who maintained functioning at a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

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):

a. Percent of infants and toddlers who did not improve functioning = [(# of infants and toddlers who did not improve functioning) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

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

c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it = [(# of infants and toddlers who improved functioning to a level nearer to

same-aged peers but did not reach it) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers = [(# of infants and toddlers who improved functioning to reach a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers = [(# of infants and toddlers who maintained functioning at a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

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

C. Use of appropriate behaviors to meet their needs:

a. Percent of infants and toddlers who did not improve functioning = [(# of infants and toddlers who did not improve functioning) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

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

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

d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers = [(# of infants and toddlers who improved functioning to reach a level comparable to same-aged peers) divided by the (# of infants and toddlers with IFSPs assessed)] times 100.

e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers = [(# of infants and toddlers who maintained functioning at a level comparable to same-aged peers) divided by the (# of infants and toddlers with IFSPs assessed)] times 100.

Summary Statements for Each of the Three Outcomes:

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

Measurement for Summary Statement 1: Percent = # of infants and toddlers reported in progress category (c) plus # of infants and toddlers reported in category (d) divided by [# of infants and toddlers reported in progress category (a) plus # of infants and toddlers reported in progress category (b) plus # of infants and toddlers reported in progress category (c) plus # of infants and toddlers reported in progress category (d)] times 100.

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

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

A. Positive social-emotional skills (including social relationships):	# of children	% of children
a. Percent of children who did not improve functioning	23	1.8%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	179	14.3%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	348	27.9%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	503	40.3%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	196	15.7%
TOTAL	1249	100%
B. Acquisition and use of knowledge and skills (including early language/communication):	# of children	% of children
a. Percent of children who did not improve functioning	15	1.2%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	146	11.7%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	473	37.9%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	542	43.4%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	73	5.8%
TOTAL	1249	100%
C. Use of appropriate behaviors to meet their needs:	# of children	% of children
a. Percent of children who did not improve functioning	25	2.0%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	146	11.7%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	447	35.8%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	547	43.8%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	84	6.7%
TOTAL	1249	100%

Actual Target Data for FFY 2012

Summary Statements	FFY 2010 Revised Baseline	FFY 2010 Data	FFY 2011 Target	FFY 2011 Data	FFY 2012 Target	FFY 2012 Data
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	77.60%	77.60%	77.60%	81.40%	78.00%	80.82%
2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program.	54.60%	54.60%	54.60%	57.20%	55.00%	56.00%
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	88.60%	88.60%	88.60%	87.90%	89.00%	86.30%
2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	60.50%	60.50%	60.50%	50.40%	61.00%	49.20%
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	87.80%	87.80%	87.80%	88.50%	88.00%	85.30%
2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program	53.80%	53.80%	53.80%	52.00%	54.00%	50.52%

Oklahoma utilizes a statewide online data system to collect data for monitoring Indicator 3. The data reviewed for this indicator represents activity that occurred between July 1, 2012 and June 30, 2013.

Oklahoma uses the Child Outcome Summary Form (COSF) developed by the Early Childhood Outcomes Center statewide for Part 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. Other acceptable assessments include child observation and parent report. Oklahoma does not serve children who are at risk of having a developmental delay.

Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2012

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

Oklahoma reported that 80.82% 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. These data represent slippage from the FFY 2011 data of 81.40%. SoonerStart did meet its FFY 2012 target of 78.00%.

The percent of children who were functioning within age expectations in this outcome by the time they exited the program was 56.00%. These data represent slippage from the FFY 2011 data of 57.20%. SoonerStart did meet its FFY 2012 target of 55.00%.

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 86.30% 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. These data represent slippage from the FFY 2011 data of 87.90%. SoonerStart did not meet its FFY 2012 target of 89.00%.

The percent of children who were functioning within age expectations in this outcome by the time they exited the program was 49.20%. These data represent slippage from the FFY 2011 data of 50.40%. SoonerStart did not meet its FFY 2012 target of 61.00%.

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

Oklahoma reported that 85.30% 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. These data represent slippage from the FFY 2011 data of 88.50%. SoonerStart did not meet its FFY 2012 target of 88.00%.

The percent of children who were functioning within age expectations in this outcome by the time they exited the program was 50.52%. These data represent slippage from the FFY 2011 data of 52.00%. SoonerStart did not meet its FFY 2012 target of 54.00%.

In FFY 2011 the improvement activities completed were focused on improving the quality of data and data collecting. Oklahoma convened an Early Childhood Outcomes (ECO) stakeholder group to review current practices in COSF completion and make recommendations regarding future trainings for staff and families. The stakeholder group advocated continued staff training in typical child development and increased involvement of parents in determining child ratings. Improvement activities to address these recommendations were initiated during FFY 2012.

A statewide training on ECOs for Part C and Part B was conducted by the OSDE in partnership with the Southeast Regional Resource Center (SERRC) and the Early Childhood Outcomes (ECO) Center in December 2012. Rural sites participated via interactive television. This training emphasized best practice in timely completion and rating determination.

All SoonerStart staff attended a two-day workshop on the new SoonerStart Operations Manual in November 2012. Technical assistance for the workshop was provided by SERRC and the Data Accountability Center (DAC). A presentation on Early Childhood Outcomes form completion and timelines was included in the workshop. SoonerStart sites continue local trainings on COSF completion that focus on the purpose and importance of ECOs as well as explanations of the individual ratings.

Program Managers provide technical assistance to each SoonerStart site on developing procedures to ensure that Child Outcome Summary Forms (COSF) are completed timely and the results entered into the statewide database. As part of Oklahoma's related requirements monitoring procedures, 10% of all SoonerStart records with initial IFSP activity during the first quarter of the fiscal year are reviewed to ensure that the child's COSF includes functional evidence that is appropriate for each outcome area and that is consistent with the rating provided by the team.

Oklahoma reported slippage in all six Outcomes. Entry and Exit COSF data entries in the SoonerStart database for FFY 2012 were 15% less (1249) than FFY 2011 (1457) although SoonerStart served 1.8% more children ages 0-3. This data may indicate that an increased number of children who received SoonerStart services during FFY 2012 met their IFSP outcomes or exited for other reasons before receiving six months of early intervention services.

SoonerStart attributes slippage to staff misinterpretation in measuring and reporting increased rate of growth on COSF. Over the next year, OSDE will conduct further investigation to determine and address the cause of this slippage. When OSDE discussed ECO slippages with local teams,

SoonerStart staff indicated that they may rate a child on the exit ECO the same as they rated the child on the Entry ECO because they compared the child's developmental milestones to his or her chronological age even if the child substantially increased his or her rate of growth. Additional technical assistance provided by the Early Childhood Outcome (ECO) Center regarding rating and reporting child progress will be incorporated in quarterly technical assistance provided by Program Managers and also written in the SoonerStart Operations Manual. A better understanding of rating rationales will make a positive impact on increased rate of growth in future years.

Due to Oklahoma's narrow eligibility criteria, children must have significant delays to qualify for early intervention services. Children with multiple developmental delays often do not achieve cognitive and communication skills at the same rate as their typically developing peers as the focus of child and family outcomes is typically on achieving motor skills. Behaviors necessary to achieve needs are predominantly tied to cognitive and communication development. Additionally, many children in SoonerStart live in rural, low socio-economic environments and have difficulty accessing on-going medical care. These children tend to have a higher incidence of middle ear and upper respiratory conditions which are poorly managed and can lead to ongoing delays in language skills.

Slippage may also have occurred due to the increase in referrals for children who are diagnosed with or have behaviors that are indicative of autism spectrum disorder. These children often do not make significant progress in their communication skills while in an early intervention program as services focus primarily on environmental awareness and social interaction with family members.

Correction and Verification of FFY 2011 Findings of Noncompliance (if State reported less than 100% compliance):

Because Oklahoma reported less than 100% compliance for FFY 2011, the State must report on the status of correction of noncompliance identified in FFY 2011 for this indicator. The one (1) finding issued to a SoonerStart site for Indicator 3 in FFY 2011 was not corrected within one year of identification.

a. Number of findings of noncompliance the State made during FFY 2011(the period from July 1, 2011, through June 30, 2012) (Sum of column a on the Indicator C 9 Worksheet)	**1**
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)	**0**
c. Number of findings <u>not</u> verified as corrected within one year [(1) minus (2)]	**1**

During FFY 2011 all sites received a quarterly review of the SoonerStart database. On-site verification visits were conducted quarterly by the Program Manager if a 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.

Related requirements were also monitored annually as part of the initial Compliance Review at each site. Any site determined to be in noncompliance in regards to a related requirement is issued a letter of finding within 30 days of the identified noncompliance and has one year from the date of the letter to correct noncompliance.

In December 2011, a finding of noncompliance was made for Indicator #3 – Early Childhood Outcomes. A Corrective Action Plan was submitted in January 2012 and the site had one year to correct systemic noncompliance. Subsequent monitoring and technical assistance on-site occurred in February 2012, March 2012, April 2012, July 2012, October 2012 and January 2013. On January 9, 2013, it was noted that systemic noncompliance had not been corrected.

A comprehensive report detailing individual instances of noncompliance was presented at a meeting held on March 25, 2013 with the Oklahoma State Department of Education (Lead Agency); Oklahoma State Department of Health (provider agency) and local site staff. The purpose of the meeting was to discuss obstacles to the completion of the COSFs and collaborate in the development of a state-directed Corrective Action Plan with strategies to ensure future compliance.

The Corrective Action Plan was received by the Oklahoma State Department of Education on May 16, 2013 with specific steps to correct noncompliance for the completion of entry and exit Child Outcome Summary Forms (COSFs). The local staff and provider agency were notified that financial sanctions may be implemented for continuing noncompliance as outlined in the contractual agreement with the lead agency and partner agencies.

Revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: NONE

Part C State Annual Performance Report (APR) for FFY 2012

Monitoring Priority: Early Intervention Services In Natural Environments

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

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

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

Measurement:

A. Percent = [(# of respondent families participating in Part C who report that early intervention services have helped the family know their rights) divided by the (# of respondent families participating in Part C)] times 100.

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

C. Percent = [(# of respondent families participating in Part C who report that early intervention services have helped the family help their children develop and learn) divided by the (# of respondent families participating in Part C)] times 100.

FFY	Measurable and Rigorous Target
FFY 2012	A. 93.40% of families participating in Part C who report that early intervention services have helped families **know their rights**. B. 95.40% of families participating in Part C who report that early intervention services have helped families **effectively communicate their children's needs**. C. 94% of families participating in Part C who report that early intervention services have helped families **help their children develop and learn**.

Tools Used to Gather Family Outcomes Data:

SoonerStart utilizes the Family Survey for Early Intervention (Version 2.0) developed by the National Center for Special Education Accountability Monitoring (NCSEAM) to collect data used in reporting family outcomes.

The Family Survey is administered and collected by the Oklahoma Parent Center (OPC), the statewide federally funded Parent Training and Information Center (PTI). The OPC provides a summary of the data to the OSDE SoonerStart program to analyze for reporting on the state's Annual Performance Report (APR).

The Family Survey is available to SoonerStart families online, by phone or by mail. Service Coordinators explain how to access the survey and provide the family with a "Parent Survey Brochure" at the Annual Review of the Individualized Family Service Plan (IFSP) and when a child exits or transitions from the SoonerStart program. Participation in the Family Survey is voluntary and family responses remain confidential.

Actual Target Data for FFY 2012:

For FFY 2012, 412 surveys were returned to SoonerStart. There were 2612 children on IFSPs for the FFY 2012 Child Count and this count is used to determine the response rate. For FFY 2012, the family survey response rate is 15.77%. This represents progress from the FFY 2011 response rate of 10.26%.

The survey produced the following data:
A. 94.77 percent know their rights: 363 respondent families participating in SoonerStart reported that early intervention services helped them know their rights divided by 383 families participating in SoonerStart (times 100) with responses to the questions referencing Indicator 4A.
B. 90.27 percent effectively communicate their children's needs: 334 respondent families participating in SoonerStart reported that early intervention services helped them effectively communicate their children's needs divided by 370 families participating in SoonerStart (times 100) with responses to questions referencing Indicator 4B.
C. 93.71 percent help their children develop and learn: 343 respondent families participating in SoonerStart reported that early intervention services helped the family help their children develop and learn divided by 366 families participating in SoonerStart (times 100) with responses to questions referencing Indicator 4C.

Target Data and Actual Target Data	FFY 2012 Target	FFY 2012 Actual	FFY 2011 Actual
A. Know their rights	**93.40%**	**94.77%**	**98.48%**
B. Effectively communicate their children's needs	**95.40%**	**90.27%**	**96.96%**
C. Help their children develop and learn	**94.00%**	**93.71%**	**96.58%**

Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2012:

In FFY 2012, SoonerStart partnered with the Oklahoma Parent Center to facilitate the dissemination of Parent Surveys. Providing families with the option to complete the survey online, by telephone or via mail has increased the response rate for the surveys.

SoonerStart has worked to improve the response rate on the Family Survey in the urban areas. One local SoonerStart site in an urban area developed an incentive program for staff to achieve a targeted number of Family Surveys completed. This site increased their Family Survey response rate from 15.6% in FFY 2011 to 44.0% in FFY 2012 when compared to all Family Surveys received statewide.

The Interagency Coordinator Council (ICC) has initiated a Service Design committee to explore various methods and systems of providing early intervention services in Oklahoma. Parents of infants and toddlers with disabilities serving on this committee have provided input on strategies that may improve the Family Survey response rate as well as increase the percentage of families who reply affirmatively to the statements in APR Indicator 4.

The SoonerStart data from the Family Surveys indicates slippage from FFY 2011 and also indicates that SoonerStart did not meet the target for Indicator #4b and #4c. For FFY 2012, the overall response rate for the Family Survey increased approximately 56% from the response rate in FFY 2011. It is expected that with the larger number of surveys returned, there would be a larger number of respondents who did not make affirmative responses to the survey questions. However, the number of responses indicating that families know their rights (94.77%) met the target set by SoonerStart (93.40%).

Of 412 surveys returned, only 381 surveys contained information regarding race, ethnicity and child's age at the time of the survey.

Race and Ethnic Distribution of Families Represented by Survey Respondents

Race/Ethnicity	Race/Ethnicity reported on survey	Oklahoma 2010 Census data
American Indian or Alaska Native	17.1%	8.6%
Asian or Pacific Islander	3.4%	1.8%
Black or African American	9.2%	7.4%
Hispanic or Latino	11.8%	8.9%
White	65.1%	72.2%
Multi-racial	0	5.9%
Unknown	4.7%	--

Families who reported their race/ethnicity as American Indian was more than double the 2010 census data for Oklahoma. It is three times the percentage rate of families with a child included in the 2012-2013 Part C Child Count data, who identified themselves as American Indian (5%). Race and ethnicity reported by families completing the SoonerStart Family Survey exceeds 100% because families were instructed to check all that apply.

Child's Age at Time of Survey Completion

Age Range	Number	Percentage	618 Data
Birth to 1 year	63	16.5%	16.1%
1 – 2 years	137	36.0%	32.9%
2 – 3 years	161	42.3%	51.0%
Over 3 years	9	2.4%	--
Blank	11	2.8%	
TOTAL	381	100%	100%

The percentage of surveys completed by parents of children between 1- 2 years of age and 2-3 years of age is significantly higher than those completed by parents of children birth-1 year of age. This is consistent with Oklahoma's reported 618 data for Table 1 for the percentage of infants and toddlers with disabilities served by SoonerStart in each of these age categories.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: NONE

Part C State Annual Performance Report (APR) for FFY 2012

Monitoring Priority: Effective General Supervision Part C / Child Find

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

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

Measurement:

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

FFY	Measurable and Rigorous Target
FFY 2012	In FFY 2012, 1.34% of infants (0-1) with IFSPs will receive early intervention services.

Actual Target Data for FFY 2012

In FFY 2012, the national percentage of the population birth to 1 receiving services in the IDEA Part C early intervention program was 1.06%. In FFY 2012, Oklahoma served 421 of 51,481 (.82%) of this population.

Oklahoma utilizes the U.S. Department of Education, Office of Special Education Programs, EDFacts Metadata and Process System (EMAPS), OMB #1820-0557: "Infants and Toddlers Receiving Early Intervention Services in Accordance with Part C," 2012 to collect data for Indicator 5. The data reported in this indicator is consistent with Oklahoma's reported 618 data for Table 1.

Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2012:

For FFY 2012, SoonerStart's data (.82%) showed progress from its FFY 2011 data of .66% and but still did not meet its target of 1.34% for serving infants birth to 1. Oklahoma's population of children age birth to one decreased approximately 4% from 53,393 in FFY 2011 to 51,481 in FFY 2012.

Compared to the average national data percentage of children birth to 1 year of age receiving early intervention services (1.06%), Oklahoma served .82% of the resident population of children birth to 1 year of age. Oklahoma trails the national average by .24 percentage points, and the percentage of infants served ranked 32nd among the 50 states, DC and Puerto Rico.

SoonerStart continues to face challenges in increasing the number of infants age 0-1 receiving early intervention services. State funding has remained flat for many years however increased costs have

resulted in limited funds for any activities other than direct services to families. Reduced budgets have resulted in staff shortages which have impacted the availability of personnel to complete outreach activities in the local communities. Professional printing and dissemination of public awareness materials has been reduced in order to dedicate more funding to provide early intervention services to eligible infants and toddlers and their families.

Oklahoma's narrow eligibility requirements limit the number of children eligible for early intervention services because at-risk infants and toddlers are not served.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: NONE

Part C State Annual Performance Report (APR) for FFY 2012

Monitoring Priority: Effective General Supervision Part C / Child Find

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

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

Measurement:

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

FFY	Measurable and Rigorous Target
FFY 2012	In FFY, 2012, 2.25% of infants and toddlers (0-3) will receive early intervention services.

Actual Target Data for FFY 2012

In FFY 2012, the national percent of the population birth to three receiving services in the IDEA Part C early intervention program was 2.77% In FFY 2012, Oklahoma served 2,612 of 154,731 (1.69%) of this population.

Oklahoma utilizes the U.S. Department of Education, Office of Special Education Programs, EDFacts Metadata and Process System (EMAPS), OMB #1820-0557: "Infants and Toddlers Receiving Early Intervention Services in Accordance with Part C," 2012 to collect data for Indicator 6. The data reported in this indicator is consistent with Oklahoma's reported 618 data for Table 1.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2012

For FFY 2012, SoonerStart's data showed progress from its FFY 2011 data of 1.62% and but did not meet its target of 2.25% for serving infants birth to three. Oklahoma's population of children age birth to 3 decreased approximately 2% from 158,596 in FFY 2011 to 154,731 in FFY 2012.

Compared to the average national data percentage of children birth to 3 years of age receiving early intervention services (2.77%), Oklahoma served 1.69% of the resident population of children birth to 3 years of age. Oklahoma trails the national average by 1.08 percentage points, and the percentage of infants and toddlers served ranked 46th among the 50 states, DC and Puerto Rico.

SoonerStart continues to face challenges in increasing the number of infants and toddlers receiving early intervention services. State funding has remained flat for many years however increased costs

have resulted in limited funds for any activities other than direct services to families. Reduced budgets have resulted in staff shortages which have impacted the availability of personnel to complete outreach activities in the local communities. Professional printing and dissemination of public awareness materials has been reduced in order to dedicate more funding to provide early intervention services to eligible infants and toddlers and their families.

Also, Oklahoma's narrow eligibility requirements limit the number of children eligible for early intervention services because at-risk infant and toddlers are not served.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: **NONE**

Part C State Annual Performance Report (APR) for FFY 2012

Monitoring Priority: Effective General Supervision Part C / Child Find

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

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

Measurement:

Percent = [(# of eligible infants and toddlers with IFSPs for whom an initial evaluation and initial assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline) divided by the (# of eligible infants and toddlers evaluated and assessed for whom an initial IFSP 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 2012	For FFY 2012, 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 2012:

For FFY 2012, 2446 of 2601 records reviewed (94.04%) 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, 471 IFSPs were past the timeline due to exceptional family circumstances. These cases were included in the state's calculation.

There were 155 children who did not have an evaluation, assessment, and initial IFSP meeting within Part C's 45-day timeline.

Oklahoma utilizes a statewide online data system to collect data for monitoring Indicator 7. The data reviewed for this indicator represents activity that occurred between July 1, 2012 and June 30, 2013. 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.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2012*:*

These data represent significant progress from the FFY 2011 data of 82.89%. SoonerStart did not meet its FFY 2012 target of 100%.

SoonerStart sites are using all available resources to meet timelines. 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. Teams also schedule the evaluation and initial IFSP at the SoonerStart office. This has assisted team members with reducing travel time which gives them the ability to have more evaluation time openings to offer to families. However if a family has transportation issues or any medical issues that would prohibit them from getting to the SoonerStart office, arrangements are made for an in home evaluation. 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. This gives providers more availability for direct service which helps with IFSP timeline. 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. At on-site visits Program Managers stress the importance of documentation of why timelines are or are not met. Per actual record reviews in each SoonerStart site, staff continues to identify staff shortages as adversely affecting the scheduling of eligibility evaluations and IFSPs.

Correction of FFY 2011 Findings of Noncompliance (if State reported less than 100% compliance):

Because Oklahoma reported less than 100% compliance for FFY 2011, the State must report on the status of correction of noncompliance identified in FFY 2011 for this indicator. The 23 findings issued to SoonerStart sites for Indicator 7 in FFY 2011 were corrected within one year of identification.

a. Number of findings of noncompliance the State made during FFY 2011 (the period from July 1, 2011, through June 30, 2012) (Sum of column a on the Indicator C 9 Worksheet)	**23**
b. Number of FFY 2011 findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding) (Sum of column b on the Indicator C 9 Worksheet)	**23**
c. Number of FFY 2011 findings not verified as corrected within one year [(1) minus (2)]	**0**

During FFY 2011 all sites received a quarterly review of the SoonerStart database as well as an on-site verification visit by the Program Manager if a finding was issued until compliance was 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.

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 any timelines were missed. Quarterly on-site verification visits or database reviews by Program Managers ensure that the local site is correctly implementing the policies and procedures for each child in the SoonerStart program. See the Oklahoma State Performance Plan for detailed monitoring procedures.

All 23 findings were verified as timely corrected (within one year from the date of notification to the EIS program of the finding). All noncompliance in FFY 2011 has been verified as corrected. Correction of noncompliance for FFY 2011 is 100%.

Revisions, <u>with Justification</u>, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: NONE

Part C State Annual Performance Report (APR) for FFY 2012

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Indicator 8: Percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:

A. Developed an IFSP with transition steps and services at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler's third birthday;

B. Notified (consistent with any opt-out policy adopted by the State) the SEA and the LEA where the toddler resides at least 90 days prior to the toddler's third birthday for toddlers potentially eligible for Part B preschool services; and

C. Conducted the transition conference held with the approval of the family at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler's third birthday for toddlers potentially eligible for Part B preschool services.

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

Measurement:

A. Percent = [(# of toddlers with disabilities exiting Part C who have an IFSP with transition steps and services at least 90 days, and at the discretion of all parties not more than nine months, prior to their third birthday) divided by the (# of toddlers with disabilities exiting Part C)] times 100.

B. Percent = [(# of toddlers with disabilities exiting Part C where notification (consistent with any opt-out policy adopted by the State) to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services) divided by the (# of toddlers with disabilities exiting Part C who were potentially eligible for Part B)] times 100.

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

Account for untimely transition planning under 8A, 8B, and 8C, including the reasons for delays.

FFY	Measurable and Rigorous Target
FFY 2012	*A. 100% of children exiting Part C have an IFSP with transition steps and services at least 90 days and, at the discretion of all parties, not more than nine months prior to their third birthday.* *B. 100% of children exiting Part C and potentially eligible for Part B in which notification to the SEA and LEA occurred at least 90 days prior to their third birthday.* *C. 100% of children exiting Part C and potentially eligible for Part B in which the transition conference occurred at least 90 days and at the*

	discretion of all parties, not more than nine months prior to their third birthday.

Oklahoma utilizes a statewide online data system to collect data for monitoring Indicator 8A, 8B and 8C. The data reviewed for this indicator represents activity that occurred between July 1, 2012 and June 30, 2013. 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; notification to the LEA; or timely Transition Planning Conference (TPC) are verified at the local site to determine if exceptional family circumstances or other issues affecting the requirement 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.

Actual Target Data for FFY 2012:

8A. In FFY 2012, 1302 of 1335 (97.52%) children exiting Part C received timely transition planning (at least 90 days and at the discretion of all parties, not more than nine months, prior to their third birthday) to support their transitions to preschool and other appropriate community services by their third birthdays, including IFSPs with transition steps and services. This includes 34 children for whom delays were due to exceptional family circumstances.

8B. In FFY 2012, 1145 of 1287 (88.96%) children exiting Part C received timely transition planning (at least 90 day prior to their third birthday*)* to support their transitions to preschool and other appropriate community services by their third birthdays including notification to the SEA and LEA, if they were potentially eligible for IDEA Part B services. This includes 39 children for whom delays were due to exceptional family circumstances.

8C. In FFY 2012, 1020 of 1173 (86.95%) children exiting Part C received timely transition planning (at least 90 days and at the discretion of all parties, not more than nine months, prior to their third birthday) 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 168 children for whom delays were due to exceptional family circumstances. There were 138 toddlers for whom the parent did not provide approval for the transition conference.

SoonerStart is proud to note that 380 children "transitioned" with the completion of their IFSP before reaching 33 months of age. This number, compared to all children transitioning, resulted in **22%** of all children in 2012-2013 transitioning from SoonerStart meeting their IFSP goals before their third birthday. These children were deemed by the IFSP team (parents and staff) not to need additional intervention services. These children were not included in the calculation in the percentage of toddlers with disabilities exiting Part C with timely transition planning.

Discussion of Improvement Activities Completed <u>and</u> Explanation of Progress or Slippage that occurred for FFY 2012:

The *Transition at Age Three: Steps for Success* transition guide that is disseminated to all families at the initiation of transition planning was revised. Revisions 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. The *Transition at Age Three: Steps to Success* guide also serves

as a tool to assist service coordinators and providers in planning and implementing transition activities.

SoonerStart developed the SoonerStart Operational Manual to provide information to staff on day-to-day procedures and held a statewide training on the manual in November 2012. This technical assistance document outlines step-by-step procedures for transition at age three aligned with Part C Regulations.

SoonerStart experienced slippage for Indicator 8A from the FFY 2011 data of 99.31% and did not meet its FFY 2012 target of 100% for this indicator. The slippage for Indicator 8A from FFY 2011 is 1.79%. This minimal drop in percentage of compliance is attributed to the new Part C regulations requiring transition planning to occur BETWEEN 27 months and 33 months of age. In prior years, transition planning could occur any time before 33 months and be considered in compliance.

SoonerStart experienced slippage for Indicator 8B from the FFY 2011 data of 98.38% and did not meet its FFY 2012 target of 100% for this indicator. There was significant slippage of 9.42% in Indicator 8B from FFY 2011 to this year. Oklahoma has identified two explanations for this slippage. In FFY 2012, verification of compliance for Indicator 8B was predicated on compliance of Indicator 8C. Sites were not issued findings for 8B – Notification to the **SEA/LEA** – if the TPC timeline (8C) was in compliance. Upon further review of Oklahoma's monitoring procedures, it was noted that since some families decline to meet with the LEA, the TPC may not always meet the 90 day timeline. Therefore, it was determined that Indicator 8B and 8C should be monitored independently for compliance. Oklahoma did not go back and issue findings for FFY 2012, however, the SoonerStart database reflected that notification to the LEA did not occur timely for 11.04% of toddlers potentially eligible for Part B services. Data for the FFY 2012 APR is taken from the SoonerStart database.

Also, Oklahoma developed procedures for an Opt-Out Policy for Notification to the LEA. This policy was submitted to OSEP for approval and staff was trained regarding its implementation. After several months of providing families with the opt-out option for notification to the LEA, Oklahoma was informed by the OSEP state contact that the Opt-Out policy submitted had not been received. Oklahoma stopped providing this option to families although some staff continued offering the Opt-Out due to a misunderstanding of new procedures. The SoonerStart database reflected that Notification to the LEA had not occurred in a timely manner. Data for the FFY 2012 APR is taken from the SoonerStart database.

SoonerStart experienced slippage for Indicator 8C from the FFY 2011 data of 90.73% and did not meet its FFY 2012 target of 100% for this indicator. In FFY 2012 one of the two urban SoonerStart sites eliminated the designation of "Transition Resource Coordinator" (TRC) due to staff shortages caused by budget constraints. Comprehensive service coordination duties, including transition services, were required of all site Resource Coordinators. Many Resource Coordinators who had previously transferred families to a TRC when the child reached 27 months of age were required to provide transition services until the child's third birthday. Along with learning new duties, Resource Coordinators were required to adhere to timelines that had previously been only the responsibility of the TRC. This change in responsibilities resulted in a greater number of missed timelines for all transition activities specifically TPCs.

Correction and Verification of FFY 2011 Findings of Noncompliance (if State reported less than 100% compliance):

Because Oklahoma reported less than 100% compliance for FFY 2011, the State must report on the status of correction of noncompliance identified in FFY 2011 for Indicators 8A, 8B and 8C.

Indicator #8A

a. Number of findings of noncompliance the State made during FFY 2011(the period from July 1, 2011, through June 30, 2012) (Sum of column a on the Indicator C 9 Worksheet)	**7**
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)	**7**
c. Number of findings not verified as corrected within one year [(1) minus (2)]	**0**

The 7 findings issued to SoonerStart sites for Indicator 8A in FFY 2011 were corrected within one year of identification.

Indicator #8B

a. Number of findings of noncompliance the State made during FFY 2011(the period from July 1, 2011, through June 30, 2012) (Sum of column a on the Indicator C 9 Worksheet)	**2**
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)	**2**
c. Number of findings not verified as corrected within one year [(1) minus (2)]	**0**

The 2 findings issued to SoonerStart sites for Indicator 8B in FFY 2011 were corrected within one year of identification.

Indicator #8C

a. Number of findings of noncompliance the State made during FFY 2011(the period from July 1, 2011, through June 30, 2012) (Sum of column a on the Indicator C 9 Worksheet)	**15**
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)	**15**

c. Number of findings not verified as corrected within one year [(1) minus (2)]	**0**

The 15 findings issued to SoonerStart sites for Indicator 8C in FFY 2011 were corrected within one year of identification.

Oklahoma utilizes OSEP Memorandum 09-02 to monitor compliance at both the child level and the site level to ensure that SoonerStart is correctly implementing IDEA requirements. Quarterly review of the SoonerStart database and quarterly on-site verification visits insure that the local site is correctly implementing the Transition requirements for each child in the SoonerStart program unless the child is no longer within the jurisdiction of the EIS program.

The Program Manager reviewed the SoonerStart database to determine sites requiring verification visits. Quarterly on-site visits involved reviewing the SoonerStart database Transition 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. Quarterly on-site verification visits or database reviews by Program Managers ensure that the local site is correctly implementing the policies and procedures for each child in the SoonerStart program. OSDE-SES Program managers provide On-site monitoring and technical assistance statewide. See the Oklahoma State Performance Plan (Data/Reporting Part C | Oklahoma State Department of Education) for detailed monitoring procedures.

All 24 findings for Indicators 8A, 8B, and 8C were verified as timely corrected (within one year from the date of notification to the EIS program of the finding). All noncompliance in FFY 2011 has been verified as corrected. Correction of noncompliance for FFY 2011 is 100%.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: NONE

Part C State Annual Performance Report (APR) for FFY 2012

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 C9 Worksheet" to report data for this indicator (see Attachment 1).

FFY	Measurable and Rigorous Target
FFY 2012	In FFY 2012, 100.00% of noncompliance identified will be corrected within one year of identification.

Actual Target Data for FFY 2012:

In FFY 2012, 57 of 58 findings (98.28%) of noncompliance identified in FFY 2011 were corrected within one year of identification.

During FFY 2012 all sites received a quarterly review of the SoonerStart database. On-site verification visits were conducted quarterly by the Program Manager if a 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.

The Program Manager reviewed the SoonerStart database to determine sites requiring verification visits. On-site visits involved reviewing the SoonerStart database data reports 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. Quarterly on-site verification visits or database reviews by Program Managers ensure that the local site is correctly implementing the policies and procedures for each child in the SoonerStart program. See the Oklahoma State Performance Plan for detailed monitoring procedures.

a. Number of findings of noncompliance the State made during FFY 2011 (the period from July 1, 2011, through June 30, 2012) (Sum of Column a on the Indicator C 9 Worksheet)	**58**
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)	**57**
c. Number of findings not verified as corrected within one year [(1) minus (2)]	**1**

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2012:

SoonerStart experienced slippage for Indicator 9 from the FFY 2011 data of 100% and did not meet its FFY 2012 target of 100% for this indicator.

In December 2011, a finding of noncompliance was made for Indicator #3 – Early Childhood Outcomes. A Corrective Action Plan was submitted in January 2012 and the site had one year to correct systemic noncompliance. Subsequent monitoring and technical assistance on-site occurred in February 2012, March 2012, April 2012, July 2012, October 2012 and January 2013. On January 9, 2013, it was noted that systemic noncompliance had not been corrected.

A comprehensive report detailing individual instances of noncompliance was presented at a meeting held on March 25, 2013 with the Oklahoma State Department of Education (Lead Agency), Oklahoma State Department of Health (provider agency) and local site staff. The purpose of the meeting was to discuss obstacles to the completion of the COSFs and collaborate in the development of a state-directed Corrective Action Plan with strategies to ensure future compliance.

The Corrective Action Plan was received by the Oklahoma State Department of Education on May 16, 2013 with specific steps to correct noncompliance for the completion of entry and exit Child Outcome Summary Forms (COSFs). The local staff and provider agency were notified that financial sanctions may be implemented for continuing noncompliance as outlined in the contractual agreement with the lead agency and partner agencies.

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

d. Number of findings of noncompliance the State made during FFY 2010 (the	**82**

period from July 1, 2010, through June 30, 2011) (Sum of Column a on the Indicator C 9 Worksheet)	
e. 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**
f. Number of findings not verified as corrected within one year [(1) minus (2)]	**0**

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2012: NONE

INDICATOR C-9 WORKSHEET

Indicator/Indicator Clusters	**General Supervision System Components**	**# of EIS Programs Issued Findings in FFY 2011 (7/1/11 through 6/30/12)**	**(a) # of Findings of noncompliance identified in FFY 2011 (7/1/11 through 6/30/12)**	**(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	**9**	**10**	**10**
	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	**1**	**1**	**0**
	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 1 with IFSPs	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	**0**	**0**	**0**
6. Percent of infants and toddlers birth to 3 with IFSPs	Dispute Resolution: Complaints, Hearings			
7. Percent of eligible infants and toddlers with IFSPs for whom an initial evaluation and initial assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	**23**	**23**	**23**
	Dispute Resolution: Complaints, Hearings			
8. The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	**7**	**7**	**7**

A. Developed an IFSP with transition steps and services at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler's third birthday;	Dispute Resolution: Complaints, Hearings			
8. The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	**2**	**2**	**2**
B. Notified (consistent with any opt-out policy adopted by the State) the SEA and the LEA where the toddler resides at least 90 days prior to the toddler's third birthday for toddlers potentially eligible for Part B preschool services; and	Dispute Resolution: Complaints, Hearings			
8. The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	**15**	**15**	**15**
C. Conducted the transition conference held with the approval of the family at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler's third birthday for toddlers potentially eligible for Part B preschool services.	Dispute Resolution: Complaints, Hearings			

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			
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			58	57
Percent of noncompliance corrected within one year of identification = (column (b) sum divided by column (a) sum) times 100.			**(b) / (a) X 100 =**	**98.28%**

Note: To add more rows for Other areas of noncompliance, highlight row 25, right click and choose Insert.
Repeat - there are now two new rows. Highlight rows 26 and 27. Copy these rows.
Highlight rows 25 and 26. Paste. Following these steps will allow the calculation to work correctly.

Part C State Annual Performance Report (APR) for FFY 2012

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 12: Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements (applicable if Part B due process procedures are adopted).

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

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

FFY	Measurable and Rigorous Target
FFY 2012	For FFY 2012, no targets have been established based 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 2012

For FFY 2012, 0 of 0 hearing requests that went to resolution sessions were resolved through session settlement agreements.

Data Source

Data collected on Table 4 of Information Collection 1820-0678 (*Report of Dispute Resolution Under Part C of the Individuals with Disabilities Education Act*).

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2012:

Because SoonerStart has not received any requests for resolution sessions, no improvement activities have been proposed (as part of the *Oklahoma State Performance Plan, 2005-2010*) or completed. In addition, no progress or slippage has occurred.

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

Not applicable.

Part C State Annual Performance Report (APR) for FFY 2012

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

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

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

FFY	Measurable and Rigorous Target
FFY 2012	For FFY, 2012, 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 2012:

For FFY 2012, 0 of 0 mediation requests resulted in mediation agreements.

Data Source

Data collected on Table 4 of Information Collection 1820-0678 (*Report of Dispute Resolution Under Part C of the Individuals with Disabilities Education Act*).

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2012*:*

Because SoonerStart has not received any requests for mediation, no improvement activities have been proposed (as part of the *Oklahoma State Performance Plan, 2005-2010*) or completed. In addition, no progress or slippage has occurred.

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

Not applicable.

Part C State Annual Performance Report (APR) for FFY 2012

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

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

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

a. Submitted on or before due dates (February 1 for child count, including race and ethnicity, settings and November 1 for exiting, personnel, dispute resolution); and

b. Accurate, including covering the correct year and following the correct measurement.

As stated in the Indicator Measurement Table, States may, but are not required, to report data for this indicator. OSEP will use the Indicator 14 Rubric to calculate the State's data for this indicator. States will have an opportunity to review and respond to OSEP's calculation of the State's data.

FFY	Measurable and Rigorous Target
FFY 2012	For FFY 2012, 100% of state-reported data will be timely and accurate.

Actual Target Data for FFY 2012

For FFY 2012, 100% of state-reported data were timely and accurate.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2012

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

IMPROVEMENT ACTIVITIES	INDICATOR(S)	STATUS
SoonerStart utilizes monitoring data collected from all early intervention sites. Teams that score less than 100% are required to assure correction for noncompliance and/or complete corrective action plans. SoonerStart Program Managers monitor and verify correction and subsequent compliance. In addition, they continue to provide technical assistance and training opportunities to staff.	1,3,7,8	ONGOING
SoonerStart Program Managers convene meetings with local sites if noncompliance is not corrected in a timely manner (i.e. one year from the date of the finding). A state-directed corrective action plan is developed with the local team with input from OSDE and OSDH state level SoonerStart administrators.	1,3,7,8	ONGOING
SoonerStart is in the process of changing team roles. Some Service Coordinators have been trained and are now providing evaluations, assessments and IFSP services. In turn, service providers are trained in service coordination.	1,7	ONGOING
OSDE obtains individual service provider productivity reports from OSDH to ensure service provider resources are maximized.	1,7	ONGOING
SoonerStart evaluates staff shortages and how best to address the problem statewide. The OSDE works with the OSDH to identify service providers from urban areas that are able to serve children in rural areas of the state. Service Coordinators provide developmental services and activities in some local sites.	1,7	ONGOING
SoonerStart received technical assistance and information from SERRC and the Data Accountability Center on strategies for improving child outcomes.	3	COMPLETED
SoonerStart utilizes technical assistance and information from the ECO Center, NECTAC, and other agencies, stakeholder groups, taskforces, and technical assistance providers regarding completion of ECOs.	3	ONGOING
SoonerStart develops additional training opportunities for staff in typical child development for the completion of ECOs.	3	ONGOING
SoonerStart develops training for staff in partnering with parents to complete entry and exit ECOs.	3	ONGOING
SoonerStart sites provide technical assistance for developing procedures to ensure that the COSF is administered and entered in the SoonerStart database.	3	ONGOING
SoonerStart submitted a request to Oklahoma's Office of Management and Enterprise Services to add an Entry and Exit ECO Target Date report to the SoonerStart database.	3	COMPLETED
The Oklahoma Parent Center facilitates the dissemination of Family Surveys and offers families the options of completing them online, by telephone or via mail.	4	ONGOING

IMPROVEMENT ACTIVITIES	INDICATOR(S)	STATUS
SoonerStart will explore using a different Family Survey that has been approved by OSEP or make approved modifications to the current survey.	4	ONGOING
SoonerStart increased the response rate on the Family Surveys in one urban area.	4	COMPLETED
SoonerStart reviews Family Survey data annually to determine areas for continuous improvement. Additional efforts will be implemented to increase the family response rate in other areas of the state.	4	ONGOING
SoonerStart will develop a parent handbook for Part C parents.	4	ONGOING
SoonerStart will explore methods to increase the dissemination of resource and referral information to families.	4	ONGOING
SoonerStart will collaborate with SERC and OPC to develop family training in advocacy, parent involvement, transition from Part C to Part B and procedural safeguards.	1,4	ONGOING
Each SoonerStart site develops a yearly public awareness plan.	5,6	ONGOING
SoonerStart developed a public awareness plan template for each site to customize and complete for their individual communities.	5,6	COMPLETED
SoonerStart partners with Oklahoma Parent Center and Oklahoma Family Network to disseminate information through their websites, conferences, communications, etc. about the SoonerStart program.	5,6	ONGOING
Each SoonerStart site partners with local Department of Human Services (DHS) offices to ensure that all children with substantiated cases of abuse and/or neglect (including drug exposure) are referred to the SoonerStart program.	5,6	ONGOING
SoonerStart utilizes monies from funded staff vacancies that have been made available for contracts with service providers in rural areas of the state through OSDH to assist with evaluations and service provision. SoonerStart continues to seek funding to fill additional vacancies in critical SoonerStart sites. This would reduce the impact of staff shortages for required early intervention services.	1,7	ONGOING
SoonerStart filled 3 service coordinator positions.	1,7	COMPLETED
SoonerStart Program Managers provide technical assistance to all SoonerStart personnel on Procedural Safeguards and Parent Rights.	1,7,8	ONGOING
SoonerStart teams were trained on Routines Based Intervention by Robin McWilliams to improve quality of services and ultimately improve early childhood outcomes. Implementation has been initiated.	2,3,7,8	COMPLETED

IMPROVEMENT ACTIVITIES	INDICATOR(S)	STATUS
SoonerStart revised the *Transition at Age Three: Steps for Success* transition guide that is disseminated to all families at the initiation of transition planning. Revisions 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.	8	COMPLETED
SoonerStart developed an Operational Manual to provide information to staff on day-to-day procedures. A statewide training on the manual was completed in November 2012.	1,2,3,4,5,6.7.8	COMPLETED
OSDE and OSDH continue collaboration on merging the agencies' databases to provide a single point of data entry. This will streamline data reporting and the availability of program reports used by staff in monitoring their caseloads and timelines.	1, 3,7,8	ONGOING
The ICC has initiated a Service Design committee to explore various methods and systems of providing early intervention services in Oklahoma.	1,3,4,5,6,7,8	ONGOING
SoonerStart will develop a Personnel Development task group with parental involvement to explore opportunities for continued personnel training as well as design specific training to meet the needs of staff.	9	ONGOING
SoonerStart will develop joint training for SoonerStart staff and LEA staff to facilitate improved transition outcomes for children transitioning from Part C to Part B.	8	ONGOING