

STATE PERFORMANCE PLAN / ANNUAL PERFORMANCE REPORT: PART C

for STATE FORMULA GRANT PROGRAMS under the Individuals with Disabilities Education Act

**For reporting on
FFY 2019**

Oklahoma



**PART C DUE
February 1, 2021**

**U.S. DEPARTMENT OF EDUCATION
WASHINGTON, DC 20202**

Introduction

Instructions

Provide sufficient detail to ensure that the Secretary and the public are informed of and understand the State's systems designed to drive improved results for infants and toddlers with disabilities and their families and to ensure that the Lead Agency (LA) meets the requirements of Part C of the IDEA. This introduction must include descriptions of the State's General Supervision System, Technical Assistance System, Professional Development System, Stakeholder Involvement, and Reporting to the Public.

Intro - Indicator Data

Executive Summary

IDEA Part C requires the SoonerStart Program to report ten state accountability indicators to the Office of Special Education Programming (OSEP) annually. Indicator data are drawn from SoonerStart in June and December (child count). Sites are responsible to OSDE-SoonerStart for meeting a target for each indicator, just as the State is responsible to OSEP. SoonerStart uses a Site Data Profile tool to share results with the sites annually. The data are aggregated to report to OSEP.

Oklahoma maintained or improved its scores from the previous year in most indicators, despite COVID-19 pandemic shutdowns and restrictions on in-person services. SoonerStart attributes these results to three factors:

1. The program quickly developed and implemented procedures for providing evaluations and services by video or teleconferencing to ensure that families could continue to receive early intervention services in some format.
2. The support of Oklahoma government agencies promoting telework to mitigate COVID-19 spread among staff and families, as well as easing regulations, and approving reimbursement for virtual teletherapy services.
3. Written guidance provided by the Office of Special Education Services (OSEP) expanding the definition of "exceptional family circumstances" to include unforeseen events outside of the Part C programs' control when accounting for delays in meeting required timelines.

Overview

- Oklahoma experienced an increase in services in the natural environment (home or a community setting either in-person or via a virtual visit) and met the FFY 2019 target of 96.00% (Indicator 2).
- The percentage of children who improved growth in social/emotional skills, skills and knowledge, and appropriate behaviors from program entry to exit (Indicator 3A, 3B, 3C) was greater than 84% in all three child outcomes and met FFY 2019. The percentage of children who exited SoonerStart with peer-level child outcomes decreased slightly and did not meet targets.
- Oklahoma maintained its high parent approval ratings, ranging between 98.3 to 99.8 percent (Indicators 4A, 4B, and 4C) based on 838 family survey responses received.
- The rate of children served by SoonerStart, ages birth to one, decreased slightly and did not meet the state target (Indicator 5). However, the rate of all children served by SoonerStart, ages birth to three, increased slightly and met the state target (Indicator 6).
- Oklahoma continues to work well with families, as evidenced by the zero counts of complaints (measured through the counts of resolution and mediation sessions in Indicators 9 and 10).
- Oklahoma did not meet the federally required target of 100% on any five compliance indicators. However, it increased or maintained its rates for three indicators (1, 7 & 8A).

Additional information related to data collection and reporting

General Supervision System

The systems that are in place to ensure that IDEA Part C requirements are met, e.g., monitoring systems, dispute resolution systems.

The Oklahoma Early Intervention Act designated the Oklahoma State Department of Education (OSDE) as the lead agency and the Oklahoma State Department of Health (OSDH) as the primary partner agency for administering the SoonerStart Early Intervention Program. OSDE is responsible for monitoring progress and providing oversight for early intervention services at 27 sites for infants and toddlers and their families to ensure statewide implementation of the Individuals with Disabilities Education Act (IDEA). Oklahoma's general supervision system is reliant on data collection and reporting. SoonerStart compiles, analyzes, and utilizes all of the data that is submitted by local SoonerStart sites. Part C personnel in Oklahoma are state employees, and SoonerStart implements procedures to promote consistency in data entry and utilization of the EdPlan data system. EdPlan, the State's Part C database, is maintained by an outside vendor. The system has been effective in collecting and sorting data for reporting purposes. Over time, improvements have greatly enhanced the State's ability to report all compliance data and support evidence-based practices accurately. EdPlan's main-menu page hosts user instructions, with real-time assistance available during the workday through the online message board.

Oversight by the OSDE includes the use of various accountability processes. The OSDE collects both compliance and performance data for the Annual Performance Report through the EdPlan database. Oklahoma's General Supervision activities include on-site program improvement visits with the local sites and monitoring for compliance with IDEA Part C regulations. On-site visits occur on a three-year cycle (nine local site visits per year). SoonerStart administrators and program managers from both OSDE and OSDH meet with early intervention staff to learn about local challenges and successes. Staff receive updates on state and federal Part C procedures or changes and are encouraged to share ideas for program improvement with SoonerStart administrators. Due to COVID-19, only three of the nine scheduled site visits occurred in FFY2019. SoonerStart has scheduled the remaining six visits to be held virtually in 2021 and will hopefully resume the in-person site visits to nine local sites in 2022.

Oklahoma's compliance monitoring process verifies that each local SoonerStart Early Intervention site with non-compliance is correctly implementing the specific regulatory requirements and has corrected any untimely individual records. All 27 SoonerStart sites are monitored annually for each APR indicator. The State's database, Edplan, can formally identify all instances of systemic and single-occurrence non-compliance through its data reporting tools. EdPlan contains the child's electronic record, and the data reports pull child information and timeline data directly from that record for each child in the SoonerStart program. The electronic record reflects the date that early intervention activities occur and, if not timely, requires staff to enter the reason for missing the timeline. However, non-compliance identification may also come through parent surveys, informal complaints, local/peer feedback, and other periodic reports submitted to the State. Following the formal identification, SoonerStart issues a written finding of non-compliance to the local site for any individual cases of non-compliance identified, even if the non-compliance is corrected before the finding is issued. The State's APR reports all non-compliance. In reviewing compliance issues, SoonerStart tracks data on every child in Oklahoma by a unique identifier number in the EdPlan database. The monitoring plan includes an annual review of child and site-level compliance data. Steps to implement corrective action plans and action plan tracking and monitoring are defined. Security processes for electronic documents concerning findings of non-compliance are well established. Oklahoma has selected the 4th quarter of the fiscal year (April, May, and June) as the APR reporting period. These results are representative of a full year of the State's data because it includes all areas of the State, all provider types, and all categories of eligible children.

Additionally, the Part C Data Specialist examines data reported for this period and compares them to data for the full year (FFY 2019) to ensure that they are representative of all quarters of the year. The data review for this reporting period occurs in the first two weeks of September for the prior fiscal year. Using EdPlan database reports, the State developed standardized statewide data reports containing all relevant records from all sites. SoonerStart has procedures to review data, identify non-compliance, issue findings, and implement correction of non-compliance at both the child and local site level.

Due to statewide restrictions resulting from COVID-19, Oklahoma anticipated that the 4th quarter data would reflect a significant decrease in early intervention activities and compliance. However, the entire year's data analysis indicated that the 4th quarter continued to represent the full year's data. The continued representation is attributed to SoonerStart's urgency to put procedures in place to continue services virtually and ensure that all staff provided documentation of exceptional circumstances for activities that exceeded timelines as provided in OSEP guidance (OSEP QA 21-02).

Oklahoma requires verification of child-specific correction of non-compliance and long-term compliance with the regulatory requirements (based on a review of subsequent data reflecting 100% compliance). Verification of correction of non-compliance happens through review of the child's electronic record, and subsequent data reports to ensure that the prescribed corrective action is occurring and is effective. Local site supervisors ensure that correction of non-compliance occurs timely with follow-up verification by the Part C Data Specialist one year from the finding's issuance. The State assures correction of all instances of non-compliance within one year of identification at both the child level and site level.

For Part C, Oklahoma has adopted the Part B due process hearing procedures under 34 CFR 303.430(d)(2), administered through the OSDE Special Education Services.

Technical Assistance System:

The mechanisms that the State has in place to ensure the timely delivery of high quality, evidenced based technical assistance and support to early intervention service (EIS) programs.

The SoonerStart State Leadership Team is responsible for ensuring the timely delivery of high quality, evidence-based technical assistance and support to SoonerStart staff at the 27 local sites across the State. The State Leadership Team is comprised of the SoonerStart Executive Director and Assistant Executive Director with the Oklahoma State Department of Education (lead agency) and the SoonerStart Director and Assistant Director with the Oklahoma State Department of Health (partner agency). The Leadership Team, individually and collectively, provides technical assistance to each local site through the monitoring process, scheduled program improvement visits, and staff's responses. Technical assistance includes:

- Support for identifying underlying causes of low performance and non-compliance;
- Developing appropriate strategies for improvement;
- Troubleshooting issues with the SoonerStart EdPlan database
- Providing explanation and clarification of SoonerStart operational procedures and IDEA, Part C regulations

The Regional Early Intervention Coordinator (REIC) and Health Department Lead Clinician at each SoonerStart site work together to implement policies, procedures, and regulations per IDEA, Part C, and the lead agency. They assure correction of all non-compliance and that procedures are put into place to address child level and systemic non-compliance. The Leadership Team provides technical assistance to identify underlying causes of low performance and non-compliance and help local teams develop appropriate strategies for improvement. Additional resources from the Early Childhood Technical Assistance Center (ECTA Center) and National Center for Systemic Improvement (NCSI) are utilized as needed.

SoonerStart uses both web-based training and local supervisors to provide the initial training and ongoing support for the EdPlan database, which contains the electronic record for children enrolled in the Part C program. An outside vendor maintains the SoonerStart EdPlan database, but all EI staff have access to the Message Board to request information or assistance with features of the system. Detailed database "Tip Sheets" to improve data entry and data report access procedures are on the database's Main Menu page. The Assistant Executive Director works with the outside vendor to improve EdPlan and regularly provides staff with updates on new processes and procedures.

SoonerStart continues implementing the revised family interview process initiated in FFY 2018 with web-based training and technical assistance provided by the REICs and Lead Clinicians at the local site level. The purpose of the revised process is to ensure family engagement and leadership in selecting IFSP outcomes and services, resulting in improved infant and toddlers' improved results. The local supervisors monitor fidelity to the process through observation or provider self-assessment with support from the Leadership Team as needed.

The SoonerStart Operations Manual is available on the SoonerStart page of the Oklahoma State Department of Education website. A standing multi-agency task group reviews the Manual regularly to ensure that all guidelines reflect current state and federal regulations/policies as well as current OSDE and OSDH agency practices. Where applicable, operational guidelines link to the new SoonerStart EdPlan database procedures. The Leadership Team announces updates to the Operations Manual in program-wide emails. The SoonerStart Assistant Executive Director has the primary responsibility to respond to staff's questions across the State and provide guidance and written feedback to local SoonerStart sites regarding IDEA, Part C regulations.

In mid-March 2020, statewide COVID-19 restrictions required SoonerStart to halt in-person early intervention services. The Leadership Team, the SoonerStart Professional Development Specialist, and the Part C Data Specialist worked extensively on modifying program guidelines as virtual services were implemented. SoonerStart documents and forms were revised to specifically reflect changes due to COVID-19. These documents, as well as the accompanying instructions, were posted on the SoonerStart webpage. Email announcements informed staff weekly or bi-weekly. Individual members of the Leadership Team fielded staff phone calls daily to provide technical assistance as needed. The Leadership Team utilized Guidance Memos provided by OSEP to inform SoonerStart procedural updates and technical assistance provided to staff.

As the COVID-19 pandemic continued into summer, the SoonerStart Leadership Team developed a "Re-Entry Plan" in anticipation of returning to in-person family visits when it was determined safe to do so. Utilizing the Oklahoma COVID-19 Alert System, a four-tiered risk measurement tool with corresponding color categories that identified the current COVID-19 risk level, SoonerStart determined the parameters and protocols for in-person services on a county-by-county basis. As staff continued to need additional support in decision making, the State team developed a Question and Answer document. Unfortunately, very few in-person visits were provided before the designation of Oklahoma as a high-risk level state. Services since September 2020 have remained virtual as virus mitigation has been unsuccessful.

Professional Development System:

The mechanisms the State has in place to ensure that service providers are effectively providing services that improve results for infants and toddlers with disabilities and their families.

Oklahoma provides professional personnel development to all SoonerStart staff to comply with the Individuals with Disabilities Education Act (IDEA) Part C requirement that a state system must include a comprehensive personnel development system. SoonerStart professional development activities seek to ensure accountability and promote the use of recommended and evidence-based practices. The goal of SoonerStart's ongoing professional development is to provide EI professionals (service coordinators, service providers, and EI program administration) with the tools, confidence, and

competence to equip them to support families. Professional development is crucial in helping SoonerStart staff promote evidence-based practices that assist families in helping their child develop and learn. To meet this goal, SoonerStart employs a dedicated Professional Development Specialist to develop activities to support providers in meeting program requirements. The Professional Development Specialist provides quality services to families of eligible infants and toddlers in an individualized, culturally sensitive, and ethical manner; Supported by a set of stakeholders who advise the program as a professional development subcommittee of the ICC. The design of the SoonerStart professional development system is to operate hand-in-hand with the TA system. As a component of the general supervision system, it designs to:

- Be responsive to identified provider/agency/family needs,
- Inform the system when new procedures and policies are required,
- Address practice change to improve child and family outcomes, and
- Implement evidence-based practices

The system includes:

- Entry-level online training modules
- Information sharing and resource sharing
- Posting information on the OSDE website-SoonerStart page that includes information and training for families
- Face-to-face professional development activities provided by early intervention content experts.

The identification of professional development needs manifest through a variety of methods. Including the review of the individual program and statewide data, information from compliance monitoring and quality assurance reviews, new research and current evidence-based practices and initiatives in early intervention, input from local site supervisors, results from training surveys, and national and state-level policy changes. Oklahoma continues to utilize its online learning platform designed by the same vendor that supports the SoonerStart EdPlan database to provide online learning, interactive communities, and a tracking system. In February 2020, a staff stakeholder group worked together to revise the "SoonerStart New Employee Orientation" training series, which offers blended learning modules. Online training modules are also available regarding the EdPlan Database navigation, covering staff competency requirements from program entry to exit of all SoonerStart children.

Due to COVID-19 safety restrictions, all face-to-face training required suspension in mid-March 2020. SoonerStart quickly adapted by building an online professional development clearinghouse utilizing Microsoft TEAMS. The Professional Development Specialist sought early intervention and other relevant training opportunities from multiple state, federal and private entities and created a master calendar to inform staff and other stakeholders of the availability and registration links. Feedback from staff has been positive. Also, SoonerStart staff and stakeholders who identify training not currently listed can make them available on the TEAMS training page.

SoonerStart staff faced many challenges with shifting from in-person services to virtual services during the COVID-19 pandemic. Oklahoma's focus in the last quarter of FFY 2019 was on accessing quality training on providing Early Intervention services in a virtual setting. Additional training on self-care was also a priority as staff navigated working from home amid other stressors.

With the increased competency and comfort level of staff in using technology for virtual interaction, SoonerStart initiated a series of training via Zoom and other online interactive formats developed and presented by both Resource Coordinators and Service Providers. The Professional Development Specialist serves as facilitator and logistics coordinator. The peer-to-peer training has been well received, and staff participation has been high.

Collaboration with agency partners such as AbleTech or the Oklahoma Health Care Authority continues to offer new opportunities for staff training. Staff mentoring and peer-to-peer collaborations provide informal training at the local site level across the State.

With a full-time Professional Development Specialist and the allocation of additional resources to develop a wide array of professional development activities, SoonerStart provides:

- Statewide coordination of training activities related to infants and toddlers and their families;
- Greater access to learning opportunities for families and service providers;
- A balanced and coordinated schedule of training activities in terms of topics, locations, and dates throughout the State available year-round;
- On-line and face-to-face training; and
- Specialized training opportunities bring together families and professionals from different fields, including early education and child care service providers.

SoonerStart remains committed to ensuring service providers' equipping to effectively provide services that continually improve the results of infants and toddlers with disabilities and their families, even in these challenging times.

Stakeholder Involvement:

The mechanism for soliciting broad stakeholder input on targets in the SPP/APR, and any subsequent revisions that the State has made to those targets, and the development and implementation of Indicator 11, the State Systemic Improvement Plan (SSIP).

The ICC serves as one of the primary stakeholder groups providing ongoing guidance and input into the SPP/APR and SSIP. Information and updates are provided regularly at each ICC meeting regarding progress towards the achievement of targets, the child outcome data process, selection of targets, training initiatives, and public reporting of program status. SoonerStart provides the ICC sub-committees and special task groups ongoing opportunities for input throughout the year. Each sub-committee follows specific by-laws for the membership that reflects the State's diversity, with sub-committees including Personnel Development, Public Awareness, Program Planning and Evaluation, and Financial Planning. The SoonerStart lead agency identifies broad-based stakeholders (per §303.601) and provides the information about prospective members to the Oklahoma Governor's office for approval and appointment to the council. Members represent service providers, families of children with disabilities under the age of 12, child development instructors, and representatives from state agencies providing services to families of infants and toddlers with disabilities. ICC members are provided multiple opportunities to share their input throughout the year. Lead Agency personnel share programmatic updates regularly via email and at each quarterly ICC meeting. The ICC chose to extend FFY 2018 targets to FFY 2019. The ICC will be actively involved in setting new targets for the FFY 2020 APR due in February 2022.

Oklahoma's Part C ICC meets quarterly, adhering to Oklahoma's open meeting laws. In May 2020, Oklahoma lawmakers issued an exemption to the Oklahoma Open Meeting Act due to COVID-19 allowing virtual public meetings. At the scheduled meetings held virtually in June and September 2020, the ICC received updates on the impact of COVID-19 on early intervention services. In preparation for ICC input, the Part C data team readied the FFY 2019 APR data for presentation at the December 2020 meeting. However, the exemption to the Open Meeting Act expired in November 2020, and a virtual ICC meeting became impossible. Due to the high-risk of COVID-19 spread in Oklahoma, the lead agency and the ICC chair cancelled the

December 2020 meeting since it could not be held virtually. Summary APR data was distributed by email to all ICC members, and feedback was requested. The ICC Chair confirmed that the ICC has reviewed Oklahoma's Part C FFY 2019 SPP/APR for accuracy and completeness.

In FFY 2019, SoonerStart continued to hold team meetings with stakeholders who represented subgroups of a larger SoonerStart Strategic Planning Stakeholders group. A SoonerStart state administrative staff member facilitates each of the four teams (Finance, System Design, Professional Development, and Public Awareness/Outreach). Stakeholders include members of the ICC, early intervention staff, parents of children enrolled or formerly enrolled in SoonerStart, and community early childhood advocates (HeadStart, Child Care, Preschool). Each team's mission is to make data-driven suggestions for improvements to the SoonerStart program in the teams' focus areas. A meeting of the entire SoonerStart Strategic Planning Stakeholders group was to be held in the Spring of 2020 to discuss each team's improvement strategies however, it was postponed due to COVID-19. SoonerStart hopes to incorporate these stakeholder teams as part of the ongoing development of Oklahoma's new SSIP in FFY 2020.

As part of the SSIP, additional stakeholder engagement activities are conducted based on the improvement strategy's needs. Across all strategies, we regularly consult with various stakeholders to ensure that activities meet the intended outputs and outcomes.

Apply stakeholder involvement from introduction to all Part C results indicators (y/n)

NO

Reporting to the Public:

How and where the State reported to the public on the FFY 2018 performance of each EIS Program located in the State on the targets in the SPP/APR as soon as practicable, but no later than 120 days following the State's submission of its FFY 2018 APR, as required by 34 CFR §303.702(b)(1)(i)(A); and a description of where, on its website, a complete copy of the State's SPP/APR, including any revision if the State has revised the targets that it submitted with its FFY 2018 APR in 2020, is available.

SoonerStart has made its FFY 2018 SPP/APR and its Part C Annual Determination Letter for FFY 2018 available to the public on the OSDE website:

<http://ok.gov/sde/datareporting-part-c/>

The FFY 2018 and FFY 2019 SoonerStart Site Data Profiles, which report each SoonerStart site's performance, were made available to each site and the public promptly via the same website.

Intro - Prior FFY Required Actions

In the FFY 2019 SPP/APR, the State must report FFY 2019 data for the State-identified Measurable Result (SiMR). Additionally, the State must, consistent with its evaluation plan described in Phase II, assess and report on its progress in implementing the SSIP. Specifically, the State must provide: (1) a narrative or graphic representation of the principal activities implemented in Phase III, Year Five; (2) measures and outcomes that were implemented and achieved since the State's last SSIP submission (i.e., April 1, 2020); (3) a summary of the SSIP's coherent improvement strategies, including infrastructure improvement strategies and evidence-based practices that were implemented and progress toward short-term and long-term outcomes that are intended to impact the SiMR; and (4) any supporting data that demonstrates that implementation of these activities is impacting the State's capacity to improve its SiMR data.

Response to actions required in FFY 2018 SPP/APR

Intro - OSEP Response

The State Interagency Coordinating Council (SICC) submitted to the Secretary its annual report that is required under IDEA section 641(e)(1)(D) and 34 C.F.R. §303.604(c). The SICC noted it has elected to support the State lead agency's submission of its SPP/APR as its annual report in lieu of submitting a separate report. OSEP accepts the SICC form, which will not be posted publicly with the State's SPP/APR documents.

Intro - Required Actions

Indicator 1: Timely Provision of Services

Instructions and Measurement

Monitoring Priority: Early Intervention Services In Natural Environments

Compliance indicator: Percent of infants and toddlers with Individual Family Service Plans (IFSPs) who receive the early intervention services on their IFSPs in a timely manner. (20 U.S.C. 1416(a)(3)(A) and 1442)

Data Source

Data to be taken from monitoring or State data system and must be based on actual, not an average, number of days. Include the State's criteria for "timely" receipt of early intervention services (i.e., the time period from parent consent to when IFSP services are actually initiated).

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.

Instructions

If data are from State monitoring, describe the method used to select early intervention service (EIS) programs for monitoring. If data are from a State database, describe the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period) and how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Targets must be 100%.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data and if data are from the State's monitoring, describe the procedures used to collect these data. States report in both the numerator and denominator under Indicator 1 on the number of children for whom the State ensured the timely initiation of new services identified on the IFSP. Include the timely initiation of new early intervention services from both initial IFSPs and subsequent IFSPs. Provide actual numbers used in the calculation.

The State's timeliness measure for this indicator must be either: (1) a time period that runs from when the parent consents to IFSP services; or (2) the IFSP initiation date (established by the IFSP Team, including the parent).

States are not required to report in their calculation the number of children for whom the State has identified the cause for the delay as exceptional family circumstances, as defined in 34 CFR §303.310(b), documented in the child's record. If a State chooses to report in its calculation children for whom the State has identified the cause for the delay as exceptional family circumstances documented in the child's record, the numbers of these children are to be included in the numerator and denominator. Include in the discussion of the data, the numbers the State used to determine its calculation under this indicator and report separately the number of documented delays attributable to exceptional family circumstances.

Provide detailed information about the timely correction of noncompliance as noted in the Office of Special Education Programs' (OSEP's) response table for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, methods to ensure correction, and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2019 SPP/APR, the data for FFY 2018), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

1 - Indicator Data

Historical Data

Baseline Year	Baseline Data
2005	96.74%

FFY	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%
Data	98.59%	98.70%	99.07%	97.88%	98.62%

Targets

FFY	2019
Target	100%

FFY 2019 SPP/APR Data

Number of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	Total number of infants and toddlers with IFSPs	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
764	864	98.62%	100%	99.07%	Did Not Meet Target	No Slippage

Number of documented delays attributable to exceptional family circumstances

This number will be added to the "Number of infants and toddlers with IFSPs who receive their early intervention services on their IFSPs in a timely manner" field above to calculate the numerator for this indicator.

92

Include your State's criteria for "timely" receipt of early intervention services (i.e., the time period from parent consent to when IFSP services are actually initiated).

Oklahoma defines "timely" receipt of early intervention services as 15 working days from the date of parent consent on the IFSP to the date of the first intervention service provided to the family.

What is the source of the data provided for this indicator?

State database

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).

Data were collected during the time period between April 1, 2020 and June 30, 2020 (4th quarter of FFY 2019).

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Program data for this indicator are collected from Oklahoma's Early Intervention online database called EdPlan. EdPlan captures and displays the status and content of the infant or toddler's record at any given period of time. Staff uses the system to create an electronic record for each infant and toddler that enters the program with a referral. For children who are evaluated and determined eligible for an IFSP, the first intervention service date following parental consent on the IFSP is entered by the service provider in the electronic record. EdPlan allows for a direct flow of information from each local SoonerStart site to OSDE as the lead agency, enabling centralized monitoring and oversight. SoonerStart supervisors review the first intervention service dates for all initial and subsequent IFSPs completed during the time period reported at each local site. Any data missing or appearing to be incorrect identified using the First Intervention Visit database report created by the Part C Data Specialist are verified by comparing it to the child's electronic record in EdPlan. Delays attributed to Exceptional Family Circumstances are documented in the child's electronic record.

Oklahoma has chosen to utilize the first intervention service data from the fourth quarter (April 1, 2020, to June 30, 2020) to report in the FFY 2019 APR, as it has previously done the past three years. After review by local supervisors, the SoonerStart Part C Data Specialist examined data reported for this time period and compared them to data for the full year (FFY 2019). Based on the number and percentages of completed IFSPs for the entire year, Oklahoma determined that despite COVID-19, the 4th quarter data is representative of all quarters for FFY 2019 APR reporting.

Quarter: IFSP #	IFSP %			
1st Quarter: 683	21.0%			
2nd Quarter: 870		26.7%		
3rd Quarter: 835		25.7%		
4th Quarter: 864		26.6%		

Additionally, the 4th quarter results are representative of a full year of the state's data because all areas of the state, all provider types, and all categories of eligible children are included.

SoonerStart reported that 92 children did not receive timely first intervention visits due to exceptional family circumstances. Eight children did not receive timely first intervention visits due to staff reasons. Staff reasons include unavailability due to vacation, illness, or scheduling.

If needed, provide additional information about this indicator here.

COVID-19 restrictions on in-person services caused SoonerStart to pause services for a brief period at the end of March 2020. New program procedures for virtual services were quickly developed and implemented, allowing early intervention services to continue in April 2020.

Correction of Findings of Noncompliance Identified in FFY 2018

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
7	7	0	0

FFY 2018 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements

The Part C Data Specialist conducts verification of correction for noncompliance at the site level to ensure that each site is correctly implementing the specific regulatory requirement for all children with developmental delays or disabilities. The Part C Data Specialist ensures that a Site Correction Assurance Statement was submitted by each local site demonstrating less than 100% compliance for first intervention visits the previous year. He also reviews subsequent data reported in the First Intervention Service Visit Report created in the EdPlan database to ensure the local site demonstrates 100% compliance for timeliness of first intervention service visits. The report pulls the first visit from the child's electronic record for all children enrolled in each local site and indicates the number of working days between the IFSP consent date and the first intervention visit. If more than 15 working days, the report also includes the reason for delay documented in the child's record. Records with delays attributed to exceptional family circumstances are considered to be in compliance. If the local site has not demonstrated noncompliance correction within 12 months of a finding, the Part C Data Specialist requires the local site to submit a formal Corrective Action Plan outlining strategies to address obstacles encountered by the site that led to continued noncompliance. For findings issued in FFY 2018, all local SoonerStart sites demonstrated noncompliance correction within 12 months of identification.

The SoonerStart Part C Assistant Executive Director supervises the verification process and provides technical assistance to the local sites in conjunction with the Part C Data Specialist. Verification of correction of both child and site-level noncompliance findings is completed according to OSEP Memorandum 09-02.

Describe how the State verified that each individual case of noncompliance was corrected

The Part C Data Specialist is responsible for identifying and verifying the correction of non-compliance identified and reported in the previous fiscal year. For any non-compliance concerning a child-specific requirement that is subject to a timeline requirement, SoonerStart must ensure that the local site has corrected each case of non-compliance no more than 12 months from identification, unless the child is no longer enrolled in the SoonerStart program. The Part C Data Specialist verified correction for all records with first intervention visits previously identified as non-compliant by looking at the child's electronic record in the EdPlan database. Verification ensures that the required action has been completed, although late, and that staff has documented the reason for missing the timeline in the child's record. The seven findings of non-compliance for timely first intervention visits issued in FFY 2018 were verified as corrected within 12 months of identification. Completing verification of correction of both child and site-level noncompliance findings adheres to OSEP Memorandum 09-02.

Correction of Findings of Noncompliance Identified Prior to FFY 2018

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

1 - Prior FFY Required Actions

None

1 - OSEP Response

The State reported that it used data from a State database to report on this indicator. The State further reported that it did not use data for the full reporting period (July 1, 2019-June 30, 2020). The State described how the time period in which the data were collected accurately reflects data for infants and toddlers with IFSPs for the full reporting period.

1 - Required Actions

Because the State reported less than 100% compliance for FFY 2019, the State must report on the status of correction of noncompliance identified in FFY 2019 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2020 SPP/APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2019 for this indicator: (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 or provider, consistent with OSEP Memo 09-02. In the FFY 2020 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

If the State did not identify any findings of noncompliance in FFY 2019, although its FFY 2019 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2019.

Indicator 2: Services in Natural Environments

Instructions and Measurement

Monitoring Priority: Early Intervention Services In Natural Environments

Results indicator: 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)

Data Source

Data collected under section 618 of the IDEA (IDEA Part C Child Count and Settings data collection in the EDFacts Metadata and Process System (EMAPS)).

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.

Instructions

Sampling from the State's 618 data is not allowed.

Describe the results of the calculations and compare the results to the target.

The data reported in this indicator should be consistent with the State's 618 data reported in Table 2. If not, explain.

2 - Indicator Data

Historical Data

Baseline Year	Baseline Data
2005	95.52%

FFY	2014	2015	2016	2017	2018
Target>=	95.00%	95.00%	95.50%	95.50%	96.00%
Data	96.29%	97.34%	97.29%	96.53%	95.06%

Targets

FFY	2019
Target>=	96.00%

Targets: Description of Stakeholder Input

The ICC, as the primary stakeholder group for Oklahoma's Part C program, extended the FFY 2018 targets to FFY 2019.

Prepopulated Data

Source	Date	Description	Data
SY 2019-20 Child Count/Educational Environment Data Groups	07/08/2020	Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	2,522
SY 2019-20 Child Count/Educational Environment Data Groups	07/08/2020	Total number of infants and toddlers with IFSPs	2,619

FFY 2019 SPP/APR Data

Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	Total number of Infants and toddlers with IFSPs	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
2,522	2,619	95.06%	96.00%	96.30%	Met Target	No Slippage

Provide additional information about this indicator (optional)

Data for Indicator 2 (Services in the Natural Environment) was taken from Child Count data collect December 1, 2019, and submitted April 1, 2020. COVID-19 did not impact this data.

2 - Prior FFY Required Actions

None

2 - OSEP Response

2 - Required Actions

Indicator 3: Early Childhood Outcomes

Instructions and Measurement

Monitoring Priority: Early Intervention Services In Natural Environments

Results indicator: 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)

Data Source

State selected data source.

Measurement

Outcomes:

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

Progress categories for A, B and C:

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

Summary Statements for Each of the Three Outcomes:

Summary Statement 1: Of those infants and toddlers who entered 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.

Instructions

Sampling of infants and toddlers with IFSPs is allowed. When sampling is used, submit a description of the sampling methodology outlining how the design will yield valid and reliable estimates. (See General Instructions page 2 for additional instructions on sampling.)

In the measurement, include in the numerator and denominator only infants and toddlers with IFSPs who received early intervention services for at least six months before exiting the Part C program.

Report: (1) the number of infants and toddlers who exited the Part C program during the reporting period, as reported in the State's Part C exiting data under Section 618 of the IDEA; and (2) the number of those infants and toddlers who did not receive early intervention services for at least six months before exiting the Part C program.

Describe the results of the calculations and compare the results to the targets. States will use the progress categories for each of the three Outcomes to calculate and report the two Summary Statements.

Report progress data and calculate Summary Statements to compare against the six targets. Provide the actual numbers and percentages for the five reporting categories for each of the three outcomes.

In presenting results, provide the criteria for defining "comparable to same-aged peers." If a State is using the Early Childhood Outcomes Center (ECO) Child Outcomes Summary Process (COS), then the criteria for defining "comparable to same-aged peers" has been defined as a child who has been assigned a score of 6 or 7 on the COS.

In addition, list the instruments and procedures used to gather data for this indicator, including if the State is using the ECO COS.

If the State's Part C eligibility criteria include infants and toddlers who are at risk of having substantial developmental delays (or "at-risk infants and toddlers") under IDEA section 632(5)(B)(i), the State must report data in two ways. First, it must report on all eligible children but exclude its at-risk infants and toddlers (i.e., include just those infants and toddlers experiencing developmental delay (or "developmentally delayed children") or having a diagnosed physical or mental condition that has a high probability of resulting in developmental delay (or "children with diagnosed conditions")). Second, the State must separately report outcome data on either: (1) just its at-risk infants and toddlers; or (2) aggregated performance data on all of the infants and toddlers it serves under Part C (including developmentally delayed children, children with diagnosed conditions, and at-risk infants and toddlers).

3 - Indicator Data

Does your State's Part C eligibility criteria include infants and toddlers who are at risk of having substantial developmental delays (or "at-risk infants and toddlers") under IDEA section 632(5)(B)(i)? (yes/no)

NO

Targets: Description of Stakeholder Input

The ICC, as the primary stakeholder group for Oklahoma's Part C program, extended the FFY 2018 targets to FFY 2019.

Historical Data

Outcome	Baseline	FFY	2014	2015	2016	2017	2018
A1	2013	Target>=	78.00%	78.00%	78.50%	78.50%	79.00%
A1	78.15%	Data	79.73%	78.17%	84.99%	83.35%	84.69%
A2	2013	Target>=	52.00%	52.00%	52.50%	52.50%	53.00%
A2	52.41%	Data	55.67%	55.34%	53.50%	54.01%	52.09%
B1	2013	Target>=	83.00%	83.00%	83.50%	83.50%	84.00%
B1	83.04%	Data	84.87%	82.14%	85.01%	86.10%	88.26%
B2	2013	Target>=	46.00%	46.00%	46.50%	46.50%	47.00%
B2	46.48%	Data	50.58%	49.05%	45.15%	45.55%	44.30%
C1	2013	Target>=	84.00%	84.00%	84.50%	84.50%	85.00%
C1	84.31%	Data	86.53%	83.56%	87.03%	86.81%	86.90%
C2	2013	Target>=	47.00%	47.00%	47.50%	47.50%	48.00%
C2	47.03%	Data	50.23%	49.86%	48.53%	49.78%	48.37%

Targets

FFY	2019
Target A1>=	79.00%
Target A2>=	53.00%
Target B1>=	84.00%
Target B2>=	47.00%
Target C1>=	85.00%
Target C2>=	48.00%

FFY 2019 SPP/APR Data

Number of infants and toddlers with IFSPs assessed

1,952

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

Outcome A Progress Category	Number of children	Percentage of Total
a. Infants and toddlers who did not improve functioning	7	0.36%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	256	13.11%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	709	36.32%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	777	39.81%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	203	10.40%

Outcome A	Numerator	Denominator	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
A1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who	1,486	1,749	84.69%	79.00%	84.96%	Met Target	No Slippage

Outcome A	Numerator	Denominator	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
substantially increased their rate of growth by the time they turned 3 years of age or exited the program							
A2. The percent of infants and toddlers who were functioning within age expectations in Outcome A by the time they turned 3 years of age or exited the program	980	1,952	52.09%	53.00%	50.20%	Did Not Meet Target	Slippage

Provide reasons for A2 slippage, if applicable

The FFY 2019 data indicate that the percent of infants and toddlers who were functioning within age expectations for positive social-emotional skills by the time they turned three years of age or exited the Part C program was below the target of 53.00 percent by 2.8 percent, a decrease from the previous reporting period (52.09 percent) of 1.89 percent. However, the difference in scores between the two years is not statistically significant (using a z-test for differences in proportions), suggesting it happened by chance. Therefore, the FFY 2019 overall percentage of children who exited at peer level may not represent a real change in the child population.

Even so, the drop below target requires attention. As reported last year, SoonerStart has identified a need for a uniform, statewide, comprehensive training for all service providers in completing the Child Outcome Summary Process. Following the FFY 2018 APR submission, the SoonerStart Leadership Team began planning a statewide training on Early Childhood Outcomes to be conducted by June 2020. Due to the COVID-19 pandemic, the training was put on hold as the Leadership Team focused its efforts on ensuring continued services for children and families. Shifting the Child Outcome Summary Process training to a virtual format is currently being planned while the risk of COVID-19 continues to prohibit scheduling in-person training. In the absence of a statewide training, the ECTA Decision Tree and various ECO resources from other states has been sent to staff and discussed at virtual discipline specific meetings.

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

Outcome B Progress Category	Number of Children	Percentage of Total
a. Infants and toddlers who did not improve functioning	4	0.20%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	257	13.17%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	887	45.44%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	728	37.30%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	76	3.89%

Outcome B	Numerator	Denominator	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
B1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	1,615	1,876	88.26%	84.00%	86.09%	Met Target	No Slippage
B2. The percent of infants and toddlers who were functioning within age expectations in Outcome B by the time they turned 3 years of age or exited the program	804	1,952	44.30%	47.00%	41.19%	Did Not Meet Target	Slippage

Provide reasons for B2 slippage, if applicable

The FFY 2019 data indicates the percent of infants and toddlers who were functioning within age expectations in the acquisition and use of knowledge and skills by the time they turned three years of age or exited the Part C program was below the target of 47.00 percent by 5.81 percent, a decrease from the previous reporting period (44.30 percent) of 3.11 percent. However, the difference in scores between the two years is not statistically significant (using a z-test for differences in proportions), suggesting it happened by chance. Therefore, the FFY 2019 overall percentage of children who exited at peer level may not represent a real change in the child population.

Even so, the drop below target requires attention. As reported last year, SoonerStart has identified a need for a uniform, statewide, comprehensive training for all service providers in completing the Child Outcome Summary Process. Following the FFY 2018 APR submission, the SoonerStart Leadership Team began planning a statewide training on Early Childhood Outcomes to be conducted by June 2020. Due to the COVID-19 pandemic, the training was put on hold as the Leadership Team focused its efforts on ensuring continued services for children and families. Shifting the Child

Outcome Summary Process training to a virtual format is currently being planned while the risk of COVID-19 continues to prohibit scheduling in-person training. In the absence of a statewide training, the ECTA Decision Tree and various ECO resources from other states has been sent to staff and discussed at virtual discipline specific meetings.

Outcome C: Use of appropriate behaviors to meet their needs

Outcome C Progress Category	Number of Children	Percentage of Total
a. Infants and toddlers who did not improve functioning	5	0.26%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	222	11.37%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	803	41.14%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	812	41.60%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	110	5.64%

Outcome C	Numerator	Denominator	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
C1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	1,615	1,842	86.90%	85.00%	87.68%	Met Target	No Slippage
C2. The percent of infants and toddlers who were functioning within age expectations in Outcome C by the time they turned 3 years of age or exited the program	922	1,952	48.37%	48.00%	47.23%	Did Not Meet Target	Slippage

Provide reasons for C2 slippage, if applicable

The FFY 2019 data indicate that the percent of infants and toddlers who were functioning within age expectations in the use of appropriate behaviors to meet their needs by the time they turned three years of age or exited the Part C program was below the target of 48.00 percent by 0.77 percent, a decrease from the previous reporting period (48.37 percent) of 1.14 percent. However, the difference in scores between the two years is not statistically significant (using a z-test for differences in proportions), suggesting it happened by chance. Therefore, the FFY 2019 overall percentage of children who exited at peer level may not represent a real change in the child population.

Even so, the drop below target requires attention. As reported last year, SoonerStart has identified a need for a uniform, statewide, comprehensive training for all service providers in completing the Child Outcome Summary Process. Following the FFY 2018 APR submission, the SoonerStart Leadership Team began planning a statewide training on Early Childhood Outcomes to be conducted by June 2020. Due to the COVID-19 pandemic, the training was put on hold as the Leadership Team focused its efforts on ensuring continued services for children and families. Shifting the Child Outcome Summary Process training to a virtual format is currently being planned while the risk of COVID-19 continues to prohibit scheduling in-person training. In the absence of a statewide training, the ECTA Decision Tree and various ECO resources from other states has been sent to staff and discussed at virtual discipline specific meetings.

The number of infants and toddlers who did not receive early intervention services for at least six months before exiting the Part C program.

Question	Number
The number of infants and toddlers who exited the Part C program during the reporting period, as reported in the State's part C exiting 618 data	2,980
The number of those infants and toddlers who did not receive early intervention services for at least six months before exiting the Part C program.	835

Sampling Question	Yes / No
Was sampling used?	NO

Did you use the Early Childhood Outcomes Center (ECO) Child Outcomes Summary Form (COS) process? (yes/no)

YES

List the instruments and procedures used to gather data for this indicator.

Program data for this indicator comes from Oklahoma's Early Intervention online database, EdPlan. SoonerStart maintains an electronic record for each infant and toddler in the program, including an electronic version of the Child Outcome Summary Form. Service provider staff are responsible for inputting entry ratings in the electronic COS form within 30 days following the initial IFSP's development. Exit ratings and progress statements are

entered for each child exiting SoonerStart if he or she received services for at least a 180 day period from the date of the IFSP to the date of the child's exit from the program. Staff enters the COSF ratings and progress information within 30 days of the child's third birthday or 30 days following the child's exit from the program if the child leaves the program before age 3. The Part C Data Specialist generates an Early Childhood Outcome report from the EdPlan database to review data completeness. After data validation for completeness, Oklahoma uses the Early Childhood Technical Assistance Center (ECTA) COS Calculator to convert the raw data to federal reporting categories included in the Annual Performance Report.

Provide additional information about this indicator (optional)

It is difficult to determine if COVID-19 had an impact on Early Childhood Outcomes in FFY 2019. The data results indicate that children exiting SoonerStart maintained or slightly increased their growth rate and met the state target in all three summary statements (A1, B1, C1). The data indicated that the percentage of children functioning within age expectations at exit did not meet state targets; however, the current year's decrease was not statistically significant.

3 - Prior FFY Required Actions

None

3 - OSEP Response

3 - Required Actions

Indicator 4: Family Involvement

Instructions and Measurement

Monitoring Priority: Early Intervention Services In Natural Environments

Results indicator: 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)

Data Source

State selected data source. State must describe the data source in the SPP/APR.

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.

Instructions

Sampling of families participating in Part C is allowed. When sampling is used, submit a description of the sampling methodology outlining how the design will yield valid and reliable estimates. (See General Instructions page 2 for additional instructions on sampling.)

Provide the actual numbers used in the calculation.

Describe the results of the calculations and compare the results to the target.

While a survey is not required for this indicator, a State using a survey must submit a copy of any new or revised survey with its SPP/APR.

Report the number of families to whom the surveys were distributed.

Include the State's analysis of the extent to which the demographics of the families responding are representative of the demographics of infants, toddlers, and families enrolled in the Part C program. States should consider categories such as race and ethnicity, age of the infant or toddler, and geographic location in the State.

If the analysis shows that the demographics of the families responding are not representative of the demographics of infants, toddlers, and families enrolled in the Part C program, describe the strategies that the State will use to ensure that in the future the response data are representative of those demographics. In identifying such strategies, the State should consider factors such as how the State distributed the survey to families (e.g., by mail, by e-mail, on-line, by telephone, in-person), if a survey was used, and how responses were collected.

States are encouraged to work in collaboration with their OSEP-funded parent centers in collecting data.

4 - Indicator Data

Historical Data

Measure	Baseline	FFY	2014	2015	2016	2017	2018
A	2006	Target>=	92.00%	93.00%	94.00%	95.00%	96.00%
A	95.39%	Data	96.30%	97.46%	98.67%	97.59%	99.31%
B	2006	Target>=	92.00%	93.00%	94.00%	95.00%	96.00%
B	95.31%	Data	94.44%	96.87%	98.23%	99.12%	99.31%
C	2006	Target>=	92.00%	93.00%	94.00%	95.00%	96.00%
C	95.86%	Data	94.44%	96.67%	97.12%	99.67%	97.58%

Targets

FFY	2019
Target A>=	96.00%
Target B>=	96.00%
Target C>=	96.00%

Targets: Description of Stakeholder Input

The ICC, as the primary stakeholder group for Oklahoma's Part C program, extended the FFY 2018 targets to FFY 2019.

FFY 2019 SPP/APR Data

The number of families to whom surveys were distributed	2,764
Number of respondent families participating in Part C	838
A1. Number of respondent families participating in Part C who report that early intervention services have helped the family know their rights	824
A2. Number of responses to the question of whether early intervention services have helped the family know their rights	838
B1. Number of respondent families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs	836
B2. Number of responses to the question of whether early intervention services have helped the family effectively communicate their children's needs	838
C1. Number of respondent families participating in Part C who report that early intervention services have helped the family help their children develop and learn	834
C2. Number of responses to the question of whether early intervention services have helped the family help their children develop and learn	838

Measure	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
A. Percent of families participating in Part C who report that early intervention services have helped the family know their rights (A1 divided by A2)	99.31%	96.00%	98.33%	Met Target	No Slippage
B. Percent of families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs (B1 divided by B2)	99.31%	96.00%	99.76%	Met Target	No Slippage
C. Percent of families participating in Part C who report that early intervention services have helped the family help their children develop and learn (C1 divided by C2)	97.58%	96.00%	99.52%	Met Target	No Slippage

Sampling Question	Yes / No
Was sampling used?	NO

Question	Yes / No
Was a collection tool used?	YES
If yes, is it a new or revised collection tool?	NO
The demographics of the families responding are representative of the demographics of infants, toddlers, and families enrolled in the Part C program.	NO

If not, describe the strategies that the State will use to ensure that in the future the response data are representative of those demographics.

UPDATED: As reported in the description of demographic representation that follows, SoonerStart suspects that the variation between the response pool and child count concerning race is due to the significantly higher response rate from families reporting as Hispanic in the survey versus when registering for SoonerStart. The higher variation between groups is thus a result of willingness to identify as Hispanic, which skews the relative representation of other groups. Furthermore, recent years' efforts to increase Hispanic family responses have been successful, contributing to this group's over-representation.

UPDATED: This past year, the "White or Caucasian" race group was underrepresented in the survey compared to the SoonerStart population. This was partly because of differences in the ways Hispanic families reported ethnicity in the survey versus when registering with SoonerStart. Even so, SoonerStart believes that by increasing the overall response rate for the state, families who identify as White will be more likely to be included in the response pool, since it is the majority of the population in the state. One strategy recently implemented by SoonerStart in increase response rates isto email families upon exiting the program to ask them to respond to the family survey (an active hyperlink was included in the email). This was done because of the inability to hold in-person meetings.

SoonerStart is working to increase the response rate at all sites, ensuring that all parents have an opportunity to respond to the survey. Although all parents are invited to respond, because the response is voluntary, we cannot guarantee that the response pool will ever be perfectly representative (as it could be if we conducted a weighted sample). UPDATED: SoonerStart allows families to respond to the survey through multiple methods (online, via the telephone or on a mailed paper copy), which will continue.

Include the State's analysis of the extent to which the demographics of the families responding are representative of the demographics of infants, toddlers, and families enrolled in the Part C program.

Respondent children's gender, age, and race are compared to those reported and collected in the 2019-2020 Child Count.

As shown in the comparisons below, respondents reported genders for their children that align very closely with the overall child count demographics.

Gender: Survey Respondents%; SoonerStart Child Count %
Female: 34.1%; 36.8%
Male: 63.4%; 63.2%
Prefer Not to Answer: 2.5%; 0.0%
Total: 100.0%; 100.0%

Age Demographics SY 2019-2020

The distribution of respondents' children by age more closely matches the child count distribution this year and is more even than in previous years. Ages 0 to 1 are just slightly under-reported. In recent years, the efforts adopted to increase new clients' responses have increased the percentage of parents of very young children in the response pool.

Age Group: Survey Respondents%; Child Count%; Survey Respondents#, Child Count#
0 to 1: 16.5%; 14.2%; 138; 373
1 to 2: 30.7%; 31.3%; 257; 820
2 to 3: 50.6%; 54.4%; 424; 1426
No Response: 2.3%; 0.0%; 19; 0
Total: 100.0%; 100.0%; 838; 2619

Race Demographics SY 2019-2020

The response pool's racial distribution is not a match to the child count race distribution. Some groups--Native American, "Two or more races," and Hispanic--are over-represented in the response pool, while others are under-represented. There was also a significant percentage difference (15.5 %) of respondents identified as Hispanic as compared to our child count (2.4%). We suspect the current demographic distribution misalignment results from the large difference in families willing to report as "Hispanic" in different venues, skewing the corresponding results for this year. Certainly, our efforts to increase the rate of Hispanic family responses have been successful. SoonerStart is working with sites to ensure that all parents get an opportunity to respond to the survey.

Race/Ethnicity Group: Survey Respondents%; Child Count%; Survey Respondents#, Child Count#
American Indian or Alaska Native: 8.6%; 7.7%; 72; 201
Asian: 1.3%; 2.6%; 11; 67
Black or African American: 6.4%; 8.0%; 54; 210
Hispanic or Latino: 15.5%; 2.4%; 130; 63
Native Hawaiian or Pacific Islander: 0.2%; 0.4%; 2; 10
White or Caucasian: 50.7%; 69.1%; 425; 1810
Two or More Races: 12.6%; 9.9%; 106; 258
Prefer Not to Answer: 3.3%; 0.0%; 28; 0
Total: 100.0%; 100.0%; 838; 2619

Provide additional information about this indicator (optional)

In FFY 2019, SoonerStart worked to increase the family survey response rate in all sites. Staff efforts to ensure families were asked to complete the survey following IFSP meetings and at exit/transition resulted in a 72% increase in family survey distribution. However, the increase in survey responses from the previous year was only 45%. It is suspected that COVID-19 had a significant impact on the number of survey responses received in April, May, and June 2020 (17% of FFY 2019 total).

4 - Prior FFY Required Actions

In the FFY 2019 SPP/APR, the State must report whether its FFY 2019 response data are representative of the demographics of infants, toddlers, and families enrolled in the Part C program, and, if not, the actions the State is taking to address this issue. The State must also include its analysis of the extent to which the demographics of the families responding are representative of the population.

Response to actions required in FFY 2018 SPP/APR

This is addressed in the previous section on the analysis of demographic representation. Oklahoma does not collect family demographic information. However, we can compare the demographics of the children of parents who responded to the Oklahoma population for that age group (0-3). Because the 2019 Family Survey data does not provide a clear indication of "two or more races," we have not included that in our comparison. Thus, the survey responses are not clearly representative of the overall population.

Race Survey Respondents	OK Population 0-3
American Indian or Alaska Native	8.60% 11.49%
Asian/Pacific Islander	1.50% 2.52%
Black or African American	6.40% 11.02%
Hispanic or Latino	15.50% 17.95%
White or Caucasian	50.70% 57.10%
Two or More Races	12.60%
Prefer Not to Answer	3.30%

4 - OSEP Response

4 - Required Actions

In the FFY 2020 SPP/APR, the State must report whether its FFY 2020 response data are representative of the demographics of infants, toddlers, and families enrolled in the Part C program , and, if not, the actions the State is taking to address this issue. The State must also include its analysis of the extent to which the demographics of the families responding are representative of the population.

Indicator 5: Child Find (Birth to One)

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part C / Child Find

Results indicator: Percent of infants and toddlers birth to 1 with IFSPs compared to national data. (20 U.S.C. 1416(a)(3)(B) and 1442)

Data Source

Data collected under section 618 of the IDEA (IDEA Part C Child Count and Settings data collection in the EDFacts Metadata and Process System (EMAPS)) and Census (for the denominator).

Measurement

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

Instructions

Sampling from the State's 618 data is not allowed.

Describe the results of the calculations and compare the results to the target and to national data. The data reported in this indicator should be consistent with the State's reported 618 data reported in Table 1. If not, explain why.

5 - Indicator Data

Historical Data

Baseline Year	Baseline Data
2013	0.81%

FFY	2014	2015	2016	2017	2018
Target >=	0.85%	0.90%	0.86%	0.88%	0.90%
Data	0.79%	0.67%	0.71%	0.80%	0.83%

Targets

FFY	2019
Target >=	0.90%

Targets: Description of Stakeholder Input

The ICC, as the primary stakeholder group for Oklahoma's Part C program, extended the FFY 2018 targets to FFY 2019.

Prepopulated Data

Source	Date	Description	Data
SY 2019-20 Child Count/Educational Environment Data Groups	07/08/2020	Number of infants and toddlers birth to 1 with IFSPs	373
Annual State Resident Population Estimates for 6 Race Groups (5 Race Alone Groups and Two or More Races) by Age, Sex, and Hispanic Origin	06/25/2020	Population of infants and toddlers birth to 1	48,442

FFY 2019 SPP/APR Data

Number of infants and toddlers birth to 1 with IFSPs	Population of infants and toddlers birth to 1	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
373	48,442	0.83%	0.90%	0.77%	Did Not Meet Target	No Slippage

Compare your results to the national data

Oklahoma exhibited a slight decrease in the single-day percentage of children aged 0 to 1 who were receiving EI services on the child count day; however, the decrease did not result in slippage from the previous year. Oklahoma did not meet the Indicator 5 target in FFY 2019. Other states ranged from 0.64 percent served in Kentucky to 7.97 percent in New Hampshire. With a service rate of 0.77 percent, Oklahoma fell in the bottom twenty percent of all states. In FFY 2019, the national average was 1.37%; however, New Hampshire's percentage of children age 0-1 served was 3% higher than the next highest state resulting in a mean 1.5% higher than the state median of 1.22%. However, Oklahoma has narrow eligibility requirements compared to many states, greatly reducing the total pool of children eligible for services. At-risk children are not identified nor served through SoonerStart in Oklahoma. With broader requirements, Oklahoma's number of children birth to one served could approach or exceed the national average.

Provide additional information about this indicator (optional)

Oklahoma's Part C Child Count data for Indicator #5 were collected on December 1, 2019. COVID-19 did not impact these data.

5 - Prior FFY Required Actions

None

5 - OSEP Response

5 - Required Actions

Indicator 6: Child Find (Birth to Three)

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part C / Child Find

Results indicator: Percent of infants and toddlers birth to 3 with IFSPs compared to national data. (20 U.S.C. 1416(a)(3)(B) and 1442)

Data Source

Data collected under IDEA section 618 of the IDEA (IDEA Part C Child Count and Settings data collection in the ED Facts Metadata and Process System (EMAPS)) and Census (for the denominator).

Measurement

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

Instructions

Sampling from the State's 618 data is not allowed.

Describe the results of the calculations and compare the results to the target and to national data. The data reported in this indicator should be consistent with the State's reported 618 data reported in Table 1. If not, explain why.

6 - Indicator Data

Baseline Year	Baseline Data
2013	1.66%

FFY	2014	2015	2016	2017	2018
Target >=	1.65%	1.75%	1.66%	1.68%	1.70%
Data	1.61%	1.75%	1.65%	1.67%	1.73%

Targets

FFY	2019
Target >=	1.70%

Targets: Description of Stakeholder Input

The ICC, as the primary stakeholder group for Oklahoma's Part C program, extended the FFY 2018 targets to FFY 2019.

Prepopulated Data

Source	Date	Description	Data
SY 2019-20 Child Count/Educational Environment Data Groups	07/08/2020	Number of infants and toddlers birth to 3 with IFSPs	2,619
Annual State Resident Population Estimates for 6 Race Groups (5 Race Alone Groups and Two or More Races) by Age, Sex, and Hispanic Origin	06/25/2020	Population of infants and toddlers birth to 3	149,364

FFY 2019 SPP/APR Data

Number of infants and toddlers birth to 3 with IFSPs	Population of infants and toddlers birth to 3	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
2,619	149,364	1.73%	1.70%	1.75%	Met Target	No Slippage

Compare your results to the national data

In FFY 2019, Oklahoma improved the single-day percentage of children aged 0 through 2 who were receiving EI services on the child count day and met the state target. Other states ranged from 0.96 percent served in Arkansas to 10.59 percent in Massachusetts. With a service rate of 1.75 percent, Oklahoma continues to be second to last among all states. In FFY 2019, the national average was 3.70%, and the state median was 3.43%. Oklahoma has narrow eligibility requirements compared to many states, greatly reducing the total pool of children eligible for services. At-risk children are not identified nor served through SoonerStart in Oklahoma. With broader requirements, Oklahoma's number of children birth through two served could approach or exceed the national average.

Provide additional information about this indicator (optional)

Oklahoma's Part C Child Count data for Indicator #6 were collected on December 1, 2019. COVID-19 did not impact these data.

6 - Prior FFY Required Actions

None

6 - OSEP Response

6 - Required Actions

Indicator 7: 45-Day Timeline

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part C / Child Find

Compliance indicator: 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)

Data Source

Data to be taken from monitoring or State data system and must address the timeline from point of referral to initial IFSP meeting based on actual, not an average, number of days.

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 meeting was required to be conducted)] times 100.

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

Instructions

If data are from State monitoring, describe the method used to select EIS programs for monitoring. If data are from a State database, describe the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period) and how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Targets must be 100%.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data and if data are from the State's monitoring, describe the procedures used to collect these data. Provide actual numbers used in the calculation.

States are not required to report in their calculation the number of children for whom the State has identified the cause for the delay as exceptional family circumstances, as defined in 34 CFR §303.310(b), documented in the child's record. If a State chooses to report in its calculation children for whom the State has identified the cause for the delay as exceptional family circumstances documented in the child's record, the numbers of these children are to be included in the numerator and denominator. Include in the discussion of the data, the numbers the State used to determine its calculation under this indicator and report separately the number of documented delays attributable to exceptional family circumstances.

Provide detailed information about the timely correction of noncompliance as noted in OSEP's response table for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, methods to ensure correction, and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2019 SPP/APR, the data for FFY 2018), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

7 - Indicator Data

Historical Data

Baseline Year	Baseline Data
2005	96.75%

FFY	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%
Data	94.64%	90.94%	96.59%	95.56%	95.40%

Targets

FFY	2019
Target	100%

FFY 2019 SPP/APR Data

Number of eligible infants and toddlers with IFSPs for whom an initial evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline	Number of eligible infants and toddlers evaluated and assessed for whom an initial IFSP meeting was required to be conducted	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
360	628	95.40%	100%	99.84%	Did Not Meet Target	No Slippage

Number of documented delays attributable to exceptional family circumstances

This number will be added to the "Number of eligible infants and toddlers with IFSPs for whom an initial evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline" field above to calculate the numerator for this indicator.

267

What is the source of the data provided for this indicator?

State database

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).

Data were collected during the time period between April 1, 2020 and June 30, 2020 (4th quarter of FFY 2019).

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Program data for this indicator are collected from Oklahoma's Early Intervention online database called EdPlan. EdPlan captures and displays the status and content of the infant or toddler's record at any given period of time. Staff uses the system to create an electronic record for each infant and toddler that enters the program with a referral. For children who are evaluated and determined eligible for an IFSP, the date of the Initial IFSP is entered by the service coordinator in the electronic record. EdPlan allows for a direct flow of information from each local SoonerStart site to OSDE as the lead agency, enabling centralized monitoring and oversight. SoonerStart local site supervisors review the IFSP Timeline Report created in the EdPlan Database for missing or incomplete data. After local review, the Part C Data Specialist compares dates of initial IFSPs completed during the reporting time period to the 45-day IFSP target date calculated and included on the IFSP Timeline Report. Any initial IFSPs identified as non-compliant are verified by reviewing the child's electronic record in EdPlan. Delays attributed to Exceptional Family Circumstances are documented in the child's electronic record.

Oklahoma has chosen to utilize initial IFSP data from the fourth quarter (April 1, 2020, to June 30, 2020) to report in the FFY 2019 APR, as it has previously done the past three years. The SoonerStart Part C Data Specialist examined data reported for this time period and compared them to data for the full year (FFY 2019). COVID-19 restrictions on in-person services caused SoonerStart to pause services for a brief period at the end of March 2020. New program procedures for virtual services were quickly developed and implemented, allowing early intervention services to continue in April 2020. Based on the number and percentages of completed initial IFSPs for the entire year, Oklahoma determined that despite COVID-19, the 4th quarter data is representative of all quarters for FFY 2019 APR reporting. All areas of the state, all provider types, and all categories of eligible children are included.

Initial IFSP #	Initial IFSP %			
1st Quarter: 690	25.6%			
2nd Quarter:		745		27.7%
3rd Quarter:			629	23.4%
4th Quarter:			628	23.3%

SoonerStart reported that 267 children did not receive timely initial IFSPs due to exceptional family circumstances. One child did not receive a timely initial IFSP due to staff reasons. Staff reasons include unavailability due to vacation, illness, or scheduling.

Provide additional information about this indicator (optional)

Per OSEP's Q & A document dated July 6, 2020, an "exceptional family circumstances" exception can be applied "when clear circumstances outside the State LA's or EIS provider's control, such as a hurricane, do not permit the underlying activity to occur and thus the child and family are unavailable as a practical matter." In FFY 2019, SoonerStart included the number of documented delays attributable to exceptional family circumstances children whose initial IFSP was delayed due to state or local COVID-19 restrictions outside of SoonerStart's control. In these situations, the Part C Data Specialist verified that the exception was documented in the child's early intervention record. The local site completed the delayed evaluation, assessment, and initial IFSP as soon as possible after the exceptional circumstances were mitigated using virtual technology.

Correction of Findings of Noncompliance Identified in FFY 2018

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
10	10	0	0

FFY 2018 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements

The Part C Data Specialist conducts verification of correction for noncompliance at the site level to ensure that each site is correctly implementing the specific regulatory requirement for all children with developmental delays or disabilities. The Part C Data Specialist ensures that a Site Correction Assurance Statement was submitted by each local site demonstrating less than 100% compliance for timely Initial IFSPs the previous year. He also reviews subsequent data utilizing the 45-Day Timeline Report created in the EdPlan database to ensure the local site demonstrates 100% compliance for the timely development of initial IFSPs. The report pulls the initial IFSP date from the child's electronic record for all children enrolled in the local site and indicates if there were more than 45 calendar days between the IFSP referral date and the Initial IFSP date. The report also includes the reason for the delay documented in the child's record. Records with delays attributed to exceptional family circumstances are considered to be in compliance. If the local site has not demonstrated noncompliance correction within 12 months of a finding, the Part C Data Specialist requires the local site to submit a formal Corrective Action Plan outlining strategies to address obstacles encountered by the site that led to continued noncompliance. For findings issued in FFY 2018, all local SoonerStart sites demonstrated noncompliance correction within 12 months of identification. The SoonerStart Part C Assistant Executive Director supervises the verification process and provides technical assistance to the local sites in conjunction with the Part C Data Specialist. Verification of correction of both child and site-level noncompliance findings is completed according to OSEP Memorandum 09-02.

Describe how the State verified that each individual case of noncompliance was corrected

The Part C Data Specialist is responsible for verifying correction of non-compliance that is identified and reported in the previous fiscal year. For any non-compliance concerning a child-specific requirement that is subject to a timeline requirement, SoonerStart must ensure that the local site has corrected each case of non-compliance no more than 12 months from identification unless the child is no longer enrolled in the SoonerStart program. The Part C Data Specialist verified correction for all Initial IFSPs previously identified as non-compliant by looking at the child's electronic record in the EdPlan database. Verification ensures that the required action has been completed, although late, and that staff has documented the reason for missing the timeline in the child's record. The ten findings of non-compliance for timely initial IFSPs issued in FFY 2018 were verified as corrected within 12 months of identification. Verification of correction of both child and site-level noncompliance findings is completed according to OSEP Memorandum 09-02.

Correction of Findings of Noncompliance Identified Prior to FFY 2018

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

7 - Prior FFY Required Actions

None

7 - OSEP Response

The State reported that it used data from a State database to report on this indicator. The State further reported that it did not use data for the full reporting period (July 1, 2019-June 30, 2020). The State described how the time period in which the data were collected accurately reflects data for infants and toddlers with IFSPs for the full reporting period.

7 - Required Actions

Because the State reported less than 100% compliance for FFY 2019, the State must report on the status of correction of noncompliance identified in FFY 2019 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2020 SPP/APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2019 for this indicator: (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 or provider, consistent with OSEP Memo 09-02. In the FFY 2020 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

If the State did not identify any findings of noncompliance in FFY 2019, although its FFY 2019 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2019.

Indicator 8A: Early Childhood Transition

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Compliance indicator: The 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)

Data Source

Data to be taken from monitoring or State data system.

Measurement

- A. Percent = $[(\# \text{ of toddlers with disabilities exiting Part C who have an IFSP with transition steps and services at least 90 days, and at the discretion of all parties not more than nine months, prior to their third birthday}) \div (\# \text{ of toddlers with disabilities exiting Part C})] \times 100$.
- B. Percent = $[(\# \text{ of toddlers with disabilities exiting Part C where notification (consistent with any opt-out policy adopted by the State) to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services}) \div (\# \text{ of toddlers with disabilities exiting Part C who were potentially eligible for Part B})] \times 100$.
- C. Percent = $[(\# \text{ of toddlers with disabilities exiting Part C where the transition conference occurred at least 90 days, and at the discretion of all parties not more than nine months, prior to the toddler's third birthday for toddlers potentially eligible for Part B}) \div (\# \text{ of toddlers with disabilities exiting Part C who were potentially eligible for Part B})] \times 100$.

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

Instructions

Indicators 8A, 8B, and 8C: Targets must be 100%.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data. Provide the actual numbers used in the calculation.

Indicators 8A and 8C: If data are from the State's monitoring, describe the procedures used to collect these data. If data are from State monitoring, also describe the method used to select EIS programs for monitoring. If data are from a State database, describe the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period) and how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Indicators 8A and 8C: States are not required to report in their calculation the number of children for whom the State has identified the cause for the delay as exceptional family circumstances, as defined in 34 CFR §303.310(b), documented in the child's record. If a State chooses to report in its calculation children for whom the State has identified the cause for the delay as exceptional family circumstances documented in the child's record, the numbers of these children are to be included in the numerator and denominator. Include in the discussion of the data, the numbers the State used to determine its calculation under this indicator and report separately the number of documented delays attributable to exceptional family circumstances.

Indicator 8B: Under 34 CFR §303.401(e), the State may adopt a written policy that requires the lead agency to provide notice to the parent of an eligible child with an IFSP of the impending notification to the SEA and LEA under IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §303.209(b)(1) and (2) and permits the parent within a specified time period to "opt-out" of the referral. Under the State's opt-out policy, the State is not required to include in the calculation under 8B (in either the numerator or denominator) the number of children for whom the parents have opted out. However, the State must include in the discussion of data, the number of parents who opted out. In addition, any written opt-out policy must be on file with the Department of Education as part of the State's Part C application under IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §§303.209(b) and 303.401(d).

Indicator 8C: The measurement is intended to capture those children for whom a transition conference must be held within the required timeline and, as such, only children between 2 years 3 months and age 3 should be included in the denominator.

Indicator 8C: Do not include in the calculation, but provide a separate number for those toddlers for whom the parent did not provide approval for the transition conference.

Indicators 8A, 8B, and 8C: Provide detailed information about the timely correction of noncompliance as noted in OSEP's response table for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, methods to ensure correction, and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2019 SPP/APR, the data for FFY 2018), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

8A - Indicator Data

Historical Data

Baseline Year	Baseline Data
2005	97.82%

FFY	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%
Data	94.14%	96.61%	96.93%	99.51%	96.83%

Targets

FFY	2019
Target	100%

FFY 2019 SPP/APR Data

Data include only those toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has 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. (yes/no)

YES

Number of children exiting Part C who have an IFSP with transition steps and services	Number of toddlers with disabilities exiting Part C	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
400	414	96.83%	100%	99.52%	Did Not Meet Target	No Slippage

Number of documented delays attributable to exceptional family circumstances

This number will be added to the "Number of children exiting Part C who have an IFSP with transition steps and services" field to calculate the numerator for this indicator.

12

What is the source of the data provided for this indicator?

State database

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).

Data were collected during the time period between April 1, 2020 and June 30, 2020 (4th quarter of FFY 2019).

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Program data for this indicator are collected from Oklahoma's Early Intervention online database called EdPlan. EdPlan captures and displays the status and content of the infant or toddler's record at any given period of time. Staff uses the system to create an electronic record for each infant and toddler that enters the program with a referral. The dates of critical transition events are recorded permanently in the electronic record. These dates include the date of LEA notification, the date of the IFSP with transition steps and services initiated, and the date of the TPC with the LEA for children potentially eligible for Part B services. EdPlan allows for a direct flow of information from each local SoonerStart site to OSDE as the lead agency, enabling centralized monitoring and oversight.

The dates of the IFSP with timely transition steps and services completed during the time period reported are entered in the EdPlan records and reviewed by SoonerStart supervisors at each local site. Any data missing or appearing to be incorrect identified using the Transition Timeline Monitoring report created in the EdPlan database is verified by comparing it to the child's electronic record in EdPlan. Delays attributed to Exceptional Family Circumstances are documented in the child's electronic record.

Oklahoma has chosen to utilize transition initiation data from the fourth quarter (April 1, 2020, to June 30, 2020) to report in the FFY 2019 APR, as it has previously done the past three years. Early Intervention records for toddlers with third birthdays between April 1, 2020, and June 30, 2020, were reviewed for timely transition initiation utilizing the EdPlan database. After review by local supervisors, the SoonerStart Part C Data Specialist examined data reported for this time period and compared them to data for the full year (FFY 2019). Based on the number and percentages of children transitioning from SoonerStart at age 3 for the entire year, Oklahoma determined that despite COVID-19, the 4th quarter data is representative of all quarters for FFY 2019 APR reporting.

Children aged out at 3 years of age # Children aged out at 3 years of age %

1st Quarter:	433	27%		
2nd Quarter:			411	25%
3rd Quarter:			375	23%
4th Quarter:			414	25%

Additionally, the 4th quarter results are representative of a full year of the state's data because all areas of the state, all provider types, and all categories of eligible children are included.

SoonerStart reported that 12 children did not receive timely transition steps and services on their IFSP due to exceptional family circumstances. Two children did not receive timely transition steps and services on their IFSP due to staff reasons. Staff reasons include unavailability due to vacation, illness, or scheduling.

Provide additional information about this indicator (optional)

COVID-19 restrictions on in-person services caused SoonerStart to pause services for a brief period at the end of March 2020. New program procedures for virtual services were quickly developed and implemented allowing early intervention services to continue in April 2020. With the use of technology, SoonerStart was able to develop IFSPs with families in a timely manner, including IFSPs with transition steps and services.

Correction of Findings of Noncompliance Identified in FFY 2018

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
10	10	0	0

FFY 2018 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements

The Part C Data Specialist conducts verification of correction for noncompliance at the site level to ensure that each site is correctly implementing the specific regulatory requirement for all children with developmental delays or disabilities. The Part C Data Specialist ensures that a Site Correction Assurance Statement was submitted by each local site demonstrating less than 100% compliance for the timely initiation of transition the previous year. He also reviews subsequent data utilizing the Transition Timeline Monitoring Report created in the EdPlan database to ensure the local site demonstrates 100% compliance for timely completion of transition initiation on the IFSP. The report pulls the transition initiation date entered in the child's electronic record for all children enrolled in each local site, as well as a calculated date for the timeline target based on the child's third birthday. If the transition initiation date occurs after the target timeline date, the report also includes the reason for the delay documented in the child's record. Records with delays attributed to exceptional family circumstances are considered to be in compliance. If the local site has not demonstrated noncompliance correction within 12 months of a finding, the Part C Data Specialist requires the local site to submit a formal Corrective Action Plan outlining strategies to address obstacles encountered by the site that led to continued noncompliance. For findings issued in FFY 2018, all local SoonerStart sites demonstrated noncompliance correction within 12 months of identification. The SoonerStart Part C Assistant Executive Director supervises the verification process and provides technical assistance to the local sites in conjunction with the Part C Data Specialist. Verification of correction of both child and site-level noncompliance findings is completed according to OSEP Memorandum 09-02.

Describe how the State verified that each individual case of noncompliance was corrected

The Part C Data Specialist is responsible for verifying correction of non-compliance that is identified and reported in the previous fiscal year. For any non-compliance concerning a child-specific requirement subject to a timeline requirement, SoonerStart must ensure that the local site has corrected each case of non-compliance no more than 12 months from identification child is no longer enrolled in the SoonerStart program. The Part C Data Specialist verified correction for all transition initiation dates previously identified as non-compliant by looking at the child's electronic record in the EdPlan database. Verification ensures that the required action has been completed, although late, and that staff has documented the reason for missing the timeline in the child's record. The ten findings of non-compliance for timely Transition Steps and Services on the IFSP issued in FFY 2018 were verified as corrected within 12 months of identification. Verification of correction of both child and site-level noncompliance findings is completed according to OSEP Memorandum 09-02.

Correction of Findings of Noncompliance Identified Prior to FFY 2018

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

8A - Prior FFY Required Actions

None

8A - OSEP Response

The State reported that it used data from a State database to report on this indicator. The State further reported that it did not use data for the full reporting period (July 1, 2019-June 30, 2020). The State described how the time period in which the data were collected accurately reflects data for infants and toddlers with IFSPs for the full reporting period.

8A - Required Actions

Because the State reported less than 100% compliance for FFY 2019, the State must report on the status of correction of noncompliance identified in FFY 2019 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2020 SPP/APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2019 for this indicator: (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 or provider, consistent with OSEP Memo 09-02. In the FFY 2020 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

If the State did not identify any findings of noncompliance in FFY 2019, although its FFY 2019 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2019.

Indicator 8B: Early Childhood Transition

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Compliance indicator: The 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)

Data Source

Data to be taken from monitoring or State data system.

Measurement

- A. Percent = $\left[\frac{\text{\# of toddlers with disabilities exiting Part C who have an IFSP with transition steps and services at least 90 days, and at the discretion of all parties not more than nine months, prior to their third birthday}}{\text{\# of toddlers with disabilities exiting Part C}} \right] \times 100$.
- B. Percent = $\left[\frac{\text{\# of toddlers with disabilities exiting Part C where notification (consistent with any opt-out policy adopted by the State) to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services}}{\text{\# of toddlers with disabilities exiting Part C who were potentially eligible for Part B}} \right] \times 100$.
- C. Percent = $\left[\frac{\text{\# of toddlers with disabilities exiting Part C where the transition conference occurred at least 90 days, and at the discretion of all parties not more than nine months, prior to the toddler's third birthday for toddlers potentially eligible for Part B}}{\text{\# of toddlers with disabilities exiting Part C who were potentially eligible for Part B}} \right] \times 100$.

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

Instructions

Indicators 8A, 8B, and 8C: Targets must be 100%.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data. Provide the actual numbers used in the calculation.

Indicators 8A and 8C: If data are from the State's monitoring, describe the procedures used to collect these data. If data are from State monitoring, also describe the method used to select EIS programs for monitoring. If data are from a State database, describe the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period) and how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Indicators 8A and 8C: States are not required to report in their calculation the number of children for whom the State has identified the cause for the delay as exceptional family circumstances, as defined in 34 CFR §303.310(b), documented in the child's record. If a State chooses to report in its calculation children for whom the State has identified the cause for the delay as exceptional family circumstances documented in the child's record, the numbers of these children are to be included in the numerator and denominator. Include in the discussion of the data, the numbers the State used to determine its calculation under this indicator and report separately the number of documented delays attributable to exceptional family circumstances.

Indicator 8B: Under 34 CFR §303.401(e), the State may adopt a written policy that requires the lead agency to provide notice to the parent of an eligible child with an IFSP of the impending notification to the SEA and LEA under IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §303.209(b)(1) and (2) and permits the parent within a specified time period to "opt-out" of the referral. Under the State's opt-out policy, the State is not required to include in the calculation under 8B (in either the numerator or denominator) the number of children for whom the parents have opted out. However, the State must include in the discussion of data, the number of parents who opted out. In addition, any written opt-out policy must be on file with the Department of Education as part of the State's Part C application under IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §§303.209(b) and 303.401(d).

Indicator 8C: The measurement is intended to capture those children for whom a transition conference must be held within the required timeline and, as such, only children between 2 years 3 months and age 3 should be included in the denominator.

Indicator 8C: Do not include in the calculation, but provide a separate number for those toddlers for whom the parent did not provide approval for the transition conference.

Indicators 8A, 8B, and 8C: Provide detailed information about the timely correction of noncompliance as noted in OSEP's response table for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, methods to ensure correction, and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2019 SPP/APR, the data for FFY 2018), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

8B - Indicator Data

Historical Data

Baseline Year	Baseline Data
2005	100.00%

FFY	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%
Data	90.38%	92.34%	92.91%	98.54%	96.15%

Targets

FFY	2019
Target	100%

FFY 2019 SPP/APR Data

Data include notification to both the SEA and LEA

YES

Number of toddlers with disabilities exiting Part C where notification to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services	Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
398	414	96.15%	100%	96.14%	Did Not Meet Target	No Slippage

Number of parents who opted out

This number will be subtracted from the "Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B" field to calculate the denominator for this indicator.

0

Describe the method used to collect these data

Program data for this indicator are collected from Oklahoma's Early Intervention online database called EdPlan. EdPlan captures and displays the status and content of the infant or toddler's record at any given period of time. Staff uses the system to create an electronic record for each infant and toddler that enters the program with a referral. The dates of critical transition events are recorded permanently in the electronic record. These dates include the date of LEA notification, the date of the IFSP with transition steps and services initiated, and the date of the TPC with the LEA for children potentially eligible for Part B services.

Early Intervention staff is required to input the date written notification is sent to the LEA. Using the Transition Timeline Monitoring report created in the EdPlan database, the Part C Data Specialist verifies that the Notification to the LEA occurred and, if past the target date requirement, determines whether the toddler was considered a late referral (referred less than 90 days before the child's third birthday). Suppose the Notification date to the LEA is missing. In that case, the local site supervisor must verify that a copy of a timely LEA notification is on file and enter the date in the EdPlan database. The Oklahoma SEA is notified of toddlers potentially eligible for Part B services through SoonerStart EdPlan, under the SoonerStart MOU with the Oklahoma State Department of Education 619 program. EdPlan allows for a direct flow of information from each local SoonerStart site to OSDE as the lead agency, enabling centralized monitoring and oversight and statewide child find.

Do you have a written opt-out policy? (yes/no)

NO

What is the source of the data provided for this indicator?

State database

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).

Data were collected during the time period between April 1, 2020 and June 30, 2020 (4th quarter of FFY 2019).

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Oklahoma has chosen to utilize transition data from the fourth quarter (April 1, 2020, to June 30, 2020) to report in the FFY 2019 APR, as it has previously done the past three years. Early Intervention records for toddlers with third birthdays between April 1, 2020, and June 30, 2020, were reviewed for timely notification to the LEA utilizing the EdPlan database. The SoonerStart Part C Data Specialist examined data reported for this time period and compared them to data for the full year (FFY 2019). Based on the number and percentages of children transitioning from SoonerStart at age 3 for the entire year, Oklahoma determined that the 4th quarter data is representative of all quarters for FFY 2019 APR reporting.

Children aged out at 3 years of age % Children aged out at 3 years of age %

1st Quarter: 433	27%		
2nd Quarter:		411	25%
3rd Quarter:		375	23%
4th Quarter:		414	25%

Additionally, the 4th quarter results are representative of a full year of the state's data because all areas of the state, all provider types, and all categories of eligible children are included.

SoonerStart does not have an opt-out policy, so no delays affected the timely Notification to the LEA due to exceptional family circumstances. Sixteen children did not have a timely Notification to the LEA due to staff reasons. Staff reasons include unavailability due to vacation, illness, or scheduling.

Provide additional information about this indicator (optional)

Oklahoma does not have an opt-out policy regarding the notification to the LEA. Because parental consent is not required before releasing personally identifiable information (in accordance with IDEA Part C §303.209(b)(1)(i) and (b)(1)(ii)), timely completion of the notification to the SEA and the LEA was not impacted by COVID-19 in FFY 2019.

Correction of Findings of Noncompliance Identified in FFY 2018

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
10	10	0	0

FFY 2018 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements

The Part C Data Specialist conducts verification of correction for noncompliance at the site level to ensure that each site is correctly implementing the specific regulatory requirement for all children with developmental delays or disabilities. The Part C Data Specialist ensures that a Site Correction Assurance Statement was submitted by each local site demonstrating less than 100% compliance for timely notification to the LEA the previous year. He also reviews subsequent data utilizing the Transition Timeline Monitoring Report created in the EdPlan database to ensure the local site demonstrates 100% compliance for timely notification to the LEA. The report pulls the date of the notification to the LEA entered in the child's electronic record for all children enrolled in each local site and a calculated date for the timeline target based on the child's third birthday. If the notification to the LEA occurs after the target timeline date, the report also indicates if the child was a late referral to the SoonerStart program. Children referred less than 90 days before their 3rd birthday are considered late referrals, and the notification to the LEA is not deemed non-compliant due to transmission after the target timeline. Suppose the local site has not demonstrated noncompliance correction within 12 months of a finding. In that case, the Part C Data Specialist requires the local site to submit a formal Corrective Action Plan outlining strategies to address the site's obstacles that led to continued noncompliance. For findings issued in FFY 2018, all local SoonerStart sites demonstrated noncompliance correction within 12 months of identification. The SoonerStart Part C Assistant Executive Director supervises the verification process and provides technical assistance to the local sites in conjunction with the Part C Data Specialist. Verification of correction of both child and site-level noncompliance findings is completed according to OSEP Memorandum 09-02.

Describe how the State verified that each individual case of noncompliance was corrected

The Part C Data Specialist is responsible for verifying correction of non-compliance that is identified and reported in the previous fiscal year. For any non-compliance concerning a child-specific requirement that is subject to a timeline requirement, SoonerStart must ensure that the local site has corrected each case of non-compliance no more than 12 months from identification unless the child is no longer enrolled in the SoonerStart program. The Part C Data Specialist verified correction for all transition initiation dates previously identified as non-compliant by looking at the child's electronic record in the EdPlan database. Verification ensures that the required action has been completed, although late, and that staff has documented the reason for missing the timeline in the child's record. The ten findings of non-compliance for timely Notification to the LEA issued in FFY 2018 were verified as corrected within 12 months of identification. Verification of correction of both child and site-level noncompliance findings is completed according to OSEP Memorandum 09-02.

Correction of Findings of Noncompliance Identified Prior to FFY 2018

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

8B - Prior FFY Required Actions

None

8B - OSEP Response

The State reported that it used data from a State database to report on this indicator. The State further reported that it did not use data for the full reporting period (July 1, 2019-June 30, 2020). The State described how the time period in which the data were collected accurately reflects data for infants and toddlers with IFSPs for the full reporting period.

8B - Required Actions

Because the State reported less than 100% compliance for FFY 2019, the State must report on the status of correction of noncompliance identified in FFY 2019 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2020 SPP/APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2019 for this indicator: (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 or provider, consistent with OSEP Memo 09-02. In the FFY 2020 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

If the State did not identify any findings of noncompliance in FFY 2019, although its FFY 2019 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2019.

Indicator 8C: Early Childhood Transition

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part C / Effective Transition

Compliance indicator: The 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)

Data Source

Data to be taken from monitoring or State data system.

Measurement

- A. Percent = $[(\# \text{ of toddlers with disabilities exiting Part C who have an IFSP with transition steps and services at least 90 days, and at the discretion of all parties not more than nine months, prior to their third birthday}) \div (\# \text{ of toddlers with disabilities exiting Part C})] \times 100$.
- B. Percent = $[(\# \text{ of toddlers with disabilities exiting Part C where notification (consistent with any opt-out policy adopted by the State) to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services}) \div (\# \text{ of toddlers with disabilities exiting Part C who were potentially eligible for Part B})] \times 100$.
- C. Percent = $[(\# \text{ of toddlers with disabilities exiting Part C where the transition conference occurred at least 90 days, and at the discretion of all parties not more than nine months, prior to the toddler's third birthday for toddlers potentially eligible for Part B}) \div (\# \text{ of toddlers with disabilities exiting Part C who were potentially eligible for Part B})] \times 100$.

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

Instructions

Indicators 8A, 8B, and 8C: Targets must be 100%.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data. Provide the actual numbers used in the calculation.

Indicators 8A and 8C: If data are from the State's monitoring, describe the procedures used to collect these data. If data are from State monitoring, also describe the method used to select EIS programs for monitoring. If data are from a State database, describe the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period) and how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Indicators 8A and 8C: States are not required to report in their calculation the number of children for whom the State has identified the cause for the delay as exceptional family circumstances, as defined in 34 CFR §303.310(b), documented in the child's record. If a State chooses to report in its calculation children for whom the State has identified the cause for the delay as exceptional family circumstances documented in the child's record, the numbers of these children are to be included in the numerator and denominator. Include in the discussion of the data, the numbers the State used to determine its calculation under this indicator and report separately the number of documented delays attributable to exceptional family circumstances.

Indicator 8B: Under 34 CFR §303.401(e), the State may adopt a written policy that requires the lead agency to provide notice to the parent of an eligible child with an IFSP of the impending notification to the SEA and LEA under IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §303.209(b)(1) and (2) and permits the parent within a specified time period to "opt-out" of the referral. Under the State's opt-out policy, the State is not required to include in the calculation under 8B (in either the numerator or denominator) the number of children for whom the parents have opted out. However, the State must include in the discussion of data, the number of parents who opted out. In addition, any written opt-out policy must be on file with the Department of Education as part of the State's Part C application under IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §§303.209(b) and 303.401(d).

Indicator 8C: The measurement is intended to capture those children for whom a transition conference must be held within the required timeline and, as such, only children between 2 years 3 months and age 3 should be included in the denominator.

Indicator 8C: Do not include in the calculation, but provide a separate number for those toddlers for whom the parent did not provide approval for the transition conference.

Indicators 8A, 8B, and 8C: Provide detailed information about the timely correction of noncompliance as noted in OSEP's response table for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, methods to ensure correction, and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2019 SPP/APR, the data for FFY 2018), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

8C - Indicator Data

Historical Data

Baseline Year	Baseline Data
2005	99.42%

FFY	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%
Data	90.68%	92.88%	92.94%	95.61%	96.03%

Targets

FFY	2019
Target	100%

FFY 2019 SPP/APR Data

Data reflect only those toddlers for whom the Lead Agency has 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 (yes/no)

YES

Number 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	Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
203	414	96.03%	100%	95.69%	Did Not Meet Target	No Slippage

Number of toddlers for whom the parent did not provide approval for the transition conference

This number will be subtracted from the "Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B" field to calculate the denominator for this indicator.

66

Number of documented delays attributable to exceptional family circumstances

This number will be added to the "Number 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" field to calculate the numerator for this indicator.

130

What is the source of the data provided for this indicator?

State database

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).

Data were collected during the time period between April 1, 2020 and June 30, 2020 (4th quarter of FFY 2019).

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Program data for this indicator are collected from Oklahoma's Early Intervention online database called EdPlan. EdPlan captures and displays the status and content of the infant or toddler's record at any given period of time. Staff uses the system to create an electronic record for each infant and toddler that enters the program with a referral. The dates of critical transition events are recorded permanently in the electronic record. These dates include the date of LEA notification, the date of the IFSP with transition steps and services initiated, and the date of the TPC with the LEA for children potentially eligible for Part B services. EdPlan allows for a direct flow of information from each local SoonerStart site to OSDE as the lead agency, enabling centralized monitoring and oversight.

The Transition Planning Conference (TPC) dates completed during the time period reported are entered in the child's EdPlan record and reviewed by SoonerStart supervisors at each local site. Any data missing or appearing to be incorrect identified using the Transition Timeline Monitoring report created in the EdPlan database is verified by comparing it to the child's electronic record in EdPlan. Delays attributed to Exceptional Family Circumstances are documented in the child's electronic record.

Oklahoma has chosen to utilize TPC data from the fourth quarter (April 1, 2020, to June 30, 2020) to report in the FFY 2019 APR, as it has previously done the past three years. Early Intervention records for toddlers with third birthdays between April 1, 2020, and June 30, 2020, were reviewed for timely TPCs with the LEA utilizing the EdPlan database. After review by local supervisors, the SoonerStart Part C Data Specialist examined data reported for this time period and compared them to data for the full year (FFY 2019). Based on the number and percentages of children transitioning from SoonerStart at age 3 for the entire year, Oklahoma determined that despite COVID-19, the 4th quarter data is representative of all quarters for FFY 2019 APR reporting.

Children aged out at 3 years of age # Children aged out at 3 years of age %

1st Quarter:	433	27%		
2nd Quarter:			411	25%
3rd Quarter:			375	23%
4th Quarter:			414	25%

Additionally, the 4th quarter results are representative of a full year of the state's data because all areas of the state, all provider types, and all categories of eligible children are included.

SoonerStart reported that 130 children did not receive timely Transition Planning Conferences due to exceptional family circumstances. Fifteen children did not receive timely TPCs due to staff reasons. Staff reasons include unavailability due to vacation, illness, or scheduling.

Provide additional information about this indicator (optional)

COVID-19 significantly hindered SoonerStart's efforts to schedule and conduct timely Transition Planning Conferences. Oklahoma schools were closed from late March through April 2020. When re-opened, Part B staff were initially hesitant to schedule transition meetings with SoonerStart while waiting for federal and state guidance on eligibility determination and IEP services. SoonerStart staff attempted to schedule virtual TPCs; however, most families asked to postpone the TPC and the transition process until meetings with the LEA could be held in person. Unfortunately, in June 2020, it became evident that in-person meetings could not be held safely. By that time, the LEAs had protocols to determine Part B eligibility and complete the transition process for SoonerStart children at age 3. SoonerStart staff reached out to families who had earlier declined to continue with the transition process and obtained their agreement to participate in virtual TPC meetings. One-third of all TPCs completed in the 4th quarter of FFY 2019 (the reporting period) were delayed due to exceptional family circumstances caused by the COVID-19 pandemic.

Correction of Findings of Noncompliance Identified in FFY 2018

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
8	8	0	0

FFY 2018 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements

The Part C Data Specialist conducts verification of correction for noncompliance at the site level to ensure that each site is correctly implementing the specific regulatory requirement for all children with developmental delays or disabilities. The Part C Data Specialist ensures that a Site Correction Assurance Statement was submitted by each local site demonstrating less than 100% compliance for timely transition planning conferences (TPCs) the previous year. Subsequent data is also reviewed utilizing the Transition Timeline Monitoring Report created in the EdPlan database to ensure the local site demonstrates 100% compliance for timely TPCs with the LEA.

The report pulls the TPC date entered in the child's electronic record for all children enrolled in each local site, as well as a calculated date for the timeline target based on the child's third birthday. If the TPC date for children potentially eligible for Part B services occurs with the LEA after the target timeline date, the report also includes the reason for delay documented in the child's record. Records with delays attributed to exceptional family circumstances are considered to be in compliance. If the local site has not demonstrated noncompliance correction within 12 months of a finding, the Part C Data Specialist requires the local site to submit a formal Corrective Action Plan outlining strategies to address obstacles encountered by the site that led to continued noncompliance. For findings issued in FFY 2018, all local SoonerStart sites demonstrated noncompliance correction within 12 months of identification. The SoonerStart Part C Assistant Executive Director supervises the verification process and provides technical assistance to the local sites in conjunction with the Part C Data Specialist. Verification of correction of both child and site-level noncompliance findings is completed according to OSEP Memorandum 09-02.

Describe how the State verified that each individual case of noncompliance was corrected

The Part C Data Specialist is responsible for verifying correction of non-compliance that is identified and reported in the previous fiscal year. For any non-compliance concerning a child-specific requirement that is subject to a timeline requirement, SoonerStart must ensure that the local site has corrected each case of non-compliance no more than 12 months from identification unless the child is no longer enrolled in the SoonerStart program. The Part C Data Specialist verified correction for all TPC dates previously identified as non-compliant by looking at the child's electronic record in the EdPlan database. Verification ensures that the required action has been completed, although late, and that staff has documented the reason for missing the timeline in the child's record. The eight findings of non-compliance for timely TPCs with the LEA issued in FFY 2018 were verified as corrected within 12 months of identification. Verification of correction of both child and site-level noncompliance findings is completed according to OSEP Memorandum 09-02.

Correction of Findings of Noncompliance Identified Prior to FFY 2018

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2018 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

8C - Prior FFY Required Actions

None

8C - OSEP Response

The State reported that it used data from a State database to report on this indicator. The State further reported that it did not use data for the full reporting period (July 1, 2019-June 30, 2020). The State described how the time period in which the data were collected accurately reflects data for infants and toddlers with IFSPs for the full reporting period.

8C - Required Actions

Because the State reported less than 100% compliance for FFY 2019, the State must report on the status of correction of noncompliance identified in FFY 2019 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2020 SPP/APR, that it has verified that each EIS program or provider with noncompliance identified in FFY 2019 for this indicator: (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 or provider, consistent with OSEP Memo 09-02. In the FFY 2020 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

If the State did not identify any findings of noncompliance in FFY 2019, although its FFY 2019 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2019.

Indicator 9: Resolution Sessions

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part C / General Supervision

Results indicator: 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)

Data Source

Data collected under section 618 of the IDEA (IDEA Part C Dispute Resolution Survey in the ED Facts Metadata and Process System (EMAPS)).

Measurement

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

Instructions

Sampling from the State's 618 data is not allowed.

This indicator is not applicable to a State that has adopted Part C due process procedures under section 639 of the IDEA.

Describe the results of the calculations and compare the results to the target.

States are not required to establish baseline or targets if the number of resolution sessions is less than 10. In a reporting period when the number of resolution sessions reaches 10 or greater, the State must develop baseline and targets and report them in the corresponding SPP/APR.

States may express their targets in a range (e.g., 75-85%).

If the data reported in this indicator are not the same as the State's 618 data, explain.

States are not required to report data at the EIS program level.

9 - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Select yes to use target ranges.

Target Range not used

Select yes if the data reported in this indicator are not the same as the State's data reported under section 618 of the IDEA.

NO

Prepopulated Data

Source	Date	Description	Data
SY 2019-20 EMAPS IDEA Part C Dispute Resolution Survey; Section C: Due Process Complaints	11/04/2020	3.1 Number of resolution sessions	0
SY 2019-20 EMAPS IDEA Part C Dispute Resolution Survey; Section C: Due Process Complaints	11/04/2020	3.1(a) Number resolution sessions resolved through settlement agreements	0

Targets: Description of Stakeholder Input

Historical Data

Baseline Year	Baseline Data

FFY	2014	2015	2016	2017	2018
Target>=					
Data					

Targets

FFY	2019
Target>=	

FFY 2019 SPP/APR Data

3.1(a) Number resolutions sessions resolved through settlement agreements	3.1 Number of resolutions sessions	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
0	0				N/A	N/A

Provide additional information about this indicator (optional)

Oklahoma did not have any resolution sessions in FFY 2019. The state is not required to set targets until the fiscal year in which ten or more resolution sessions are held.

9 - Prior FFY Required Actions

None

9 - OSEP Response

The State reported fewer than ten resolution sessions held in FFY 2019. The State is not required to provide targets until any fiscal year in which ten or more resolution sessions were held.

9 - Required Actions

Indicator 10: Mediation

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part C / General Supervision

Results indicator: Percent of mediations held that resulted in mediation agreements. (20 U.S.C. 1416(a)(3)(B) and 1442)

Data Source

Data collected under section 618 of the IDEA (IDEA Part C Dispute Resolution Survey in the EDFacts Metadata and Process System (EMAPS)).

Measurement

Percent = $((2.1(a)(i) + 2.1(b)(i)) \text{ divided by } 2.1) \text{ times } 100$.

Instructions

Sampling from the State's 618 data is not allowed.

Describe the results of the calculations and compare the results to the target.

States are not required to establish baseline or targets if the number of mediations is less than 10. In a reporting period when the number of mediations reaches 10 or greater, the State must develop baseline and targets and report them in the corresponding SPP/APR.

States may express their targets in a range (e.g., 75-85%).

If the data reported in this indicator are not the same as the State's 618 data, explain.

States are not required to report data at the EIS program level.

10 - Indicator Data

Select yes to use target ranges

Target Range not used

Select yes if the data reported in this indicator are not the same as the State's data reported under section 618 of the IDEA.

NO

Prepopulated Data

Source	Date	Description	Data
SY 2019-20 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/04/2020	2.1 Mediations held	0
SY 2019-20 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/04/2020	2.1.a.i Mediations agreements related to due process complaints	0
SY 2019-20 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/04/2020	2.1.b.i Mediations agreements not related to due process complaints	0

Targets: Description of Stakeholder Input

Historical Data

Baseline Year	Baseline Data
2005	

FFY	2014	2015	2016	2017	2018
Target>=					
Data					

Targets

FFY	2019
Target>=	

FFY 2019 SPP/APR Data

2.1.a.i Mediation agreements related to due process complaints	2.1.b.i Mediation agreements not related to due process complaints	2.1 Number of mediations held	FFY 2018 Data	FFY 2019 Target	FFY 2019 Data	Status	Slippage
		0				N/A	N/A

Provide additional information about this indicator (optional)

The State reported fewer than ten mediations held in FFY 2019. The State is not required to provide targets until any fiscal year in which ten or more mediations were held.

10 - Prior FFY Required Actions

None

10 - OSEP Response

The State reported fewer than ten mediations held in FFY 2019. The State is not required to provide targets until any fiscal year in which ten or more mediations were held.

10 - Required Actions

Indicator 11: State Systemic Improvement Plan – Part C SSIP Indicator



FFY19_SSSIP_Templat
e_Report.pdf

Overall State APR Attachment



Part C

APR-Certification (sig)

Certification

Instructions

Choose the appropriate selection and complete all the certification information fields. Then click the "Submit" button to submit your APR.

Certify

I certify that I am the Director of the State's Lead Agency under Part C of the IDEA, or his or her designee, and that the State's submission of its IDEA Part C State Performance Plan/Annual Performance Report is accurate.

Select the certifier's role

Designated Lead Agency Director

Name and title of the individual certifying the accuracy of the State's submission of its IDEA Part C State Performance Plan/Annual Performance Report.

Name:

Ginger L. Elliott-Teague

Title:

Director of Data Analysis

Email:

ginger.elliott-teague@sde.ok.gov

Phone:

405-521-4871

Submitted on:

04/23/21 5:20:01 PM

ED Attachments



OK-2021DataRubricP
artC.xlsx



OK-C-Dispute-Resolu
tion-2019-20.pdf



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