

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

Overview of the Annual Performance Report Development:

On September 10, and November 12, 2010, the Department of Economic Security, Arizona Early Intervention Program (DES/AzEIP) presented to the Interagency Coordinating Council (ICC): (a) an overview of available data of the Arizona Early Intervention Program (AzEIP) related to APR indicators, (b) the preliminary analysis of reasons for progress and slippage, (c) the implementation and results of improvement activities, and (d) proposed new and revised improvement activities. In addition, DES/AzEIP discussed its proposed revisions to target data and improvement activities in the Arizona’s State Performance Plan (SPP) to extend the SPP until 2012. DES/AzEIP revised and refined the descriptions of progress and/or slippage and the improvement activities based on stakeholder input and staff planning. Indicator drafts were posted to the DES/AzEIP website for public review and input through January 14, 2011. DES/AzEIP presented the final data and improvement strategies with a verbal description of progress and slippage, to the ICC on January 14, 2011. The ICC voted to certify the APR at that time. The State will post the final APR and SPP on the DES/AzEIP website.

Monitoring Priority: Early Intervention Services In Natural Environments

Indicator 1: Percent of infants and toddlers with Individualized Family Service Plans (IFSP) who receive the early intervention services on their IFSPs in a timely manner.

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

Measurement:

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

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

FFY	Measurable and Rigorous Target
FFY 2009	100%

Actual Target Data for FFY 2009:

84%

Method used to collect data and the procedures used to collect these data: Timely services data were gathered through on site monitoring of child files with an Individualized Family Service Plan (IFSP) that had a new service added between January 1, 2010 and April 30, 2010. (The IFSPs reviewed were initial and annual IFSPs and other IFSP reviews.) Please refer to Indicator 9 for a description of how programs are selected for monitoring.

Arizona’s definition of timely IFSP services: All newly identified IFSP services must be provided within 45 days of the parent’s consent to the IFSP **OR**, if the planned start date is greater than 45 days from the parent’s consent, the service must start on or before the planned start date for that service. The denominator and numerator include children for whom the delay was due to exceptional family circumstances.

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

A. Number of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.	51
B. Total number of infants and toddlers with IFSPs.	61
Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner (Percent = [(b) divided by (a)] times 100).	84%

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

The State did not meet its target and experienced slippage from 97 percent in FFY 2008 to 84 percent in FFY 2009.

The slippage was primarily related to one of the three early intervention programs (EIP) included in the site review. As part of the drill down process during the site review, the monitoring team looked at files and interviewed supervisors and team members to determine that the lack of timely services was limited to one of the EIP’s two core teams. Based on the data gathered, the following contributing factors or root causes emerged: 1) service coordinators (SC) did not fulfill service coordination functions to assist the family in accessing timely IFSP services with the identified team member; and 2) a new team member who did not regularly attend the EIP’s weekly team meetings and did not understand the regulatory requirements of initiating timely services within the required timeframe.

Accounting for untimely services:

- o Sixteen percent (10/61) children had untimely services; that is, new IFSP services did not start within 45 days of the date the parent consented to the IFSP or on the actual planned start date if greater than 45 days from date of consent.
- o The ten non-family reasons for untimely services break down as follows:
 - Nine of the ten system reasons were related to **one** particular EIP and one particular core team within that EIP. Review of files and interviews with staff indicated the service coordinators did not effectively communicate and/or coordinate schedules with other team members to ensure services were provided timely. In addition, five of the nine delay reasons were limited to one particular therapist who was new to the team and did not regularly participate in weekly team meetings where the team members discuss and confirm schedules.
 - One of the ten reasons for delay was due to provider unavailability in a different EIP.
- o Reasons for service not being provided in a timely manner are documented in the child’s record. Site reviews validated and verified the documentation.
- o One of 61 children had a documented delay due to exceptional family circumstance. Exceptional family circumstances are included in both the numerator and the denominator.

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- All children for whom services were untimely did subsequently receive the service and the EIP submitted documentation to the State of actual start dates of services for each child.
- Two findings of noncompliance were made during FFY 2009; correction of these findings will be reported in the FFY 2010 APR.

Improvement Activity	Timeline	Status
Expand implementation of the team-based model and participation-based practices.	Ongoing	<p>AzEIP Technical Assistance & Monitoring Specialists (TAMS)'s training on functional, participation-based IFSP outcomes.</p> <p>AzEIP YouTube videos on functional outcomes – 188 viewers to date and AzEIP Team Based Model and practices – 124 viewers to date.</p> <p>Lunch and Learn statewide conference calls by Dathan Rush and M'Lisa Sheldon on participation based practices.</p>
Gather information from parents about their early intervention experiences and practices that are most and least helpful and use information to identify system strengths, limitations and plans for improvement.	May 2010	<p>DES/AzEIP conducted a survey with the assistance of Data Driven Enterprises, funded by Mountain Plains Regional Resource Center (MPRRC), to a sample of parents in January 2010.</p> <p>Results were reviewed with the ICC's Collaboration and Education Committee where relative strengths and limitations of the survey were identified and the need to improve information for families about the purpose of early intervention was identified.</p> <p>DES/AzEIP organized a workgroup, with parent representation, that created a new, AzEIP Family Rights Handbook.</p>

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<p>Provide targeted and general technical assistance through regional meetings, on-site and phone meetings with AzEIP TAMS and/or DES/AzEIP staff, written guidance/clarification and other strategies. Technical assistance will address:</p> <ul style="list-style-type: none"> • Policies and procedures; • IDEA requirements, including timelines; • Natural environments; • Procedural Rights and Safeguards; • Purpose of early intervention; • Service Coordination; • Coordination across programs during the initial planning process (IPP) IFSP timeline; • Coordination with other funding sources, such as Medicaid and private insurance. 	<p>Ongoing and targeted</p>	<p>Policies and Professionalism Training available throughout the State upon EIP request and ten trainings were held in FFY 2009.</p> <p>Targeted, individualized technical assistance was provided to early intervention programs by AzEIP TAMS based on corrective actions, program improvement implementation of policies and/or procedures.</p>
<p>Identify the reasons that early intervention professionals, by discipline and geographic area, decide to remain in or leave the field of early intervention.</p>	<p>August 2010</p>	<p>Completed. In December 2009, Data Driven Enterprises disseminated a survey with questions to over 500 professionals asking about professional satisfaction. Results identified reasons why professionals stay in the field and areas for improvement.</p>
<p>Enhance and coordinate recruitment and retention with potential partners, such as the Arizona Department of Education (ADE).</p>	<p>Ongoing</p>	<p>State agency partner, First Things First, is providing funding, through nine regional councils throughout the State, loan repayment programs and stipends for early childhood therapists.</p> <p>Worked with DES/Division of Developmental Disabilities (DDD)'s recruitment activities including: (1) streamlining the monthly vendor calls, (2) providing opportunities to problem-solve with the Districts on therapy needs, solutions, and (3) sharing professional development and recruitment needs within an e-bulletin.</p> <p>The AzEIP website was updated to include information for professionals looking for opportunities to work in Arizona, its personnel requirements, and links to the professional licensing boards.</p>

Partner with the universities to infuse information about functional, participation-based early intervention and service coordination into pre-service curricula.	Ongoing	DES/AzEIP and AZEIP TAMS have sought opportunities and/or been invited to present information to students about early intervention practices and employment opportunities; however, aligning preservice curricula with AzEIP policies and practices is daunting endeavor requiring significant, dedicated person-power. See proposed revisions on Page 11 in the Revisions section.
Incorporated herein are the improvement activities from (i) Indicator 2 regarding the AzEIP Standards of Practice; (ii) Indicator 9 regarding revising and implementing General Supervision policies, procedures, tools and forms, root cause analysis, and enforcement and sanctions, and; (iii) Indicator 14 regarding data management, editing and validation, and analysis.		See Improvement Activities (IA) from other Indicators referenced.

Correction of FFY 2008 Findings of Noncompliance (if State reported less than 100% compliance):

Level of compliance (actual target data) State reported for FFY 2008 for this indicator: 97% (32/33 files reviewed.)

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

Demonstrating Correction as outlined in 09-02 Memo

1. Accounting for All Instances of Noncompliance:

- o The State accounted for all instances of noncompliance as identified through on site monitoring of EIPs based on a 5 year cycle.

2. Noncompliance Occurred in One EIP as Follows:

- o FFY 2008
 - a. One EIP had noncompliance identified in 1 of 33 children (97% compliance). One finding of noncompliance was issued. Root causes of the noncompliance included:
 - The level of noncompliance was limited to one child and was due to provider unavailability.

3. To Address the Noncompliance, the State Required the EIP to:

- o Ensure the core team had adequate, full-time equivalent (FTE) across all team members (occupational therapists (OT), physical therapists (PT), speech-language pathologists (SLP), and developmental special instructionists (DSI)) to serve all children in contracted regions.

4. Verification of Correction of FFY 2008 Findings of Noncompliance (either timely or subsequent):

Prong 1: To ensure correction of child-specific noncompliance, the State ensured that the EIP programs initiated the IFSP service for the child, although late by requiring the EIP to submit documentation of the actual start date the service was initiated for the one child who did not receive timely provision of services. The State required the above EIP to submit documentation of the actual date the service was initiated for the child who did not receive timely provision of services.

Prong 2: To ensure the program was correctly implementing the timely service provision requirements (i.e., achieved 100 percent compliance) in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) a subsequent follow up on-site review of child files with IFSPs written between 7/1/09 - 9/30/09 was conducted by the AzEIP TAMS. Review resulted in the program being at 100 percent compliance for timely provision of all IFSP services, indicating the program was implementing the timely service requirements.

Correction of Remaining FFY 2007 Findings of Noncompliance

Level of compliance (actual target data) State reported for FFY 2007 for this indicator: 71% (114/161 files reviewed.)

1. Number of remaining uncorrected FFY 2007 findings of noncompliance noted in OSEP's June 2010, FFY 2008 APR response table for this indicator.	2
2. Number of remaining FFY 2007 findings the State has verified as corrected.	2
3. Number of remaining FFY 2007 findings the State has NOT verified as corrected [(1) minus (2)].	0

Demonstrating Correction as outlined in 09-02 Memo

1. Accounting for All Instances of Noncompliance

- a. The State accounted for all instances of noncompliance as identified through on site monitoring of the EIPs based on a 5 year cycle.

2. Noncompliance Occurred in Three EIPs as Follows:

- a. FFY 2007
 - i. Program A (DDD- Pima County) had noncompliance identified with 59 of 94 IFSPs (63% compliance). One finding of noncompliance was issued. Root causes of the noncompliance included:
 - 1. DDD utilizes a Qualified Vendor (QV) system to procure services. The QV, also known as 557, was designed to allow for family/consumer choice of providers; however it also allows therapists to choose who they will serve. This is a statutory requirement which prevents DDD to require a

therapist to serve any specific area or zip code. As a result, not all children have access to timely provision of services.

2. Limited number of bilingual providers.
 3. Limited number of providers willing to travel to rural areas and or less desirable areas of the County.
 4. Utilizing and accessing medically necessary services available through Medicaid's Early and Periodic Screening, Diagnosis and Treatment (EPSDT) plan.
- ii. Program B (Easter Seals Blake Foundation (ESBF)) had noncompliance identified in 37 of 48 children (77%). One finding of noncompliance was issued. Root causes of the noncompliance included:
1. Determination of the type and frequency of services is based on the level of delay rather than on the family's priorities, resources, the unique strengths and need of the child, and the participation-based outcomes.
 2. Contracts with therapists do not include specific language requiring a therapist to serve a child when the service is identified on an IFSP. The service coordinators may have to call multiple providers before a therapist is identified.
 3. Utilization of available funding sources, such as EPSDT or private insurance, can cause delays when authorizations are not timely.
 4. Team members (contracted therapists) do not ensure that services provided in accordance with planned start date on IFSP. There are no consequences if the services are not timely.
 5. A minimal number of bilingual therapists are available throughout the County.

3. To Address the Noncompliance, the State Required Each EIP to:

- a. Have supervisors and service coordinators participate in quarterly on-site technical assistance visits with the AzEIP TAMS to review IFSPs, procedures for accessing services on the IFSP, and appropriate documentation of service coordination activities.
- b. Participate in technical assistance activities related to developing functional, participation-based outcomes to result in services and supports identified in the IFSP designed to enhance the capacity of the family in promoting their child's participation and engagement in routines, activities, and interactions.
- c. Ensure adequate FTE for all core team members (OT, PT, SLP, DSI and SC) for the contracted county or region.
- d. Review AzEIP policies and procedures, related to service coordination functions and IFSP development and implementation to ensure local procedures are consistent with State procedures.
- e. If necessary, revise and implement local procedures to ensure adherence to AzEIP policies related to service coordination responsibilities in IFSP development, including IFSP team decision making.
- f. When feasible, revise contracts with therapists to include language specifying the therapist will serve children within a specific region and initiate services in accordance with the IFSP.
- g. Continue recruitment efforts for difficult to serve areas and Spanish speaking families.

4. Verification of Correction of FFY 2007 Findings of Noncompliance (either timely or subsequent):

Prong 1: To ensure correction of child-specific noncompliance, the State ensured that the EIP programs initiated the IFSP service for each child, although late (unless the child was no longer within the jurisdiction of the EIP) by requiring the EIP to submit documentation of the actual start date the service was initiated for each child who did not receive timely provision of services. The

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State required the EIPs to submit documentation of the actual date the service was initiated for the children who did not receive timely provision of services.

Prong 2: To ensure the program was *correctly* implementing the timely service provision requirements (i.e., achieved 100 percent compliance) in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) a subsequent follow-up on-site review of child files with IFSPs written between 3/1/10-4/30/10 was conducted by the AzEIP TAMS. This review resulted in the EIP being at 100 percent compliance (23/23 files reviewed) for timely provision of all IFSP services indicating the program was implementing the timely service requirements.

Correction of Remaining FFY 2004 Findings of Noncompliance Not Timely Corrected

5. Number of remaining FFY 2004 findings of noncompliance noted in OSEP's June 1, 2009, FFY 2007 APR response table for this indicator.	1
6. Number of remaining FFY 2004 findings the State has verified as corrected.	0
7. Number of remaining FFY 2004 findings the State has NOT verified as corrected [(1) minus (2)].	1

Discussion of Remaining FFY 2004 Findings of Noncompliance Not Timely Corrected

DDD Maricopa County: Review of data (two files per service coordinator) for IFSPs with a new service(s) Written on the IFSP between 7/1/10 - 11/15/10.

33% or twenty three (23) of the seventy (70) IFSPs with a new service written during July 1, 2010-October 15, 2010 resulted in infants and toddlers receiving all IFSP services in a timely manner.

The breakdown of the data by the 7 DDD unit offices in Maricopa County

Unit	IFSPs Reviewed	IFSPs with All Services Provided Timely	IFSPs with All Services Not Timely	Reason for Delay		Total Timely w/Family circumstance	% Timely
				Family	System		
A	11	3	8	0	8	3	27.3%
B	11	4	7	0	7	4	36.4%
C	13	4	9	0	9	4	30.8%
D	8	3	5	2	3	5	62.5%
E	13	5	8	0	8	5	38.5%
F	14	2	12	0	12	2	14.3%
	70	21	49	2	47	23	32.9%

A: Avondale, B:Black Canyon, C: Clarendon, D: Gilbert, E: Peoria, and F: Southwest

Accounting for untimely services:

Of the twenty-three children out of seventy (70) who received all of their IFSPs in a timely manner, two (2) were delayed due to exceptional family circumstances as documented in the child's file. The two (2) family reasons were included in both the numerator and the denominator in AzEIP's calculation.

Forty seven (47) of the seventy (70) IFSPs that did not include timely provision of services were delayed due to system reasons, primarily provider unavailability.

Drill down of DDD Timely Provision of Services for July - December 2010:

- 1) Qualified Vendor procurement process does not require a provider to serve a child. Providers select where and who they want to serve.
- 2) Lack of clear and consistent written procedures, including timelines and responsibilities, for identifying and accessing providers (therapists).
- 3) Lack of documentation in child's file of actual start dates of services.
- 4) Service coordinators do not consistently utilize tracking systems within focus database.
- 5) In reviewing child files, Unit E service coordinators documented efforts in directly contacting providers to identify availability, which resulted in more timely identification of a provider. However, their services were not the timeliest of all units. This may be a result of the provider not being aware of when the service needed to start to be considered timely.
- 6) During the timeframe the data was collected several of the DDD units were very low in staff and/or recently hired new staff to help reduce the caseloads. While the staff has increased Unit F and D in particular have all brand new service coordinators and two new supervisors.
- 7) Bi-lingual Spanish speaking service coordinators have much higher caseloads and have access to fewer bilingual providers.

Enforcement Actions DES has implemented to address the causes:

- 1) DES/AzEIP is examining DDD's FOCUS data system to determine what data points related to timely services can be collected through the present database, and how the data can be used to conduct root cause analysis, identify underlying contributing causes, and to develop strategies to address the underlying causes.
- 2) DDD is revising the Service Inquiry process/form to include the planned start date for each service so that providers are aware of, and adhere to, providing services in accordance with the State's definition of timely services.
- 3) DDD is implementing a process by which the provider notifies the SC of the actual start date of services and reason for delay, if timelines were not met.
- 4) DES, in its response to OSEP's Verification Visit letter provided assurance that the Department will:
 - comply with the single line of responsibility requirements to administer all early intervention programs consistent with the Individuals with Disabilities Education Act (IDEA) section 635(a)(10)(A) (20 USC §1435(a)(10)(A)) and 34 CFR §303.501(b)(2);
 - provide timely early intervention services to eligible children and their families in all geographical regions in the State through appropriate written methods under IDEA sections 637(a)(2) and 640(b) (20 USC §1437(a) and 20 USC §1440(b)) by (a) modifying DDD's Qualified Vendor system to procure services in a team-based model and (b) amending the DES/AzEIP's contracts to require early intervention services for children and families when the DDD Qualified Vendor network is not available to do so.

Results of the Actions:

- 1) DES/AzEIP is presently working with DDD and the AzEIP Technical Assistance and Monitoring Specialists (TAMS) to determine data points and tracking processes to conduct root cause analysis using Focus database. DES/AzEIP anticipates being able to report results of this action in the May 2011 Special conditions report.
- 2) DES/DDD adopted AzEIP Policies and Procedures as their procedures for children ages birth to three.

APR Template – Part C (4)

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- DES/DDD disseminated an email notifying staff of the revisions to the policies with a link to the AzEIP Policies and Procedures.
 - DES/DDD is in the process of developing, and once approved by AzEIP, will provide technical assistance to ensure the DDD employees, contractors and vendors understand and comply with the AzEIP Policies and Procedures.
- 3) DES/AzEIP is in the process of making amendments to its contracts to require the contractor to provide early intervention services for children and families when the DDD Qualified Vendor network is not available to do so.

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

Statement from the Response Table	State’s Response
State must demonstrate, in the FFY 2009 APR that the one remaining uncorrected noncompliance finding identified in FFY 2007 was corrected.	The State included data to demonstrate that the one remaining finding identified in FFY 2007 was corrected.
State must demonstrate, in the FFY 2009 APR that the one remaining uncorrected noncompliance finding identified in FFY 2004 was corrected.	<p>The State did not demonstrate that the one remaining uncorrected noncompliance finding identified in FFY 2004 was corrected. The State has submitted Assurances, in response to the Verification Visit by the OSEP, that address the persistent and longstanding noncompliance related to timely provision of services.</p> <p>The State is in the process of finalizing Corrective Measures and Remedies for enforcing DDD Compliance and Performance under the Individuals with Disabilities Education Act to be enforced with the support of DES’ Director’s Office.</p>
If the State does not report 100 percent compliance in the FFY 2009 APR, the State must review its improvement activities and revise them, if necessary.	Data for Indicator 1 in FFY 2009 APR is not reported to be at 100 percent compliance. Improvement activities have been reviewed and revised.

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

Improvement Activity	Timeline	Resources
<p>Revise IA, Timeline, and Resources: Gather information from parents about their early intervention experiences and practices that are most and least helpful and use information to identify system strengths, limitations and plans for improvement.</p> <p>Proposed Revision: Revise and Implement the AzEIP Family Survey.</p> <p>Justification: The above Improvement Activity was in reference to one-time snapshot completed by Data Driven Enterprises, funded by MMRPC. Propose a new focus on revising the family survey to be more meaningful and simple to families.</p>	<p>Revise: May 2010</p> <p>To: July 2011</p>	<p>DES/AzEIP staff, AzEIP TAMS, ICC Collaboration and Education Committee.</p>
<p>Revise Timeline and Resources: Identify the reasons that early intervention professionals, by discipline and geographic area, decide to remain in or leave the field of early intervention.</p> <p>Justification: This Improvement Activity entailed a one-time survey of early intervention professionals completed by Data Driven Enterprises, funded by MPRRC.</p>	<p>Revise: August 2010</p> <p>To: January 2012, January 2013</p>	<p>CSPD Coordinator, Agency Partners, ICC Collaboration and Education Committee, and AzEIP TAMS</p>

APR Template – Part C (4)

<p>Revise Timeline and Resources: Identify the reasons that early intervention professionals, by discipline and geographic area, decide to remain in or leave the field of early intervention.</p> <p>Justification To align with extension of SPP using current State resources.</p>	<p>Revise: August 2010</p> <p>To January 2012, 2013</p>	<p>CSPD Coordinator, Agency partners, ICC Collaboration and Education Committee, and AzEIP TAMS</p>
<p>Revise IA and Resources: Partner with the universities to infuse information about functional, participation-based early intervention and service coordination into pre-service curricula.</p> <p>Proposed: Partner with the universities to present and/or make available information about functional, participation-based early intervention and service coordination, and employment opportunities to students.</p> <p>Justification: Given current financial condition in Arizona, and specifically with Institutes of Higher Education, AzEIP proposes changing focus of partnering with universities to promoting awareness of functional, participation-based early intervention practices to university staff and students to build knowledge and relationships.</p>	<p>Revise: Ongoing</p> <p>To: July 2010 and ongoing</p>	<p>CSPD Coordinator, Agency Partners, and AzEIP TAMS</p>

APR Template – Part C (4)

New Improvement Activities	Timelines	Resources
<p>Use survey data to identify strengths, limitations, and opportunities for improvement.</p> <p>Justification: Although the improvement activity was in reference to the above one-time survey, it is still appropriate for proposed new improvement activity.</p>	<p>July 2012</p>	<p>DES/AzEIP staff, Agency Partners, and AzEIP TAMS</p>

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

Overview of the Annual Performance Report Development:

See Overview description in Indicator 1.

Monitoring Priority: Early Intervention Services In Natural Environments

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

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

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

FFY	Measurable and Rigorous Target
FFY 2009	92%

Actual Target Data for FFY 2009: 74%

Source: Arizona Table 2- Report of Program Settings, submitted February 1, 2010. The report includes setting data for all children reported on Table 1, Report of Children Receiving Early Intervention Services in accordance with Part C for 2009.

Calculation used: Home + Community Based / Total= Actual Target Data. [(3972 Home + 24 Community-Based)/5372]

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

- o Billing records were utilized to identify each child's primary service setting for 2009. Changes to AzEIP billing data collection under the team-based model for some programs created new challenges for extracting settings data from billing records. Changes were made to the AzEIP data system in the spring of 2010 and implemented in August 2010, to support the gathering and reporting of settings data from IFSPs during FFY 2010.
- o The report of children receiving their early intervention services in Community-Based settings was under-reported in FFY 2009. Of the 1,376 children reported as served in "Other" settings, an unknown number of these children were served by DES/Division of Developmental Disabilities (DDD) and received their early intervention services in community-based settings. DDD billing data do not include a settings code that is comparable to OSEP's community-based setting; because the DDD setting code for "community based" includes non-natural settings, such as therapy clinics and hospitals,

children reported by DDD as receiving services in community-based settings are reported by DES/AzEIP to OSEP under the “Other” settings category.

- The February 1, 2010, Table 2- Program Settings Report of children receiving their early intervention services in Home or Community-Based settings reflects an undercount of children actually served in those settings.

During the development of this APR, the February 1, 2010 Table 2- Program Settings results were reviewed and analyzed to identify regional or program trends that might account for the slippage in children receiving their services in settings other than home or community-based. AzEIP found no evidence of non-compliance and made no findings related to services in natural environments through the site monitoring process.

DES/AzEIP expected settings performance data to improve for FFY 2009 as a result of the implementation of Phase 2 team-based model contracts. The team based model implemented by AzEIP during 2008-2010 places very strong emphasis on the provision of services in natural environments. Local program invoice data, and file reviews for July 2008 - June 2010 demonstrated very high levels of performance on this measure. Arizona's Table 2 data processing reports for FFY 2009, based on those same local programs, however, produced results showing low levels of performance on this indicator, therefore contradicting the evidence from invoices and file reviews.

Because of this apparent contradiction in results, the data processing code used by AzEIP to compile the February 1, 2010, 618 Table 2- Program Setting report was reviewed by DES Division of Technology Services, Systems and Programming staff, to determine whether the code was accurately identifying settings for individual children. The code review revealed two issues: 1) coding errors converting the old federal settings codes to the new settings in the program databases; and 2) coding errors in assigning a setting code to children served through the team-based model programs. Neither of these errors were related to program practices or data entry error; the errors were embedded in the data program code itself. Adjustments and corrections are being devised for the settings data compilation process for the February 1, 2010 Table 2 Program Settings Report; DES AzEIP hopes to have those adjustments and correction in place before the report due date.

- DES/AzEIP completed Phase 2 implementation of team-based service delivery models in February 2010. This model strongly supports the provision of early intervention services in home and community-based settings. Targeted training and technical assistance was provided to new and continuing local programs, on topics, such as development of functional outcomes for children and families, and providing services in natural environments.

Team-based model monthly invoice reviews conducted by DES/AzEIP staff throughout FFY 2009, included analyzing the invoices for use of non-natural settings for early intervention service delivery. If unusual patterns were noted, the program was contacted, asked to review their use of non-natural settings for those children and ensure that such a setting was justified. If the program's invoices showed an unusual trend in delivering services in non-natural environments, the Technical Assistance and Monitoring Specialists (TAMS) assigned to that program was asked to review selected files with the program, and to provide targeted technical assistance related to addressing child and family IFSP outcomes in natural environments. None of these cases resulted in findings of non-compliance.

Improvement Activities	Timelines	Status
Continued implementation of the AzEIP Standards of Practice for early intervention professionals to support understanding of early intervention in natural environments.	December 2005 with annual trainings and ongoing test options	Ongoing
Provide focused technical assistance to programs that do not comply with natural environments.	December 2005 and ongoing	Incorporated into monitoring site visits
Incorporated herein are the improvement activities from: (i) Indicator 1 regarding expansion of the team-based model and functional, participation-based practices; (ii) Indicator 1 regarding recruitment and retention; (iii) Indicator 9 regarding revising and implementing General Supervision policies, procedures, tools and forms, root cause analysis, and enforcement and sanctions; and (iv) Indicator 14 regarding data management, editing and validation, and analysis.		

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY2010

Improvement Activity	Timeline	Resources
<p>Delete: Provide focused technical assistance to programs that do not comply with natural environments.</p> <p>Replace with: Provide targeted and general technical assistance through regional meetings, on-site and phone meetings with TAMS and/or DES/AzEIP staff, written guidance/clarification and other strategies.</p> <p>Justification: Expands the range or formats in which training and technical assistance can be provided to address compliance and performance.</p>	<p>December 2005 and ongoing</p> <p>June 2011 and ongoing</p>	<p>CQI Coordinators & TAMS</p> <p>DES/AzEIP staff, TAMS and agency partners</p>

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

Overview of the State Performance Plan Development:

See Overview description in Indicator 1.

Monitoring Priority: Early Intervention Services in Natural Environments

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

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

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

Measurement:

Outcomes:

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

Progress categories for A, B and C:

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

Summary Statements for Each of the Three Outcomes (use for FFY 2008-2009 reporting):

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

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

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

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

Arizona adopted the Early Childhood Outcomes Center's (ECO) Child Outcomes Summary Form and renamed it the Child Indicator Summary Form (CISF). Minor adaptations were made to the form to capture necessary demographic information, combine data tables, and change the ratings from numbers to letters so children would not be rated a high or low number. Beginning June 15, 2006, Child Indicator Summary Entry Forms were completed for infants and toddlers who were (i) referred at age 2.6 years or younger, (ii) eligible for AzeIP, and (iii) interested in early intervention. On December 15, 2006, programs began completing exit forms. Exit data are collected for children who exit early intervention after at least six months in early intervention, regardless of the exit reason. The exit rating is determined no earlier than 90 days prior to the child's exit from early intervention.

The child's IFSP team, which includes the family, uses the CISF to summarize data from a variety of sources, including parent report, observation, a broad spectrum tool, other evaluation results, and available records. Arizona has approved certain broad spectrum tools that (i) ensure all areas of development are assessed, and have been cross-walked by the ECO Center. Programs may choose any tool on the following list:

- o The Ounce Scale;
- o Battelle Developmental Inventory, Second Edition;
- o Bayley Scales of Infant Development, Third Edition;
- o Brigance Diagnostic Inventory of Early Development, Second Edition;
- o Carolina Curriculum for Infants and Toddlers with Special Needs, Third Edition;
- o Developmental Assessment of Young Children;
- o Early Learning Accomplishment Profile;
- o Hawaii Early Learning Profile;
- o Infant -Toddler Developmental Assessment Record with Provence Birth-to-Three Developmental Profile;
- o Michigan Early Intervention Developmental Profile, Revised, Vol. 1 and 2; and
- o The Oregon Project for Visually Impaired and Blind Preschool Children Skills Inventory, Sixth Edition.

Target Data and Actual Target Data for FFY 2009:

Summary Statements	Target Data FFY 2009 (% of children)	Actual Target Data FFY 2009 (% of children)
Outcome A: Positive social-emotional skills (including social relationships)		
1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they exited the program.	62%	65%
2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program.	57%	64%

Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)		
1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program.	71%	73%
2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program.	49%	57%
Outcome C: Use of appropriate behaviors to meet their needs		
1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they exited the program.	71%	75%
2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program.	52%	56%

Progress Data for Part C Children FFY 2009

A. Positive social-emotional skills (including social relationships):	Number of children	% of children
a. Percent of infants and toddlers who did not improve functioning.	30	4%
b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers.	155	19%
c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach.	114	14%
d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers.	230	28%
e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers.	296	36%
Total	825	100%
B. Acquisition and use of knowledge and skills (including early language/communication):	Number of children	% of children
a. Percent of infants and toddlers who did not improve functioning.	20	2%
b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers.	155	19%
c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach.	183	22%
d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers.	300	36%
e. Percent of infants and toddlers who maintained	167	20%

functioning at a level comparable to same-aged peers.		
Total	825	100%
C. Use of appropriate behaviors to meet their needs:	Number of children	% of children
a. Percent of infants and toddlers who did not improve functioning.	24	3%
b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers.	139	17%
c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach.	187	23%
d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers.	305	37%
e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers.	170	21%
Total	825	100%

Discussion of Data: Arizona met its target for FFY 2009. Data in all summary statements improved from FFY 2008.

Quality of Services: Despite Arizona's narrow eligibility, Arizona's data demonstrate that between 65-75 percent of the children in the program substantially increased their rate of growth by the time they turned three or exited the program. Between 56-64 percent of the children were functioning within age expectations by the age of three years or at the time of exit.

DES/AzEIP reviewed the child outcome data by program. For all but one program, data generally followed the State's pattern for the child outcomes. That program, which serves the largest number of children in early intervention, had data ranging from 7 to 22 percentage points below the State's actual data. DES/AzEIP has been provided technical assistance to address both data and program quality with this program. For the majority of the remainder of the State early intervention programs, the Team-Based Model has been implemented. Although child outcome data is still new, it is hypothesized that this model is improving child outcomes for children and families in the State.

Quality of Data: Due to database identification errors during the conversion to new contracts during FFY 2009, the number of children for whom data were available is underrepresented. Data programmers are in the process of correcting the matching of children entering and exiting to correct the error.

DES/ADES/AzEIP compared a sample of paper forms from different regions with database entries to ensure accuracy of the data. DES/AzEIP also identified "impossible" errors in the data where additional technical assistance was then provided to programs by the AzEIP TAMS and data corrections made. DES/AzEIP identified one program with inconsistent completion of the forms during the reporting period. TAMS follow-up was made and review of forms undertaken.

Representativeness of Data:

Ethnicity	618 Data	AZ Child Outcome Data	+/-
American Indian	6%	6%	
Asian or Pacific Islander	2%	2%	
Black or African American	5%	3%	-2
Hispanic or Latino	37%	28%	-9
White	50%	61%	+11

Gender	618 Data	AZ Child Outcome Data	
Female	35%	35%	
Male	65%	65%	

The State's child outcome data for ethnicity are generally representative of the ethnicity of the children served in the program per the State's 618 data, except there is a 10 and 11 point difference for Hispanic and White, respectively. DES/AzEIP reviewed the ethnicities of the children who could not be entered due to one program's failure to consistently complete the forms. The ethnicity percentages would not change if these children had been included in the data. One reason for the difference may be connected to the fact that 47 percent of the children who exited early intervention due to "attempts to contact unsuccessful" were Hispanic. (See AzEIP 618 data.) Because programs complete the CISF with the family, if the early intervention team had no contact for an extended period of time, they do not complete exit forms because recent developmental information is not available. Although 618 data are for a different date range, this difference has been consistent for the last 3 reporting periods.

Additional activities will be undertaken to determine if there is a means to increase representation for the CISF for children who are Hispanic.

The State's percentage of child outcome data by gender is close in representation to the gender of children served by the program. As to geographic representation, child outcome data were received from 14 of the 15 counties in Arizona. The one county without representation, La Paz, did not have any children exiting the program who were in early intervention for at least 6 months.

Integrated Monitoring Activities Data: DES/AzEIP reviewed program data from the remainder of Cycle 1 programs monitored for the child outcome related requirements during FFY 2009. Data reflect 100 percent performance on the related items. The related requirements for Indicator 3 are included in the new AzEIP Program Self-Reports, and this data will be reported in FFY 2010.

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

Progress was made in all areas of the child outcomes from FFY 2008 data. To improve the quality of the data, a YouTube video was created on the topic of Child Indicators (Child Outcomes) with 110 viewers to date. One area the video addressed was a specific data error made by rating teams. Focused, onsite TA was also provided by the AzEIP TAMS to programs around the State that were identified through the automated database with data errors. The percentage of data errors decreased from FFY 2008 to FFY 2009.

Additional training and technical assistance to improve program services, the following was completed in an effort to affect child outcomes:

- o YouTube video overviews created by the AzEIP Technical Assistance and Monitoring Specialists (TAMS) on the following topics: (1) Functional Outcomes – 118 viewers to date; (2) the AzEIP Team-Based Model – 124 viewers to date; and (3) Service Coordination functions – 144 viewers to date.
- o Lunch and Learn statewide conference calls by Dathan Rush and M'Lisa Sheldon on participation based practices.
- o In-person and telephonic trainings and TA for the new AzEIP Team-Based Model contracts covering nine counties and completing the team-based model implementation for DES/AzEIP contractors. The TA and trainings also included the local programs with the Arizona State Schools for the Deaf and the Blind (ASDB) and the DES/Division of Developmental Disabilities (DDD) to ensure continuity of information across the AzEIP system.
- o Continued support for AzEIP Team-Based Model Contractors through review of quarterly data with the programs.

Improvement Activities	Timelines	Status
DES/AzEIP works closely with AzEIP service-providing agencies to ensure that the necessary data elements needed for the new database are entered into the current data systems. The programs are encouraged to monitor their data system on at least a monthly basis, to ensure accurate and timely data collection.	August 2007 - 2010	DES/AzEIP's focus and results during FFY 2009 supported DES/AzEIP contractors and data processes. FFY 2010 focus is to support DDD and ASDB in data editing and validation processes.
DES/AzEIP is developing a data-handling plan, which includes a regular review (at least bi-annually) of the child indicator data. Through this review, DES/AzEIP will (i) coordinate with the TAMS to provide technical assistance with programs; and (ii) share data with programs for program improvement.	October 2007 – 2010	DES/AzEIP communicated with representatives from DAC and NECTAC for TA on its data handling plan. DAC will return in May 2011 to help evaluate implementation of the integrated monitoring system, and data routines and validations processes.
<p>Provide targeted and general technical assistance through regional meetings, on-site and phone meetings with TAMS and/or DES/AzEIP staff, written guidance/clarification and other strategies. Technical assistance will address:</p> <ul style="list-style-type: none"> • policies and procedures; • IDEA requirements, including timelines; and • child outcomes and completion of the Child Indicator Summary Form. 	January 2008 and ongoing	Ten Policies and Professionalism trainings were held throughout the State. Focused TA and training were provided in responses to identified areas of need from AzEIP's integrated monitoring activities. New team-based model contracts were awarded in FY 2009 and direct TA and training provided to those contractors related to improving outcomes for children and families through the team-based model. Both ASDB and DDD local programs were invited to these trainings. For current TBM contractors, meetings (both telephonic and in-person) were held at least quarterly.
Provide technical assistance and training to programs during targeted regional meetings regarding improving child outcomes through program improvement activities.	July 2008 and ongoing	See Status directly above.
DES/AzEIP will review a random sample of CISFs and compare with the database to reduce errors.	Quarterly beginning June 2008 and ongoing	Completed by comparing a sample of paper forms from different regions with database entries to ensure accuracy.
DES/AzEIP to review policies and procedures and circulate for public comment proposed changes to expand description of purpose and process for child and family outcomes.	July 2009 – July 2010	DES/AzEIP policies were issued for public comment in spring 2009 and subsequently approved by OSEP. Chapter 2, General Supervision describes the indicators in the context of

Improvement Activities	Timelines	Status
		the SPP and APR. Chapter 4, Early Intervention Services discusses the purpose and process for child outcomes in the context of the how and when early intervention supports the child and family.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010

Improvement Activity	Timeline	Resources
DES/AzEIP works closely with AzEIP service-providing agencies to ensure that the necessary data elements needed for the new database are entered into the current data systems. The programs are encouraged to monitor their data system on at least a monthly basis, to ensure accurate and timely data collection.	<p>Revise: August 2007 – 2010</p> <p>To: August 2007 and ongoing</p> <p>Justification: Align with extension of SPP</p>	DES/AzEIP staff, Agency Partners, TAMS
DES/AzEIP is developing a data-handling plan, which includes a regular review (at least bi-annually) of the child indicator data. Through this review, DES/AzEIP will: (i) coordinate with the TAMS to provide technical assistance with programs; and (ii) share data with programs for program improvement.	<p>Revise: October 2007 – 2010</p> <p>To: October 2007 and ongoing</p> <p>Justification: Align with extension of SPP</p>	DES/AzEIP Staff, Agency Partners, TAMS
<p>Delete: Provide technical assistance and training to programs during targeted regional meetings regarding improving child outcomes through program improvement activities.</p> <p>Justification: Duplicative of another improvement activity to provide targeted and general technical assistance to programs.</p>	<p>July 2008 and ongoing</p>	

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

Overview of the Annual Performance Report Development:

See Overview description in Indicator 1.

Monitoring Priority: Early Intervention Services In Natural Environments

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

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

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

Measurement:

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

Target Data and Actual Target Data for FFY 2009:

Target Data and Actual Data	FFY 2009 Target	FFY 2009	
		# Surveys	Actual
A. Know their rights.	91.5%	565	95%
B. Effectively communicate their children's needs.	91.5%	546	94%
C. Help their children develop and learn.	91.5%	566	96%

DES/AzeIP used the NCSEAM 6-point rating scale. The percentage reported for each of the sub-indicators equals the percent of families who rated a "4" or higher.

DES/AzEIP received a total of 578 surveys for all questions; however, not all families rated all questions. This represents a 21 percent increase from the 476 surveys received in FFY 2008. The numbers of surveys received by question used in this indicator are: 565 responses for sub-indicator A; 564 responses for sub-indicator B; and 566 responses for sub-indicator C. By question, the change is: +103 for A, +97 for B and +105 for C.

Representativeness:

Ethnicity	618 Data (2009)	AZ Survey Data	+/-
American Indian	6%	6%	----
Asian or Pacific Islander	2%	1%	-1
Black or African American	5%	3%	-2
Hispanic or Latino	37%	34%	-3
White	50%	56%	+6
Age		Age @ time of survey	
0-1	10%	5%	-5
1-2	32%	30%	-2
2-3	58%	65%	+7

The State's family survey data for ethnicity is generally representative of the ethnicity of the children served in the program per the State's 618 data. Given the State's policy that surveys are handed out after a child and family have been in the program for a year (at the annual IFSP) and at transition, the percentage of surveys received for children birth to one is low and the percentage of children 2-3 years old at the time of the survey is high. Fifteen percent (88/578) of the surveys received for this indicator were in Spanish.

As to geographic representation, DES/AzEIP received surveys from families in all 15 counties in Arizona.

Data from Integrated Monitoring Activities:

In its onsite monitoring of the remaining programs in Cycle 1, DES/AzEIP reviewed (i) Indicator 4 program data and (ii) the dissemination of surveys. All program data were at or above the State's target for this indicator. As for ensuring dissemination of the surveys at the appropriate time, two programs were identified as needing improvement: one program was at 43 percent (3/7 files reviewed) and another was at 78 percent (14/18 files reviewed). This item was included in one program's Program Improvement Plan and was improved within the year. The other program improved the low performance prior to the program improvement plan being finalized, and this item was not included in the plan.

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

The State met its targets for FFY 2009. The data compared to FFY 2008 were mixed in that there was progress for families knowing their rights, slippage for families being able to effectively communicate their children's needs; and no change in helping families help their children develop and learn.

The possible increase and consistency in the two areas could be attributed to DES/AzEIP's improvement activities of revising the IFSP and targeting technical assistance to programs by the AzEIP Technical Assistance and Monitoring Specialists. In addition, the following technical assistance/training was offered:

APR Template – Part C (4)

Arizona
State

- AzEIP maintained statewide implementation of its Policies and Professionalism training (which includes the family survey requirements) as part of the required Standards of Practice required of all AzEIP personnel. Ten trainings were conducted during FFY 2009.
- DES/AzEIP, through its Arizona Staff Development and Training Project, prepared presentations on YouTube covering service coordination, functional outcomes, and the team-based model, which support improved family outcomes.
- DES/AzEIP awarded nine new contracts covering nine counties during FFY 2009. Specific technical assistance and training was provided to these programs and their local partners within the DES/Division of Developmental Disabilities (DDD) and the Arizona State Schools for the Deaf and the Blind (ASDB), as well as, regular follow-up on contract requirements.

All of the above activities support team members to understand their role and responsibilities in early intervention and to better support families and other caregivers to enhance their child's development.

Improvement Activities	Timelines	Status
Provide opportunities for discussion of family outcomes/surveys during targeted regional meetings with programs.	July 2008 - 2010	Ten Policies and Professionalism trainings were held throughout the state. Meetings (both telephonic and in-person) were held with Team-Based Model contractors at least quarterly to review family survey data and/or discussion of service coordination requirements. Focused TA and training were provided in responses to identified areas of need from AzEIP's integrated monitoring activities.
Ongoing review of distribution of family surveys during monitoring activities and follow-up on correction of identified non-compliance.	March 2007 and ongoing	Completed for the remaining programs in Cycle 1 onsite monitoring.
DES/AzEIP is developing a data-handling plan, which includes a regular review (at least bi-annually) of the family survey data. Through this review, DES/AzEIP will provide focused technical assistance.	October 2007 and ongoing	DES/AzEIP communicated with representatives from DAC and NECTAC for TA on its data handling plan. DAC will return in May 2011 to help evaluate implementation of integrated monitoring, and data routines and validations processes.
During annual review of forms, revise IFSP Transition pages to include reminder for family survey dissemination at exit.	July 2009	Completed December 2009.
DES/AzEIP to review policies and procedures and circulate for public comment proposed changes to expand description of purpose and process for child and family outcomes to support family engagement.	July 2009 – July 2010	Policies were issued for public comment in spring 2009 and subsequently approved by OSEP. Chapter 2, General Supervision describes the indicators in the context of the SPP and APR. Chapter 4, Early Intervention Services, discusses the purpose

Improvement Activities	Timelines	Status
		and process for family surveys in the context of the how and when early intervention supports the child and family.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010

Improvement Activity	Timeline	Resources
Provide opportunities for discussion of family outcomes/surveys during targeted regional meetings with programs.	<p>Revise Timeline: July 2008 – 2010</p> <p>To: July 2008 and ongoing</p> <p>Justification: To align with SPP extension.</p>	CQI Coordinators, CSPD Coordinator and TAMS
<p>Revise: Ongoing review of distribution of family surveys during monitoring activities and follow-up on correction of identified non-compliance.</p> <p>To: Ongoing review of program data and distribution of family surveys during monitoring activities and follow-up on correction of identified non-compliance.</p> <p>Justification: Revised activity to align language used for results indicators.</p>	March 2007 and ongoing	CQI Coordinators

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

Overview of the Annual Performance Report Development:

See Overview description in Indicator 1.

Monitoring Priority: Effective General Supervision Part C / Child Find

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

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

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

FFY	Measurable and Rigorous Target
FFY 2009	.77%

Actual Target Data for FFY 2009: .53%

The Arizona Early Intervention Program used the following data sources for completing this indicator:

- o Arizona’s December 1, 2009 Table 1, Report of Infants and Toddlers Receiving Early Intervention Services data reported to OSEP, submitted February 1, 2010;
- o OSEP Table C-13. Percent of infants and toddlers receiving early intervention services Under IDEA, Part C, by Age and State: 2009; and
- o The Arizona Department of Commerce 2000-2009 Composite Population Estimates by age and county.

Comparison to National Data:

	2007 Percentage of population served
National	1.03%
Arizona	.53%

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

- o Arizona’s FFY 2009 actual child count data for infants under one year of age is .53 percent of the population. Arizona did not meet its target of .77 percent for the report year 2009-2010.
- o Child find data were reviewed to identify regional or program trends that might account for the slippage. The analysis did not reveal any changes in referral, eligibility, or IFSP data that would account for slippage in this indicator.

- Analysis of statewide referral data by referral source clearly demonstrates that referrals of infants 0-1 continues to account for at least 30 percent of all referrals to AzEIP, yet children 0-1 account for only 10 percent of children counted by DES/AzEIP on December 1, 2009.
- Analysis of eligibility and IFSP data by age revealed that children 0-1 account for about 39 percent of all children who were evaluated, and 30 percent of all children who had initial IFSPs, yet children 0-1 accounted for only 10 percent of children counted as having an active IFSP on December 1, 2009. This would seem to point to an undercounting of children 0-1 in the annual child count.
- Overall, child count data collection continued to improve during 2008-2009. However, in the spring of 2010 it was determined that data entry for new children was not timely for one large partner agency, resulting in the exclusion of some newly eligible children in the 2009 child count taken on December 1, 2009. It is not known at this time what impact that had on this agency's 0-1 child count.
- The possibility of undercounting of the December 1 count data is further evidenced by the fact that Arizona's cumulative count for October 1, 2008 to September 30, 2009 was 10,429. Assuming a full year 0-3 cohort population estimate of 421,465, Arizona served 2.47 percent of the 0-3 population of the state at some point between October 1, 2008 and September 30, 2009.
- Because the review of child find data did not reveal the underlying causes of the slippage in child counts, further steps were taken to review child-count related data. Since the referral, eligibility and IFSP trends for 2008-2009 did not explain the 2009 child count slippage, the data processing code used to compile the 2009 child count was reviewed and analyzed to determine whether code changes may have resulted in an undercount. In November and December of 2009, AzEIP made data processing code changes, related to contract changes, database changes, and data requirements changes. The code review revealed two issues that did in fact lead to undercounting: one issue was related to initial IFSP dates, and the second issue was related to children who transferred between local early intervention programs. These two code issues resulted in some children with active IFSPs being excluded from the child counts.

Improvement Activities	Timelines	Status
Target public awareness to primary referral sources about referring infants as required by IDEA 2004.	December 2005 and ongoing	Public awareness activities continued throughout FFY 2009, including quarterly trainings to new Child Protective Services staff, and ongoing outreach to local referral sources by the AzEIP contractors.
Track and analyze data related to age of children found eligible for Part C compared to data related to age at referral.	December 2005 and ongoing	Data analyzed in December 2010

APR Template – Part C (4)

Arizona
State

Work in collaboration with NICU nurses and discharge planning teams to: (i) ensure appropriate referrals with required documentation to determine eligibility; and (ii) to support families in the NICU with referral, eligibility, and/or initial IFSP development as appropriate.	July 2008 and ongoing	DES/AzEIP participated with community partners and AzEIP contractors receiving referrals on a grant focusing coordination with NICU staff in Maricopa county. Trainings were conducted and meetings held to establish protocol for referrals from NICUs to AzEIP.
Conduct monthly review of submitted data for completeness and accuracy.	January 2008 and ongoing	Implemented April 2008. Continues monthly.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010

Improvement Activities	Timelines	Resources
<p>Delete: Track and analyze data related to age of children found eligible for Part C compared to data related to age at referral</p> <p>Replace with: Collect, analyze and utilize public awareness and child find data (e.g., referral source data, child demographics, public awareness materials) to guide efforts.</p> <p>Justification: The replacement improvement activity is inclusive of a broader range of data collection and analysis and provides a broader picture of child find.</p>	December 2011, June 2012, and June 2013	DES/AzEIP staff, TAMS and DES Division of Technology Services staff
<p>Delete: Target public awareness to primary referral sources about referring infants as required by IDEA 2004.</p> <p>Replace with: Develop and maintain collaborative partnerships with agencies and organizations that represent primary referral sources</p> <ul style="list-style-type: none"> • Parent organizations; • Early Head Start; • AZ Department of Education and Schools; • AHCCCS; • AZ Academy of Pediatrics; • Child Care; • DES, Division of Children, Youth and Families; and • First Things First. 	<p>Ongoing</p> <p>Ongoing</p>	<p>AzEIP staff, TAMS, and ICC Committees</p>

APR Template – Part C (4)

Arizona
State

<p>Justification: The replacement improvement activity is more comprehensive.</p>		
<p>New Improvement Activities</p>	<p>Timelines</p>	<p>Resources</p>
<p>Incorporated herein are the improvement activities from Indicator 14 regarding data management, editing and validation, and analysis.</p>		

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

Overview of the Annual Performance Report Development:

See Overview description in Indicator 1.

Monitoring Priority: Effective General Supervision Part C / Child Find

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

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

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

FFY	Measurable and Rigorous Target
FFY 2009	1.88%

Actual Target Data for FFY 2009: 1.72%

The Arizona Early Intervention Program used the following data sources for completing this indicator:

- o Arizona’s December 1, 2009 Table 1, Report of Infants and Toddlers Receiving Early Intervention Services data reported to OSEP;
- o OSEP Table C-13. Infants and Toddlers Receiving Early Intervention Services Under IDEA, Part C, by Age and State: Fall 2009; and
- o Arizona Department of Commerce 2000-2009 Composite Population Estimates by age and county.

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

- o Arizona did not meet its target of 1.88 percent for this indicator for report year 2009-2010.
- o County level data review and drill down indicates that despite the statewide slippage, 6 of 15 counties demonstrated progress on this indicator, and 9 of 15 counties met or exceeded the state target of 1.88 percent.
- o Overall child count data collection continued to improve during 2008-2009. However, in the spring of 2010 it was determined that data entry for new children was not timely for one large partner agency, resulting in the exclusion of some newly eligible children in the 2009 child count taken on December 1, 2009.
- o The possibility of undercounting of the December 1 count data is further evidenced by the fact that Arizona’s cumulative count for October 1, 2008 to September 30, 2009 was 10,429. Assuming a full year 0-3 cohort population estimate of 421,465, Arizona served 2.47 percent of the 0-3 population of the state at some point between October 1, 2008 and September 30, 2009.

- o Because the review of child find data did not reveal the underlying causes of the slippage in child counts, further steps were taken to review child-count related data. Since the referral, eligibility and IFSP trends for 2008-2009 did not explain the 2009 child count slippage, the data processing code used to compile the 2009 child count was reviewed and analyzed to determine whether code changes may have resulted in an undercount. In November and December of 2009, AzEIP made data processing code changes, related to contract changes, database changes, and data requirements changes. The code review revealed two issues that did in fact lead to undercounting: one issue was related to initial IFSP dates, and the second issue was related to children who transferred between local early intervention programs. These two code issues resulted in some children with active IFSPs being excluded from the child counts.

Improvement Activities	Timelines	Status
Update Public Awareness Plan		
Revise strategies to identify and inform families of children who: <ul style="list-style-type: none"> • are potentially transient (such as migrant, homeless, and military families); • have premature infants or infants with other physical risk factors; • are involved with the behavioral health and Medicaid system; and • are involved with the child protective system (children are wards of the State). 	January 2006 and ongoing	Completed.
Continue public awareness efforts to primary referrals sources.	December 2005 and ongoing	Public awareness activities continued throughout FFY 2009, including quarterly trainings to new Child Protective Services staff, focused coordination with NICU staff in Maricopa County, and ongoing outreach to local referral sources by the AzEIP contractors.
Monitor and evaluate public awareness efforts and revise plan as needed.	January 2007 and ongoing	Completed this year; revised for FFY 2010 and beyond.
Develop and maintain collaborative efforts with agencies and organizations representing primary referral sources.		
Continue implementation of Child Find IGA with Arizona Department of Education (ADE).	Ongoing	Completed this year with AzEIP Service Providing Agencies and PEAs making cross referrals under the IGA. The Child Find IGA was revised at the end of FFY 2009 and new

Improvement Activities	Timelines	Status
		requirements will be reported in FFY 2010 and beyond.
Continue to develop and implement agreements with Early Head Start, Healthy Families, and tribal early care and education programs that outline child find and public awareness responsibilities and efforts.	Ongoing	AzEIP Service Providing agencies continue to work with their local partners to develop protocol for referrals and ongoing coordination of children and families who are enrolled in multiple programs. Focused, regional trainings to occur in FFY 2010 with AzEIP Service Providing agencies, PEAs, Early Head Start providers, and Head Start providers.
Collect, analyze and utilize public awareness and child find data (e.g., referral source data, child demographics, public awareness materials) to guide efforts.		
Track and analyze public awareness distribution data by county.	December 2005 and annually through 2010	Completed this year; revised for FFY 2010 and beyond
Analyze referral data to identify patterns by county or referral source, including CAPTA, health and medical community, programs serving homeless children, etc.	December 2005 and ongoing	Completed this year; revised for FFY 2010 and beyond
Analyze 618 data to identify patterns by county.	December 2005 and ongoing	Completed this year; revised for FFY 2010 and beyond
Share data analysis findings with regional child find.	December 2005 and ongoing	Discontinued. This activity was not completed; however, DES/AzEIP proposes replacement of this activity with a broader activity to ensure the collection, analysis, and utilization of public awareness and child find data.
Data Collection		
Conduct monthly review of submitted data for completeness and accuracy.	January 2008 and ongoing	Completed this year; revised for FFY 2010 and beyond

Improvement Activities	Timelines	Status
<p>Incorporated herein are the improvement activities from:</p> <ul style="list-style-type: none"> • Indicator # 1 regarding the team-based model. • Indicator # 5. 		<p>Completed this year; revised for FFY 2010 and beyond</p>

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010

Improvement Activities	Timelines	Resources
<p>Delete: Revise strategies to identify and inform families of children who:</p> <ul style="list-style-type: none"> • are potentially transient (such as migrant, homeless, and military families); • have premature infants or infants with other physical risk factors; • are involved with the behavioral health and Medicaid system; and • are involved with the child protective system (children are wards of the State). <p>Replace by incorporating by reference the following IA from Indicator 5:</p> <p>Collect, analyze and utilize public awareness and child find data (e.g., referral source data, child demographics, public awareness materials) to guide efforts.</p> <p>Justification: The replacement improvement activity is inclusive of a broader range of data collection and analysis and provides a broader picture of child find.</p>		
<p>Delete: Monitor and evaluate public awareness efforts and revise plan as needed.</p> <p>Replace by incorporating by reference the following IA from Indicator 5:</p> <p>Collect, analyze and utilize public awareness and child find data (e.g., referral source data, child demographics, public awareness materials) to guide efforts.</p> <p>Justification: The replacement improvement activity is inclusive of a broader range of data collection and analysis and provides a broader picture of child find.</p>		

Improvement Activities	Timelines	Resources
<p>Delete: Continue implementation of Child Find IGA with Arizona Department of Education (ADE).</p> <p>Replace by incorporating by reference the following IA from Indicator 5:</p> <p>Develop and maintain collaborative partnerships with agencies and organizations that represent primary referral sources</p> <ul style="list-style-type: none"> • Parent organizations; • Early Head Start; • AZ Department of Education and Schools; • AHCCCS; • AZ Academy of Pediatrics; • Child Care; • DES, Division of Children, Youth and Families; and • First Things First. <p>Justification: The replacement improvement activity is more comprehensive of the State's child find efforts.</p>		
<p>Delete: Continue to develop and implement agreements with Early Head Start, Healthy Families, and tribal early care and education programs that outline child find and public awareness responsibilities and efforts.</p> <p>Replace by incorporating by reference the following IA from Indicator 5:</p> <p>Develop and maintain collaborative partnerships with agencies and organizations that represent primary referral sources</p> <ul style="list-style-type: none"> • Parent organizations; • Early Head Start; • AZ Department of Education and Schools; • AHCCCS; • AZ Academy of Pediatrics; • Child Care; • DES, Division of Children, Youth and Families; and • First Things First. <p>Justification: The replacement improvement activity is more comprehensive.</p>		

Improvement Activities	Timelines	Resources
<p>Delete: Track and analyze public awareness distribution data by county.</p> <p>Replace by incorporating by reference the following IA from Indicator 5:</p> <p>Collect, analyze and utilize public awareness and child find data (e.g., referral source data, child demographics, public awareness materials) to guide efforts.</p> <p>Justification: The replacement improvement activity is inclusive of a broader range of data collection and analysis and provides a broader picture of child find.</p>		
<p>Delete: Analyze referral data to identify patterns by county or referral source, including CAPTA, health and medical community, programs serving homeless children, etc.</p> <p>Replace by incorporating by reference the following IA from Indicator 5:</p> <p>Collect, analyze and utilize public awareness and child find data (e.g., referral source data, child demographics, public awareness materials) to guide efforts.</p> <p>Justification: The replacement improvement activity is inclusive of a broader range of data collection and analysis and provides a broader picture of child find.</p>		
<p>Delete: Analyze 618 data to identify patterns by county.</p> <p>Replace by incorporating by reference the following IA from Indicator 5:</p> <p>Collect, analyze and utilize public awareness and child find data (e.g., referral source data, child demographics, public awareness materials) to guide efforts.</p> <p>Justification: The replacement improvement activity is inclusive of a broader range of data collection and analysis and provides a broader picture of child find.</p>		
<p>Delete: Share data analysis findings with regional child</p>		

Improvement Activities	Timelines	Resources
<p>find.</p> <p>Replace by incorporating by reference the following IA from Indicator 5:</p> <p>Collect, analyze and utilize public awareness and child find data (e.g., referral source data, child demographics, public awareness materials) to guide efforts.</p> <p>Justification: The replacement improvement activity is inclusive of a broader range of data collection and analysis and provides a broader picture of child find.</p>		
<p>Delete: Conduct monthly review of submitted data for completeness and accuracy.</p> <p>Replace by incorporating by reference the following IA from Indicator 5:</p> <p>Implement system management and documentation procedures to ensure collection and reporting of accurate and timely data, including data collection, editing and validation, and reporting.</p> <p>Justification: The replacement improvement activities are more comprehensive.</p>		

New Improvement Activities	Timelines	Resources
<p>Move child count date from December 1 to October 1.</p>	<p>October 2010</p>	<p>DES AzEIP Staff, DES Division of Technology Services</p>
<p>Incorporated herein are the improvement activities for: (i) Indicator 5, regarding (a) partnerships and agencies that represent primary referral sources, and (b) regarding collection and analysis of public awareness data, and (ii) Indicator 14, regarding data management, editing and validation, and analysis.</p>		

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

Overview of the Annual Performance Report Development:

See Overview description in Indicator 1.

Data for the period April 1 – June 30, 2010 were used to report statewide compliance levels for the 45 day timeline for this APR. The same time frame was used for reporting in the FFY 2008 APR. Timelines are calculated based on the actual number of days from referral to initial IFSP for each eligible child. Calculations include children for whom the State has identified the cause for the delay as family circumstances, as documented in the child’s record

Monitoring Priority: Effective General Supervision Part C / Child Find

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

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

Measurement:

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

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

FFY	Measurable and Rigorous Target
FFY 2009	100%

Actual Target Data for FFY 2009: 85%

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

A. Number of infants and toddlers with IFSPs for whom an evaluation, assessment and an initial IFSP meeting was conducted within Part C’s 45-day timeline.	1029
B. Number of infants and toddlers with IFSPs evaluated and assessed for whom an initial IFSP meeting was required to be conducted.	1214
Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C’s 45-day timeline (Percent = [(b) divided by (a)] times 100).	85%

85% (1029 of 1214) eligible children had an initial IFSP conducted within 45 days of referral. The denominator and numerator include children for whom the delay was due to family circumstances.

The above data were collected from the data system for all children determined eligible during the period April 1 – June 30 2010. This timeframe is representative of data for FFY 2009; new early intervention contracts were implemented in more than half of the States counties in January and February 2010 and the April-June report period reflects the time frame after implementation of the States team-based model contracts.

Accounting for untimely evaluations:

- For the April-June 2010 report period, 97 (1183/1214) of all eligible children had timely evaluations/eligibility conducted within 45 days of referral, when analyzed separate and apart from the timeline for initial IFSP completion.
 - 10 percent (118/1214) of all eligible children had evaluation delays due to family circumstances. These children are included in the numerator and the denominator of AzEIP's calculation.
 - 99 percent of children (1205/1214) had evaluations/eligibility conducted within 60 days of referral.
- 100 percent of children for whom an evaluation was required had an evaluation subsequently completed. AzEIP verified this through review of subsequent data for each child who did not have an evaluation timely completed.
 - Reasons for eligibility/evaluation delay are documented in the child's record and reported in the data system. Periodic reviews of a selection of files validate the data and verify the documentation of the reason for delay.
 - 31 eligible children had untimely evaluations/eligibility; that is, not completed within 45 days of referral. The 31 number does not include children for whom the reason for delay was family circumstances.
- The 31 non-family reasons for evaluation delay break down as follows:
 - 28 due to team issues (e.g., evaluation not scheduled in a timely manner),
 - 1 due to records issues (e.g., not receiving diagnosis information in a timely manner),
 - 2 due to CAPTA issues (e.g., child moved from one foster home to another, delaying evaluation).

Accounting for untimely IFSPs:

- For the April-June 2010 report period, **85 percent (1029/1214)** of eligible children for whom IFSPs were required, had timely IFSPs completed.
 - **94 percent of eligible children for whom IFSPs were required had IFSPs developed within 60 days of referral.**
- 100 percent of children for whom an IFSP was required had an IFSP subsequently completed. AzEIP verified this through review of subsequent data for each child who did not have an evaluation timely completed.
- Reasons for eligibility/evaluation delay are documented in the child's record and reported in the data system. Periodic review of a selection of files validate the data and verify the documentation of the reason for delay.

- 185 eligible children had untimely IFSPs; that is, not completed within 45 days of referral. The 185 does not include children for whom the reason for delay was family circumstances.
- The 185 non-family reasons for IFSP delay break down as follows:
 - a. 170 due to team issues (e.g., IFSP not scheduled in a timely manner),
 - b. 5 due to records issues (e.g., not receiving needed records in a timely manner),
 - c. 7 due to CAPTA issues (e.g., child moved from one foster home to another, delaying evaluation),
 - d. 1 due to unknown reasons.
- Three findings of noncompliance were made during FFY 2009; correction of these findings will be reported on in the FFY 2010 APR.

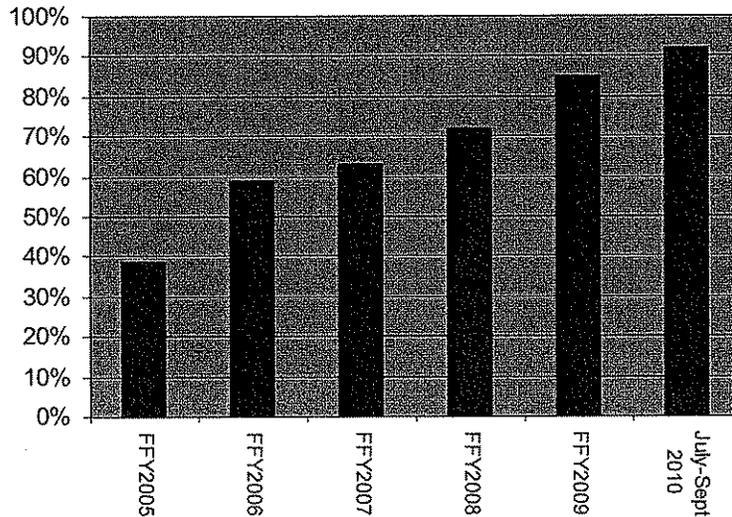
Subsequent data for the period July 1 – September 30, 2010 demonstrate continued progress:

- **98 percent** (1168/1186) of eligible children for whom IFSPs were required had evaluations conducted timely during the July- September 2010 period.
- **92 percent** (1088/1186) of eligible children for whom IFSPs were required, had timely IFSPs during the period July- September 2010.
 - **96 percent** (1140/1186) of eligible children for whom IFSPs were required had IFSPs developed within 60 days of referral.

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

- Although Arizona did not meet its FFY 2007 target of 100 percent, significant progress was made:
 - 85 percent for the fourth quarter of FFY 2009.
 - 72 percent for the fourth quarter of FFY 2008.
 - 63 percent for FFY 2007.
 - 59 percent for FFY 2006.
- Progress continued in the first quarter of FFY2010- Between July 1 – September 30 2010, timely IFSPs were developed for 92 percent of all eligible children requiring IFSPs, and 96 percent of eligible children for whom an IFSP was required had an IFSP developed within 60 days of referral. Continued progress is the result of team-based model contract implementation, technical assistance provided to new contractors, and increased interagency cooperation in timely IFSP development in Maricopa County.

IFSP Timelines FFY2005-2010

Activities that supported progress during FFY 2009:

Arizona awarded new contracts for the team-based model Phase 2 in nine regions. Phase 2 contract implementation began February 1 2010.

Targeted and general TA:

- Phase 2 team-based model contractors were provided training and program-specific technical assistance related to the 45 day timeline requirements.
 - Monthly conference calls were held with new contractors to review current data, discuss challenges, address questions, and develop program-specific improvement strategies.
 - Monthly visits by TAMS included process and file review, and targeted training and technical assistance.
- Phase 1 team-based contractors participated in quarterly or monthly calls with DES AzEIP staff and TAMS. As part of these calls, 45 day timeline data were reviewed for progress or slippage, challenges and questions were addressed, and program-specific improvement strategies were developed.

Drill down of statewide 45 day timeline data for FFY 2009:

- Throughout the FFY 2009 report year, the four programs with continued uncorrected noncompliance were required to submit their 45 day timeline data to DES/AzEIP more frequently. After each submission, the data were reviewed by DES/AzEIP staff, and lists of children exceeding the timelines were compiled and distributed to the program manager and TAMS. The programs were required to review the files of the children with their assigned TAMS, identify the cause of the lack of timeliness, and report on activities to complete the evaluations and IFSPs for those children. By reviewing subsequent data, AzEIP ensured that each child requiring evaluation or IFSP subsequently received them, whether timely or untimely.

- 45 day timeline progress reports were run and returned to each DES AzEIP EIS program in the state at least monthly to ensure that local programs were closely tracking the 45 day timeline for all children, and to enable the State to track statewide progress.
- Beginning November 2009, regional 45 day timeline reports were run for each partner agency (DDD and ASDB) and were sent to regional representatives of those agencies for review and follow up. This activity supported the completion of evaluation and IFSPs for children whose IFSP required interagency collaboration, and resulted in improved timelines for those children during the following months, especially in Maricopa County.
- Local corrective action plans were reviewed in order to identify activities that were successful, and to revise or add new improvement activities as needed. Corrective action plans for newly identified 45 day non-compliance included completion of a root cause analysis as a first step. The results of the root cause analysis were used to identify additional corrective action steps to address the correction of the noncompliance.

Improvement Activities	Timelines	Status
Provide targeted and general technical assistance through Regional meetings, on-site and phone meetings with TAMS and/or DES/AzEIP staff, written guidance/clarification and other strategies. Technical assistance will address: <ul style="list-style-type: none"> ○ Policies and procedures; ○ IDEA requirements, including timelines; ○ Procedural Rights and Safeguards; ○ Service Coordination; ○ Coordination across programs during IPP process IFSP timeline; and ○ Data systems. 	July 2010 and ongoing	DES/AzEIP, AzEIP partner agencies, AzEIP service providing agencies, program and TAMS continued this activity throughout the year.
Drill down of statewide 45 day timeline data will include analysis of timelines for children based on which partner agency will be providing ongoing services after the development of the initial IFSP.	Quarterly beginning November 2009	Began November 2009 and conducted quarterly until June 2010, then monthly thereafter.

Correction of FFY 2008 Findings of Noncompliance (if State reported less than 100% compliance):
 Level of compliance (actual target data) State reported for FFY 2008 for this indicator: 72 %

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

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

D. Number of FFY 2008 findings not timely corrected (same as the number from (3) above).	1
E. Number of FFY 2008 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction").	1
F. Number of FFY 2008 findings <u>not</u> verified as corrected [(4) minus (5)].	

Demonstrating Correction as outlined in 09-02 Memo

1. Accounting for All Instances of Noncompliance:

- A. The State accounted for all instances of noncompliance as identified through local early intervention program data review per monitoring practices in place at that time.
- B. In FFY 2008, Arizona reported statewide 45 day timeline actual target data at 72 percent. The FFY 2008 data included six new local early intervention program contracts that began operations during FFY 2008; these programs' data were included in the statewide data used to compile the 45 day timeline compliance level, but under AzEIP monitoring practices, the data from these programs were not reviewed for purposes of identification of noncompliance until after one year of contract implementation; therefore, findings of noncompliance were not made for these programs during FFY2008. After one year of contract implementation, these programs' data were reviewed for compliance; at that time, each program had either achieved 100 percent compliance with the 45 day timeline or had a finding of non-compliance made at that time.
- C. In addition, four other (not new) programs had less than 100 percent compliance on the 45 day timeline during April-June 2009 but subsequently achieved compliance before a finding of noncompliance was made.

2. Noncompliance Occurred in 1EIP as Follows:

- A. FFY 2008
 - One program had noncompliance identified in 76 children; timely IFSPs were developed for 115/191 = 60% of eligible children requiring IFSPs. One finding of noncompliance was issued. Root causes of the noncompliance included:
 - 45 day timeline requirements not fully understood by all staff involved with evaluations and IFSP development;
 - lack of procedures for tracking open referrals to ensure timely evaluation and IFSP;
 - data entry was not timely and lacked reliable delay reason data.

3. To Address the Noncompliance, the State Required the EIP to:

- A. Develop an approved corrective action plan. The corrective action plan included providing training on evaluation and IFSP development, including timeline requirements, to all staff. The plan also called for the program to develop internal procedures to support the completion of evaluations and IFSP within the 45 day timeline, including a timeline tracking form used by service coordinators and managers, weekly timeline reports, and biweekly file reviews for children exceeding the timeline. Thirdly, the plan called for the

program to revise data entry forms to include delay reason data and make changes to timeframes for data collection and entry to ensure that current information was available for each child.

4. Verification of Correction of FFY 2008 Findings of Noncompliance (either timely or subsequent):

Prong 1: To ensure correction of child-specific noncompliance, the state ensured that the EIP program completed the evaluation and IFSP for each child, although late, by reviewing subsequent data system records for each child who did not receive a timely evaluation and IFSP.

Prong 2: To ensure the program was correctly implementing the timely evaluation and IFSP requirements (i.e., achieved 100 percent compliance) in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a) AzEIP verified that the program timely corrected the 45 day timeline noncompliance through review of 100 percent of one month's subsequent evaluation and IFSP data for that program through the State's data system, and ensuring that each evaluation and IFSP were timely or were delayed due to documented family circumstances. The program achieved 100 percent compliance 15 months after the finding was made.

Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier:

A. Number of remaining FFY 2004 findings of noncompliance noted in OSEP's June 2010, FFY 2008 APR response table for this indicator.	3
B. Number of remaining FFY 2004 findings the State has verified as corrected.	2
C. Number of remaining FFY 2004 findings the State has NOT verified as corrected [(1) minus (2)].	

Demonstrating Correction as outlined in 09-02 Memo

1. Accounting for All Instances of Noncompliance:

A. Three remaining FFY 2004 findings of noncompliance remained uncorrected as of February 2010.

2. Uncorrected Noncompliance Remained as of February 2010 in 3 Early Intervention Programs as Follows:

A. Blake Pima 2a had noncompliance identified in 6 of 68 children; timely IFSPs were developed for 91 percent (62/68 children). Root causes of the continued noncompliance included:

- Individual service coordinator compliance with timelines for evaluations and initial IFSPs varied widely.
- Contract model at that time did not support team-based practices needed to improve timelines.

B. Blake Pima 2b had noncompliance identified in 12 of 128 children; timely IFSPs were developed for 91 percent (116/128 children). Root causes of the continued noncompliance included:

- Individual service coordinator compliance with timelines for evaluations and initial IFSPs varied widely.
 - Contract model at that time did not support team-based practices needed to improve timelines.
- C. Blake Pinal/Gila had noncompliance identified in 23 of 105 children; timely IFSPs were developed for 78 percent (82/105 children). Root causes of the continued noncompliance included:
- Individual service coordinator compliance with timelines for evaluations and initial IFSPs varied widely.
 - Contract model at that time did not support team-based practices needed to improve timelines.

3. To Address the Noncompliance, the State Required the Early Intervention Programs to:

- A. Team-based model contracts were implemented in these regions in February 2010
 - i. Pima 2a and 2b were divided into four smaller regions, 2a, b, c, and d.
- B. Receive training and program-specific technical assistance related to the 45 day timeline requirements under the team-based model
- C. Participate in monthly conference calls to review current data, discuss challenges, address questions, and develop program-specific improvement strategies. As part of these calls, 45 day timeline data were reviewed for progress or slippage, challenges and questions were addressed, and region-specific improvement strategies were developed.
- D. Blake was required to continue to submit data on a semi-monthly basis so that 45 day timelines could be closely tracked. The data were reviewed, analyzed, and follow up was provided to the program supervisors and TAMS.

4. Verification of Correction of FFY 2004 Findings of Noncompliance (either timely or subsequent):

A. Blake Pima 2a was split into Pima 2C and 2D in February 2010:

- **Pima 2C** attained 100 percent compliance (17 of 17 children requiring IFSPs) during **August 2010**.

Prong 1: To ensure correction of child-specific noncompliance, the state ensured that the EIP programs completed the evaluation and IFSP for each child, although late, by reviewing subsequent data system records for each child who did not receive a timely evaluation and IFSP.

Prong 2: To ensure the program was correctly implementing the timely evaluation and IFSP requirements (i.e., achieved 100 percent compliance) in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a) AzEIP verified that the program timely corrected the 45 day timeline noncompliance through review of 100 percent of one month's subsequent evaluation and IFSP data for that program through the State's data system and ensuring that each evaluation and IFSP were timely or were delayed due to documented family circumstances.

- **Pima 2D** attained 100 percent compliance (16 of 16 children requiring IFSPs) during **April 2010**.

Prong 1: To ensure correction of child-specific noncompliance, the state ensured that the EIP programs completed the evaluation and IFSP for each

child, although late, by reviewing subsequent data system records for each child who did not receive a timely evaluation and IFSP.

Prong 2: To ensure the program was correctly implementing the timely evaluation and IFSP requirements (i.e., achieved 100 percent compliance) in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a) AzEIP verified that the program timely corrected the 45 day timeline noncompliance through review of 100 percent of one month's subsequent evaluation and IFSP data for that program through the State's data system and ensuring that each evaluation and IFSP were timely or were delayed due to documented family circumstances.

B. Blake Pima 2b was split into Pima 2A and 2B in February 2010

- **Pima 2A** attained 100 percent compliance (6 of 6 children requiring IFSPs) during **March 2010**.

Prong 1: To ensure correction of child-specific noncompliance, the state ensured that the EIP programs completed the evaluation and IFSP for each child, although late, by reviewing subsequent data system records for each child who did not receive a timely evaluation and IFSP.

Prong 2: To ensure the program was correctly implementing the timely evaluation and IFSP requirements (i.e., achieved 100 percent compliance) in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a) AzEIP verified that the program timely corrected the 45 day timeline noncompliance through review of 100 percent of one month's subsequent evaluation and IFSP data for that program through the State's data system and ensuring that each evaluation and IFSP were timely or were delayed due to documented family circumstances.

- **Pima 2B** attained 100 percent compliance (8 of 8 children requiring IFSPs) during **April 2010**.

Prong 1: To ensure correction of child-specific noncompliance, the state ensured that the EIP programs completed the evaluation and IFSP for each child, although late, by reviewing subsequent data system records for each child who did not receive a timely evaluation and IFSP.

Prong 2: To ensure the program was correctly implementing the timely evaluation and IFSP requirements (i.e., achieved 100 percent compliance) in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a) AzEIP verified that the program timely corrected the 45 day timeline noncompliance through review of 100 percent of one month's subsequent evaluation and IFSP data for that program through the State's data system and ensuring that each evaluation and IFSP were timely or were delayed due to documented family circumstances.

Discussion of 1 Remaining FFY 2004 Findings of Noncompliance Not Timely Corrected

Blake Pinal/Gila: Review of data for all children requiring IFSPs for the period July 1, 2010- Dec 31, 2010:

	Eligibility	IFSP
July 2010	93% (27/29)	76% (22/29)
August 2010	97% (33/34)	79% (27/34)
September 2010	100% (31/31)	81% (25/31)
October 2010	94% (32/34)	76% (26/34)
November 2010	96% (24/25)	92% (23/25)
December 2010	100% (26/26)	88% (23/26)
Total	97% (173/179)	82% (146/179)

Accounting for untimely evaluations:

- o For the July - December 2010 report period, 97 percent (173/179) of all eligible children in the Blake Pinal/Gila program had timely evaluations/eligibility conducted within 45 days of referral, when analyzed separate and apart from the timeline for initial IFSP completion.
 - 15 percent (23/153) of all eligible children had evaluation delays due to family circumstances. These children are included in the numerator and the denominator of AzEIP’s calculation.
 - 98 percent of children (176/179) had evaluations/eligibility conducted within 60 days of referral.
- o 100 percent of children for whom an evaluation was required had an evaluation subsequently completed. AzEIP verified this through review of subsequent data for each child who did not have an evaluation timely completed.
- o Reasons for eligibility/evaluation delay are documented in the child’s record and reported in the data system. Site reviews validate the data and verify the documentation of the reason for delay.
 - 6 eligible children had untimely evaluations/eligibility; that is, not completed within 45 days of referral. This does not include children for whom the reason for delay was family circumstances.
 - The 6 non-family reasons for evaluation delay break down as follows:
 - a. 4 due to team issues (e.g., evaluation not scheduled in a timely manner).
 - b. 2 due to CAPTA issues (e.g., child moved from one foster home to another, delaying evaluation).

Accounting for untimely IFSPs:

- o For the July-December 2010 report period, 82 percent (146/179) of eligible children in the Blake Pinal/Gila program, for whom IFSPs were required, had timely IFSPs completed.
 - 91 percent of eligible children for whom IFSPs were required had IFSPs developed within 60 days of referral.
- o 100 percent children for whom an IFSP was required had an IFSP subsequently completed. AzEIP verified this through review of subsequent data for each child who did not have an evaluation timely completed.
- o Reasons for eligibility/evaluation delay are documented in the child’s record and reported in the data system. AzEIP validates the data and verifies the documentation of the reason for delay through review of selected files.

- 33 eligible children had untimely IFSPs; that is, not completed within 45 days of referral. This does not include children for whom the reason for delay was family circumstances.
- The 30 non-family reasons for IFSP delay break down as follows:
 - a. 31 due to team issues (e.g., IFSP not scheduled in a timely manner).
 - b. 1 due to records issues (e.g., not receiving needed records in a timely manner).
 - c. 1 due to CAPTA issues (e.g., child moved from one foster home to another, delaying evaluation).

Drill down of Pinal/Gila 45 day timeline data for July-December 2010:

- Census data reveal that the Pinal County population of young children grew by 39 percent between 2007 and 2009. The northern and eastern areas of Pinal County now lie within the Phoenix metropolitan area, and these areas experienced rapid growth through the development of new suburban subdivisions. Although the Blake Pinal/Gila program expanded to meet the growing population, the challenge of responding to the rapid growth, in staff as well as client base, has been significant.
- 45 day timeline progress reports were run and returned to the program semi-monthly during FFY 2009 to ensure that the local program was closely tracking the 45 day timeline for all children, and to enable the State to track progress or slippage.
- Regional 45 day timeline reports were run for each partner agency (DDD and ASDB) and were sent to regional representatives of those agencies for review and follow up.
- Timeline reports for each individual service coordinator in this program were run by DES AzEIP in November 2010. The results showed wide variation in timelines, including two service coordinators at less than 54 percent timely IFSPs, to seven service coordinators at 100 percent. The results were provided to the program manager.

Actions Taken if Noncompliance Not Corrected:

Previously initiated corrective action steps continued. Throughout the period, the program was required to submit 45 day timeline data for each child to DES/AzEIP on a semi-monthly basis. After each submission, the data were reviewed by DES/AzEIP staff, and lists of children exceeding the timelines were compiled and distributed to the program manager and TAMS. The program was required to review the files of the children with their TAMS, identify the cause of the lack of timeliness, and report on activities to complete the evaluations and IFSPs for those children. By reviewing subsequent data, AzEIP ensured that each child requiring evaluation or IFSP subsequently received them, whether timely or untimely.

To address delays resulting from interagency collaboration challenges region-wide meetings began in October 2010 with the AzEIP local program contractor, regional DDD staff and supervisors, DES AzEIP monitoring staff, and AzEIP TAMS. These meetings involve review of current and recent sub-regional data related to the 45 day timeline, and identification of intra-and interagency challenges to compliance with timelines for eligibility and initial IFSP development. After identifying specific challenges facing the sub-regions, solutions, including interagency timelines were developed. Meetings will continue on a monthly basis until the issues have been resolved.

Additional Information Required by the OSEP APR Response Table for this Indicator:

Statement from the Response Table	State's Response
<p>State must demonstrate, in the FFY 2009 APR that the State is in compliance with the 45 day timeline requirements in 34 CFR 303.321(e)(1), and 303.342(a).</p> <p>Because the State reported less than 100 percent compliance for FFY 2008, the State must report on the status of correction of noncompliance in the data the State reported for this indicator.</p>	<p>The State included data that demonstrates continued improvement in the 45 day timeline requirements.</p> <p>The State reported on the status of correction of noncompliance.</p>
<p>State must demonstrate, in the FFY 2009 APR that the three remaining uncorrected noncompliance findings identified in FFY 2004 were corrected.</p>	<p>The State included data to demonstrate that two of the three remaining findings identified in FFY 2004 were corrected.</p> <p>The State did not demonstrate that one remaining uncorrected noncompliance finding identified in FFY 2004 was corrected. Progress data and action steps are included in this APR.</p>
<p>If the State does not report 100 percent compliance in the FFY 2009 APR, the State must review its improvement activities and revise them, if necessary.</p>	<p>While considerable progress has been made subsequent to the FFY 2009 report period, and is reported in this APR, the State has not demonstrated 100 percent compliance. Improvement activities have been reviewed, and revised.</p>

Additional Information Required by the June 2010 OSEP Determination Letter for this Indicator

Technical assistance sources from which the State received assistance	Actions the State took as a result of the technical assistance
<p>Regional Resources Center Program, SPP/APR Calendar Website</p>	<p>Reviewed (1) Local Corrective Action Plan, (2) 45 Day Timeline Root Cause Analysis, and (3) Investigative Questions for Part C Indicator 7. As a result, revised the State's 45 Day Timeline Root Cause Analysis tool. The State will also incorporate ideas from the Local Corrective Action Plan and the Investigative Questions.</p>
<p>Data Accountability Center</p>	<p>The State reviewed and revised documentation of data management procedures related to Indicator 7, identified data collection and reporting issues</p>

	impacting the State's ability to timely analyze and monitor 45 day timeline data, and developed strategies to resolve the issues.
OSEP Overlapping Data Meeting	The State revised its' data collection tools, made changes to the data collection system, and revised procedures for utilizing data to identify and ensure correction of noncompliance. The State also began development of training and technical assistance materials that will support local programs in the use of their data for program improvement.
Regional Resource Center Website- Streamlining Eligibility Determination for Part C TA Call	The State incorporated the eligibility decision-making algorithm/process as a corrective action strategy to improve timelines.
M'Lisa Sheldon and Dathan Rush	Provided TA to new team-based model contractors and agency partner staff (DDD) related to improving the efficiency of evaluation and initial IFSP development to meet the 45 day timeline.
NECTAC	The State revised the initial planning paperwork and IFSP form to streamline the process during the 45 day timeline.
OSEP, NECTAC Frequently Asked Questions Document on Transition	The State revised policies to align with the document, which addresses the referral of children within 45 days of the child's third birthday, and provided clarification to local programs.

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

Improvement Activities	Timelines	Revision	Resources
<p>Provide targeted and general technical assistance through Regional meetings, on-site and phone meetings with TAMS and/or DES/AzEIP staff, written guidance/clarification and other strategies. Technical assistance will address:</p> <ul style="list-style-type: none"> o Policies and procedures; o IDEA requirements including timelines, o Procedural Rights and Safeguards; o Service Coordination; o Coordination across 	<p>July 2010 and ongoing</p> <p>Revised timeline:</p> <p>July 2011-2012</p>	<p>DES/AzEIP proposes that T/TA priorities be more clearly defined:</p> <ul style="list-style-type: none"> o Family Rights; o Transition; o Team-based early intervention; o Service Coordination; o Financial Matters, including FCP, Medicaid private insurance; 	<p>DES/AzEIP, AzEIP partner agencies, AzEIP service providing agencies, TAMS, and ICC</p>

APR Template – Part C (4)

<p>programs during IPP process IFSP timeline; and</p> <ul style="list-style-type: none"> ○ Data systems. 		<ul style="list-style-type: none"> ○ Child Indicators/child Indicator Forms; and ○ Data Collection and Reporting Requirements. 	
<p>Drill down of statewide 45 day timeline data will include analysis of timelines for children based on which partner agency will be providing ongoing services after the development of the initial IFSP.</p>	<p>Quarterly beginning November 2009</p> <p>Revised timeline: July 2010 and ongoing</p>	<p>Replace with: Utilize root cause analysis process to identify challenges and barriers to correction of non-compliance.</p>	<p>DES/AzEIP, AzEIP partner agencies, AzEIP service providing agencies, TAMS, and ICC</p>
<p>Review of Regional Resource Center website material for Indicator 7 (45 day timeline).</p>	<p>July-September 2010</p>	<p>New activity</p>	<p>DES AzEIP staff</p>

Part C State Annual Performance Report (APR) for 2009

Overview of the Annual Performance Report Development:

See Overview description in Indicator 1.

Monitoring Priority: Effective General Supervision Part C / Effective Transition

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

- A. IFSPs with transition steps and services;
- B. Notification to the Local Education Agency (LEA), if child potentially eligible for Part B; and
- C. Transition conference, if child potentially eligible for Part B.

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

Measurement:

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

FFY	Measurable and Rigorous Target
2009	100%

Actual Target Data for FFY 2009: 100%

- o 66/66 files reviewed were compliant

Method used to collect data and the procedures used to collect these data:

Included in the calculation for 8A were all files reviewed during the on-site monitoring of three EIPs during May and June 2009. See Indicator 9 for description of how monitoring sites were selected.

The monitoring team reviewed each child’s IFSP Transition Plan and Timeline page to ensure service coordinators completed and documented the transition steps and services in accordance with each child’s age. The State IFSP format includes a written description and space for documentation that appropriate steps and service are taken to support the transition of the child and family in accordance with 34 C.F.R. §303.148.

APR Template – Part C (4)

Arizona
State

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

The State met its target of 100 percent for FFY 2009. The three EIPs demonstrated understanding and adherence to the requirements ensuring appropriate steps and service are taken to support the transition children and families in accordance with 34 C.F.R. §303.148. The Arizona IFSP document provides the structure and format to document discussions related to transition throughout the child's enrollment in AzEIP, and in particular, the steps needed to be taken as the child nears their third birthday.

APR Template – Part C (4)

Arizona
State

Improvement Activities	Timelines	Status
<p>AzEIP and ADE instituted an Alert system to allow local Part C and Part B representatives to notify their State contacts of compliance issues, which were not able to be resolved at the local level.</p>	<p>2007; ongoing Alerts</p>	<p>The Alert system has provided a systematic method for DES/AzEIP and the Arizona Department of Education (ADE) 619 Coordinator to provide TA to their programs that have been unable or unwilling to resolve issues (e.g., notification of potentially eligible children, scheduling of transition conference to occur between 2.6 - 2.9 years) with their local partners.</p> <p>This Alert system is maintained through a data sharing agreement with AzEIP and ADE that enables both the Part C staff and the 619 Coordinator to track and document Alerts in a shared tracking log.</p>
<p>Revise, if needed, the Transition IGA to align with Frequently Asked Questions document issued by OSEP in December 2009.</p>	<p>July 2010</p>	<p>The Transition IGA was revised to align with the Frequently Asked Questions document issued by OSEP in December 2009. Revisions were submitted with the State's Application. AzEIP Transition Policies and Procedures were approved and implemented in September 2010.</p>
<p>Continue annual cross-training on the Transition IGA in collaboration with ADE.</p>	<p>November 2006 and annually through 2010</p>	<p>AzEIP TAMS and the ADE 619 Coordinator focused both individual and cross-training efforts in regions that requested the training, were having trouble resolving issues locally and/or were identified through monitoring data or Alerts as needing focused technical assistance. Cross training occurred on the Navajo Nation, and the border communities of Southern Arizona.</p> <p>AzEIP Continuous Quality Improvement Coordinator and the ADE 619 Coordinator presented on the Transition IGA during the ADE Director's Institute.</p> <p>The ICC and the Arizona Special Education Advisory Panel (SEAP) developed a workgroup made up of representatives from both Councils along with Raising Special Kids (RSK), Arizona's Parent Training and Information Center, and ADE Parent Information Network Specialists (PINS) to: 1) coordinate presentations and written materials across the agencies; 2)</p>

		<p>develop information for parents on transition; and 3) coordinate and collaborate across agencies in training staff, providers, and families. The workgroup met over the course of the year and completed the above tasks, including the "In By 3: What's Next for Me" parent handbook. The handbook is posted on ADE's website.</p> <p>The ADE PINS and RSK provided information to Service Coordinators and LEAs regarding the training opportunities for families throughout Arizona to ensure the information was widely dispersed to families.</p> <p>The ICC/SEAP workgroup finalized the "In By 3: What's Next for Me" parent handbook, which is posted on ADE's website.</p>
<p>Incorporated herein are the improvement activities from: (i) Indicator 1 regarding expansion of the team-based model and functional, participation-based practices; (ii) Indicator 1 regarding recruitment and retention; (iii) Indicator 2 regarding the AzEIP Standards of Practice; (iv) Indicator 9 regarding revising and implementing General Supervision policies, procedures, tools and forms, root cause analysis, and enforcement and sanctions, and; (v) Indicator 14 regarding data management, editing and validation, and analysis.</p>	<p>July 2010</p>	<p>See Improvement Activities across other Indicators.</p>

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010

Improvement Activities	Timelines	Resources
<p>Continue annual cross-training on the Transition IGA in collaboration with ADE.</p>	<p>Revise: November 2006 and annually through 2010</p> <p>To: November 2010 and annually through 2012</p> <p>Justification: Align with extension of SPP</p>	<p>CSPD Coordinator, TAMS</p>
<p>Incorporated herein are the improvement activities from: (i) Indicator 1 targeted technical assistance; (ii) Indicator 2 regarding the AzEIP Standards of Practice; (iii) Indicator 9 regarding revising and implementing General Supervision policies, procedures, tools and forms, root cause analysis, and enforcement and sanctions, and; (iv) Indicator 14 regarding data management, editing and validation, and analysis.</p>	<p>Revise: July 2010</p> <p>To: June 2012</p> <p>Justification: Align with extension of SPP</p>	<p>DES/AzEIP staff, TAMS and the ADE 619 Coordinator</p>

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

Overview of the Annual Performance Report Development:

See Overview description in Indicator 1.

Monitoring Priority: Effective General Supervision Part C / Effective Transition

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

A Notification to the local education agency (LEA), if child potentially eligible for Part B;

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

Measurement:

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

FFY	Measurable and Rigorous Target
FFY 2009	100%

Actual Target Data for FFY 2009:

84%

Method used to collect data and the procedures used to collect these data:

Included in the calculation for 8B were all files reviewed during on-site monitoring of three EIPs between May and June of 2009 of children who would shortly reach the age of eligibility for Part B **and** who the State had determined are potentially eligible for Part B children. See Indicator 9 for description of how monitoring sites were selected.

The reviewers looked for documentation that the Arizona Transition Planning Form, Part 1, had been sent to the LEA. Part 1 of this form serves two purposes: 1) notify the LEA of a potentially eligible child; and 2) provide an invitation to the Transition Planning Conference. A copy of this form is evidence that the school was notified of a potentially eligible child nearing their 3rd birthday. The State does not have an Opt-Out Policy.

AZ Definition of Potentially Eligible under IDEA, Part B:

After considering Part B's eligibility criteria in conjunction with the State's narrow eligibility criteria, the State has defined a potentially eligible child under IDEA, Part B to mean a child who is eligible for AzEIP and who has an IFSP when the child is two years of age or older.

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

a. Number of children exiting Part C and potentially eligible for Part B where the notification to the LEA occurred.	26
b. Number of children exiting Part C who were potentially eligible for Part B.	31
Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday (Notification to LEA) (Percent = [(b) divided by (a)] times 100).	84%

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

The actual State Target data was 84 percent. The State did not meet its target and experienced slippage from FFY 2008's APR Target data of 100 percent.

Three EIPs were monitored for this Indicator and one was at 100 percent (10/10 files). The second was at 89 percent (8/9 files) and the third EIP was at 67 percent (8/12).

Accounting for Untimely Notification/Referrals to LEA:

- o 1/31 was not timely due to exceptional family circumstances. This number is included in the calculation in both the numerator and the denominator.
- o 1/5 untimely Notification was due to a service coordinator who did not send the Notification to the LEA when required.
- o 4/5 untimely Notifications were due to procedural errors.
- o Analysis of the noncompliance identified for one EIP revealed that the noncompliance was limited to two of the four service coordinators. The service coordinators were not using the appropriate State form required for Notification to the LEA. The service coordinators were using the ADE/AzEIP Child File Referral form instead of the Arizona Transition Planning Form, Part 1 as the LEA Notification. During the Site Review, the State monitoring team reviewed the procedures, outlined in the Transition IGA and AzEIP Policies and Procedures, directly with the service coordinators and their supervisor.
- o Each child-specific instance of noncompliance was subsequently corrected, although late.
- o Two findings of noncompliance were made during FFY 2009; action has been taken to ensure correction, and correction of these findings will be reported on in the FFY 2010 APR.

Improvement Activities	Timelines	Status
<p>AzEIP and ADE instituted an Alert system to allow local Part C and Part B representatives to notify their State contacts of compliance issues, which were not able to be resolved at the local level.</p>	<p>2007; Ongoing Alerts</p>	<p>The Alert system has provided a systematic method for DES/AzEIP and the ADE 619 Coordinator to provide TA to their programs that have been unable or unwilling to resolve issues (e.g., notification of potentially eligible children, scheduling of transition conference to occur between 2.6 - 2.9 years) with their local partners.</p> <p>This Alert system is maintained through a data sharing agreement with AzEIP and ADE that enables both the Part C staff and the 619 Coordinator to track and document Alerts in a shared tracking log.</p>
<p>Revise, if needed, the Transition IGA to align with Frequently Asked Questions document issued by OSEP in December 2009.</p>	<p>July 2010</p>	<p>The Transition IGA was revised to align with the Frequently Asked Questions document issued by OSEP in December 2009. Revisions were submitted with the State's Application. AzEIP Transition Policies and Procedures were approved and implemented in September 2010.</p>
<p>Continue annual cross-training on the Transition IGA in collaboration with ADE.</p>	<p>November 2006 and annually through 2010</p>	<p>AzEIP TAMS and the ADE 619 Coordinator focused both individual and cross-training efforts in regions that requested the training, were having trouble resolving issues locally and/or were identified through monitoring data or Alerts as needing focused technical assistance. Cross training occurred on the Navajo Nation and the border communities of Southern Arizona.</p> <p>AzEIP Continuous Quality Improvement Coordinator and the ADE 619 Coordinator presented on the Transition IGA during the ADE Director's Institute.</p> <p>The ICC and the Arizona Special Education Advisory Panel (SEAP) developed a workgroup made up of representatives from both Councils along with Raising Special Kids (RSK), Arizona's Parent Training and Information Center, and ADE Parent Information Network Specialists (PINS) to: 1) coordinate presentations and</p>

		<p>written materials across the agencies; 2) develop information for parents on transition; and 3) coordinate and collaborate across agencies in training staff, providers, and families. The workgroup met over the course of the year and completed the above tasks, including the "In By 3: What's Next for Me" parent handbook. The handbook is posted on ADE's website.</p> <p>ADE PINS and RSK provided information to Service Coordinators and LEAs regarding the training opportunities for families throughout Arizona to ensure the information was widely dispersed to families.</p> <p>The ICC/SEAP workgroup finalized the "In By 3: What's Next for Me" parent handbook, which is posted on ADE's website.</p>
<p>Go back and enter last IA from FFY 2008.</p>		
<p>Incorporated herein are the improvement activities from: (i) Indicator 1 regarding expansion of the team-based model and functional, participation-based practices; (ii) Indicator 1 regarding recruitment and retention; (iii) Indicator 2 regarding the AzEIP Standards of Practice; (iv) Indicator 9 regarding revising and implementing General Supervision policies, procedures, tools and forms, root cause analysis, and enforcement and sanctions, and; (v) Indicator 14 regarding data management, editing and validation, and analysis.</p>	<p>July 2010</p>	<p>See Improvement Activities across other Indicators.</p>

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

APR Template – Part C (4)

Improvement Activities	Timelines	Status
<p>Continue annual cross-training on the Transition IGA in collaboration with ADE.</p>	<p>Revise: November 2006 and annually through 2010</p> <p>To: November 2010 and annually through 2012</p> <p>Justification: Align with extension of SPP</p>	<p>CSPD Coordinator, TAMS</p>
<p>Incorporated herein are the improvement activities from: (i) Indicator 1 regarding targeted T/TA; (ii) Indicator 2 regarding the AzEIP Standards of Practice; (iii) Indicator 9 regarding revising and implementing General Supervision policies, procedures, tools and forms, root cause analysis, and enforcement and sanctions, and; (iv) Indicator 14 regarding data management, editing and validation, and analysis.</p>	<p>Revise: July 2010</p> <p>To: June 2012</p> <p>Justification: Align with extension of SPP</p>	<p>DES/AzEIP staff, TAMS and the ADE 619 Coordinator</p>

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

Overview of the Annual Performance Report Development:

See Overview description in Indicator 1.

Monitoring Priority: Effective General Supervision Part C / Effective Transition

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

- C. Transition conference, if child potentially eligible for Part B.
(20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement:

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

Account for untimely transition conferences, including reasons for delays.

FFY	Measurable and Rigorous Target
2009	100%

Actual Target Data for FFY 2009:

82%

Method used to collect data and the procedures used to collect these data:

Included in the calculation for 8C were all files reviewed during the on-site monitoring of three EIPs during May and June of 2009. The files reviewed included those in which a transition conference should have occurred for children exiting Part C who were potentially eligible for Part B. See Indicator 9 for description of how monitoring sites were selected.

The reviewers looked for documentation (a copy of a completed Arizona Transition Planning Form, Part II) that a transition conference occurred, between the child's age of 2 years and 6 months and 2 years and 9 months, for children who were potentially eligible for Part B.

AZ Definition of Potentially Eligible under IDEA, Part B:

After considering Part B’s eligibility criteria in conjunction with the State’s narrow eligibility criteria, the State has defined a potentially eligible child under IDEA, Part B to mean a child who is eligible for AzEIP and who has an IFSP when the child is two years of age or older.

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

A. Number of children exiting Part C and potentially eligible for Part B where the transition conference occurred.	23
B. Number of children exiting Part C who were potentially eligible for Part B.	28
Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday (Transition Conference) (Percent = [(b) divided by (a)] times 100).	82%

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

Three EIPs were monitored for this Indicator. One was at 100 percent (9/9 files compliant), the second one was at 78 percent (7/9 files compliant) and the last one was at 70 percent (7/10 files compliant).

The State experienced slippage from 100 percent in FFY 2008 to 82 percent in FFY 2009. Through files reviews, and interview with supervisors and their service coordinators, the State was able to account for the untimely transition conferences:

- o 2 of the 23 files reviewed were not timely due to family circumstances. However, the calculation includes the two files in both the numerator and the denominator.
- o 1 of the 3 EIPs monitored ensured a timely transition conference for all children reviewed.
- o 2 of the 3 EIPs monitored did not ensure all children and their families reviewed had timely transition conferences.
- o 5 of the 28 files were not timely due to system reasons. Specifically, the service coordinators did not ensure that the transition conferences were scheduled and held between the time the child was 2 years and 6 months and 2 years and 9 months.
- o Subsequently, the service coordinators did schedule and facilitate transition conferences for the five children and families, although late.
- o In most situations, the service coordinators attempted to schedule the transition conference within the required timelines. However, if the school district did not respond or responded that they could not participate in the conference between the child’s age of 2 years and 6 months and 2 years and 9 months, the service coordinators scheduled the transition conference after the child was 2 years and 9 months to accommodate the districts. The service coordinators did not understand that they were required to hold the transition conference during the required timeframe even if the district representative could not attend.
- o Two findings of noncompliance were made during FFY 2009; action taken to ensure full correction, and correction of these findings will be reported on in the FFY 2010 APR.

Improvement Activities	Timelines	Status
<p>AzEIP and ADE instituted an Alert system to allow local Part C and Part B representatives to notify their State contacts of compliance issues, which were not able to be resolved at the local level.</p>	<p>2007; Ongoing Alerts</p>	<p>The Alert system has provided a systematic method for DES/AzEIP and the ADE 619 Coordinator to provide TA to their programs that have been unable or unwilling to resolve issues (e.g., notification of potentially eligible children, scheduling of transition conference to occur between 2.6 - 2.9 years) with their local partners.</p> <p>This Alert system is maintained through a data sharing agreement with AzEIP and ADE that enables both the Part C staff and the 619 Coordinator to track and document Alerts in a shared tracking log.</p>
<p>Revise, if needed, the Transition IGA to align with Frequently Asked Questions document issued by OSEP in December 2009.</p>	<p>July 2010</p>	<p>The Transition IGA was revised to align with the Frequently Asked Questions document issued by OSEP in December 2009. Revisions were submitted with the State's Application. AzEIP Transition Policies and Procedures were approved and implemented in September 2010.</p>
<p>Continue annual cross-training on the Transition IGA in collaboration with ADE.</p>	<p>November 2006 and annually through 2010</p>	<p>AzEIP TAMS and the ADE 619 Coordinator focused both individual and cross-training efforts in regions that requested the training, were having trouble resolving issues locally and/or were identified through monitoring data or Alerts as needing focused technical assistance. Cross training occurred in the Navajo Nation and the border communities of Southern Arizona.</p> <p>AzEIP Continuous Quality Improvement Coordinator and the ADE 619 Coordinator presented on the Transition IGA during the ADE Director's Institute.</p> <p>The ICC and the Arizona Special Education Advisory Panel (SEAP) developed a workgroup made up of representatives from both Councils along with Raising Special Kids (RSK), Arizona's Parent Training and Information Center, and ADE Parent Information Network Specialists (PINS) to: 1) coordinate presentations and</p>

		<p>written materials across the agencies; 2) develop information for parents on transition; and 3) coordinate and collaborate across agencies in training staff, providers, and families.</p> <p>ADE PINS and RSK provided information to Service Coordinators and LEAs regarding the training opportunities for families throughout AZ to ensure the information was widely dispersed to families.</p> <p>The ICC/SEAP workgroup finalized the "In By 3: What's Next for Me" parent handbook, which is posted on ADE's website.</p>
<p>Go back and enter last IA from FFY 2008</p>		
<p>Incorporated herein are the improvement activities from: (i) Indicator 1 regarding expansion of the team-based model and functional, participation-based practices; (ii) Indicator 1 regarding recruitment and retention; (iii) Indicator 2 regarding the AzEiP Standards of Practice; (iv) Indicator 9 regarding revising and implementing General Supervision policies, procedures, tools and forms, root cause analysis, and enforcement and sanctions, and; (v) Indicator 14 regarding data management, editing and validation, and analysis.</p>	<p>July 2010</p>	<p>See Improvement Activities across other Indicators.</p>

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

Improvement Activities	Timelines	Status
<p>Continue annual cross-training on the Transition IGA in collaboration with ADE.</p>	<p>Revise: November 2006 and annually through 2010</p> <p>To: November 2010 and annually through 2012</p> <p>Justification: Align with extension of SPP</p>	<p>CSPD Coordinator, TAMS</p>
<p>Incorporated herein are the improvement activities from: (i) Indicator 1 regarding Targeted technical assistance; (ii) Indicator 2 regarding the AzEIP Standards of Practice; (iii) Indicator 9 regarding revising and implementing General Supervision policies, procedures, tools and forms, root cause analysis, and enforcement and sanctions, and; (iv) Indicator 14 regarding data management, editing and validation, and analysis.</p>	<p>Revise: July 2010</p> <p>To: June 2012</p> <p>Justification: Align with extension of SPP</p>	<p>DES/AzEIP staff, TAMS and the ADE 619 Coordinator</p>

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

Overview of the Annual Performance Report Development:

See Overview description in Indicator 1.

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

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

Measurement:

Percent of noncompliance corrected within one year of identification:

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

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

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

FFY	Measurable and Rigorous Target
FFY 2009	100%

Actual Target Data for FFY 2009:

86%

Describe the process for selecting EIS programs for Monitoring:

DES/AzEIP established a five-year monitoring cycle for conducting site reviews based on population and risk factors. Maricopa County, which consists of 60 percent of the population in the State and had known system concerns and compliance issues, was chosen for Cycle 1. Cycle 2, 3, 4, and 5 were chosen by risk factors, and then grouped geographically to establish the Cycles.

During FFY 2008 Arizona began the process of making significant revision to its General Supervision policies, procedures, forms and/or tools to integrate General Supervision components and align with federal and State requirements, including child and family outcomes. The revised General Supervision system will incorporate the principles and practices of desk audit, program self-assessment, focused monitoring, data validation, corrective action, enforcement, family outcomes surveys and review of

APR Template – Part C (4)

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complaint logs. A full description of the revised General Supervision system will be included in the FFY 2010 APR.

As a transition from Arizona's established a five-year monitoring cycle for conducting site reviews to its revised General Supervision system, site reviews were conducted for programs that were part of Cycle 1, Maricopa County. Therefore, the data used to measure this indicator are taken from site visits that occurred in Maricopa County during FFY 2008 with programs that were part of Cycle 1 (of Arizona's five-year site visit cycle). One program in Cycle 1 was not included in this year's site review process as they recently underwent a Focused Monitoring visit, have an open Corrective Action Plan and are engaging in intensive technical assistance efforts with the AzEIP TAMS.

In addition, data from Dispute Resolutions in FFY 2008 were reviewed. There were no findings of noncompliance issued in FFY 2008 as a result of dispute the resolution processes.

AZ INDICATOR C-9 WORKSHEET				
Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2009 (7/1/09 through 6/30/10)	(a) # of Findings of noncompliance identified in FFY 2009 (7/1/09 through 6/30/10)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
1. Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.	Monitoring Activities	1	1	1
7. Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.	Monitoring Activities	2	2	1
8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including: A. IFSPs with transition steps and services.	Monitoring Activities	0	0	0

APR Template – Part C (4)

<p>8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including: B. Notification to LEA, if child potentially eligible for Part B.</p>	<p>Monitoring Activities</p>	<p>0</p>	<p>0</p>	<p>0</p>
<p>8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including: C. Transition conference, if child potentially eligible for Part B.</p>	<p>Monitoring Activities</p>	<p>0</p>	<p>0</p>	<p>0</p>
<p>OTHER AREAS OF NONCOMPLIANCE Service Coordination Functions: Coordinate and monitor delivery of IFSP services; Assist family in accessing services; Document steps needed to assist family in obtaining "Other Related Services"</p>	<p>Monitoring Activities</p>	<p>1</p>	<p>3</p>	<p>3</p>
<p>OTHER AREAS OF NONCOMPLIANCE: IFSP Required Components: "Other Related Services" needed or in place are documented on the IFSP</p>	<p>Monitoring Activities</p>	<p>1</p>	<p>1</p>	<p>1</p>
<p>OTHER AREAS OF NONCOMPLIANCE: Timely and Accurate data Data is entered timely Data is accurate- data in child's file matches data in database Delay reason for 45 day timeline is entered timely and accurately</p>	<p>Monitoring Activities</p>	<p>1</p>	<p>1</p>	<p>0</p>
<p>OTHER AREAS OF NONCOMPLIANCE: Procedural Safeguards- Evaluation and Assessment in family's native language; PWN initial evaluation; initiation of services; eligibility decisions; Ensuring families have copy of Procedural Safeguards for Families booklet; Record release and access log in file.</p>	<p>Monitoring Activities</p>	<p>2</p>	<p>6</p>	<p>6</p>

	14	12
Sum the numbers down Column a and Column b		
Percent of noncompliance corrected within one year of identification =	(b) / (a) X 100 =	86%
(column (b) sum divided by column (a) sum) times 100.		

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

- o The State experienced slippage from FFY 2008 at 95 percent to 86 percent in FFY 2009.
- o The State did not meet its target of 100 percent.
- o The two remaining items not corrected were in 1 EIP: 45 day timeline and timely, accurate, and complete data.
- o AzEIP TAMS conducted follow up with program in special conditions re: 45 day timeline; and quarterly site reviews and targeted technical assistance visits with special conditions re: timely provision of services.
- o At least quarterly, the AzEIP TAMS met with the EIP(s) with open corrective action plans to review progress toward completion of activities and strategies contributing to the noncompliance; to conduct subsequent child file audits to determine if the EIP was correctly implementing the regulatory requirement in which the EIP was issued a finding of noncompliance.
- o DES/AzEIP and the AzEIP TAMS held quarterly conference calls with the EIPs to review the outcomes of the visits with the TAMS, to discuss current status of the CAP and to identify training, technical assistance needed to address the root causes of any noncompliance not yet corrected.
- o To ensure new AzEIP contractors understood the breadth of the regulatory requirements, the TAMS provided Quarterly TA visits to Redesign Phase One programs and monthly TA visits to new contractors beginning in November 2009.

Improvement Activity	Timeline	Status
<p>Revise General Supervision policies, procedures, forms and/or tools to integrate General Supervision components and align with federal and State requirements, including child and family outcomes. The revised General Supervision system will incorporate the principles and practices of desk audit, program self-assessment, focused monitoring, data validation, corrective action, enforcement, family outcomes surveys and review of complaint logs.</p>	<p>July 2010</p>	<p>Completed</p> <p>DES/AzEIP worked with Mountain Plains Regional Resources Center, and the Data Accountability Center to establish the operating manual for implementation of the new AzEIP General Supervision policy.</p> <p>The General Supervision policies, procedures, forms and/or tools to integrate General Supervision components and align with federal and State requirements, including child and family outcomes have been revised.</p>
<p>Initiate implementation of the revised General Supervision policies, procedures, and tools.</p>	<p>July 2010</p>	<p>DES/AzEIP fully implemented the new General Supervision system July 1, 2010.</p> <p>Revised General Supervision tools, such as the AzEIP Self Report, were implemented in July 2010. In preparation for completing the Self Report, DES/AzEIP staff selected the EIPs to complete the AzEIP Self Report. The AzEIP Self Report is based on a 3 year Cycle and is one of the new components of the revised General Supervision system.</p> <p>EIPs were notified of the selection and were required to participate in a conference call with DES/AzEIP to review the Self Report process, selection of files and file review components and completion of the actual Self Report. The AzEIP TAMS provided onsite training and technical assistance with each of the EIPs selected.</p>
<p>Utilize root cause analysis process to identify challenges and barriers to correction of non-compliance.</p>	<p>July 2010 and ongoing per new General Supervision procedures</p>	<p>Corrective action plans for newly identified 45 day non-compliance included completion of a root cause analysis as a first step. The results of the root cause analysis were used to identify additional corrective action steps to address the correction of the noncompliance.</p>

Pursue contract sanctions to address noncompliance not corrected within one year. (2009-2010)	July 2010 and ongoing per new General Supervision procedures	DES/AzEIP imposed first level of contract sanctions with one EIP who did not correct all of the EIP noncompliance within one year related to Indicator 7 and timely, complete and accurate data. In coordination with the AzEIP TAMS, the EIP was required to review its CAP and conduct a root cause analysis to identify the remaining contributing factors to its noncompliance and to revise the strategies and activities to correct the noncompliance as soon as possible. In addition, the EIP was required to participate in weekly calls with the AzEIP TAMS to ensure delay reasons, when necessary, were entered timely and accurately.
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Timely Correction of FFY 2008 Findings of Noncompliance (corrected within one year from identification of the noncompliance):

A. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008 through June 30, 2009) (Sum of Column a on the Indicator C 9 Worksheet).	18
B. Number of findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS programs of the finding) (Sum of Column b on the Indicator C 9 Worksheet).	16
C. Number of findings <u>not</u> verified as corrected within one year [(1) minus (2)].	

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

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

Demonstrating Correction as outlined in 09-02 Memo

The information below pertains to the correction of the "Other Areas of Noncompliance" reported above in the C-9 worksheet and represented in the below table.

1. Accounting for All Instances of Noncompliance:

- a. The State accounted for all instances of noncompliance as identified through on site monitoring of Early Intervention Programs (EIP) in Cycle 1 of the States 5 year cycle.

2. Noncompliance Occurred in 1 EIP as Follows

- a. FFY 2008 – Site Reviews

APR Template – Part C (4)

Areas of Noncompliance	Percentage of Noncompliance	Root Cause Based on review of child files, interviews with EIP supervisors and service coordinators the following contributing factors to the noncompliance were identified:	
Procedural Safeguards			
Documentation - Evaluation and Assessment conducted in family's native language/primary mode of communication.	91% (29/31 files reviewed)	<ol style="list-style-type: none"> 1. The percentage and level of noncompliance was not extensive. 2. The few instances of noncompliance were not isolated to any one particular team or service coordinator. 3. One significant contributing factor was related to the service coordinators not adhering to AzEIP Policies and Procedures related to ensuring appropriate documentation is maintained in each child's file, specifically copies of consent and prior written notice forms, documentation that a copy of Procedural Safeguards were provided, documentation of service coordination activities and ensuring a record release/access log was in each child's file. 4. Another contributing factor was identified as the service coordinators ensuring documents are completed appropriately, such as updates to the IFSP, evaluation and assessment reports including all areas of development, and obtaining parent initials on the IFSP related to PWN. 	
Documentation of Consent and Prior Written Notice for Evaluation 303.403(b).	97% (32/33 files reviewed)		
Prior Written Notice of eligibility decision 303.403(b).	85% (28/33 files reviewed)		
Documentation of Prior Written Notice – Initiation of IFSP services 303.342(e).	95% (20/21 files reviewed)		
Documentation that Procedural Safeguards handbook provided with PWN. 303.403(b).	94% (32/34 files reviewed)		
Record Release and Access log not in file.	88% (29/33 files reviewed)		
IFSP Required Components			
Documentation of "Other Related Services" in place or needed on the IFSP Supports and Services page.			
Evaluation and Assessment			
Evaluation and Assessment includes all areas of development 303.322(c)(3).	94% (29/31 files reviewed)		
Service Coordination Functions			
SC documentation of activities to assist family to identify and access community resources.	83% (5/6 files reviewed)		
Documentation of coordination and monitoring efforts in ensuring timely service delivery.	83% (19/23 files reviewed)		
Documentation that outcomes were reviewed during six month review of the IFSP.	67% (2/3 files reviewed)		
Timely and Accurate data			
Timely, complete and accurate data.	92% (23/25 files reviewed)	<ol style="list-style-type: none"> 1. EIP did not have clearly outlined procedures for service coordinators to submit data for timely and accurate data entry, including reason for delay related to 45 day timeline. 2. EIP did not have procedures for ensuring accuracy and completeness across the child's paper file and electronic file. 	

3. To Address the Noncompliance, the State Required Each EIP to:

- In coordination with the AzEIP TAMS, develop and implement a Corrective Action Plan detailing the actions the EIP will take to correct the noncompliance as soon as possible, but no later than one year from the date of the notification. As part of the process of developing the CAP, the EIP is required to look at potential contributing factors to the noncompliance and develop strategies, timelines and training and technical assistance needs to address the factors identified related to:
 - Infrastructure/Staffing;
 - Valid and Reliable Data;
 - Development/Revisions to Program Policies and Procedures;
 - Changes to Supervision;
 - Provision of Training and Technical Assistance; and
 - Changes to Provider Practices.
- Require supervisors and service coordinators to participate in quarterly technical assistance visits with the AzEIP TAMS to review the regulatory requirements under IDEA, Part C and AzEIP Policies and Procedures.
- Access additional technical assistance, as needed.

4. Verification of Correction of FFY 2008 Findings of Noncompliance (either timely or subsequent):

Prong 1: To ensure correction of child-specific noncompliance, the state required the EIP program to correct each instance of the noncompliance (as described in the Table above) and submit documentation of the correction to the State office within 45 days of the EIP site review. The State reviewed the documentation to ensure the child-specific noncompliance was corrected in accordance with the IDEA, Part C and AzEIP Policies and Procedures.

Prong 2: To ensure the program was *correctly implementing each of the regulatory requirements (i.e., achieved 100 percent compliance)* a subsequent site review of additional child files was conducted by the AzEIP TAMS. The AzEIP TAMS reviewed additional files with the EIP supervisor and service coordinators. The review resulted in the program being at 100 percent compliance for each of the regulatory requirements, in which they had a finding, indicating the program was implementing them in accordance with IDEA, Part C and AzEIP Policies and Procedures.

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

If the State reported less than 100 percent for this indicator in its FFY 2007 APR and did not report that the remaining FFY 2007 findings were subsequently corrected, provide the information below:

A. Number of remaining FFY 2007 findings noted in OSEP's June 2010 FFY 2008 APR response table for this indicator.	2
B. Number of remaining FFY 2007 findings the State has verified as corrected.	2
C. Number of remaining FFY 2007 findings the State has NOT verified as corrected [(1) minus (2)].	0

Demonstrating Correction as outlined in 09-02 Memo**1. Accounting for All Instances of Noncompliance**

- a. The State accounted for all instances of noncompliance as identified through on site monitoring of the EIPs based on a 5 year cycle.

2. Noncompliance Occurred in Three EIPs as Follows:

- a. FFY 2007

- i. Program A (DDD- Pima County) had noncompliance identified with 59 of 94 IFSPs (63 percent compliance). One finding of noncompliance was issued. Root causes of the noncompliance included:

1. DDD utilizes a Qualified Vendor (QV) system to procure services. The QV, also known as 557, was designed to allow for family/consumer choice of providers; however it also allows therapists to choose who they will serve. This is a statutory requirement which prevents DDD to require a therapist to serve any specific area or zip code. As a result, not all children have access to timely provision of services.
2. Limited number of bilingual providers.
3. Limited number of providers willing to travel to rural areas and or less desirable areas of the County.
4. Utilizing and accessing medically necessary services available through Medicaid's Early and Periodic Screening, Diagnosis and Treatment (EPSDT) plan.

- ii. Program B (Easter Seals Blake Foundation (ESBF)) had noncompliance identified in 37 of 48 children (77 percent). One finding of noncompliance was issued. Root causes of the noncompliance included:

1. Determination of the type and frequency of services is based on the level of delay rather than on the family's priorities, resources, the unique strengths and need of the child, and the participation-based outcomes.
2. Contracts with therapists do not include specific language requiring a therapist to serve a child when the service is identified on an IFSP. The service coordinators may have to call multiple providers before a therapist is identified.
3. Utilization of available funding sources, such as EPSDT or private insurance, can cause delays when authorizations are not timely.
4. Team members (contracted therapists) do not ensure that services provided in accordance with planned start date on IFSP. There are no consequences if the services are not timely.
5. A minimal number of bilingual therapists are available throughout the County.

3. To Address the Noncompliance, the State Required Each EIP to:

- a. Have supervisors and service coordinators participate in quarterly on-site technical assistance visits with the AzEIP TAMS to review IFSPs, procedures for accessing services on the IFSP, and appropriate documentation of service coordination activities.
- b. Participate in technical assistance activities related to developing functional, participation-based outcomes to result in services and supports identified in the IFSP designed to enhance the capacity of the family in promoting their child's participation and engagement in routines, activities, and interactions.
- c. Ensure adequate FTE for all core team members (OT, PT, SLP, DSI and SC) for the contracted county or region.

- d. Review AzEIP policies and procedures, related to service coordination functions and IFSP development and implementation to ensure local procedures are consistent with State procedures.
- e. If necessary, revise and implement local procedures to ensure adherence to AzEIP policies related to service coordination responsibilities in IFSP development, including IFSP team decision making.
- f. When feasible, revise contracts with therapists to include language specifying the therapist will serve children within a specific region and initiate services in accordance with the IFSP.
- g. Continue recruitment efforts for difficult to serve areas and Spanish speaking families.

4. Verification of Correction of FFY 2007 Findings of Noncompliance (either timely or subsequent):

Prong 1: To ensure correction of child-specific noncompliance, the state ensured that the EIP programs initiated the IFSP service for each child, although late (unless the child was no longer within the jurisdiction of the EIP) by requiring the EIP to submit documentation of the actual start date the service was initiated for each child who did not receive timely provision of services. The State required the EIPs to submit documentation of the actual date the service was initiated for the children who did not receive timely provision of services.

Prong 2: To ensure the program was *correctly* implementing the timely service provision requirements (i.e., achieved 100 percent compliance) in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) a subsequent follow-up on-site review of child files with IFSPs written between 3/1/10-4/30/10 was conducted by the AzEIP TAMS. This review resulted in the EIP being at 100 percent compliance (23/23 files reviewed) for timely provision of all IFSP services indicating the program was implementing the timely service requirements.

Correction of Remaining FFY 2004 Findings of Noncompliance from

If the State reported <100 percent for this indicator in its FFY 2004 APR and did not report that the remaining FFY 2004 findings were subsequently corrected, provide the information below:

5. Number of remaining FFY 2004 findings noted in OSEP's June 1, 2009 FFY 2007 APR response table for this indicator.	4
6. Number of remaining FFY 2004 findings the State has verified as corrected.	2
7. Number of remaining FFY 2004 findings the State has NOT verified as corrected [(1) minus (2)].	

Actions taken as a result of noncompliance not corrected by one EIP in Maricopa County:

One (1) remaining FFY 2004 findings the State has not verified as corrected is related to Indicator 1 –timely provision of all IFSP services (DDD Maricopa County).

DES, in its response OSEP's Verification Visit letter provided assurance that the Department will:

- 1. Comply with the single line of responsibility requirements to administer all early intervention programs consistent with the Individuals with Disabilities Education Act (IDEA) section 635(a)(10)(A) (20 USC §1435(a)(10)(A)) and 34 CFR §303.501(b)(2);
 - a. DES/DDD adopted AzEIP Policies and Procedures as their procedures for children ages birth to three.
 - b. DES/DDD is in the process of developing, and once approved by AzEIP, will provide

technical assistance to ensure the DDD employees, contractors and vendors understand and comply with the AzEIP Policies and Procedures.

2. Provide timely early intervention services to eligible children and their families in all geographical regions in the State through appropriate written methods under IDEA sections 637(a)(2) and 640(b) (20 USC §1437(a) and 20 USC §1440(b)) by (a) modifying DDD's Qualified Vendor system to procure services in a team-based model and (b) amending the Department's Arizona Early Intervention Program's (DES/AzEIP's) contracts to require early intervention services for children and families when the DDD Qualified Vendor network is not available to do so.
 - a. DES/AzEIP is in the process of making amendments to its contracts to require the contractor to provide early intervention services for children and families when the DDD Qualified Vendor network is not available to do so.

Actions taken as a result of the noncompliance not corrected by one EIP in Pinal/Gila Counties:

One (1) remaining FFY 2004 finding the State has not verified as corrected is related to Indicator 7 – Initial IFSP developed within 45 days of referral for all eligible children (one program in Pinal/Gila).

Previously initiated corrective action steps continued. Throughout the period, the program was required to submit 45 day timeline data for each child to DES/AzEIP on a semi-monthly basis. After each submission, the data were reviewed by DES/AzEIP staff, and lists of children exceeding the timelines were compiled and distributed to the program manager and TAMS. The program was required to review the files of the children with their TAMS, identify the cause of the lack of timeliness, and report on activities to complete the evaluations and IFSPs for those children. By reviewing subsequent data, AzEIP ensured that each child requiring evaluation or IFSP subsequently received them, whether timely or untimely.

To address delays resulting from interagency collaboration challenges region-wide meetings began in October 2010 with the AzEIP local program contractor, regional DDD staff and supervisors, DES AzEIP monitoring staff, and AzEIP TAMS. These meetings involve review of current and recent sub-regional data related to the 45 day timeline, and identification of intra-and interagency challenges to compliance with timelines for eligibility and initial IFSP development. After identifying specific challenges facing the sub-regions, solutions, including interagency timelines were developed. Meetings will continue on a monthly basis until the issues have been resolved.

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

Statement from the Response Table	State's Response
<p>The State must demonstrate, in the FFY 2009 APR, that the remaining two findings of noncompliance in FFY 2007 and four findings in FFY 2004 that were not reported as corrected in the FFY 2008 APR were corrected.</p>	<p>The State included data to demonstrate, in the FFY 2009 APR, that the remaining two findings of noncompliance in FFY 2007 were corrected. A full description can be found in Indicator 1.</p> <p>The State included data to demonstrate that two of the four remaining findings identified in FFY 2004 were corrected. Both corrections were related to Indicator 7.</p> <p>The State did not demonstrate that two remaining uncorrected noncompliance finding identified in FFY 2004 were corrected. Progress data and action steps are included in this APR in Indicator 1 and Indicator 7.</p>
<p>The State must report that it verified that each EIS program with noncompliance identified in FFY 2007 and FFY 2008: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100 percent 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 in the jurisdiction of the EIS program, consistent with OSEP Memo 09-02. In the FFY 2009 APR, that State must describe the specific actions taken to verify the correction.</p>	<p>In Indicator 1 and Indicator 7, the State reported that it verified that each EIS program with noncompliance identified in FFY 2007 and FFY 2008: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100 percent 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 in the jurisdiction of the EIS program, consistent with OSEP Memo 09-02. In the FFY 2009 APR, that State must describe the specific actions taken to verify the correction.</p>
<p>In responding to Indicators 1 and 7 in the FFY 2009 APR, the State must report on correction of noncompliance described in this table under those Indicators.</p>	<p>In responding to Indicator 1 and 7 in FFY 2009 APR, the State reported on correction of noncompliance as described in this table under those Indicators.</p>
<p>The State must use the Indicator 9 Worksheet.</p>	<p>The State used the Indicator 9 worksheet and has included it as part of Indicator 9.</p>
<p>If the State does not report 100 percent compliance for this indicator in the FFY 2009 APR, the State must review its improvement activities and revise them, if necessary.</p>	<p>The State did not report 100 percent compliance for this indicator. The State reviewed its improvement activities and revised them, as necessary.</p>

APR Template – Part C (4)

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

Improvement Activity	Timeline	Resources
<p>Initiate implementation of the revised General Supervision policies, procedures, and tools.</p> <p>Revise: Evaluate General Supervision policies, procedures, forms and tools, revise and improve efficiency and effectiveness.</p> <p>Justification: Initial implementation is underway.</p>	<p>July 2010</p> <p>Revised timeline June 2012, 2013</p> <p>Justification: Align with extension of SPP</p>	<p>CQI Coordinators, TAMS</p>
<p>Utilize root cause analysis process to identify challenges and barriers to correction of non-compliance.</p>	<p>July 2010 and ongoing per new General Supervision procedures</p>	<p>DES/AzEIP staff, Early Intervention Programs</p>
<p>Pursue contract sanctions to address noncompliance not corrected within one year (2009-2010).</p>	<p>July 2010 and ongoing per new General Supervision procedures</p>	<p>DES/AzEIP staff, DES Office of Procurement</p>
New Improvement Activities	Timelines	Resources
<p>DDD will, with modification appropriate to DDD, implement AzEIP policies and procedures for early intervention services for children birth to three and their families. Policies, procedures, directives, and other guidelines will comply with IDEA Part C and AzEIP.</p> <p>Justification: Reflect requirements from OSEP Verification Visit to align DDD policies, including IFSP team decision-making, and support implementation.</p>	<p>July 2010 and ongoing</p>	<p>DES/AzEIP staff, DES/DDD, TAMS</p>

APR Template – Part C (4)

<p>Provide targeted and general technical assistance through regional meetings, on-site and phone meetings with TAMS and/or DES/AzEIP staff, written guidance/clarification and other strategies. Technical assistance will address:</p> <ul style="list-style-type: none"> • Family Rights; • Transition; • Team-based early intervention; • Service Coordination; • Financial Matters, including FCP, Medicaid, private insurance; • Child Indicators/ Child Indicator Summary Forms; • Data Collection and Reporting Requirements; • Data Systems and resolution of production problems; and • Transition. <p>Justification: To clearly define the T/TA priorities of the State.</p>	<p>June 2011, 2012</p>	<p>DES/AzEIP staff, TAMS</p>
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Part C State Annual Performance Report (APR) for FFY 2009

Overview of the Annual Performance Report Development:

See Overview description in Indicator 1.

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

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

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

FFY	Measurable and Rigorous Target
2008	100%

Actual Target Data for FFY 2009: 100%

The State received three written, signed complaints filed during FFY 2009 were investigated and reports issued within the required 60-day timeline.

SECTION A: WRITTEN, SIGNED COMPLAINTS	
(1) Total number of written, signed complaints filed.	3
(1.1) Complaints with reports issued.	3
(a) Reports with findings of noncompliance.	1
(b) Reports within timeline.	3
(c) Reports within extended timelines.	0
(1.2) Complaints pending.	0
(a) Complaints pending a due process hearing.	0
(1.3) Complaints withdrawn or dismissed.	0

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

The State met its target for FFY 2009 at 100 percent.

One report issued included findings of noncompliance. The findings of noncompliance were: 34 C.F.R. §303.344 timely provision of services; 34 C.F.R. §303.23 Procedural Safeguards; 34 C.F.R. §303.344(f) (1), projected dates for initiation of services as soon as possible after the IFSP meeting.

The State sent written notification to the EIP of the three findings related to the compliant. The EIP was required to develop a corrective action plan to ensure correction of noncompliance as soon as possible

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Arizona
State

but no later than one year of the date of the written notification. The findings and corrections will be reported in FFY 2010 APR.

Improvement Activities	Timelines	Status
Continued implementation of the AzEIP Standards of Practice to support understanding of how and when to provide families with their procedural safeguards.	December 2005 with annual trainings	On-going through AzEIP Policies and Professionalism training, a required content area in the AzEIP Standards of Practice. The AzEIP TAMS provided ten AzEIP Policies and Professionalism Trainings throughout the State in FFY 2009.
Conduct semi-annual reviews of the complaint logs to assist in identifying and resolving systemic issues.	December 2005 and every six months through 2010	Semi annual reviews were conducted.
Develop template for extending timelines when there are exceptional circumstances with respect to a particular complaint.	March 1, 2010	Template for extending timelines was drafted, shared with the ICC Education and Collaboration subcommittee and finalized by DES/AzEIP staff.
Revise the AzEIP Procedural Safeguards Handbook, distribute and provide training and technical assistance to support implementation.	August 2010	A workgroup with representatives from each of the AzEIP service providing agencies, the ICC (parent representatives), Arizona Parent Training and Information Center, and other parent support groups was established to assist DES/AzEIP in revising the handbook. The handbook is expected to be translated and available by March 2011.
To: Incorporated herein are the improvement activities from: (i) Indicator 1 regarding expansion of the team-based model and functional,	July 2010	DES/AzEIP staff, TAMS, AzEIP Participating State

APR Template – Part C (4)

Improvement Activities	Timelines	Status
participation-based practices; (ii) Indicator 1 regarding recruitment and retention; (iii) Indicator 2 regarding the AzEIP Standards of Practice; (iv) Indicator 9 regarding revising and implementing General Supervision policies, procedures, tools and forms, root cause analysis, and enforcement and sanctions, (v) Indicator 11 regarding revision of the AzEIP Procedural Safeguards Handbook, and; (vi) Indicator 14 regarding data management, editing and validation, and analysis.		Agency partners

Revisions, with justifications to Proposed Targets/Improvement Activities/Timelines /Resources for FFY 2010

Improvement Activities	Timelines	Resources
Continued implementation of the AzEIP Standards of Practice to support understanding of how and when to provide families with their procedural safeguards.	Revise timeline: December 2005 with annual trainings To: July 2011-2012 Justification: Align with extension of SPP	CSPD Coordinator, ASDTP staff
Conduct semi-annual reviews of the complaint logs to assist in identifying and resolving systemic issues.	Revise timeline: December 2005 and every six months through 2010 To: July 2011-2012 Justification: Align with extension of SPP	CQI Coordinators, TAMS
Delete: Revise the AzEIP Procedural Safeguards Handbook, distribute and provide training and technical assistance to support implementation. Justification: Completed.	August 2010	

APR Template – Part C (4)

Improvement Activities	Timelines	Resources
New Improvement Activities	Timelines	Resources
<p>Provide targeted and general technical assistance through regional meetings, on-site and phone meetings with TAMS and/or DES/AzEIP staff, written guidance/clarification and other strategies. Technical assistance will address:</p> <ul style="list-style-type: none"> • Family Rights. <p>Justification: To reflect the State's prioritization of T/TA on the revised handbook is provided.</p>	<p>June 2011, 2012</p>	<p>DES/AzEIP staff, TAMS</p>

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

Overview of the Annual Performance Report Development:

See Overview description in Indicator 1.

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

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

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

FFY	Measurable and Rigorous Target
2008	100%

Actual Target Data for FFY 2009: N/A

SECTION C: Due Process Complaints	
(3) Total number of due process complaints filed (for all States)	1
(3.2) Hearings (fully adjudicated) (for all States) -	0
(1) Decisions within timeline - Part C Procedures	n/a
(3.3) Hearing pending (for all States)	0
(3.4) Due process complaint withdrawn or dismissed (including resolved without a hearing) (for all States)	1

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

The State had one due process hearing request submitted related to timely provision of services. The request for due process was withdrawn as the service was provided, although late; the parent no longer felt it necessary to go to a hearing.

Even though the request for the due process hearing was withdrawn by the parent, the State did conduct a desk review of the complaint and found the EIP did not provide the service in a timely manner. The State did not issue a finding of noncompliance as the EIP has an outstanding finding of noncompliance from FFY 2004 and is currently working under a focused monitoring CAP.

APR Template – Part C (4)

Improvement Activities	Timelines	Status
Continued implementation of the AzEIP Standards of Practice to support understanding of how and when to provide families with their procedural safeguards.	December 2005 with annual trainings	On-going through AzEIP Policies and Professionalism training, a required content area in the AzEIP Standards of Practice. The AzEIP TAMS provided ten AzEIP Policies and Professionalism Trainings throughout the State in FFY 2009.
Conduct semi-annual reviews of the complaint logs to assist in identifying and resolving systemic issues.	December 2005 and every six months through 2010	Semi annual reviews were conducted.
Revise the AzEIP Procedural Safeguards Handbook, distribute and provide training and technical assistance to support implementation.	August 2010	A workgroup with representatives from each of the AzEIP service providing agencies, the ICC (parent representatives), Arizona Parent Training and Information Center, Autism Coalition, and the AzEIP Family TAMS was established to assist DES/AzEIP in revising the handbook. The handbook revision is complete and is expected to be translated and available by March 2011.
To: Incorporated herein are the improvement activities from: (i) Indicator 1 regarding expansion of the team-based model and functional, participation-based practices; (ii) Indicator 1 regarding recruitment and retention; (iii) Indicator 2 regarding the AzEIP Standards of Practice; (iv) Indicator 9 regarding revising and implementing General Supervision policies, procedures, tools and forms, root cause analysis, and enforcement and sanctions, (v) Indicator 11 regarding revision of the AzEIP Procedural Safeguards Handbook, and; (vi) Indicator 14 regarding data management, editing and validation, and analysis.	July 2010	DES/AzEIP staff, TAMS, AzEIP Participating State Agency partners

APR Template – Part C (4)

Improvement Activities	Timelines	Status

Revisions, with justifications to Proposed Targets/Improvement Activities/Timelines /Resources for FFY 2010

Improvement Activities	Timelines	Resources
Continued implementation of the AzEIP Standards of Practice to support understanding of how and when to provide families with their procedural safeguards.	<p>Revise timeline: December 2005 with annual trainings</p> <p>To: July 2011-2012</p> <p>Justification: Align with extension of SPP</p>	CSPD Coordinator, ASDTP staff
Conduct semi-annual reviews of the complaint logs to assist in identifying and resolving systemic issues.	<p>Revise timeline: December 2005 and every six months through 2010</p> <p>To: July 2011-2012</p> <p>Justification: Align with extension of SPP</p>	DES/AzEIP staff
New Improvement Activities	Timelines	Resources
<p>Propose: Provide targeted and general technical assistance through regional meetings, on-site and phone meetings with TAMS and/or DES/AzEIP staff, written guidance/clarification and other strategies. Technical assistance will address:</p> <ul style="list-style-type: none"> • Family Rights <p>Justification: To reflect the State’s prioritization of T/TA on the revised handbook is provided.</p>	June 2011, 2012	DES/AzEIP staff, TAMS

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

Overview of the Annual Performance Report Development:

See Overview description in Indicator 1.

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

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

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

FFY	Measurable and Rigorous Target
2009	100%

Actual Target Data for FFY 2009:

N/A

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

N/A

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010

N/A

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

Overview of the Annual Performance Report Development:

See Overview description in Indicator 1.

The Arizona Early Intervention Program used the following sources for completing this indicator:

- o State data system;
- o Arizona’s SPP and APR;
- o OSEP Self-Scoring Rubric for Indicator 14;
- o OSEP data submission guidelines;
- o Data desk audits; and
- o Monitoring data from site visits.

In addition, the State reviewed OSEP’s Data Accuracy: Critical Elements for Review of SPPs, the information presented during the Data Meeting in June 2010 and the technical assistance calls.

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

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

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

- a. Submitted on or before due dates (February 1 for child count and settings and November 1 for exiting and dispute resolution); and
- b. Accurate, including covering the correct year and following the correct measurement.

States are required to use the “Indicator 14 Data Rubric” for reporting data for this indicator (see Attachment B).

FFY	Measurable and Rigorous Target
FFY 2009	100%

Actual Target Data for FFY 2009:

95.7%

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

- o The State did not meet the target of 100 percent for this indicator.
- o AzEIP’s data system is comprised of three child record databases (DES AzEIP ACTS, ASDB ECFE, and DES DDD Focus). These databases are not live and online and therefore there are time delays between the entry of data and the State’s ability to review and analyze it for completeness, reliability and validity. These databases have some

differences in structure and therefore the process of converting them to a single format and merging them into a single central database is a complex process. If changes are made to any of the separate databases, changes must also be made to the conversion and merging processes and to the data analysis process as well. Changes made during FFY 2009 related to contracting structures, data collection requirements, reporting requirements resulted in challenges to the data system. DES AzEIP has received and continues to receive technical assistance and support from the Data Accountability Center and the DES Division of Technology Services, Systems and Programming to address these challenges.

- As noted in the C-14 data rubric, AzEIP experienced slippage related to Indicator 2, Settings Data, Indicator 5 and 6, Child Count Data.
 - Indicator 5 and 6, Child Count: During the development of Indicators 5 and 6, Child Find, for this APR, child find data were reviewed to identify regional or program trends that might account for the slippage. The analysis did not reveal any changes in referral, eligibility, or IFSP data that would account for a lower child count compared to 2008 child find data.

Because the review of child find data did not reveal the underlying causes of the slippage in child counts, further steps were taken to review the child data. The data processing code used to compile the 2009 child count was reviewed and analyzed to determine whether the code changes made in November and December of 2009 may have resulted in undercounting of active IFSPs. The code review revealed two issues that did in fact lead to undercounting: one issue was related to initial IFSP dates, and the second issue was related to children who transferred between local early intervention programs. These two code issues resulted in some children with active IFSPs being excluded from the child counts through the data processing and reporting procedures. Adjustments and corrections are being developed for the child count data compilation process for the February 1, 2010 618 Table 1, Report of Infants and Toddlers Receiving Early Intervention Services data reported to OSEP; DES AzEIP hopes to have those adjustments and correction in place before the report due date of February 1, 2011.

- Indicator 2, Settings: During the development of this APR, the Table 2- Program Settings results were reviewed to identify regional or program trends that might account for the slippage in children receiving their services in settings other than home or community-based. The team based model implemented by AzEIP in 2008 places very strong emphasis on the provision of services in natural environments, and local program invoice data demonstrated very high levels of performance on this measure. Table 2 reports based on those same local programs, however, produced results showing low levels of performance on this indicator, contradicting the evidence from invoices and file reviews. Because of this contradiction between the two information sources, the data processing code used to compile the 618 Table 2- Program Setting report was reviewed to determine whether the code was accurately identifying settings for individual children. The code review revealed that settings data from team-based model programs was being transposed by the report compilation process. Adjustments and corrections are being developed for the settings data compilation process for the February 1, 2010 Table 2 Program Settings Report; DES AzEIP hopes to have those adjustments and correction in place before the report due date of February 1, 2011.
- With assistance from the Data Accountability Center, the State has done considerable work on the development and implementation of data editing and validations processes, as well as system management and documentation procedures. This work has produced strong positive results with DES AzEIP local

program contractor data collection and reporting. Related activities include the utilization of several data analysis tools to review all databases on a regularly scheduled basis. These tools identify data errors and incomplete records, and are also used to verify correction of data errors and completion of child records. Targeted technical assistance was provided by DES AzEIP staff and TAMS to new and continuing team-based model programs to review data collection requirements, and to ensure data reliability.

Improvement Activity	Timelines	Status
Engage OSEP-funded technical assistance centers, i.e., Mountain Plains Regional Resource Center (MPRRC) and the Data Accountability Center (DAC), to support AzEIP in modifying general supervision, including establishing data editing and validations processes and system management procedures.	December 2010	DAC will return in May 2011 to help evaluate implementation of integrated monitoring, and data routines and validations processes.
Implement data editing and validations processes in order to identify unusual findings in a timely manner, including regular review/monitoring of programs/public agencies' practices in collecting, editing and reporting data.	July 2010	Focus has been primarily with DES/AzEIP local program contractors. Results have been very positive; data timeliness, accuracy, validity and completeness have improved significantly.
Implement system management and documentation procedures to ensure collection and reporting of accurate and timely data, including data collection, editing and validation, and reporting	July 2010	Focus has been primarily with DES/AzEIP local program contractors. Results have been very positive; data timeliness, accuracy, validity and completeness have improved significantly.
Provide targeted and general technical assistance through Regional meetings, on-site and phone meetings with TAMS and/or DES/AzEIP staff, written guidance/clarification and other strategies. Technical assistance will address: <ul style="list-style-type: none"> o Policies and procedures; o IDEA requirements; o Data collection and reporting requirements; and o Data systems and resolution of production issues. 	July 2010 and ongoing	Targeted technical assistance provided to new DES/AzEIP team based local program contractors resulted in rapid progress toward meeting data collection and reporting requirements.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010

Improvement Activity	Timelines	Resources
<p>Revise: Provide targeted and general technical assistance through Regional meetings, on-site and phone meetings with TAMS and/or DES/AzEIP staff, written guidance/clarification and other strategies. Technical assistance will address:</p> <ul style="list-style-type: none"> ○ Policies and procedures; ○ IDEA requirements; ○ Data collection and reporting requirements; and ○ Data systems and resolution of production issues. <p>Propose: Provide targeted and general technical assistance through Regional meetings, on-site and phone meetings with TAMS and/or DES/AzEIP staff, written guidance/clarification and other strategies. Technical assistance will address:</p> <ul style="list-style-type: none"> ○ Family Rights; ○ Transition; ○ Team-based early intervention; ○ Service Coordination; ○ Financial Matters, including FCP, Medicaid, private insurance; ○ Child Indicators/Child Indicator Summary Forms; and ○ Data Collection and Reporting Requirements. <p>Justification: DES/AzEIP proposes that training and technical assistance priorities for the next two years be more clearly defined.</p>	<p>Revise: July 2010 and ongoing</p> <p>To: July 2010 – June 2012</p>	<p>DES/AzEIP staff, TAMS, Agency Partners</p>

Self-Scoring Rubric for Part C - Indicator 14
APR and 618 -State Reported Data

DATE: January 2011

Please read the following guidelines before completing the Self-Scoring Rubric for Part C - Indicator 14

This rubric is a worksheet to assist in compiling data for Indicator 14.

In each cell, select **1** if your State met the requirements for the given APR indicator or 618 data collection, **0** if your State did not meet the requirements, and **"N/A"** if the requirement is not applicable to your State.

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

Please see below the definitions for the terms used in this worksheet.

SPP/APR Data

1) Valid and Reliable Data - Data provided are from the correct time period, are consistent with 618 (when appropriate) and the measurement, and are consistent with previous indicator data (unless explained).

2) Correct Calculation - Result produced follows the required calculation in the instructions for the indicator.

618 Data

1) Timely – All data for the APR are submitted on or before February 1, 2011. Data for tables for 618 are submitted on or before each tables' due date. NO extensions.

2) Complete Data – No missing sections. No placeholder data. Data submitted from all programs or agencies. For example, when the instructions for an indicator require data broken down into subparts, data for all subparts are provided.

3) Passed Edit Check - 618 data submissions do not have missing cells or internal inconsistencies. (See <https://www.ideadata.org/TAMaterial.asp> regarding edit checks).

4) Responded to Data Note Requests - Provided written explanation of year to year changes for inclusion in Data Notes to accompany 618 data submissions.

FFY 2008 APR (STATE)

SPP/APR Data - Indicator 14			
APR Indicator	Valid and Reliable	Correct Calculation	Total
1	1	1	2
2	0	1	1
3	1	1	2
4	1	1	2
5	0	1	1
6	0	1	1
7	1	1	2
8a	1	1	2
8b	1	1	2
8c	1	1	2
9	1	1	2
10	1	1	2
11	1	1	2
12	1	1	2
13	1	1	2
		Subtotal	27
APR Score Calculation	Timely Submission Points - If the FFY 2009 APR was submitted on-time, place the number 5 in the cell on the right		5
	Grand Total - (Sum of subtotal and Timely Submission Points) =		32

FFY 2008 APR (STATE)

618 Data - Indicator 14					
Table	Timely	Complete Data	Passed Edit Check	Responded to Data Note Requests	Total
Table 1 - Child Count Due Date: 2/1/10	1	1	1	1	4
Table 2 - Program Settings Due Date: 2/1/10	1	1	1	1	4
Table 3 - Exiting Due Date: 11/1/10	1	1	1	N/A	3
Table 4 - Dispute Resolution Due Date: 11/1/10	1	1	1	N/A	3
				Subtotal	14
618 Score Calculation			Grand Total (Subtotal X 2.5)		35

Indicator #14 Calculation	
A. APR Grand Total	32.00
B. 618 Grand Total	35.00
C. APR Grand Total (A) + 618 Grand Total (B) =	67.00
Total NA in APR	0.00
Total NA in 618	0.00
Base	70.00
D. Subtotal (C divided by Base*) =	0.957
E. Indicator Score (Subtotal D x 100) =	95.7

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

FFY 2009 APR Arizona

2009 SPP/APR Data - Indicator 14			
APR Indicator	Valid and Reliable	Correct Calculation	Total
1	1	1	2
2	1	1	2
3	1	1	2
4	1	0	1
5	0	0	0
6	0	0	0
7	1	1	2
8a	1	1	2
8b	1	1	2
8c	1	1	2
9	0	0	0
10	1	1	2
11	1	1	2
12	1	1	2
13	1	1	2
		Subtotal	23
APR Score Calculation	Timely Submission Points - If the FFY 2009 APR was submitted on-time, place the number 5 in the cell on the right.		5
	Grand Total - (Sum of subtotal and Timely Submission Points) =		28

618 Data - Indicator 14					
Table	Timely	Complete Data	Passed Edit Check	Responded to Data Note Requests	Total
Table 1 - Child Count Due Date: 2/1/10	1	1	1	1	4
Table 2 - Program Settings Due Date: 2/1/10	1	1	1	1	4
Table 3 - Exiting Due Date: 11/1/10	1	1	1	N/A	3
Table 4 - Dispute Resolution Due Date: 11/1/10	1	1	1	N/A	3
				Subtotal	14
618 Score Calculation			Grand Total (Subtotal X 2.5)		35

Indicator #14 Calculation	
A. APR Grand Total	28.00
B. 618 Grand Total	35.00
C. APR Grand Total (A) + 618 Grand Total (B) =	63.00
Total NA in APR	0.00
Total NA in 618	0.00
Base	70.00
D. Subtotal (C divided by Base*) =	0.900
E. Indicator Score (Subtotal D x 100) =	90.0

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