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MEMORANDUM

TO: Point of Entry Grant Administrators, Supervisors and ISC Staff
First Steps Providers
Kentucky Interagency Coordinating Council
District Early Intervention Council Chairpersons

FROM: Ruth Ann Shepherd, MD, Director
Division of Adult & Child Health Improvement

DATE: January 30, 2007

SUBJECT: Compliance Update: Role of Service Coordination

In December, Dr. Steve Davis communicated with you regarding Kentucky's performance in relation to the 45 day timeline. As we continue to work on compliance issues and ongoing improvements in the program, I am now coming to you in an effort to be open regarding the Department's administration of the First Steps program.

As many of you are aware, a System Design Team was convened in 2004 to assist the Department in shaping the First Steps program under the administration of the Department for Public Health. That group worked under 3 guiding principles: 1) children will get the services that they need, 2) families will get the support that they need, and 3) First Steps will stay in budget.

Little more than two years after implementing a number of that Team's recommendations, we are now in a position to assess the impact of some of those system changes and evaluate the efficiency and efficacy of the existing system structure. We also have to consider there is a growing body of evidence-based research into recommended practices in Early Intervention. But perhaps most importantly, there is now a necessary and immediate need impressed upon us by OSEP to demonstrate compliance with established federal performance indicators. It is from this framework that the Department is beginning discussions regarding a change to the system of service coordination in Kentucky.

The Department is increasingly concerned that the existing system of service coordination in Kentucky has not proven sufficient to ensure adequate oversight of ongoing or "Primary" service coordination activities. This limits the Department's ability to ensure appropriate services and supports to eligible children and families, thereby threatening the Department's ability to demonstrate compliance with federal program mandates. Further, the existing system of service coordination increases, rather than reduces, the number of "systems" that must be

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Given these concerns, the Department is exploring a change to the system of service coordination in Kentucky that would bring all service coordination activities “home” to the local Point of Entry (POE). Based on the experience of other states, it is anticipated that such a change would better ensure adequate oversight of service coordination activities and would provide families with a seamless system of service coordination from referral through transition at age three. The goal would be to integrate current providers into a new system that allows for more support for them and more balanced case loads.

Following discussions with our OSEP project officer, the Department has very recently begun discussions regarding this proposal with a series of stakeholders, including the regional Technical Assistance Teams (TATs) and POE grant administrators. In addition, a Strategic Planning Team comprised of families, providers, ICC representatives, TAT members, POE grant administrators and Central Office staff has been convened to review this proposal and provide the Department with barriers to and strategies for such a proposal.

It is important to note at this time that the Department is in the beginning stages of discussion in regard to this proposal. *No firm action plan has been established and no timeline is in place.* As a stakeholder, this is an opportunity to have your voice heard. If you have thoughts regarding this proposal that you would like to share, strategies to address challenges or barriers to implementation and/or alternatives you feel bear consideration, please contact Kirsten Hammock, First Steps Part C Coordinator at Kirsten.hammock@ky.gov or by phone at 502/564-3756 x 3973.

As always, I appreciate your time and consideration. Your commitment to the children and families in the First Steps program is a gift that I am ever grateful for. I look forward to continuing the collaborative relationship that we have strived to develop with our stakeholder community.