

# Kentucky



## Annual Performance Report FFY 2009

*Cabinet for Health & Family Services*

DEPARTMENT FOR PUBLIC HEALTH

*DIVISION OF MATERNAL AND CHILD HEALTH*

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

### Overview of the Annual Performance Report Development:

Central Office work of improving the quality of the improvement activities was greatly aided by the Mid-South Regional Resource Center (MSRRC). Kentucky's SPP/APR development process included a stakeholder group comprised of Central Office staff, Technical Assistance (TA) staff, parents, providers and members of the Interagency Coordinating Council (ICC). Input was specifically sought for target-setting for Indicator 3, Child Outcomes, through a variety of methods—webinars, telephone conferences, and presentations at conferences.

Significant changes to the infrastructure of the Kentucky Part C system were implemented during the FFY 2008 to enhance the general supervision system for First Steps (Kentucky's Part C system). All planned changes were completed during FFY 2009. Completed changes include the following:

- Each Point of Entry (POE) district, Kentucky's local Lead Agency, includes a dedicated POE Manager(s). This person is responsible for ensuring appropriate implementation of all policies and procedures, including data entry.
- In December, 2008 an online data system was implemented that 1) provides an electronic educational record for each child, 2) serves as the claims payment for early intervention services and 3) supplies data for reporting and management purposes. Kentucky uses The Technology-Assisted Observation and Teaming Support System (TOTS), a modified version of the online system first developed by Tennessee Part C. This system provides child level information as well as district and state level information. Data used for the FFY 2009 APR reflects a full year of data from TOTS.
- Kentucky Part C has redesigned their monitoring system. With the guidance of the federal technical assistance providers (MSRRC, National Early Childhood Technical Assistance Center (NECTAC), and Data Accountability Center (DAC)), Kentucky has a system in place that both identifies instances of noncompliance and verifies correction. The monitoring system was reviewed and approved by the OSEP state contact.

Several other infrastructure changes that were developed and planned in FFY 2008 were completed during FFY2009. This includes the addition of Child Evaluation Specialists (CES) at each Point of Entry (POE), development and promulgation of revised regulations, and development of revised policies and procedures consistent with the new regulations.

The FFY2009 APR was developed by Lead Agency staff with input from stakeholder groups formed to study data and revise targets for results indicators. These stakeholder groups also were charged with the revision of improvement activities for both compliance and results indicators. The draft APR was posted on the First Steps website for one week to gather input from families, early intervention providers and other interested individuals. The ICC also reviewed and gave input on the content of the APR.

The State Performance Plan (SPP) and APR are both posted on the First Steps website at: <http://chfs.ky.gov/dph/firstSteps/First+Steps+Annual+Reports.htm>. This website also includes the POE performance data which is posted in June after the District Determinations process is finalized. District performance data are the actual district data and progress or slippage in meeting the targets for each indicator.

**Monitoring Priority: Early Intervention Services In Natural Environments**

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

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

**Measurement:**

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

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

FFY	Measurable and Rigorous Target
<b>2009</b>	100% of infants and toddlers with IFSPs will receive early intervention services on their IFSPs in a timely manner.

**Actual Target Data for FFY 2009: 86.70%**

**Data Source and Method:**

Technology-assisted Observation and Teaming Supports (TOTS) Database, 07/1/2009-06/30/2010. TOTS is a statewide database that pulls queries from the child early intervention record.

**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	<b>6990</b>
b. Total number of infants and toddlers with IFSPs	<b>8062</b>
Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner (Percent = [(a) divided by (b)] times 100)	<b>87%</b>

**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: **74.7%**

1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009)	<b>15</b>
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)	<b>13</b>

3. Number of FFY 2008 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	2
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**Correction of FFY 2008 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:**

4. Number of FFY 2008 findings not timely corrected (same as the number from (3) above)	2
5. Number of FFY 2008 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	2
6. Number of FFY 2008 findings <u>not</u> verified as corrected [(4) minus (5)]	0

**Actions Taken if Noncompliance Not Corrected:** Not applicable

**Verification of Correction of FFY 2008 noncompliance or FFY 2008 findings (either timely or subsequent):**

Monitoring findings of noncompliance were issued in May, 2009. Each POE with a finding of noncompliance was required to implement a Corrective Action Plan (CAP) that included not only verifying locally the correction of noncompliance but also requiring the maintenance of compliance for a specified time period. POEs were required to conduct reviews of all new IFSPs and any new services on existing IFSPs to verify date of initial service delivery. Correction had to be maintained in order for the POE to be released from the CAP. State Lead Agency staff verified each child-specific case of noncompliance for verification of subsequent correction. Once the POE attained the level of 100% compliance and maintained that for the specified time period, the POE was released from the CAP. POE Managers were directed to continually monitor the indicator for slippage.

**Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2008:**

State Lead Agency staff verified correction of findings by implementing the following steps:

1. Reviewed child's record on the TOTS system focusing on date of the IFSP and the date of initial service delivery according to service logs entered by the provider in TOTS. Each finding of noncompliance was checked to ensure that services were delivered, even when later than 21 days from the IFSP date.
2. Check of data to determine if the reason for delay was a family-driven reason or service provider driven reason or if the data were a result of a computer programming glitch.
3. Once verified that the delay was due to a service provider driven reason, the state Lead Agency staff sent notices of performance to the provider indicating that the delay was unacceptable. The notice informed the provider that additional instances of noncompliance would result in suspension of their contract to provide early intervention services.

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

1. Number of remaining uncorrected FFY 2007 findings of noncompliance noted in OSEP's June 2010, FFY 2008 APR response table for this indicator	15
2. Number of remaining FFY 2007 findings the State has verified as corrected	15

3. Number of remaining FFY 2007 findings the State has NOT verified as corrected [(1) minus (2)]	0
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**Verification of Correction of Remaining FFY 2007 findings:**

To verify the correction of FFY 2007 findings, two data systems were used. Kentucky implemented the TOTS system in December, 2008. Previous data were obtained from the Central Billing and Information System (CBIS) system. State Lead Agency staff pulled a list of children from the TOTS who were referred to First Steps between July 1, 2007 and June 30, 2008. This list included the referral date, initial IFSP date, and exit date. Each child’s initial IFSP date was compared to the initial billing for service dates in the CBIS.

**Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2007:**

In FFY 2007, the monitoring system used by the Lead Agency did not provide findings of noncompliance that were child specific; rather, the findings were based on the early intervention program as a whole. Therefore, in order to identify child specific instances of noncompliance, the Lead Agency staff looked for service billings within 21 days of the IFSP meeting to verify compliance for those children on the list described above. When the date of billing was later than 21 days, a search of records was conducted to identify the provider and date of first billing for services. When a date for services was identified, this verified that the service had been provided (subsequent compliance), although not timely. Due to the limitations of the previous data system and the resources of the Lead Agency, verification of continued correction was not conducted.

The monitoring system now used to identify noncompliance and verify correction provides the child specific data needed to address all prongs for correction of noncompliance. The data is readily available that indicates the delivery of all initial services and can provide ongoing data for verification of timely services. This process is described above under the FFY 2008 findings and verification.

**Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable):** Not Applicable

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

Kentucky continues to make progress on this indicator although does not meet the target of 100%. The significant improvement from the FFY 2008 rate of 74.7% of early intervention services delivered timely can be attributed to the changes to the early intervention system. Another factor was that all service coordination moved to the direct supervision of the Point of Entry (POE).

	Actual Data
FFY 06	80
FFY07	81.2
FFY08	74.7
FFY09	86.7

**Improvement Activities Completed:**

<b>Indicator # 1 Improvement Activity #6</b>	Change the definition of timely services to 30 days Action Steps: <ol style="list-style-type: none"> <li>1. Embed new definition in policies and procedures</li> <li>2. Revise TOTS to accommodate new definition in local and state reporting features</li> <li>3. Train service coordinators and providers on new policy</li> </ol>
<b>Justification</b>	The ICC recommended that the definition of timely services be changed from 21 days to 30 days. The Lead Agency agrees with this recommendation as this is the most common definition used by Part C systems in other states. Kentucky will implement this changed definition beginning July 1, 2010.
<b>Evaluation</b>	TOTS district and state reports
<b>Resources</b>	Part C ARRA funds; general revenue funds; Part C staff and TA staff
<b>Timeline</b>	July 1, 2010-2011
<b>Status</b>	Implemented July 1, 2010; completed

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

<b>Indicator # 1 Improvement Activity #4</b>	Require semi-annual in-service meetings of all providers to update them on program requirements and changes. Action Steps: <ol style="list-style-type: none"> <li>1. Seek input from providers on this possible contractual requirement</li> <li>2. Run financial impact on providers reports</li> <li>3. Charge CSPD Committee of ICC to develop recommendations</li> <li>4. Lead Agency to review recommendations and make decisions.</li> <li>5. Implement decision.</li> </ol>
<b>Justification</b>	To improve services to children and families in First Steps; to provide opportunity for providers to learn and understand program requirements and changes
<b>Evaluation</b>	Timely service reports
<b>Resources</b>	CSPD workgroup, First Steps Lead Agency staff
<b>Timeline</b>	July 2010 -June 2012
<b>Status</b>	In process; early intervention providers are required by contract to participate in Lead Agency mandatory meetings. Contracts are valid for the time period July 1, 2010 through June 30, 2012.

<p><b>Indicator # 1 Improvement Activity #5</b></p>	<p>Recruit and retain an adequate number of early intervention providers. Action Steps:</p> <ol style="list-style-type: none"> <li>1. Focus public awareness activities and materials on provider recruitment.</li> <li>2. Require regional technical assistance staff to conduct recruitment activities within their respective regions as needed.</li> <li>3. Develop an easily accessible provider matrix to be used for early intervention provider selection.</li> <li>4. Target funds as available on specific capacity building efforts to meet the needs of very young children with disabilities. Funds to be used for training and support to providers to participate in the training (stipends, etc).</li> </ol>
<p><b>Justification</b></p>	<p>To ensure eligible children and families receive timely appropriate services</p>
<p><b>Evaluation</b></p>	<p>Timely services report; TAT reports</p>
<p><b>Resources</b></p>	<p>Public Relations workgroup of ICC; POE Managers; state Lead Agency staff</p>
<p><b>Timeline</b></p>	<p>July 2010-June 2013</p>
<p><b>Status</b></p>	<p>In process; Online provider matrix currently under design.</p>

<p><b>Indicator # 1 Improvement Activity #7</b></p>	<p>Monitor POEs for compliance with this indicator Action Steps:</p> <ol style="list-style-type: none"> <li>1. Require Corrective Action Plans for findings of noncompliance</li> <li>2. Technical Assistance Staff review TOTS data reports with POE Managers Include financial penalties in POE contracts for continued noncompliance. Financial penalties are assessed if correction is not achieved within 12 months of the citation.</li> </ol>
<p><b>Justification</b></p>	<p>Focused attention on this indicator is necessary to reach compliance</p>
<p><b>Evaluation</b></p>	<p>TOTS district and state reports; verification of corrections</p>
<p><b>Resources</b></p>	<p>Lead Agency general supervision staff, TA staff</p>
<p><b>Timeline</b></p>	<p>July 1, 2010-2013</p>
<p><b>Status</b></p>	<p>In progress</p>

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

**Overview of the Annual Performance Report Development: See 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
<b>2009</b>	98.7% of infants and toddlers will receive early intervention services in the home or programs for typically developing children.

**Actual Target Data for FFY 2009: 99.4%**

99.4% was derived by dividing the number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings (n=5049) by the total number of infants and toddler with IFSPs (n= 5077) times 100.

Data Source: 618 Data, Table 2 December 1, 2009

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

Kentucky’s efforts to implement a service delivery system that focuses on the families’ priorities, concerns and resources within their daily routines have contributed to the high level of performance demonstrated by the data presented below:

Indicator 2	Actual	Target
FFY 06	99.3	98.7
FFY07	99.5	98.7
FFY08	99.5	98.7
FFY09	99.4	98.7

As part of Improvement Activity # 4 (listed below), the monitoring system has been revised. The individual decision-making aspect of natural environments is addressed in the self-assessment tool. Questions for the POE to address include how the IFSP team determines what is the natural environment for the child and how is the information gathered in the family assessment (Routines-Based Interview) incorporated into service delivery location? The self-assessment was piloted by five POEs during FFY 2009. Five new POEs will conduct the self-assessment during FFY 2010. Improvement Activity #5 (listed below) has been implemented in phases. The staff for the Kentucky Early Childhood Transition Project has provided training to early intervention providers on embedding the Early Childhood Standards into their intervention strategies. Training available through KEDS addressed using ongoing assessment data for IFSP planning. Both of these efforts impact services in the natural environment. RBI interviewing is a needed training for service coordinators and has not been developed yet.

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

<b>Indicator # 2 Improvement Activity #4</b>	Revise monitoring document to capture natural environments requirements and embed use of data reports in monitoring procedures.
<b>Justification</b>	Improve ability to monitor requirements for EIS in the natural environment
<b>Evaluation</b>	Natural environments reports from data system
<b>Resources</b>	First Steps Lead Agency staff
<b>Timeline</b>	July 2010-June 2013
<b>Status</b>	In initial stages of development of the revised document

<b>Indicator # 2 Improvement Activity #5</b>	Develop training on natural environments to include coaching parents, RBI interviewing, and use of Kentucky's Early Childhood Standards. Action Steps: <ol style="list-style-type: none"> <li>1. Establish small workgroup to develop training module that includes slide show, handouts, and learning activities</li> <li>2. Transfer materials to online training system utilized by Lead Agency</li> <li>3. Disseminate announcement of availability of training</li> </ol>
<b>Justification</b>	New provider contracts require that providers document six clock hours of training on typical child development prior to June 30, 2012.
<b>Evaluation</b>	TOTS district and state reports; contract renewal documentation. Training materials are evaluated by participants through pre and post test and post-training survey.
<b>Resources</b>	Lead Agency training coordinator, Kentucky Department of Education (KDE) early care and education program consultants
<b>Timeline</b>	July 1, 2007–June 30, 2011
<b>Status</b>	In progress

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

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

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 three 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.

**Actual Data for FFY 2009**

Summary Statements	Baseline FFY08 (% of children)	Targets FFY09	Actual Results FFY09
<b>Outcome A: Positive social-emotional skills (including social relationships)</b>			
1. Of those children who entered the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	70.1	62	66.8
2. The percent of children who were functioning within age expectations in Outcome A by the time they turned 3 years of age or exited the program	48.1	31	62.4
<b>Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>			
1. Of those children who entered the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	61.8	50	67.7
2. The percent of children who were functioning within age expectations in Outcome B by the time they turned 3 years of age or exited the program	28.8	26	57.4

<b>Outcome C: Use of appropriate behaviors to meet their needs</b>			
1. Of those children who entered the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	57.3	50	67.2
2. The percent of children who were functioning within age expectations in Outcome C by the time they turned 3 years of age or exited the program	29.1	26	56.7

**Progress Data for ALL EXITING children with complete progress data for 2009-2010: Outcome A**

<b>A. Positive social-emotional skills (including social relationships):</b>	<b>Number of children</b>	<b>% of children</b>
a. Percent of infants and toddlers who did not improve functioning	36	6.1
b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	80	13.5
c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach	106	17.9
d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers	127	21.5
e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers	242	40.9
<b>Total</b>	<b>N= 591</b>	<b>100%</b>

**Progress Data for ALL EXITING children with complete progress data for 2009-2010: Outcome B**

<b>B. Acquisition and use of knowledge and skills (including early language/communication and early literacy):</b>	<b>Number of children</b>	<b>% of children</b>
a. Percent of infants and toddlers who did not improve functioning	45	7.6
b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	80	13.5
c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach	127	21.5
d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers	135	22.8
e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers	204	34.5
<b>Total</b>	<b>N= 591</b>	<b>100%</b>

**Progress Data for ALL EXITING children with complete progress data for 2009-2010: Outcome C**

<b>C. Use of appropriate behaviors to meet their needs</b>	<b>Number of children</b>	<b>% of children</b>
a. Percent of infants and toddlers who did not improve functioning	37	6.3
b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	95	16.1
c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach	124	21.0
d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers	147	24.9
e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers	188	31.8
<b>Total</b>	<b>N= 591</b>	<b>100%</b>

Data Source: KEDS, University of Kentucky

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

The KEDS project at the University of Kentucky (UK) provides a web-based platform for gathering data from multiple programs/providers for progress monitoring on KY standards and OSEP child outcomes. Demographic data for each child are gathered through Technology-Assisted Observation and Teaming Support System (TOTS; the KY EI data system), downloaded to KEDS, and verified by Point of Entry (POE) staff across the state. While TOTS has greatly improved the accuracy of demographic data of children in the system, it has required providers to learn a new data entry system while implementing new assessment procedures. Considerable training and technical assistance for all EI staff and administrators have been provided to help ensure accuracy of data. The implementation of this new component of the system has undoubtedly affected the amount of assessment data entered into KEDS.

To support continued improvement of data accuracy in the system, a more seamless connection between the two systems, TOTS and KEDS, was implemented over the past year. Beginning October 1, 2008, EI providers were required to conduct approved assessments on ALL children entering the EI system. Assessment data were entered into KEDS online by either POE staff or by a designated EI team member. As of March 2010, all assessment data were required to be entered by providers. The result of this directive was an increase in the number of children for whom assessment data were obtained, although it was still lower than expected and not fully complete. A significant number of providers did not comply with the directive to enter assessment data, prompting the Lead Agency to withhold payment until the data were entered. Complete assessments are expected to increase significantly during the 2010-2011 year collection.

**Data analyses:** Based on the first level crosswalk procedure, individual item scores were analyzed to determine age-appropriate functioning. Percentages for the number of items on which the child scored at age level were computed based on cumulative scores over time. Using a common metric (percentages), a difference score was computed between each data point for each child. Percentage analysis was utilized to determine child inclusion for each reporting categories. Data analysis for 5 levels of functioning as specified by OSEP were determined as follows: (a) children who did not improve, i.e., children who exhibited no change in item scores toward age functioning, (b) children who improved but did not move significantly nearer to same-aged peers, i.e., exhibited any item gain and thus some improvement on their age-equivalent score and scored less than 50% of their age-equivalency, (c) improved but did not reach same-aged peers, i.e., children who improved functioning and whose score at exit was greater than 50% but less than 80% of their same-age peers, (d) children who reached functioning levels comparable to same-aged peers, i.e., reached age-appropriate functioning, i.e., 80% of age-appropriate functioning

level, and (e) children who maintained functioning comparable to same-aged peers, i.e., maintained scores at or above 80% age-equivalency based on age-anchoring within the crosswalk document. Data analysis was conducted for each of the 3 approved assessment tools. The child’s first and last data points were reported.

All children’s scores were matched across data points and cumulative scores created at each point based on the crosswalk age-anchoring. It is important to note there are differences in the specificity of items across the three assessment tools per benchmark and OSEP outcome. Additional data points are needed across time to appropriately measure progress for children for some of the outcomes dependent on the assessment used. Analyses are reported for all children who were *exiting* EI. An exiting child was defined as one who would turn three years on or before June 30, 2010. For the current year, any child served in EI over the prior three years who exited between July 1, 2009 and June 30, 2010 was included. The demographics of the data for this year are included in the table below.

**Demographic Information for *exiting* children with complete data**

	Exit N	Exit %
<b>Mean Age (SD)</b>	591	33.92 (4.35)
<b>Age Range in months</b>	59	6.72 – 43.92
<b>Gender</b>		
• Female	204	34.5
• Male	387	65.5
<b>Race<sup>1</sup></b>		
• White	485	82.1
• Black	59	10.0
• Hispanic	32	5.4
• Asian/Pacific Islander	12	2.0
• American Indian/Alaska Native	1	.2
• Other	1	.2
<b>Assessment Chosen</b>		
• AEPS	9	.8
• CCITSN	287	48.6
• HELP	295	50.3
<b>Total</b>	591	100.0

In FFY 2010 (2010-11), the data set will increase significantly based on the closer relationship between TOTS and KEDS. Since all children were required to have an approved assessment as of October 1, 2008, the numbers of children exiting the system with two usable points of data will increase. The sample size is anticipated to increase from approximately 591 exiting children for 2009-10 with complete data in KEDS to approximately 2,000 exiting children over the course of one year.

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

<b>Indicator # 3 Improvement Activity #3</b>	Investigate easier assessment data entry by linking TOTS and KEDS Action Steps: <ol style="list-style-type: none"> <li>1. Conceptualize viable options</li> <li>2. Prepare funding request</li> <li>3. Determine feasibility</li> <li>4. Implement decision</li> </ol>
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<b>Justification</b>	Problems exist with small data pool due to provider's lack of data entry into KEDS. A simpler, more efficient way must be developed to capture the data.
<b>Evaluation</b>	Result of investigation
<b>Resources</b>	First Steps Lead Agency staff, TOTS staff and KEDs staff; First Steps American Recovery and Reinvestment Act (ARRA) funds
<b>Timeline</b>	July 2009-June 2010
<b>Status</b>	<u>Completed</u> : a file exchange between KEDS and TOTS indicating that all assessment data were entered and saved in the KEDS system was developed and deployed July 1, 2010. A verification code from KEDS is required to trigger payment for the assessment.

<b>Indicator # 3 Improvement Activity #4</b>	Develop and disseminate in-depth training that includes a focus on inter-rater reliability for primary level evaluators and primary service providers
<b>Justification</b>	Primary level evaluators and primary service providers must use specific instruments to report progress data in state assessment collection system.
<b>Evaluation</b>	Analysis of progress data; reports from providers
<b>Resources</b>	Part C coordinator, Training Coordinator, ICC representatives, KEDS staff
<b>Timeline</b>	July 2011- June 2013
<b>Status</b>	Pending implementation

<b>Indicator # 3 Improvement Activity #5</b>	Disseminate information to early intervention providers on the importance of the assessment data
<b>Justification</b>	Primary level evaluators and primary service providers must use specific instruments to report progress data in state assessment collection system.
<b>Evaluation</b>	Analysis of progress data; reports from providers
<b>Resources</b>	Lead Agency staff, ICC representatives, KEDS staff
<b>Timeline</b>	January 2011-2013
<b>Status</b>	In development

<b>Indicator # 3 Improvement Activity #6</b>	Increase parent understanding of child progress by modifying KEDS to produce a child-specific progress report based on the Kentucky Early Learning Standards for Birth - 3. This report would be shared at the annual IFSP meeting.
<b>Justification</b>	One of the purposes of early intervention is to reduce the need for special education in the future and parents need to understand the progress their child makes in the context of the outcomes indicator.
<b>Evaluation</b>	Analysis of parent feedback on usefulness of information
<b>Resources</b>	Lead Agency staff, KEDS staff
<b>Timeline</b>	January 2011-2013
<b>Status</b>	In development phase

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

Overview of the Annual Performance Report Development: See 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 U.S.C. 1416(a)(3)(A) and 1442)

**Measurement:**

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

FFY	Measurable and Rigorous Target
<b>2009 (2009-2010)</b>	<ul style="list-style-type: none"> <li>A. 85.2% of families participating in Part C report that early intervention services have helped the family know their rights</li> <li>B. 76.3% of families participating in Part C report that early intervention services have helped the family effectively communicate their children's needs</li> <li>C. 90.6% of families participating in Part C report that early intervention services have helped the family help their child develop and learn</li> </ul>

**Actual Target Data for FFY 2009:**

- A. 94.1% (1990/2114) of families participating in Part C report that early intervention services have helped the family know their rights
- B. 93.1% (1969/2114) of families participating in Part C report that early intervention services have helped the family effectively communicate their children's needs
- C. 92.1% (1948/2114) of families participating in Part C report that early intervention services have helped the family help their child develop and learn.

Data Source: Early Childhood Outcomes Family Survey, September 2009.

9,625 surveys were mailed to families who had received services during FFY 2009. 2,163 surveys (22.4%) were returned. Of those returned surveys, 2114 (98%) were complete. The data reported above was derived by dividing the number of positive responses by the number of returned surveys then multiplying by 100.

Kentucky has exceeded the targets set for this indicator. This is the second year that the Early Childhood Outcomes Center (ECO) Family Survey was used. A list of names and addresses of First Steps program participants (census) was generated by TOTS. The survey was printed on the front and back pages in English and Spanish. The FFY 2009 return rate of 22.4% was higher than the return rate in FFY 2008 (17%).

Analysis was done to determine the representativeness of the returned surveys in the areas of race and gender based on the December 1, 2009 Child Count submitted to OSEP in February 2010. The geographic analysis to determine representativeness was based on children with IFSPs entered per district into TOTS on December 1, 2009. The results are as follows:

<b>Ethnic Group</b>	<b>Child Count</b>	<b>Percent of Total</b>	<b>Total Surveys Returned</b>	<b>Percent of Total</b>
All Children	5077	100.0%	2163	100%
American Indian/Alaska Native	12	0.24%	10	0.46%
Asian/Pacific Islander	96	1.89%	55	2.54%
Black/African American	559	11.0%	172	7.95%
Hispanic/Latino	273	5.37%	119	5.50%
White	4137	81.48%	1807	83.54%

The response by race or gender was somewhat consistent with the diversity of the population served in FFY 09. The responses by families who are black or African American were lower than the child count percentage in that racial group. There were increases in the responses from American Indian/Alaska Native and Asian/Pacific Islander families.

All regions of the state, urban and rural, were represented in the survey results.

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

As indicated by the survey results, Kentucky has made progress with family outcomes. There are two contributing factors for this improvement:

1. Service coordination moved under the authority of the Points of Entry as one service. Under the previous system design, families had one service coordinator during the intake process and a different one assigned for ongoing services. Families now have one service coordinator who remains with them throughout the period of time that the child is in First Steps. IFSP teams also benefit from a consistent person who fully understands the system of services.
2. The survey itself—this version of the ECO Family Survey was one page with a clearer rating scale for responses. The return rate improved in part due to the shorter version.

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

<b>Indicator # 4 Improvement Activity #4</b>	Monitor the implementation of Improvement Activities and future family satisfaction survey findings on an ongoing basis. Revise improvement activities according to data.
<b>Justification</b>	To ensure families are receiving accurate and useful information; this activity has been extended to continue focus on the consumer group and impact that system changes have on the consumers.
<b>Evaluation</b>	Family survey results
<b>Resources</b>	First Steps Lead Agency staff; parent consultants, ICC
<b>Timeline</b>	July 2007-June 2013
<b>Status</b>	In progress; Changes have occurred in the family survey tool and process based upon the data for response rate and feedback from families. As the system moves forward, additional uses for the data will be identified.

<b>Indicator # 4 Improvement Activity #5</b>	Increase the response rate for the ECO survey. Action Steps: <ol style="list-style-type: none"> <li>1. Implement changes in how the survey is distributed, administered and collected.</li> <li>2. Post family survey on-line for a limited time period to collect data, then mail survey to those who have not responded.</li> </ol>
<b>Justification</b>	FFY 2008 was the first year of census distribution of new survey, there is a need to improve response rate and ensure representativeness.
<b>Evaluation</b>	Comparison of response rate and representativeness to previous year survey
<b>Timeline</b>	FFY 2010-2012
<b>Resources</b>	Lead Agency staff, state general funds
<b>Status</b>	In progress; Originally the state used the NCSEAM family survey tool. Feedback from families and ICC directed the Lead Agency to change to a shorter tool that analysis would be easier for the general public to understand. The ECO survey that is presently used is credited with increasing the return rate. Given limited resources for survey follow-up, the Lead Agency is exploring the possibility of posting the survey online with expectations that the availability of this convenient way to respond may increase the survey response.

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

**Overview of the Annual Performance Report Development: See 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
<b>2009</b>	0. 86% of infants and toddlers aged birth to 1 in Kentucky will have IFSPs.

**Actual Target Data for FFY 2009:**

Kentucky's participation rate for birth to one for FFY 2009 is 0.68%.

The actual target percentage was derived by dividing the number of infants and toddlers birth to 1 with IFSPs (N=382) by the Kentucky population of infants and toddlers ages birth to 1 (N=56,470). The resulting number was then multiplied by 100.

	Number served Birth to 1 year	Population of Infants and Toddlers Birth to 1	Percentage
<b>Kentucky Data</b>	<b>382</b>	<b>56,470</b>	<b>0.68</b>
<b>National Data</b>	<b>44,341</b>	<b>4,314,824</b>	<b>1.03</b>

Data Source: Federal 618 Data Table 1, December 1, 2009

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

Kentucky did not meet the target set for this year and this rate is a decrease from the rate of 0.74% reported in FFY 2008. Additionally, Kentucky is below the national rate served. The slippage from the rate reported in FFY 2008 can be attributed to fewer child find activities at the local level specifically targeting this age group. It appears that infrastructure changes impacted priorities as POE Managers were busy implementing the addition of new staff positions and screening procedures. Another factor which may impact identifying children under the age of one year is the process for referral used by the Neonatal Intensive Care Unit (NICU) Follow-Up Clinics and First Steps. Children who are followed by the NICU Follow-Up Clinics are seen on a periodic basis. Extensive examinations and assessments are conducted to determine the developmental status of each child. Some children with known

developmentally disabling conditions are referred to First Steps immediately. However, alternately, home programming or other clinical services (such as physical therapy) are often provided to the families of less involved children, who may have only transient delays, for implementation between clinic visits. Children are not referred by the NICU Follow-Up Team until after reassessment of the developmental status. Some children who were suspected of having a delay no longer do after the implementation of the NICU Follow-Up services. By doing this "response to intervention" approach, only those children who appear to have sustained developmental delays and will meet eligibility criteria are referred to First Steps.

Updated child find campaign materials that accurately described the early intervention system were not available which may have also impacted the participation rate.

Improvement activities were not completed but are ongoing as child find for the B-1 population is an area that requires improvement. The following table compares data from FFY 2008 with FFY 2009 for specific referral sources that are most likely to refer a child under the age of 1 to First Steps.

<b>Referral Source</b>	<b>FFY 2008</b>	<b>FFY 2009</b>
Newborn Metabolic Screening	9	3
Early Hearing Detection and Treatment (EDHI)	0	1
Neonatal Follow-Up Clinics	37	36

As evidenced by the data, referrals from these programs are low compared to the expected number of referrals. The improvement activities that address communication between these programs are expected to yield more referrals. Mapping parent consent for data sharing within TOTS will provide the ability to share child specific data with appropriate programs to assist with finding children who did not make it to First Steps for eligibility determination. A state-wide initiative for screening also holds much promise as a mechanism for child find.

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

<b>Indicator # 5 Improvement Activity #4</b>	<p>Coordinate child find methodologies with other early childhood programs, including data sharing. Action Steps:</p> <ol style="list-style-type: none"> <li>1. Uniform screening tools will be implemented by both First Steps and the home visiting program for new parents, HANDS.</li> <li>2. First Steps Lead Agency staff will develop a communication &amp; referral process for newborns identified by the Expanded Newborn Metabolic Screening Program and the Kentucky Birth Surveillance Registry (KBSR) in Kentucky.</li> <li>3. First Steps Lead Agency staff will develop a Memorandum of Agreement with the Commission for Special Health Care Needs to share referral data concerning children identified through the Newborn Hearing Screening Program.</li> </ol>
<b>Justification</b>	First Steps needs to increase referrals within this age group.
<b>Evaluation</b>	Review of referral source data; review of processes with other agencies for effectiveness. Data indicates that referrals from other programs to First Steps are lower than what is expected.
<b>Timeline</b>	FFY 2008-2012
<b>Resources</b>	Lead Agency staff, general state funds
<b>Status</b>	<p>The Ages and Stages Questionnaire-3 has been implemented by both HANDS and First Steps and both programs have collaboratively developed quality assurance and training for the implementation of this tool.</p> <p>Efforts to improve data sharing between the Newborn Metabolic Screening, Kentucky Birth Surveillance Registry (KBSR) and the Early Hearing Detection and Treatment programs are ongoing. A release of information form has been developed and mapped within the TOTS system to provide status reports on children referred from one of these programs to First Steps for which there is parental consent to share personally identifiable information.</p>

<b>Indicator # 5 Improvement Activity #5</b>	<p>Monitoring of rate of participation</p> <p>Action Steps:</p> <ol style="list-style-type: none"> <li>1. POE Managers will monitor district data on a monthly basis for participation rates to identify performance rate and focus specific child find activities targeting the birth to one population in the local districts that do not meet the state target;</li> <li>2. Lead Agency staff will review the established risk list yearly to ensure pertinent conditions are included that have a high probability of significant delay; and post the revised list on the website.</li> </ol>
<b>Justification</b>	First Steps needs to increase referrals within this age group.
<b>Evaluation</b>	Review of referral data
<b>Timeline</b>	FFY 2008-2012
<b>Resources</b>	POE staff, Lead Agency staff
<b>Status</b>	In process

<b>Indicator # 5 Improvement Activity #6</b>	Physician referrals will increase. Action steps: <ol style="list-style-type: none"> <li>1. Develop materials specifically for the medical outreach portion of the Help Me Grow initiative and assist with training/dissemination of materials.</li> <li>2. Collaborate with the KY chapter of the American Academy of Pediatricians on information dissemination.</li> </ol>
<b>Justification</b>	First Steps needs to increase referrals within this age group.
<b>Evaluation</b>	Review of referral data
<b>Timeline</b>	FFY 2010-2012
<b>Resources</b>	POE staff, Lead Agency staff.
<b>Status</b>	In progress

<b>Indicator # 5 Improvement Activity #</b>	Compliance agreements for child find. Action steps: <ol style="list-style-type: none"> <li>1. Revise sanctions for POE Determinations to include a state-directed compliance agreement for specific indicators where low performance is demonstrated.</li> <li>2. Include a corrective action for low performance by a POE on Indicator 5.</li> </ol>
<b>Justification</b>	First Steps needs to increase referrals within this age group.
<b>Evaluation</b>	Monitoring data; progress as reported on the state-directed compliance agreement
<b>Timeline</b>	FFY 2010-2012
<b>Resources</b>	POE staff, Lead Agency staff.
<b>Status</b>	In progress

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

Overview of the Annual Performance Report Development: See 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
<b>2009</b>	2.55 % of infants and toddlers aged birth to 3 in Kentucky will have IFSPs.

**Actual Target Data for FFY 2009:**

The actual target data for FFY 2009 was 2.94 %

The actual target percentage was derived by dividing the number of infants and toddlers birth to 3 with IFSPs (N=5077) by the Kentucky population of infants and toddlers ages birth to 3 (N=348,604). The resulting number was then multiplied by 100.

	Number of Infants and Toddlers Birth to 3 With IFSPs	Population of Infants and Toddlers birth to 3	Percentage
<b>Kentucky Data</b>	<b>5077</b>	<b>173,797</b>	<b>2.94</b>
<b>National Data</b>	<b>348,604</b>	<b>13,055,982</b>	<b>2.67</b>

Data Source: Federal 618 Data Table 1 December 1, 2008

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

Kentucky exceeds the state target and national data. The following table provides data from FFY 2008 with FFY 2009 for specific referral sources:

Referral Source	FFY 2008	FFY 2009
HANDS	123	159
CAPTA	63	26
DCBS	437	457
CCSHCN	74	67
Homeless Shelters	8	6
Physicians	2075	1972

The statistics listed above for CAPTA and DCBS referrals prompted the Lead Agency to convene meetings to examine the practices behind these data. It appeared that there was confusion in the field as to what constituted a CAPTA referral. Changes have been made to training for DCBS case workers in defining which children must be referred to First Steps. Fields have been added to the demographic section of TOTS to ensure better data collection in the future (FFY 2010) on CAPTA referrals.

The decrease in referrals from physicians was impacted by the low referral rate for the birth- 1 portion of the population as well as in limited outreach to physicians. Mechanisms for ongoing information dissemination to physicians and related staff have not been firmly established in several areas of the state.

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

<b>Indicator # 6 Improvement Activity #7</b>	Appropriate identification of children with autism spectrum disorders.  Action Steps: 1. Develop and provide training to DCES on the appropriate use of the M-CHAT and STAT-D screening tools
<b>Justification</b>	There is a need to improve the quality of child find and to ensure appropriate eligibility determinations are made.
<b>Evaluation</b>	Review of screening, referral and eligibility data
<b>Timeline</b>	FFY 2010-2012
<b>Resources</b>	First Steps Lead Agency staff, general revenue funds
<b>Status</b>	In progress: planning has begun to develop training plan to accomplish this activity.

<b>Indicator # 6 Improvement Activity #8</b>	<p>Kentucky will implement an information campaign targeting medical personnel that describes steps for referral of children potentially eligible for First Steps.</p> <p>Action Steps:</p> <ol style="list-style-type: none"> <li>1. Develop informational materials targeting the medical audience</li> <li>2. Collaborate with the "Help Me Grow" initiative on outreach to pediatricians, family physicians, nurse practitioners, and physicians assistants.</li> </ol>
<b>Justification</b>	There is a need to increase referrals from the medical field.
<b>Evaluation</b>	Review of screening, referral and eligibility data
<b>Timeline</b>	FFY 2010-2012
<b>Resources</b>	First Steps Lead Agency staff, ARRA funds, general revenue funds
<b>Status</b>	In progress

<b>Indicator # 5 Improvement Activity #9</b>	<p>Compliance agreements for child find.</p> <p>Action steps:</p> <ol style="list-style-type: none"> <li>1. Revise sanctions for POE Determinations to include a state-directed compliance agreement for specific indicators where low performance is demonstrated.</li> <li>2. Include a corrective action for low performance by a POE on Indicator 6</li> </ol>
<b>Justification</b>	Provide attention to child find obligations of the POE
<b>Evaluation</b>	Monitoring data; progress as reported on the state-directed compliance agreement
<b>Timeline</b>	FFY 2010-2012
<b>Resources</b>	POE staff, Lead Agency staff.
<b>Status</b>	To be implemented July 1, 2010

<b>Indicator # 5 Improvement Activity #10</b>	Modify TOTS demographic page to include an item for 'how did you learn about First Steps'?
<b>Justification</b>	Need to be able to discern if parent referred due to own knowledge or if was directed to contact First Steps by physician, health department, etc. This data will assist state in targeting child find efforts more appropriately.
<b>Evaluation</b>	Analysis of data
<b>Timeline</b>	FFY 2010-2012
<b>Resources</b>	POE staff, Lead Agency staff.
<b>Status</b>	To be implemented July 1, 2011; computer programming to begin in early 2011.

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

**Overview of the Annual Performance Report Development: See Indicator 1.**

**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 eligible 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 eligible infants and toddlers evaluated and assessed] times 100.

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

FFY	Measurable and Rigorous Target
<b>2009</b> (2009-2010)	100% of eligible infants and toddlers in Kentucky will have evaluation, assessment and an initial IFSP meeting conducted within Part C’s 45-day timeline.

**Actual Target Data for FFY 2009: 98.46%**

To arrive at 98.26%, the number of IFSPs that were developed within 45 days of referral (n; 3922) was divided by the total number of IFSPs developed (n: 3983). The resulting number was then multiplied by 100.

Reasons for missing the timeline included:

- delays with cases sent to Record Review for eligibility determination (n: 23);
- delays due to provider shortage to complete assessments (n; 7);
- delays due to problems scheduling the IFSP with providers (n: 5); and
- delays due to service coordinator actions (n: 5).

Family reasons for delay included child illness (n: 11), family vacation (n: 1), and service coordinator unable to contact family (n: 9).

The range in days beyond the 45-day timeline was 1 to 49 days.

Data Source: Technology-assisted Observation and Teaming Supports (TOTS) Database, 07/1/2009-06/30/2010. TOTS is a statewide database that pulls queries from the child early intervention record.

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

Kentucky has made significant progress on this indicator due to the increased rigorous monitoring system that was implemented in FFY 2009. The rate of IFSP completion timelines in FFY 2008 was 74.7%. The change in system infrastructure to have all service coordinators under the supervision of the POE was finalized by October 31, 2009. The data management system, TOTS, provided the POE Managers with reports that identified the number of days since referral for every referral by child and by service coordinator. POE Managers have the ability to address any potential delays to help IFSP teams from missing the timeline.

Additionally, POEs that were out of compliance with this indicator were required to have a Corrective Action Plan that was followed intensely by state Lead Agency staff.

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

a. Number of infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline	<b>3914</b>
b. Number of infants and toddlers with IFSPs evaluated and assessed for whom an initial IFSP meeting was required to be conducted	<b>3983</b>
c. Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline (Percent = [(a) divided by (b)] times 100)	<b>98%</b>

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

The timeliness of IFSP completion was due to two major factors:

- Rigorous monitoring system with enforced CAPs; and
- Infrastructure change to bring all service coordinators under the supervision of the POE Manager.

Additionally, District Child Evaluation Specialists (DCES) were hired at 14 of 15 POEs. One POE that was funded at .05 FTE did not fill the vacancy by June 30, 2010. This newly funded position is responsible for screening children, conducting the 5 Area Assessment on children with established risk conditions, and overseeing the evaluation and assessment practices within the region. One of the duties of the DCES is to assist the POE Manager in providing oversight to the intake process to ensure timeliness of eligibility procedures.

The DCES also provides assistance to service coordinators in constituting appropriate IFSP teams and serve as consultants to IFSP teams who are struggling with determining the appropriate services to meet a child's needs. The DCES were trained in the administration of the Bayley Scales of Infant Development and receive specialized technical assistance and training from the staff at the Record Review housed at the University of Louisville's Weisskopf Child Evaluation Center. The addition of these regional specialists has helped improve the quality of evaluations and assessments.

**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%**

1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009)	15-6
2. 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)	15-6
3. Number of FFY 2008 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Note: Originally we reported 15 findings of noncompliance. This is an error in reporting for the indicator. In completing the indicator table we reported the number of programs monitored and not the number of programs that were issued findings of noncompliance. The data reported in the Indicator C-9 worksheet is correct. There were 6 programs issued findings of noncompliance and all 6 corrected within one year of notification.

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

4. Number of FFY 2008 findings not timely corrected (same as the number from (3) above)	0
5. Number of FFY 2008 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	0
6. Number of FFY 2008 findings <u>not</u> verified as corrected [(4) minus (5)]	0

**Actions Taken if Noncompliance Not Corrected:**

All findings of noncompliance were corrected within one year.

**Verification of Correction of FFY 2008 noncompliance or FFY 2008 findings (either timely or subsequent):**

Monitoring findings of noncompliance were issued in May, 2009. Each POE with a finding of noncompliance was required to implement a Corrective Action Plan (CAP) that included not only verifying locally the correction of noncompliance but also requiring the maintenance of compliance for a specified time period. State Lead Agency staff verified each child-specific case of noncompliance for verification of subsequent correction by reviewing child records in TOTS. Monthly reports were also run to verify that correction was sustained over time. Once the POE attained the level of 100% compliance and maintained that for the specified time period, the POE was released from the CAP. POE Managers were directed to continually monitor the indicator for slippage.

**Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2008:**

State Lead Agency staff verified correction of findings by implementing the following steps:

1. Reviewed child's record on the TOTS system focusing on date of referral and the date of the initial IFSP. Each finding of noncompliance was checked to ensure that the initial IFSP was finalized no later than 45 days from the referral date.
2. Check of data to determine if the reason for delay was a family-driven reason or an administrative reason or if the data were a result of a computer programming glitch.

3. Once verified that the delay was due to an administrative driven reason, the Lead Agency staff then sent notices of performance to the POE indicating that the delay was unacceptable. The notice informed the POE that continued noncompliance would result in sanctions to their contract.
4. Lead Agency staff verified continued correction of all new IFSPs by reviewing monthly reports available through TOTS and reviewing all child records that did not meet the timeline.

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

1. Number of remaining FFY 2007 findings of noncompliance noted in OSEP's June 2010, FFY 2008 APR response table for this indicator	<b>15</b>
2. Number of remaining FFY 2007 findings the State has verified as corrected	<b>15</b>
3. Number of remaining FFY 2007 findings the State has NOT verified as corrected [(1) minus (2)]	<b>0</b>

*Note:* The Lead Agency, in the examination of previous reports and available data, concluded that all 15 POEs were in noncompliance in FFY 2007. The reported correction of 3 POES in the FFY 2008 Indicator 9 report was based on the then current data for FFY 2008 and did not account for the one year for correction. Therefore, the table above correctly identifies the correction of noncompliance.

**Verification of Remaining FFY 2007 findings:**

In FFY 2007, the monitoring system used by the Lead Agency did not provide findings of noncompliance that were child specific; rather, the findings were based on the early intervention program as a whole. Therefore, in order to identify child specific instances of noncompliance. Two data systems were used to verify correction. Kentucky implemented the TOTS system in December, 2008. Previous data was obtained from the Central Billing and Information System (CBIS) system. Lead Agency staff pulled a list of children from the TOTS who were referred to First Steps between July 1, 2007 and June 30, 2008. This list included the referral date, initial IFSP date, and exit date. Each child's initial IFSP date was compared to the referral date in the CBIS data to ascertain the timeline for IFSP development. Results indicated that of the children on the list, an IFSP was developed, although in some cases late (subsequent correction.)

**Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2007:**

Lead Agency staff verified correction of findings by implementing the following steps:

1. Reviewed child's record on the TOTS system focusing on date of referral and the date of initial IFSP. Each finding of noncompliance was checked to ensure that IFSP was finalized, even when later than 45 days from the referral date.
2. Check of data to determine if the reason for delay was a family-driven reason or an administrative driven reason or if the data were a result of a computer programming glitch

The Lead Agency was unable to take any further action to verify correction on these records. Due to the limitations of the previous data system and the resources of the Lead Agency, verification of continued correction was not conducted.

The monitoring system now used to identify noncompliance and verify correction provides the child specific data needed to address all prongs for correction of noncompliance. The data is readily available that indicates the delivery of all initial services and can provide ongoing data for verification of timely services. This process is described above under the FFY 2008 findings and verification,

**Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable):**

Not applicable

**Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable):** No additional information was required.

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

<b>Indicator # 7 Improvement Activity #6</b>	<p>Evaluation, assessment and the initial IFSP meeting will be held within 45-days of referral for those children for whom such actions are appropriate.</p> <p>Action Steps:</p> <ol style="list-style-type: none"> <li>1. Recruit and retain adequate number of service providers to meet the demand for evaluation, assessment and IFSP development. This includes service coordinators.</li> <li>2. Create the position of Child Evaluation Specialists in the POE structure and hire highly qualified individuals to fulfill the job duties.</li> </ol>
<b>Justification</b>	Need to address caseloads for evaluation and assessment and design a more efficient system for these functions.
<b>Evaluation</b>	Annual review of referral, evaluation data; review data on 45-day timeline
<b>Timeline</b>	FFY 2009-2011
<b>Resources</b>	State general funds, First Steps Lead Agency staff, Regional TAs, and POE Managers
<b>Status</b>	In progress. A screening procedure was instituted in January 2010 that resulted in reducing caseloads in all regions of the state. Manageable caseloads have helped service coordinators with meeting timelines. The DCES positions have streamlined assessment for children with established risk conditions.

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

Overview of the Annual Performance Report Development: See Overview page 1.

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

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

- A IFSPs with transition steps and services

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

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

FFY	Measurable and Rigorous Target
<b>2009 (2009-2010)</b>	100% of all children exiting Part C will receive timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday by: having IFSPs with transition steps and services.

**Actual Target Data for FFY 2009: 100%**

Data Source: FFY 2009 618 Exit Report

**Children Exiting Part C who Received Timely Transition Planning:**

a. Number of children exiting Part C who have an IFSP with transition steps and services	<b>4754</b>
b. Number of children exiting Part C	<b>4754</b>
c. Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday (Percent = [(a) divided by (b)] times 100)	<b>100%</b>

Note: The online IFSP requires transition steps and services in order to finalize the IFSP. Therefore, all IFSPs in the system contain this information.

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

Kentucky maintained compliance with this indicator. While the improvement activities are ongoing, all POE regions completed the development of a prenatal to age 6 transition agreement with the support of the Kentucky Early Childhood Transition Project staff and First Steps Regional Technical Assistance consultants. Individual areas continue to refine their agreements to reflect the local practices.

**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: 100%

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

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

4. Number of FFY 2008 findings not timely corrected (same as the number from (3) above)	<b>0</b>
5. Number of FFY 2008 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	<b>0</b>
6. Number of FFY 2008 findings <u>not</u> verified as corrected [(4) minus (5)]	<b>0</b>

**Actions Taken if Noncompliance Not Corrected:**

Not applicable as there were no findings of noncompliance.

**Verification of Correction of FFY 2008 noncompliance or FFY 2008 findings (either timely or subsequent):**

Not applicable as there were no findings of noncompliance.

**Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2008:**

Not applicable as there were no findings of noncompliance.

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

1. Number of remaining FFY 2007 findings of noncompliance noted in OSEP's June 2010, FFY 2008 APR response table for this indicator	15
2. Number of remaining FFY 2007 findings the State has verified as corrected	15
3. Number of remaining FFY 2007 findings the State has NOT verified as corrected [(1) minus (2)]	0

**Verification of Correction of Remaining FFY 2007 findings:**

With the conversion from the CBIS to the TOTS system, all IFSPs had to include steps and services for transition. Each POE was directed to enter any missing data. The state Lead Agency verified that all required data were included in the TOTS system before the system was activated. Finalization of the IFSP could not occur with missing required data.

Due to the structure of the data system and requirements, there are no IFSPs without steps and services for transition for FFY 2007. Verification of correction was completed by identifying any unfinalized IFSPs and having the IFSP corrected. All IFSPs are entered and maintained online, therefore, the correction is sustained. All children receiving First Steps services on an ongoing basis must have an online IFSP finalized.

**Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2007:**

State Lead Agency staff reviewed child records prior to the activation of the TOTS system. Error reports were provided by the data system vendor that was child specific. Each record on the error reports was then reviewed and corrected.

Verification of correction was completed by identifying any unfinalized IFSPs and having the IFSP corrected. All IFSPs are entered and maintained online, therefore, the correction was sustained. All children receiving First Steps services on an ongoing basis must have an online IFSP finalized.

**Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable):**

Not applicable

**Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable):** Not applicable

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010 (if applicable):** No revisions to targets or improvement activities for this Indicator.

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

Overview of the Annual Performance Report Development: See Overview page 1.

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

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

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

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

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

FFY	Measurable and Rigorous Target
<b>2009 (2009-2010)</b>	100% of all children exiting Part C will receive timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday by notification of LEA if child potentially eligible for Part B.

**Actual Target Data for FFY 2009: 100%**

Data Source: Technology-assisted Observation and Teaming Supports (TOTS) Database, 07/1/2009-06/30/2010. TOTS is a statewide database that pulls queries from the child early intervention record.

The transition section of TOTS includes a required field for inclusion in the LEA notification report that the child is potentially eligible for Part B services. Given that the eligibility criteria for Part B services and the criteria for developmental delay in Part C, the assumption is that the majority of children are potentially eligible for Part B services. The default is set at “notify LEA” and must be manually unchecked.

**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	<b>3145</b>
b. Number of children exiting Part C who were potentially eligible for Part B	<b>3145</b>
c. Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday (Notification to LEA) (Percent = [(a) divided by (b)] times 100)	<b>100%</b>

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

Kentucky maintained compliance with this indicator. The Lead Agency for Part C and the SEA collaborate to share data files for the notification to LEAs. This file exchange system between the two agencies was developed under a previous federal grant. At the regional and local levels, POE Managers or designated staff works with the local school districts to ensure that notification has occurred. POE Managers are informed when the notification lists are disseminated so that they can contact the LEAs in their region to ensure that the list was received. Transition is an ongoing discussion at the DEIC meetings. These committee meetings focus on improving the collaboration and coordination of various activities to support First Steps. The file exchange system is undergoing revision; see the status report under Improvement Activity #6.

**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: \_\_\_\_100%\_%

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

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

4. Number of FFY 2008 findings not timely corrected (same as the number from (3) above)	<b>0</b>
5. Number of FFY 2008 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	<b>0</b>
6. Number of FFY 2008 findings <u>not</u> verified as corrected [(4) minus (5)]	<b>0</b>

**Actions Taken if Noncompliance Not Corrected:**

No actions required as there were no findings of noncompliance.

**Verification of Correction of FFY 2008 noncompliance or FFY 2008 findings (either timely or subsequent):**

No verification required as there were no findings.

**Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2008:**

No actions required as there were no findings of noncompliance.

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

1. Number of remaining FFY 2007 findings of noncompliance noted in OSEP's June 2010, FFY 2008 APR response table for this indicator	15
2. Number of remaining FFY 2007 findings the State has verified as corrected	15
3. Number of remaining FFY 2007 findings the State has NOT verified as corrected [(1) minus (2)]	0

**Verification of Correction of Remaining FFY 2007 findings:**

Children who were age-eligible to transition from Part C to Part B during FFY 2007 are no longer in the jurisdiction of Part C. This determination was a result of the verification actions described below.

**Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2007:**

Verification was conducted by retrieving a report of children who were 2 or older during FFY 2007 from the CBIS stored database and searching for those children in the current TOTS system. All found in TOTS were identified as inactive due to discharge from First Steps at age 3. Given that the children are no longer within the jurisdiction of Part C, no verification of LEA notification was conducted.

**Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable):**

Not applicable

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

Not applicable

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

<b>Indicator # 8 Improvement Activity #3</b>	Institutionalize effective transition practices and state level decisions regarding roles at the local level  Action Steps: <ol style="list-style-type: none"> <li>1. Train local practitioners on the content of the state interagency agreement</li> <li>2. Provide follow-up coaching and troubleshooting as local practitioners implement local and regional agreements.</li> <li>3. Conduct pre/post surveys to measure change in practice.</li> </ol>
<b>Justification</b>	To ensure that all early childhood programs understand and implement transition requirements and effective practices
<b>Evaluation</b>	Transition reports; family survey data; training evaluation data
<b>Timeline</b>	FFY 2008- FFY 2012
<b>Resources</b>	First Steps Training Coordinator, state TA staff and KECTP staff
<b>Status</b>	In progress; Information from POEs indicates that in general, transition procedures are effective between the schools and POEs. Kentucky has promoted transition procedures for all children, prenatal to kindergarten, with a variety of stakeholders. This approach to transition tends to pose more issues at the local level than the transition under IDEA.  Activities under the SPDG have addressed training parents in transition. The first set of modules was introduced in Fall, 2010 with training offered on a regional basis at this point.

<b>Indicator # 8 Improvement Activity #6</b>	KDE Student data system will include children transitioning from Part C to Part B services to assist with effective transitions. Action Steps: <ol style="list-style-type: none"> <li>1. Program representatives of both Parts C and B meet to discuss parameters for project and identify resources.</li> <li>2. Program representatives of both Parts C and B meet with data system representatives to conceptualize project and identify needed work.</li> <li>3. KDE and CHFS staffs work to map procedures and develop work tickets.</li> <li>4. Once developed, system tested and introduced to field.</li> <li>5. Training conducted with staff for both programs for operation.</li> </ol>
<b>Justification</b>	In order to assist with tracking referrals from Part C, the need to give Part C children a student identifier so that schools would already have the basic demographics in the data system and could trigger a tracking system was identified. By establishing this communication methodology, LEA notification of potentially eligible Part C children could also be more efficient.
<b>Evaluation</b>	Finished working system; transition data
<b>Resources</b>	First Steps and Preschool Branch staff time for ongoing oversight and operation, special education funding and staff time for development;
<b>Timeline</b>	FFY 2009-2012
<b>Status</b>	In progress; the programmers for both data systems have developed a file exchange between the two systems that is currently in beta testing. Once all bugs have been resolved, the process will go live.

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

Overview of the Annual Performance Report Development: See Overview page 1.

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

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

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

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

**Measurement:**  
 Percent = [(# of children exiting Part C and potentially eligible for Part B where the transition conference occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.  
 Account for untimely transition conferences, including reasons for delays.

FFY	Measurable and Rigorous Target
2009	100% of children exiting Part C and potentially eligible for Part B will have a transition conference.

**Actual Target Data for FFY 2009: 93.17%**

Data Source: TOTS statewide data from 7/1/2009 through 6/30/2010. TOTS is a statewide database that pulls queries from the child early intervention record.

The transition conference date is a required field in TOTS. The system is set to pull all dates of transition conferences that are held between 91 days and the child’s third birthday as non-compliant. Child specific cases of noncompliance are then reviewed to determine the reason for delay.

**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	<b>2814</b>
b. Number of children exiting Part C who were potentially eligible for Part B	<b>3020</b>
c. Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday (Transition Conference) (Percent = [(a) divided by (b)] times 100)	<b>93%</b>

*Note:* Under 8B, 3145 children were reported as potentially eligible for Part B and in 8C, 3020 children are reported as potentially eligible. The number reported in the table above does not include those children who were included in the LEA report at age 2 as potentially eligible for Part B but who were discharged after the dissemination of the list and before the transition conference date range due to completion of the IFSP, or who disenrolled during that time period, and/or were unable to be located (disenrolled without formal notice to POE).

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

Kentucky continues to make progress with this indicator.

FFY	2006	2007	2008	2009
Compliance Rate	78%	79%	89.8%	93.5%

The supervision of the service coordinators by the POE Managers and focused monitoring by the Lead Agency is credited with the improvement noted above. The TOTS system generates a date range for the transition conference so it is difficult for service coordinators to miss the timeline for the meeting. Additionally, the LEAs have also been trained to expect a transition conference and to alert the POE if one has not been scheduled as the child's third birthday approaches.

**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: 89.9%

1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009)	<b>15-14</b>
2. 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)	<b>15-14</b>
3. Number of FFY 2008 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>0</b>

**Note:** Kentucky reported 15 findings of noncompliance. This is an error in reporting for the indicator. We reported the number of programs that were monitored and not the number that were issued findings of noncompliance. The data reported in the Indicator C-9 worksheet is correct. There were 14 programs issued findings of noncompliance and all 14 corrected within one year of notification.

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

4. Number of FFY 2008 findings not timely corrected (same as the number from (3) above)	<b>0</b>
5. Number of FFY 2008 findings the State has verified as corrected beyond the one-year timeline ("subsequent correction")	<b>0</b>
6. Number of FFY 2008 findings <u>not</u> verified as corrected [(4) minus (5)]	<b>0</b>

**Actions Taken if Noncompliance Not Corrected:**

No actions were taken as there were no findings not corrected.

**Verification of Correction of FFY 2008 noncompliance or FFY 2008 findings (either timely or subsequent):**

Monitoring findings of noncompliance were issued in May, 2009. Each POE with a finding of noncompliance was required to implement a Corrective Action Plan (CAP) that included not only verifying locally the correction of noncompliance but also requiring the maintenance of compliance for a specified time period. POEs were required to review monthly reports on transition conference status to ensure that the correction of the noncompliance resulted in correct implementation of the requirement. Lead Agency staff verified each child-specific case of noncompliance for verification of subsequent correction. Once the POE attained the level of 100% compliance and maintained that for the specified time period, the POE was released from the CAP. POE Managers were directed to continually monitor the indicator for slippage.

**Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2008:**

Lead Agency staff verified correction of findings by implementing the following steps:

1. Reviewed child’s record on the TOTS system focusing on transition date range and actual conference date. To be in compliance, the date of the conference must be within the transition conference date range. Each finding of noncompliance was checked to ensure that a transition conference was held, although late, or that there is documentation that the family chose to opt out of the conference.
2. Once verified that the delay was due to an administrative reason, the Lead Agency staff sent notices of performance to the POE indicating that the noncompliance had not been corrected and that the CAP was not released. CAPS were not released until the POE demonstrated correction for the specified time period identified in the Notice of Noncompliance.

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

1. Number of remaining FFY 2007 findings of noncompliance noted in OSEP’s June 2010, FFY 2008 APR response table for this indicator	<b>15</b>
2. Number of remaining FFY 2007 findings the State has verified as corrected	<b>15</b>
3. Number of remaining FFY 2007 findings the State has NOT verified as corrected [(1) minus (2)]	<b>0</b>

**Verification of Correction of Remaining FFY 2007 findings:**

Data used for the FFY 2007 report were from the monitoring procedures used at that time. The procedures did not capture child specific noncompliance, but rather program level noncompliance. The listing of children in the CBIS system for FFY 2007 was compared to the current First Steps enrolled children and none of those children are under the jurisdiction of the Part C system at this time.

**Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2007:**

The state is unable to review all paper IFSPs from FFY 2007 to determine child specific noncompliance and the subsequent correction. The comparison of the lists from CBIS and TOTS is the only action the Lead Agency took to identify children who still are within the jurisdiction of Part C. Finding no matches for these criteria, the Lead Agency assumes that all children are beyond three years of age.

**Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable):**  
Not applicable

**Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable):** Not applicable

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

<b>Indicator # 8 Improvement Activity #3</b>	<p>Institutionalize effective transition practices and state level decisions regarding roles at the local level</p> <p>Action Steps:</p> <ol style="list-style-type: none"> <li>1. Train local practitioners on the content of the state interagency agreement</li> <li>2. Provide follow-up coaching and troubleshooting as local practitioners implement local and regional agreements.</li> <li>3. Conduct pre/post surveys to measure change in practice.</li> </ol>
<b>Justification</b>	To ensure that all early childhood programs understand and implement transition requirements and effective practices
<b>Evaluation</b>	Transition reports; family survey data; training evaluation data
<b>Timeline</b>	FFY 2008- FFY 2012
<b>Resources</b>	First Steps Training Coordinator, state TA staff and KECTP staff
<b>Status</b>	<p>In progress transition issues have been discussed at the Governor's Early Childhood Task Force meetings as well as at the Early Childhood Authority meetings. The focus of discussions has been the collaboration between local early childhood councils and District Early Intervention Committees. Local training is conducted jointly with LEAs and POEs in attendance. These trainings are conducted by the Early Childhood Regional Training Centers and KECTP. Evaluation data indicates that training is well-received and credited with helping providers change practice behaviors. POE Managers report that the follow-up coaching and mentoring is critical to their success in improving compliance.</p> <p>Continued attention to transition issues will allow collaborative problem-solving and systemic approach to supporting transition.</p>

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

**Overview of the Annual Performance Report Development: See 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 9 Worksheet" to report data for this indicator (see Attachment A).

FFY	Measurable and Rigorous Target
FFY 2009	100% of instances of non compliance will be identified and corrected by the general supervision system for First Steps as soon as possible but in no case later than one year from identification.

**Actual Target Data for FFY 2009: 94%**

Data Source: Monitoring Data and Attachment 1, C-9 Worksheet

All 15 POEs are monitored annually. Additionally, 5 POEs are selected to complete and submit a self-assessment. The self-assessment process is a 3 year cycle. On-site monitoring visits are conducted annually with POE selection based upon the performance and monitoring results. Additional on-site visits may be conducted based on the immediacy of the issue to address with a POE.

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

These data shows a significant improvement from last year (up from 13.63% to 94% correction). Kentucky is fully implementing the monitoring system described in the FFY 2008 APR and approved by OSEP.

Through the current monitoring system, data are pulled for each compliance indicator for a specific timeframe. In FFY 2009, the timeframe was July 1, 2009 through May1, 2010. This raw data was given to the fifteen (15) district managers for review and cleaning. To clean the data the manager reviewed each child specific case that was listed as out of compliance to determine the reason for the noncompliance. If the reason for noncompliance was family driven, that case was removed from the total number of noncompliant cases and the number reconfigured.

These data were given back to the Lead Agency for review and verification. If not at 100% after cleaning, the district was issued a finding of noncompliance and required to submit a CAP.

Verification of sustained correction was conducted by monitoring the data submitted by each POE with a CAP. This data was retrieved by desk audit of the TOTS online child record system. Lead Agency staff reviewed each POE monthly reports to track any instances of noncompliance and checked the procedures used by the POE to correct the finding. POEs were released from the CAP only when they demonstrated sustained correction.

Kentucky believes that the significant improvement in our verification and correction of noncompliance is due to the implementation of the statewide data management system (TOTS). Since the implementation of TOTS, district managers are able to run monthly data reports for the compliance indicators. The monthly review of data allows that manager to avoid slippage in the districts performance. This ability to see the data in real time from TOTS has empowered the managers to better function in the role as a local Lead Agency. Through this monthly monitoring of the data, if it is discovered that a particular provider is continually affecting the districts performance, the manager will send a performance notice to provider. Providers that do not improve are placed under a contract suspension and face possible termination of the provider agreement. Another factor affecting the significant improvement is the change in the supervision for service coordinators. Bringing them under the direct line supervision of the point of entry manager has greatly improved their performance. They are now held accountable for their service delivery.

During this reporting period a complaint was received regarding a delay in service delivery. The provider in question was investigated and found to be noncompliant in providing timely services. The provider was required to take corrective actions and, although late, the child did receive the service in question.

Lead Agency staff has taken steps to verify the outstanding noncompliance from FFY 2007; however, the state is unable to review all paper IFSPs from FFY 2007 to determine child specific noncompliance and the subsequent correction. Specific actions taken by the Lead Agency are described in each compliance indicator (numbers 1, 7 and 8). The comparison of the lists from CBIS and TOTS is the only action the Lead Agency is able to take to identify children who still are within the jurisdiction of Part C. Finding no matches for these criteria, the Lead Agency assumes that all children are beyond three years of age. The conversion to the TOTS system ensures that all children are included in the database and that all data for compliance indicators is accessible. Kentucky is no longer in a situation where child specific data is not easily accessed for monitoring or verification of correction.

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

No revisions to targets or improvement activities for this Indicator.

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

Overview of the Annual Performance Report Development: See 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
FFY 2009	100% of signed written complaints will have reports issued and be resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint

### Actual Target Data for FFY 2009:

SECTION A: Written, signed complaints	
(1) Written, signed complaints total	9
(1.1) Complaints with reports issued	9
(a) Reports with findings	9
(b) Reports within timeline	8
(c) Reports within extended timelines	1
(1.2) Complaints withdrawn or dismissed	0
(1.3) Complaints pending	0
(a) Complaint pending a due process hearing	0

$$[8 + 1] / 9 \times 100 = 100\%$$

Data Source: 618 Data Table

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

During the reporting period a total of nine (9) complaints were received. All nine complaints were issued findings. Of the nine, one (1) had an appropriate extended timeline beyond the 60 days. Lead Agency staff continues to investigate any complaint received against the program and strives to resolve these issues in a timely manner.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:** No revisions to targets or improvement activities for this Indicator.

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

**Overview of the Annual Performance Report Development: See 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
FFY 2009	100% of due process hearing request will be fully adjudicated within the applicable timeline.

**Actual Target Data for FFY 2009: 100%**

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

During the reporting period Kentucky had one (1) request for a due process hearing. This request was submitted directly to the Administrative Hearings Branch (AHB) within the states Cabinet for Health and Family Services. The complainant alleged a HIPAA violation occurred when the provider in question forwarded assessment results to the family. The AHB officer determined that they have no purview over HIPAA and dismissed the request.

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

No revisions to targets or improvement activities for this Indicator.

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

Overview of the Annual Performance Report Development: See Indicator 1.

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

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

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

**Not applicable since Kentucky does not use Part B Due Process**

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

FFY	Measurable and Rigorous Target
<i>(Insert FFY)</i>	<i>(Insert Measurable and Rigorous Target.)</i>

**Actual Target Data for** *(Insert FFY):*

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

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for** *(Insert FFY)*  
*[If applicable]*

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

**Overview of the Annual Performance Report Development: See 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)) divided by 2.1] times 100.

FFY	Measurable and Rigorous Target
FFY 2009	80% of mediations will result in mediation agreements.

**Actual Target Data for FFY 2009:**

There were no mediation requests during this reporting period.

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

Kentucky will continue efforts to assure that families are aware of due process rights and procedures, including the ability to resolve disputes through mediation. Kentucky will also continue to work to ensure that disputes are resolved whenever possible in a timely manner at the local level.

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

No revisions to proposed targets/improvement activities/timelines/ resources are being made.

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

**Overview of the Annual Performance Report Development: See Indicator 1.**

**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
<b>2009</b> (2009-2010)	100% of state reported data (618 and State Performance Plan and Annual Performance Report) will be timely and accurate.

**Actual Target Data for FFY 2009: 100%**

Data Source: See Attachment #2, Data Rubric, page 54

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

FFY 2009 represents the first data set from a full year of implementation of the TOTS system. The data underwent processes conducted by the data manager to ensure valid and reliable data. All POE Managers had rigorous training on the system to ensure local procedures were implemented correctly. POE Managers were also taught how to clean the data and ensure that any questionable data were reviewed for accuracy. Technical support was provided by the data manager as well as other Lead Agency staff.

Kentucky utilizes a variety of data sources to compile data for the Annual Performance Report and the Section 618 data. Sources include the following:

- TOTS system - TOTS is a web-based system used to maintain child level data for the First Steps program. Child level Information includes referral, evaluation, meeting and IFSP data, as well as logs of all services provided and billing and payment functions. These data are used for the Section 618 child count, primary setting and exit reporting. TOTS is also used for APR Indicators 1, 2, 5, 6, 7 and 8.
- Monitoring – data gathered through monitoring reviews are utilized for Indicators 8 and 9
- First Steps General Supervision staff members receive and investigate all formal written complaints. Standardized format is used to record information on child complaints, due process hearing requests, mediations and resolution sessions. Kentucky has received no

requests for due process hearings, mediations or resolution sessions during the reporting period. The General Supervision staff monitor timelines and maintain records throughout the year, and data are used for the Section 618 Dispute Resolution table and for APR Indicators 10-13.

- Others – See Indicators 3 and 4 for information about Early Childhood Outcomes data from KEDS and the First Steps Family Survey using the 2010 ECO survey.

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

No revisions to proposed targets/improvement activities/timelines/ resources are being made.

Attachment 1: INDICATOR C-9 WORKSHEET

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2008 (7/1/08 through 6/30/09)	(a) # of Findings of noncompliance identified in FFY 2008 (7/1/08 through 6/30/09)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
1. Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	15	15	13
	Dispute Resolution: Complaints, Hearings	1	1	1
2. Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
3. Percent of infants and toddlers with IFSPs who demonstrate improved outcomes	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0

4. Percent of families participating in Part C who report that early intervention services have helped the family	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
5. Percent of infants and toddlers birth to 1 with IFSPs  6. Percent of infants and toddlers birth to 3 with IFSPs	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
7. Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	6	6	6
	Dispute Resolution: Complaints, Hearings	0	0	0
8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including: A. IFSPs with transition steps and services;	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0

8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including:  B. Notification to LEA, if child potentially eligible for Part B; and	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including:  C. Transition conference, if child potentially eligible for Part B.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	14	14	14
	Dispute Resolution: Complaints, Hearings	0	0	0
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0

OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
<b>Sum the numbers down Column a and Column b</b>			36	34

**Percent of noncompliance corrected within one year of identification =  $34/36=0.94 \times 100=94\%$   
 (column (b) sum divided by column (a) sum) times 100**

**Attachment 2: Data Rubric**

<b>SPP/APR Data - Indicator 14</b>			
<b>APR Indicator</b>	<b>Valid and Reliable</b>	<b>Correct Calculation</b>	<b>Total</b>
1	1	1	2
2	1	1	2
3	1	1	2
4	1	1	2
5	1	1	2
6	1	1	2
7	1	1	2
8a	1	1	2
8b	1	1	2
8c	1	1	2
9	1	1	2
10	1	1	2
11	1	1	2
12	1	1	2
13	1	1	2
		<b>Subtotal</b>	30
<b>APR Score Calculation</b>	<b>Timely Submission Points</b> - If the FFY 2009 APR was submitted on-time, place the number 5 in the cell on the right.		5
	<b>Grand Total</b> - (Sum of subtotal and Timely Submission Points) =		35

Table	Timely	Complete Data	Passed Edit Check
Table 1 - Child Count Due Date: 2/1/10	1	1	1
Table 2 - Program Settings Due Date: 2/1/10	1	1	1
Table 3 - Exiting Due Date: 11/1/10	1	1	1
Table 4 - Dispute Resolution Due Date: 11/1/10	1	1	1
			4
<b>618 Score Calculation</b>			<b>Grand Total (Subtotal X 2.5) = 10</b>

A. APR Grand Total	35
B. 618 Grand Total	10
C. APR Grand Total (A) + 618 Grand Total (B) =	45
Total NA in APR	0
Total NA in 618	0
<b>Base</b>	<b>45</b>
D. Subtotal (C divided by Base*) =	1
E. Indicator Score (Subtotal D x 100) =	100%