

# ANNUAL PERFORMANCE REPORT

IDEA Part C

FFY 2010 (2010 – 2011)

Submitted 4.16.2012

State of Wisconsin

Wisconsin Department of Health Services

Bureau of Long-Term Support

Division of Long Term Care

1 W. Wilson Street

Madison, Wisconsin 53707-7851

TABLE 1: APR Results and Comparison of FFY 2010, FFY 2009, and FFY 2008

Monitoring Priorities and Indicators	Target	Results 2010/2011	Results 2009/2010	Results 2008/2009
1. Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner. [Compliance Indicator]	100%	99.13%	98.73%	98.49%
2. Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings. [Results Indicator]	96.30%	95.43%	95.80%	94.68%
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. [Results Indicator]	72.5% 74.0% 78.2% 58.9%	61.8% 66.5% 68.0% 50.2%	63.0% 67.6% 70.6% 52.2%	72.5% 74% 78.2% 58.9%
	76.7% 76.4%	72.7% 68.0%	72.5% 70.3%	76.7%74.0%
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. [Results Indicator]	90%  94%  94%	86.25%  82.37%  80.78%	85%  95%  92%	73.65%  87.25%  90.65%
5. Percent of infants and toddlers birth to 1 with IFSPs compared to national data: [Results Indicator]	0.95%	0.94%	0.98%	0.86%
6. Percent of infants and toddlers birth to 3 with IFSPs compared to national data. [Results Indicator]	2.84%	2.89%	2.78%	2.72%

Monitoring Priorities and Indicators	Target	Results 2010/2011	Results 2009/2010	Results 2008/2009
7. Percent of eligible infants and toddlers with IFSPs for whom an initial evaluation and initial assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline. [Compliance Indicator]	100%	97.21%	98.21%	96.10%

Monitoring Priorities and Indicators	Target	Results 2010/2011	Results 2009/2010	Results 2008/2009
8A. Percent of toddlers with disabilities exiting Part C with timely transition planning for whom the lead agency has: Developed an IFSP with transition steps and services at least 90 days and at the discretion of all parties, not more than 9 months, prior to the toddler's third birthday; * [Compliance Indicator]	100%	99.23%	99.06%	96.45%
8B. Percent of all toddlers with disabilities exiting Part C with timely transition planning for whom the lead agency has: Notified (consistent with any opt-out policy adopted by the state) the SEA and LEA where the toddler resides at least 90 days prior to the toddlers 3 <sup>rd</sup> birthday for toddlers potentially eligible for Part B preschool services; * and [Compliance Indicator]	100%	98.13%	94.69%	95.46%
8C. Percent of all toddlers with disabilities exiting Part C with timely transition planning for whom the lead agency has: Conducted the transition conference held with the approval of the family at least 90 days, and at the discretion of all parties, not more than 9 months, prior to the toddlers 3 <sup>rd</sup> birthday for toddlers potentially eligible for Part B preschool services. * [Compliance Indicator]	100%	98.09%	96.87%	96.87%
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. [Compliance Indicator]	100%	90.78%	100%	86.11%
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.	100%	100%	100%	NA

Monitoring Priorities and Indicators	Target	Results 2010/2011	Results 2009/2010	Results 2008/2009
[Compliance Indicator]				
11. Percent of fully adjudicated due process hearing requests that were fully adjudicated within the applicable timeline. [Compliance Indicator]	100%	0%	100%	NA
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). [Compliance Indicator]	NA	NA	NA	NA
13. Percent of mediations held that resulted in mediation agreements. [Compliance Indicator]	100%	0%	NA	0%
14. State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate. [Compliance Indicator]	100%	88.50 %	90%	100%
Fiscal Audit Findings	100%	NA	NA	NA

**\* Monitoring Priorities and Indicators are based upon Part C Regulations issued September 28, 2011; OSEP 12-5 Memorandum, dated November 28, 2011. Overview of the Annual Performance Report:**

Wisconsin has a long-standing history and commitment to quality services for young children and their families. County agencies, as the local providers of Birth to 3 services, are key partners in the process through the delivery of effective early intervention services in partnership with families and community providers. County agencies, families, advocates and the Wisconsin Interagency Coordinating Council (ICC) are among the broad array of stakeholders in Wisconsin's statewide early intervention system. These groups have historically and continually provided input into all major components of Wisconsin's Part C Program, including the State Performance Plan (SPP), priorities and practices related to outcomes for children and families, targets for all Part C indicators, and Annual Performance Reports (APR). Wisconsin's County Birth to 3 Programs are fully informed of the SPP and the resulting outcome data in the APR.

The ICC has diverse membership and connects with a variety of workgroups and committees related to early intervention services in Wisconsin. In 2002, prior to the 2004 reauthorization of the Individuals with Disabilities Act (IDEA), the ICC adopted a set of Birth to 3 Program Outcomes and developed corresponding indicators to measure the progress related to each outcome. Each year, the Department of Health Services provides data to the ICC on the status of these outcomes. Subsequently, the ICC makes data-driven recommendations to the Department regarding strategies for improvement related to these outcomes and any other identified initiatives. These outcomes closely align with the indicators developed under IDEA. The ICC recommendations are frequently implemented by the Wisconsin Department of Health Services (DHS), which demonstrates the state's ongoing practice of securing and acting on stakeholder input for improvement of the Birth to 3 Program.

#### *Determination Status*

In July 2011, (DHS) received notification from the Office of Special Education Programs (OSEP) that the Birth to 3 Program was determined to be in "needs assistance" status for the second consecutive year. Wisconsin was determined to be in "needs assistance" for the first time in 2010; in 2009, Wisconsin was determined to "meet the requirements" of IDEA. Activities in 2010-11 focused on specific areas of improvement both at the state and local level to improve program performance, including finalization of a statewide data reporting system, focus on Child Outcomes practices, correction of Findings of Non-Compliance, implementation of Evidence-Based Practices, and ongoing support of quality practice.

#### *Communication with the public and stakeholder groups*

The Annual Performance Report (APR) and SPP are posted on the DHS Birth to 3 Program website at: <http://www.dhs.wisconsin.gov/children/birthto3/reports/apr/index.htm> upon submission to the U.S. Department of Education. Both documents are available in printed and alternate formats upon request. The Department provides information to the public regarding accessing the Wisconsin SPP and APR through list serves, e-mails, trainings, teleconferences, regional meetings, and local county outreach. The DHS meets the requirement for public reporting of early intervention services by county through its website via a link to the North Central Regional Resource Center (NCRRC). Performance results are currently displayed in a dashboard format, allowing readers to compare different counties' compliance on any of the eight federal indicators included on the website. The link to NCRRC and these data is [http://northcentralrrc.org/wisconsin/09\\_10\\_APR.aspx](http://northcentralrrc.org/wisconsin/09_10_APR.aspx) and through the DHS Birth to 3 Program website ([www.B3wisconsin.org](http://www.B3wisconsin.org)). These activities fulfill the state's responsibility to report annually to the public on the performance of each early intervention service (EIS) program located in the state on the targets in the SPP under IDEA section 616 (b)(C)(ii)(1) and 642. County Birth to 3 Programs are responsible for sharing their data with local advisory groups and developing other communication strategies to share data within their communities.

**General Supervision:**

The DHS Wisconsin Birth to 3 Program has increased focus on accuracy of data collection and reporting as a part of its General Supervision process. Data analysis charts are distributed to county agencies annually each spring after submission of the APR to identify each County Birth to 3 Program's compliance percentages for the nine federal compliance indicators that must be tracked and assigned a determination status. Counties are expected to analyze their performance on each of the indicators and adjust their practice if necessary to ensure compliance. In addition, data analysis is completed annually near the end of the federal fiscal year (FFY), which may result in issuance of Findings of Non-Compliance for any county that is not achieving 100 percent compliance. RESource (Regional Enhancement Support) staff, Wisconsin's DHS Birth to 3 Program's technical assistance and monitoring partner, also meet with each County Birth to 3 Program to discuss and analyze local performance on each indicator and to develop improvement strategies through use of the Program in Partnership Plan (PIPP).

DHS conducts an On-Site Review for each of the 72 County Birth to 3 Programs over a four-year cycle, with the state's largest county, Milwaukee County, being subject to an On-Site Review annually. County Birth to 3 Programs are also required to complete a Self-Assessment Process annually. Both the Self-Assessment Process and On-Site Review include review of data from PPS summary reports, file reviews, and review of other internal processes and policies. The Self-Assessment Process results in a written report to DHS. DHS Birth to 3 Program and RESource staff review the information contained in a county's Self-Assessment Report during a telephone call; an in-person visit with the county's State Lead and RESource staff may also be included if necessary.

If concerns are identified from the Self-Assessment Process, a targeted review may be conducted to resolve Findings of Non-Compliance and develop any required correction plans. RESource staff work with County Birth to 3 Programs to develop plans to correct any Findings of Non-Compliance with technical assistance provided as described in a county's PIPP. RESource also tracks progress toward correction of Findings of Non-Compliance in its database.

**Summary of 2010-11 Program Activities:***Data Initiatives*

In FFY 2010-11, DHS focused on building infrastructure in the Program Participation System (PPS) through the continuation of two data projects to track compliance with federal reporting indicators and SPP targets and to identify priorities and opportunities for improvement. The Audit and Archive project includes the development of queries to assure reliable and valid reporting and analysis of Wisconsin's progress in meeting the requirements of Part C of IDEA. This data is currently being used to calculate performance percentages for the APR, issuance of Determinations and Non-compliances, and identification of improvement activities.

The Data Mart Phase of the PPS Project includes the release of program data through a secure web-based platform providing counties with access to county-specific data for ongoing monitoring, and identification of areas for improvement activities and possible technical assistance. 'Federal Indicator Reports' were developed through the Data Mart using PPS compiled data in a timely and accurate manner to determine County Birth to 3 Program compliance levels, noncompliance levels, and data errors. These reports were used to determine the data for the 2010-11 APR.

In addition, the Data Mart will provide Wisconsin's County Birth to 3 Programs with a mechanism for communication between the state PPS system and local county information management platforms, avoiding duplicate entry of data into both systems. This project provides a solid foundation for increased analysis of statewide and local data, more specific drill down on program performance, and continuous progress toward improved compliance with Part C requirements under IDEA. Wisconsin plans to continue development of multiple reports for local County Birth to 3 Programs to more easily monitor their own data and performance percentages.

*Child Outcomes Improvement Activities and Implementation of Evidence-Based Practices*

In FFY 2010-11, the majority of County Birth to 3 Programs attended in-person and teleconference Child Outcomes trainings and complied with data documentation requirements and necessary corrections in Child Outcomes data. Counties also focused time and attention on accurate data reporting for all other federal reporting indicators. Training about the Primary Coach Approach to Teaming, a nationally-recognized Evidence-Based Practice, was provided using IDEA Part C American Recovery and Reinvestment Act (ARRA) funds, and funding also supported local agency implementation through mentors, review of coaching logs, and local county consortia. These trainings also placed continued emphasis on Routines-Based Interventions and providing services in environments where families and children have meaningful interactions.

*Findings of Non-Compliance*

Wisconsin took a variety of actions to review procedures for issuing, monitoring, and successfully verifying Findings of Non-Compliance issued to County Birth to 3 Programs. This involved consultation with federal representatives, continued outreach to counties, and verification processes that complied with federal requirements as articulated in the OSEP 09-02 memo. The DHS is working closely with county agencies with ongoing Findings of Non-Compliance to increase compliance percentages to 100 percent in order to proceed with correction verification processes.

*Collaboration with Part B Early Childhood Special Education Programs*

Part C and Part B Section 619 Early Childhood Special Education Programs have continued to collaborate regarding related federal indicators and items that affect both systems. The Wisconsin Department of Health Services (DHS) and the Department of Public Instruction (DPI) work collaboratively to address mutual or inter-related program enhancements with specific emphasis on early childhood outcomes, child find, and transition. Ongoing communication between DHS and DPI staff has resulted in joint trainings, implementation of consistent procedures, and earlier identification and resolution of problems.

DPI and DHS collaboratively accessed technical assistance through a variety of national and federal forums to address the non-compliance issues around Transition Indicators, Part B Indicator 12 and Part C Indicator 8, and Child Outcome Indicators, Part B Indicator 7 and Part C Indicator 3. The progress Wisconsin has made on these indicators is related to technical assistance from the North Central Regional Resource Center (NCRRC), the National Early Childhood Technical Assistance Center (NECTAC), and the Early Childhood Outcomes (ECO) Center. DPI and DHS staff attended the national ECO Child and Family Conference together and shared ideas for training and improvement activities.

**Conclusion**

DHS will distribute the APR to stakeholders through posting on the DHS website and through a statewide list as well as review the report with the ICC at the April 2012 meeting following the established process from previous years. County Birth to 3 Programs will be able to share both

## **APR – Part C (4)**

Wisconsin  
State

state and local data as appropriate with county advisory groups and other interagency committees related to children and families.

DHS will continue to discuss the data and progress or slippage reported in the APR with county agencies to focus on improvements in the Wisconsin Birth to 3 Program. These results will be a topic for discussion during the Spring 2012 Regional Meetings with County Birth to 3 Programs and will be considered for specialized training and technical assistance regionally and during On-Site Program Reviews.



## Part C State Annual Performance Report (APR) for 2010

**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.

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

FFY	Measurable and Rigorous Target
2010 (2010-2011)	100%
Results	99.13%

**Actual Target Data for FFY 2010 (2010- 2011):**

Children with IFSPs	Number of Children with Services	Results
1. Received timely services	12,364	99.13%
2. System Delays in delivery of services over 30 days	108	.87%
Total of 1 & 2	12,472	100%

*Data Source: Wisconsin Program Participation System (PPS) 7/1/10-6/30/11*

Data includes children for whom services began in FFY 2010 from the parent's consent to the actual start date of the service(s) or for whom services were continuing to be provided in the FFY 2010 (began in previous year(s)). "Received timely services" in the chart above outlines children who have received timely services in FFY 2010 since their initial IFSP or IFSP update, children who received late services with an exceptional family reason, and children who have been receiving services prior to the FFY 2010 and thus are all considered compliant.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:*****Data Analysis:***

During FFY 2010, Wisconsin had a compliance of 99.13 percent (12,364 of 12,472) for timely IFSP services, an increase of .04 percent from FFY 2009 which was 98.73 percent. Wisconsin did not meet its target of 100 percent compliance. Included in the calculation for timely services are 795 children whose services were initiated beyond the 30-day timeline due to exceptional family circumstances. 385 of those 795 children experienced a delay that was intentionally planned by the IFSP team, which includes the family. These sets of children were included in both the numerator and denominator. Under the Primary Coach Approach to Teaming, there are sound reasons for delaying the start of additional coaching provided through other disciplines in tandem with the primary provider while the primary provider gets to know the child better (ongoing assessment) and builds a relationship with the family and other primary caregivers. When the team including the family agree to this approach at the IFSP meeting, it is most efficient to intentionally plan for added services at the initial IFSP. In FFY 2010 108 children did not have timely services due to system reasons.

***Findings of Non-Compliance:*****Correction of FFY 2009 Findings of Non-Compliance (if State reported less than 100% compliance):**

1. Number of Findings of Non-Compliance the State made during FFY 2009 (the period from July 1, 2009, through June 30, 2010)	<b>15</b>
2. Number of FFY 2009 Findings of Non-Compliance the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	<b>14</b>
3. Number of FFY 2009 Findings of Non-Compliance <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>1</b>

**Correction of FFY 2009 Findings of Non-Compliance Not Timely Corrected (corrected more than one year from identification of the non-compliance):**

4. Number of FFY 2009 Findings of Non-Compliance not timely corrected (same as the number from (3) above)	<b>1</b>
5. Number of FFY 2009 Findings of Non-Compliance the State has verified as corrected beyond the one-year timeline ("subsequent correction")	<b>0</b>
6. Number of FFY 2009 Findings of Non-Compliance <u>not</u> verified as corrected [(4) minus (5)]	<b>1</b>

**Verification of Correction (either timely or subsequent):**

OSEP staff provided clarification about Wisconsin's verification process for correcting Findings of Non-Compliance in late 2009 during a federal On-Site Review. As a result of that clarification, Wisconsin's Birth to 3 Program adjusted its procedures for verifying correction of Findings of Non-Compliance effective December 2009. This revised process implements the requirements articulated in OSEP Memorandum 09-02 dated October 17, 2008, through a two-step verification process that includes a review of updated system level data and correction of each individual case of non-compliance.

Since implementation of this process, DHS has developed supporting documents included in Appendix E outlining the specific actions taken to verify correction of Findings of Non-Compliance.

**Enforcement Actions Taken if Non-compliance Not Corrected:**

In 2010, monitoring of the largest county in Wisconsin worked to achieve 100 percent compliance. The largest County Birth to 3 Program in Wisconsin instituted data monitoring meetings where RESource met with each of the agencies in the county providing Birth to 3 Program services and reviewed their data, along with the data for the county, identifying gaps and non-compliances. Individual agency Program In Partnership Plans (PIPPs) were updated. RESource staff and the County Birth to 3 Program coordinator had multiple conversations about what the agencies providing Birth to 3 Program services were doing to meet the indicators, what the file reviews were indicating in regards to practice to support 100 percent compliance, and brainstorming how to address issues across agencies providing the Birth to 3 Program services. If the largest County Birth to 3 Program in Wisconsin does not show 100 percent compliance, the County Birth to 3 Program will be required to develop a corrective action plan (CAP) with their State Lead to assure strategies in place will promote 100 percent compliance.

**Correction of FFY 2008 Findings of Non-Compliance (if State reported less than 100% compliance):** NA. All Findings of Non-Compliance due in FFY 2008 have been completed as reported in FFY 2009 Annual Performance Report.

**Correction of FFY 2007 Findings of Non-Compliance (if State reported less than 100% compliance):** NA. All Findings of Non-Compliance due in FFY 2007 have been completed as reported in FFY 2009 Annual Performance Report.

***Ongoing Improvement Activities:*****Clarify Policies and Procedures:**

DHS has continued to educate the County Birth to 3 Programs on the importance of timely service delivery.

**Improved Data Collection and Reporting:**

A 'Federal Indicator Report' was developed through Wisconsin's Program Participation System (PPS) Data Mart to collect data on Indicator 1 in a timely, accurate and efficient manner to determine the compliance level, noncompliance level and errors that contribute to the compliance. This report was used to determine data for the 2010-2011 APR. In the future, DHS will be enhancing the Data Mart to provide County Birth to 3 Programs more opportunities to self-monitor their compliance with Indicator 1.

Through the On-Site process, DHS has monitored the County Birth to 3 Program's accuracy in PPS data reporting. Verifying the documentation in the children's files of the actual start date has been a focus for the Wisconsin Birth to 3 Programs, specifically through the Self-Assessment and On-Site processes. Clear documentation of late reasons in the children's file at the County Birth to 3 Program level is a focus for the coming year.

**Targeted Technical Assistance:** NA

**Improved Systems Administration:** DHS State Leads have been assigned to County Birth to 3 Programs on a regional basis. This change to monitoring has increased the knowledge of the region by the State Lead and increased the quality of support that can be provided.

**Provision of Training and Technical Assistance:** Wisconsin's largest County Birth to 3 Program received additional technical assistance and monitoring, and was provided with direct oversight and support to each of this county's program providers. RESource staff, works with any County Birth to 3 Program, when compliance of Indicator is less than 100 percent, to develop a Program in Partnership Plan (PIPP) and identifying strategies to correct Indicator 1 non-compliance issues.

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

Revisions are proposed to Improvement Activities in the SPP. The additional improvement activity occurred during the FFY 2010 to support consistent monitoring of indicator compliance.

## Part C State Annual Performance Report (APR) for 2010

**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
2010 (2010-2011)	96.20%

**Actual Target Data for FFY 2010 (2010-2011):**

FY 2010 Results	95.43%
--------------------	--------

Results of data for FFY 2009 (2009-10) indicate that 95.43 percent of infants and toddlers received early intervention services in the home or programs designed for typically developing children. The following figure presents the State baseline and target data. The data presented are from the statewide data system (PPS).

## History of Wisconsin in meeting Indicator 2 requirement

FFY	Target	State
2007-08	96.00	93.96
2008-09	96.00	94.68
2009-10	96.2	95.8%
2010-11	96.3	95.43%

Table C1.1 Percent of Wisconsin early intervention services provided in the settings defined by the 618 Settings Table, FFY 2010 (2010-2011)

<b>Natural Environments</b>	<b>Number</b>	<b>Percentage</b>
Home	5316	86.70%
Community-Based Settings for typically developing children	535	8.73%
Other Settings	280	4.57%
Total	6131	100%

*Data Source:* Wisconsin 618 Settings Table, FFY 2010 (2010-2011)

### **Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:**

#### ***Data Analysis:***

Results of the data indicate that 95.43 percent of infants and toddlers received early intervention services in the home or in programs designed for typically developing children. Wisconsin did not meet its measurable and rigorous target this year of 96.30 percent. The target was missed by 0.87 percent. The data demonstrates minor slippage from the previous year.

#### ***Findings of Noncompliance:***

#### **Verification of Correction (either timely or subsequent):**

OSEP staff provided clarification about Wisconsin's Birth to 3 Program verification process for correcting Findings of Non-Compliance in late 2009 during a federal On-Site Review. As a result of that clarification, Wisconsin's Birth to 3 Program adjusted its procedures for verifying correction of Findings of Non-Compliance effective December 2009. This revised process implements the requirements articulated in OSEP Memorandum 09-02 dated October 17, 2008, through a two-step verification process that includes a review of updated system level data and correction of each individual case of non-compliance.

Since implementation of this process, DHS has developed supporting documents included in Appendix D - J outlining the specific actions taken to verify correction of Findings of Non-Compliance.

#### **Enforcement Actions Taken if Non-compliance not corrected:**

No Findings of Non-Compliance were issued for Indicator 2 in FY 2009, thus no corrections or enforcement actions were required for this Indicator in FY 2010.

#### ***Ongoing Improvement Activities:***

#### **Clarify Policies and Procedures:**

Wisconsin continues to support counties in understanding how service delivery can be enhanced through inclusion and focused attention to natural environments especially in the context of hiring and retaining staff in both urban and rural areas.

**Improve Data Collection and Reporting:**

The percentage of children being served in the natural environment was calculated from the 618 data one day count on October 1, 2010. On this day, the majority of counties provided services to children in a natural environment more than 95 percent of the time.

**Targeted Technical Assistance:**

Technical Assistance was provided to rural counties who identified challenges in recruiting and hiring staffing levels to meet the needs of children in their area. Suggestions were provided about ways to fill positions and ensure services are provided in the child's natural environment. In addition, challenges were identified in the state's largest urban county regarding staff safety concerns when providing services in the natural environment. This county has partnered with local law enforcement to educate staff regarding methods to monitor their personal safety in all situations.

**Improved Systems Administration and Monitoring:**

The county Self-Assessment is a key tool in Wisconsin's General Supervision system. The Self-Assessment is one opportunity for County Birth to 3 Programs to assess their provision of services in natural environments. Counties reflect on their compliance percentages in this area and identify challenges and opportunities to expand their strategies for individualized planning with families.

**Provision of Training and Technical Assistance:** Wisconsin continues to monitor services provided in natural environments to ensure that IFSP teams make individualized decisions regarding the settings in which infants and toddlers receive early intervention services. The state's largest county continues to make progress on this Indicator.

DHS training and technical assistance efforts focus on moving providers from the idea of the natural environment as a location, toward the full understanding of involving the parents or child care providers in strategies for enhancing the child's development within typically occurring routines and activities of the family. Natural environments policies and best practices are integrated into all technical assistance materials and trainings, including the "Orientation to Best Practices in Early Intervention," offered at least twice a year by the Wisconsin Personnel and Development Program (WPDP). This training includes discussion of strategies for planning interventions in natural environments, including routines-based intervention. Routines-based Interventions were emphasized during 2010 in the context of Primary Coach Approach to Teaming trainings with national experts, M'Lisa Sheldon and Dathan Rush.

**Collaboration and Coordination:**

NA

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

Revisions are proposed to Improvement Activities in the SPP for this Indicator. The additional improvement activity occurred during the FFY 2010 to support consistent monitoring of indicator compliance.

## Part C State Annual Performance Report (APR) for 2010

**Monitoring Priority: Early Intervention Services In Natural Environments****Indicator 3:** Percent of infants and toddlers with IFSPs who demonstrate improved:

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

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

**Measurement:**

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

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

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

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

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



peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

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

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

**C. Use of appropriate behaviors to meet their needs:**

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

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

**Summary Statements for Each of the Three Outcomes:**

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

**Measurement for Summary Statement 1:**

Percent = # of infants and toddlers reported in progress category (c) plus # of infants and toddlers reported in category (d) divided by [# of infants and toddlers reported in progress category (a) plus # of infants and toddlers reported in progress category (b) plus # of infants and toddlers reported in progress category (c) plus # of infants and toddlers reported in progress category (d)] times

100.

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

**Measurement for Summary Statement 2:**

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

**Measurable and Rigorous Targets and Actual Target Data**

FFY	Measurable and Rigorous Targets and Baseline Data		
2008 (2008-2009)	Summary Statements	TARGET FFY2008 (% of children)	ACTUAL FFY2008 (% of children)
	Outcome A: <b>Positive social-emotional skills (including social relationships)</b>		
	1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they exited the program	72.5%	72.5%
	2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program	74.0%	74.0%
	Outcome B: <b>Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>		
	1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program	78.2%	78.2%
	2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	58.9%	58.9%
	Outcome C: <b>Use of appropriate behaviors to meet their needs</b>		
	1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they exited the program	76.7%	76.7%
	2. The percent of children who were functioning within age expectations in Outcome C by the	76.4%	76.4%

	time they exited the program		
--	------------------------------	--	--

FFY 2008 (2008- 2009)	Progress Categories for Outcome A, B and C Data		
	Outcome A: <b>Positive social-emotional skills (including social relationships)</b>	# of children	% of children
	a. infants and toddlers who did not improve functioning	6	1%
	b. infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	171	17%
	c. infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	133	13%
	d. infants and toddlers who improved functioning to reach a level comparable to same-aged peers	258	25%
	e. infants and toddlers who maintained functioning at a level comparable to same-aged peers	452	44%
	TOTALS	1020	100%
	Outcome B: <b>Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>	# of children	% of children
	a. infants and toddlers who did not improve functioning	4	.4%
	b. infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	182	18%
	c. infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	261	26%
	d. infants and toddlers who improved functioning to reach a level comparable to same-aged peers	404	40%
	e. infants and toddlers who maintained functioning at a level comparable to same-aged peers	169	17%
	TOTALS	1020	100%
	Outcome C: <b>Use of appropriate behaviors to meet their needs</b>	# of children	% of children
	a. infants and toddlers who did not improve functioning	10	1%
	b. infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	138	14%

**APR – Part C (4)**Wisconsin  
State

	c. infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	130	13%
	d. infants and toddlers who improved functioning to reach a level comparable to same-aged peers	334	33%
	e. infants and toddlers who maintained functioning at a level comparable to same-aged peers	408	40%
	TOTALS	1020	100%

FFY	Measurable and Rigorous Targets		
2009 (2009-2010)	Summary Statements	TARGET FFY2009 (% of children)	ACTUAL FFY2009 (% of children)
	Outcome A: <b>Positive social-emotional skills (including social relationships)</b>		
	1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they exited the program	72.5%	63.0%
	2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program	74.0%	67.6%
	Outcome B: <b>Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>		
	1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program	78.2%	70.6%
	2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	58.9%	52.2%
	Outcome C: <b>Use of appropriate behaviors to meet their needs</b>		
	1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they exited the program	76.7%	72.5%
	2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program	76.4%	70.3%

FFY 2009 (2009- 2010)	Progress Categories for Outcome A, B and C Data		
	Outcome A: <b>Positive social-emotional skills (including social relationships)</b>	# of children	% of children
	a. infants and toddlers who did not improve functioning	27	1%
	b. infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	394	13%
	c. infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	363	12%
	d. infants and toddlers who improved functioning to reach a level comparable to same-aged peers	729	24%
	e. infants and toddlers who maintained functioning at a level comparable to same-aged peers	1501	50%
	TOTALS	3014	100%
	Outcome B: <b>Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>	# of children	% of children
	a. infants and toddlers who did not improve functioning	19	1%
	b. infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	506	17%
	c. infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	711	24%
	d. infants and toddlers who improved functioning to reach a level comparable to same-aged peers	1170	39%
	e. infants and toddlers who maintained functioning at a level comparable to same-aged peers	608	20%
	TOTALS	3014	100%
	Outcome C: <b>Use of appropriate behaviors to meet their needs</b>	# of children	% of children
	a. infants and toddlers who did not improve functioning	20	1%
	b. infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	390	13%

	c. infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	304	10%
	d. infants and toddlers who improved functioning to reach a level comparable to same-aged peers	1029	34%
	e. infants and toddlers who maintained functioning at a level comparable to same-aged peers	1271	42%
	TOTALS	3014	100%

As requested in the 2009 Part C Annual Performance Report (APR) under Instructions for Indicators/Measurement, the instruments and procedures used to gather Child Outcome data are listed below. Wisconsin uses the Child Outcomes Summary Form (COSF) as part of their rating process and does not serve “at-risk” infants and toddlers. Therefore, data in this report include only Part C eligible children. The data referenced in the Summary Statements and Progress Categories a-e was derived with the use of ECO Analytic Calculator.

The list of instruments include: Battelle Developmental Inventory Second Edition; Hawaii Early Learning Profile; Brigance Inventory of Early Development II; Greenspan Social-Emotional Scale; Early Learning Accomplishment Profile; Rosetti Infant Toddler Language Scale; Ages and Stages Developmental Screener; Preschool Language Scale 3 & 4; Peabody Developmental Motor Scales; Goldman-Fristoe Test of Articulation; Bayley Scales of Infant Toddler Development; Early Intervention Developmental Profile; Assessment, Evaluation and Programming System (AEPS); Rhode Island Test of Language Structure; Alberta Infant Motor Scale; Emergent Language Test; Receptive Expressive Emergent Language Scale-3; Winn Dunn Sensory Profile; Ages and Stages SE Questionnaire; Birth to Three Assessment and Intervention System-2; Brief Infant Toddler Social Emotional Assessment; Vineland Adaptive Behavioral Scale; The New Portage Guide Birth to Six; Degangi Infant-Toddler Symptom Checklist; Carolina Curriculum; M-Chat; Mullen Scale of Early Learning; Infant Toddler Sensory Profile; TABS Scale; Early Language Milestones; Beckman Oral Motor Evaluation; Developmental Assessment of Young Children; Coulee Children’s Center Fine Motor and Feeding Checklists; Ready, Set, Grow; Infant Developmental Screen Scale; Carolina Developmental Profile; CDHH Normal Speech Development Checklist; WPS; Penfield Developmental Scales and Developmental Profile II; Auditory Skills Checklist; Ling 6 Sound Test; Toddler Sensory Motor Checklist; Infant Toddler Developmental Assessment; High Scope Preschool Child Observation Record for Infants and Toddlers; Developmental Pre-Feeding Checklist; and the Pediatric Early Developmental Inventory.

In addition to any formal assessments, other sources of information were used to obtain accurate and reliable data including: parent interview; observation in a variety of settings and/or environments including community and childcare; review of medical records, information from previous County Birth to 3 Program records, foster parent input, and professional judgment. Also during FFY 2009 use of the Early Childhood Outcomes Center “Decision Tree” was encouraged during statewide trainings, and discussed during Birth to 3 Program Reviews and Self Assessments.

FFY	Targets and Actual Data for Part C Children Exiting in FFY 2010 (2010-2011)		
2010 (2010-2011)	Summary Statements	TARGET FFY 2010 (% of children)	ACTUAL FFY2010 (% of children)
	Outcome A: <b>Positive social-emotional skills (including social relationships)</b>		
	1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they exited the program	72.5%	61.8%
	2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program	74.0%	66.5%
	Outcome B: <b>Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>		
	1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program	78.2%	68.0%
	2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	58.9%	50.2%
	Outcome C: <b>Use of appropriate behaviors to meet their needs</b>		
	1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they exited the program	76.7%	72.7%
	2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program	76.4%	68.0%



FFY 2010 (2010-2011)	Progress Categories for Outcome A, B and C Data		
	Outcome A: <b>Positive social-emotional skills (including social relationships)</b>	# of children	% of children
	a. infants and toddlers who did not improve functioning	23	0.5%
	b. infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	945	21.3%
	c. infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	520	11.7%
	d. infants and toddlers who improved functioning to reach a level comparable to same-aged peers	1046	23.5%
	e. infants and toddlers who maintained functioning at a level comparable to same-aged peers	1913	43%
	TOTALS	4447	100%
	Outcome B: <b>Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>	# of children	% of children
	a. infants and toddlers who did not improve functioning	19	0.4%
	b. infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	1160	26.1%
	c. infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	1035	23.3%
	d. infants and toddlers who improved functioning to reach a level comparable to same-aged peers	1475	33.2%
	e. infants and toddlers who maintained functioning at a level comparable to same-aged peers	758	17%
	TOTALS	4447	100%
	Outcome C: <b>Use of appropriate behaviors to meet their needs</b>	# of children	% of children
	a. infants and toddlers who did not improve functioning	24	0.5%
	b. infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same age peers	774	17.4%
	c. infants and toddlers who improved functioning to a level nearer to same-aged peers but did	625	14.1%

	not reach it		
	d. infants and toddlers who improved functioning to reach a level comparable to same-aged peers	1501	33.8%
	e. infants and toddlers who maintained functioning at a level comparable to same-aged peers	1523	34.2%
	TOTALS	4447	100%

FFY	Measurable and Rigorous Targets	
2011 (2011-2012)	Summary Statements	TARGET FFY 2011 (% of children)
	Outcome A: <b>Positive social-emotional skills (including social relationships)</b>	
	1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they exited the program	72.6%
	2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program	74.10%
	Outcome B: <b>Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>	
	1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program	78.3%
	2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	59%
	Outcome C: <b>Use of appropriate behaviors to meet their needs</b>	
	1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they exited the program	76.8%
	2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program	76.5%

--	--	--

FFY	Measurable and Rigorous Targets	
2012  (2012-2013)	Summary Statements	<b>TARGET</b> FFY 2012 (% of children)
	<b>Outcome A: Positive social-emotional skills (including social relationships)</b>	
	1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they exited the program	<b>72.7%</b>
	2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program	<b>74.2%</b>
	<b>Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>	
	1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program	<b>78.4%</b>
	2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	<b>59.1%</b>
	<b>Outcome C: Use of appropriate behaviors to meet their needs</b>	
	1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they exited the program	<b>76.9%</b>
	2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program	<b>76.6%</b>

*Data Source:* Wisconsin Program Participation System (PPS) (7/1/10-6/30/11) in conjunction with the Early Childhood Outcomes Center Summary Statements calculator.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:*****Data Analysis:***

Data include children who had an active IFSP for a minimum of 6 months (181 days) and exited during the FFY 2010. Wisconsin had an additional 840 children receive Exit Child Outcomes during FFY 2010 (7/1/10-6/30/11) as compared to the previous FFY 2009. We expect these Exit Outcome numbers to begin leveling off with a full cohort of children entering and exiting the Birth to 3 Program. The Wisconsin PPS Data Mart allowed the DHS to identify individual missing Child Outcome data for each of Wisconsin's 72 County Birth to 3 Programs and subsequently each Birth to 3 Program had an opportunity to enter or update the missing data. Each County Birth to 3 Program received an error report identifying the missing Child Outcome data in addition to the "impossible combination" of Entry and Exit outcome ratings. Target setting for the two summary statements for each of the three child outcomes was set during the January 2010 State ICC meeting.

Each RESource TA support person was given their regional Child Outcome data including summary statements and progress categories. This was seen as an opportunity for Wisconsin's TA providers to familiarize themselves with the data and, when appropriate, share with their respective regions.

Slippage between the FFY 2009 and FFY 2010 Child Outcome targets influenced by more reliable and accurate data is likely due to Wisconsin's increased training and technical assistance provided to Birth to 3 Programs across the state. The purpose of, and process for, rating a child as part of a program's routine process with increased fidelity, continues to improve over time. As such, more accurate data is represented in the FFY 2010 APR data despite evidence of slippage among the targets. As Birth to 3 Programs become more comfortable and collaborative across disciplines and recognize the usefulness of Child Outcomes for state and local improvement, targets will become more representative. Wisconsin anticipates a leveling of slippage in Child Outcome targets over the next FFY and expects 2011 and FFY 2012 targets will be more representative of true baseline.

***Findings of Non-Compliance:*** NA

**Verification of Correction (either timely or subsequent):** NA

**Enforcement Actions Taken if Non-compliance not corrected:** NA

***Ongoing Improvement Activities:*****Clarify Policies and Procedures:**

The DHS Wisconsin Birth to 3 Program continues to educate, inform and encourage County Birth to 3 Programs to pay particular attention to the Child Outcome process. Of interest has been the emphasis placed upon learning to incorporate the Child Outcomes process into their daily work

with children and families-- a more contextual approach to intervention rather than being viewed as additional responsibility or removed from the overall routine of early intervention. Specifically, DHS staff held a "Data Discussion" during FFY 2010 providing County Birth to 3 Programs additional clarification of the entry/exit process for PPS data entry and to help ensure both the quality and timeliness of reporting of Child Outcomes. Fall 2009 Regional meetings provided a number of policy and procedure updates related to Child Outcomes. A reoccurring theme over the past two reporting periods has been to view the Child Outcomes process as a part of, not separate from, a program's everyday routine and practices.

**Improved Data Collection and Reporting:**

A 'Federal Indicator Report' was developed in Wisconsin's Program Participation System (PPS) Data Mart to collect data on Indicator 3 in a timely, accurate and efficient manner to determine the compliance level, noncompliance level and errors that contribute to the compliance. This report was used to determine data for the 2010-2011 APR.

DHS monitors County Birth to 3 Programs during the On-Site process by determining the accuracy of Child Outcome data entered into PPS. Annual Self-Assessment discussions also address Child Outcomes however the conversations are centered on the process of gathering the information through team participation, use of the Decision Tree, parent input, locations of child observations, etc. Quality data collection continues to be an emphasis and focus.

**Improved Systems Administration:**

FFY 2010 included a number of activities targeted at the state Birth to 3 leadership and County Birth to 3 Programs. The annual County Birth to 3 Program Self-Assessment, in partnership with RESource, is the best opportunity in Wisconsin's general supervision system to thoroughly examine the policies and practices that affect the children and families they serve. The Self-Assessment remains the one anticipated and preplanned opportunity for County Birth to 3 Programs to assess and evaluate the quality of their program, identify concerns and consider improvement strategies with the support and facilitation of RESource. Each year following the Self-Assessment, the County Birth to 3 Program and RESource develop a Program In Partnership Plan (PIPP) consisting of program improvement plans and activities.

**Provision of Training and Technical Assistance:**

In accordance with the OSEP response table, Wisconsin has submitted Indicator 3 data based on the required measurement table for FFY 2009 and FFY 2010.

DHS Birth to 3 Program training and technical assistance efforts included training and support activities throughout FFY 2010. Most notable, was the year long emphasis placed on introducing Relationship-Based Early Intervention in Natural Environments Using Evidence-Based-Practices (EBP) to County Birth to 3 Programs throughout the state. County Birth to 3 Programs learned how to gather both valid and reliable information (data) within a family's usual routines.

Throughout spring of 2011 statewide trainings were rolled out in collaboration with the Department of Public Instruction (DPI) Part B Child Outcomes Coordinator. Also during this period a DHS Birth to 3 Child Outcomes “Data Discussion” teleconference call was provided state wide. Topics during the call included “what’s behind the 5 progress categories” and defining “present level of functioning.”

During fall of 2010, a Child Outcomes Parent Brochure was developed and disseminated via the Collaborating Partners web site and a Child Outcomes Fidelity Self Assessment was designed and utilized during Birth to 3 Program reviews. Finally, the 2010 Early Childhood conference was attended by several DHS Birth to 3 and WPDP staff members.

**Collaboration and Coordination:**

Ongoing collaboration continues with DPI’s Part B Child Outcomes Coordinator and Birth to 3 Program staff. During FFY 2010 these collaborative meetings occurred approximately every other month. Agendas were developed during the period leading up to each meeting. Items often included were data analysis, upcoming training opportunities, joint training efforts in the future and discussions concerning local issues following an Early Childhood Outcomes Center Community of Practice call.

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

## Part C State Annual Performance Report (APR) for 2010

## 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
2010 (2010-2011)	Measurement A = 90% Measurement B = 94% Measurement C = 94%

**Actual Target Data for 2010 (2010 – 2011):**

Indicator	Description	2010 Results
4A	Know their rights	86.25%
4B	Effectively communicate their children's needs	82.37%
4C	Help their children develop and learn	80.78%

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:*****Data Analysis:***

The 4A data of 86.25 percent (2221/2575) demonstrates progress from the baseline of 82.4 percent and last year's results of 85 percent. Wisconsin's target for 2010-2011 of 90 percent was not met. The 4B data of 82.37 percent (2121/2575) demonstrates slippage from the baseline of 89.1 percent and last year's data of 95 percent. Wisconsin's target for 2010-2011 of 94 percent was not met. The 4C data of 80.78 percent (2080/2575) demonstrates slippage from the baseline of 90.4 percent and last year's data of 92 percent. Wisconsin's target for 2010-2011 of 94 percent was not met.

The number of surveys distributed was 6,067, with a final rate of return of 2,575. This is a return rate of 42 percent. Of those returned, 35 percent of the surveys were completed by non-white families. This is equal to the 35 percent of Wisconsin families who are non-white as represented in the Wisconsin 618 Child Count Table, FFY 2010 (2010-2011). All of the race and ethnic categories represented in the survey were within 1 percentage point of the same race/ethnic category from the Wisconsin 618 Child Count Table, FFY 2010 (2010-2011). Wisconsin was within 1 percentage point of having the same distribution of male and female respondents as in our general Birth to 3 program statewide populations (from the Wisconsin 618 Child Count Table, FFY 2010 (2010-2011)).

Almost half of the respondents (42 percent) had entered the Birth to 3 Program when the child was under one year old and 39 percent entered Birth to 3 when the child was between 1 – 2 years old. Over half the respondents (58 percent) completed the survey when their child was over two years old. Thirteen percent of the respondents completed the survey before their child was one year old or after their child had already turned three years old and left the Birth to 3 Program.

Wisconsin is pleased with the increase in families completing the ECO Family Outcomes Survey. Wisconsin increased the rate of return in this year's surveys by 15 percent over last year. Wisconsin had instituted a mandatory 20 percent minimum return by each County Birth to 3 Program. This was the first year Wisconsin received a representative response, without pursuing additional responses. Wisconsin is pleased with the progress in our results compared to last year around Indicator 4A: families knowing their rights. It indicates the focus the State has put into this requirement is making a difference.

Two of the family outcomes (4B and 4C) slipped this year compared to both the baseline and last year's data. With the American Recovery Reinvestment Act (ARRA) funding provided to Wisconsin, a transition to the Evidence-Based Practice of Primary Coach Approach to Teaming (PCATT) has been instituted. Wisconsin has established a five-year plan to transition all County Birth to 3 Programs to this early intervention service approach. During the past year, many County Birth to 3 Programs have begun the transition to PCATT. We are hoping to see an increase in our Indicator 4B and 4C data with this transition. However, our transition to this new approach began during this past year and may have influenced how families understand the role of the program and how services are provided.

Wisconsin continues to seek strategies to improve meeting its targets for all three family outcomes. Having representation from all response groups may indicate more accurate data/responses by families. Wisconsin included families that participated in the Birth to 3 Program for less than six months. Several County Birth to 3 Programs reported that many of the families chosen to participate in the ECO Family Outcomes survey had moved or already left the Birth to 3 Program when the surveys were distributed. This is a factor Wisconsin will need to monitor as it is likely to



occur each year. Data was pulled based upon a one day count from our Program Participation System (PPS). DHS has instructed County Birth to 3 Programs to update data in PPS monthly. Lack of updated data in PPS could influence families having already left the program by the time the family outcome surveys were distributed.

The majority of families continue to report that the Birth to 3 Program assists them in understanding their rights (86.25 percent); effectively communicating their child's needs (82.37 percent) and helping their child develop and learn (80.78 percent).

See Appendices A – B for more information about the ECO Family Outcome Survey and its distribution in FFY 2010.

***Findings of Non-Compliance:***

**Correction of FFY 2009 Findings of Non-Compliance (if State reported less than 100% compliance):**

1. Number of Findings of Non-Compliance the State made during FFY 2009 (the period from July 1, 2009, through June 30, 2010)	4
2. Number of FFY 2009 Findings of Non-Compliance the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	4
3. Number of FFY 2009 Findings of Non-Compliance <u>not</u> verified as corrected within one year [(1) minus (2)]	0

**Correction of FFY 2009 Findings of Non-Compliance Not Timely Corrected (corrected more than one year from identification of the non-compliance):**

4. Number of FFY 2009 Findings of Non-Compliance not timely corrected (same as the number from (3) above)	0
5. Number of FFY 2009 Findings of Non-Compliance the State has verified as corrected beyond the one-year timeline ("subsequent correction")	0
6. Number of FFY 2009 Findings of Non-Compliance not verified as corrected [(4) minus (5)]	0

Two of the Findings of Non-Compliance were given based upon an IDEA complaint received by the DHS Birth to 3 Program.

**Verification of Correction (either timely or subsequent):**

OSEP staff provided clarification about Wisconsin's verification process for correcting Findings of Non-Compliance in late 2009 during a federal On-Site Review. As a result of that clarification, Wisconsin's Birth to 3 Program adjusted its procedures for verifying correction of Findings of Non-Compliance effective December 2009. This revised process implements the requirements articulated in OSEP Memorandum 09-02 dated October 17, 2008 through a two-step verification

process that includes a review of updated system level data and correction of each individual case of non-compliance.

Since implementation of this process, DHS has developed supporting documents included in Appendix D – J outlining the specific actions taken to verify correction of Findings of Non-Compliance.

**Enforcement Actions Taken if Non-compliance Not Corrected: NA*****Ongoing Improvement Activities:*****Clarify Policies and Procedures:**

DHS continues to review materials developed to inform and educate families on their rights and the program philosophy and approach to service delivery, to ensure the materials match regulations. DHS Birth to 3 Program materials are in the process of being updated and re-issued; ARRA funding helped to complete a review of all Wisconsin Birth to 3 Program materials in the past year and a half.

**Improved Data Collection and Reporting:**

The DHS Wisconsin Birth to 3 Program participated in ECO Family Outcome calls throughout the FFY 2010. Based upon reports from other states during these calls, DHS provided additional guidance in 2010 around the distribution and collection of the family outcome surveys. County Birth to 3 Programs were encouraged to hand-deliver the surveys. Many County Birth to 3 Programs provided incentives to families for completing the survey.

Wisconsin will continue the census process for surveying families in the Birth to 3 Program. Next year, families of children participating in the Birth to 3 Program for less than six months will not participate in the completion of the ECO Family Outcome survey. Twenty-five percent (638/2575) of the respondents had participated in the Birth to 3 Program for less than six months at the time of completing the survey. Many of the families responded in the “comments” boxes Wisconsin added to the survey that they were not in the program long enough to answer the questions.

**Targeted Technical Assistance: NA****Improved Systems Administration:**

Wisconsin promotes family-centered services with a focus on parent participation and involvement their child’s learning of skills, which promote family outcomes. Wisconsin’s technical support provider, RESource, worked with individual County Birth to 3 Programs to plan continued progress toward family-centered practice using the survey results as one of many sources of information for future planning. In addition, ARRA funding was used to support the Primary Coach Approach to Teaming (PCATT) to Birth to 3 Programs across Wisconsin. With the ARRA funding, technical assistance from a nationally recognized team, Rush and Sheldon, was provided to County Birth to 3 Programs to support the transition to PCATT in the first two years. This TA allowed planning for the PCATT implementation process for the state.

The Wisconsin Self-Assessment and On-Site processes will be updated to include a focus on family involvement through the implementation of the PCATT. Each County Birth to 3 Program completes a Self-Assessment annually; an On-Site occurs once every four years. The Self-Assessment or On-Site process informs each County Birth to 3 Program’s plan for progress toward the PCATT that is documented on their PIPP.

**Provision of Training and Technical Assistance:**

The DHS Birth to 3 Program provided four trainings throughout the FFY 2010 around the Primary Coach Approach to Teaming. For FFY 2011, the DHS contract for personnel training with Wisconsin Personnel Development Project (WPDP) includes one-day trainings for county staff on the Primary Coach Approach to Teaming (PCATT). RESource staff, through a DHS contract, provides ongoing technical assistance on an individualized basis to County Birth to 3 Programs to promote PCATT. Wisconsin DHS provided five trainings during the FFY 2010 to County Birth to 3 Program staff which focused on rights of parents, specifically Written Prior Notice, in the Birth to 3 Program.

If family outcomes are identified for a County Birth to 3 Program as an area for improvement due to low compliance of the indicator or an unclear process for assessing program performance, strategies are added to the County Birth to 3 Program's Program In Partnership Plan (PIPP). This action helps to ensure a focus on improving practice so families reach the goals identified through the family outcome indicators. Through the Self-Assessment process, several County Birth to 3 Programs in the past year has added strategies to their PIPP around improving family outcomes.

**Collaboration and Coordination:**

Since FFY 2007, Wisconsin's Family Assistance Center for Education, Training and Support (FACETS) has been contracted to assist families with oral translation and support in completing the survey. Great Lakes Inter-tribal Council (GLITC) helped tribal families to complete the survey and followed up to assist in an increased rate of return. Both of these entities had contracts to assist with the 2010-2011 distribution of the ECO Family Survey.

Each year at a statewide, co-sponsored conference, a Parent Feedback forum is co-hosted with Family Voices, the Department of Public Instruction (DPI) and the Board for Persons with Developmental Disabilities (BPDD) to ascertain concerns and holistic needs of families, in addition to the IDEA benchmarks for Family Outcomes. Our mediation contract provides information to other agencies and programs that come into contact with families of children in the Birth to 3 Program and has promoted the use of mediation as an option for families.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:** The SPP has been revised to reflect the new distribution process of census instead of sampling. This decision was based upon feedback from County Birth to 3 Programs and State analysis of Family Outcome survey data over the past years. The SPP has timeframe changes to improvement activities to meet the requirements of the Wisconsin Part C FFY 2009 SPP/APR Response Table.

## Part C State Annual Performance Report (APR) for 2010

## Monitoring Priority: Effective General Supervision Part C / Child Find

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

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

**Measurement:**

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

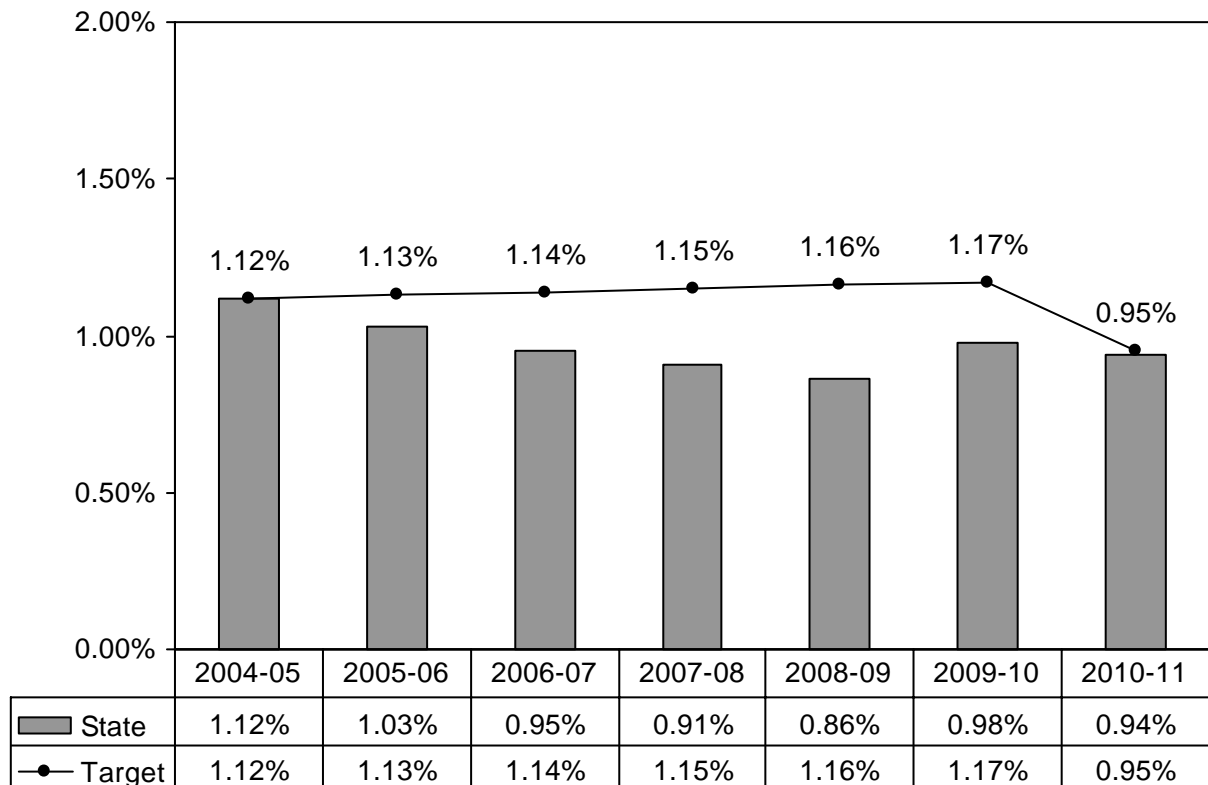
FFY	Measurable and Rigorous Target
2010 (2010-2011)	.95% infants and toddlers birth to one with IFSPs

**Actual Target Data for 2010 (2010-2011):**

2010 Results	.94%
-----------------	------

Results of data for FFY 2010 indicate that 0.94 percent of Wisconsin infants and toddlers birth to one had IFSPs according to Wisconsin's one-day count on October 1, 2010. The following figure presents State baseline and target data. (This figure does not include a comparison to other states with similar eligibility or children considered to be "at risk.")

Figure C5.1 Baseline, target, and performance of percentage of infants and toddlers birth to 1 with IFSPs in Wisconsin



*Data Source:* Wisconsin SPP 2005-2011; Wisconsin Program Participation System (PPS) U.S. Department of Education, Office of Special Education Programs, Data Analysis System (DANS), "Report of infants and toddlers receiving early intervention services in accordance with Part C," 2010. <https://www.ideadata.org/PartCData.asp>

**Comparison of Wisconsin to National Data** The National percent of the population of infants and toddlers birth to one who received Part C services during FFY 2010 was 1.03 percent while Wisconsin's average percentage of children served birth to one was 0.94 percent. Wisconsin has been below the national average for serving children birth to one during FFY 2008, FFY 2009 and FFY 2010; however, the total number of children served (birth through age 2) has steadily increased for each of the past three FFY 2008, 2009 and 2010.

#### **Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010 (2010-11):**

##### **Data Analysis:**

While Wisconsin has served a lower percentage of infants and toddlers than the national average, it continues to serve at or above the overall percentage of infants and toddlers birth through age 2. Many of the new initiatives funded through ARRA for increasing our focus on referrals for children under age one was necessary and effective. We expect a slow but steady increase over the next several years. We do not believe the targets originally set in FFY 2004 are realistic and, in fact, were an anomaly and unique to that particular baseline year. Analysis

of trends indicates that the percentage of children served birth to one in 2004 (baseline year), was an unusual spike from 0.90 percent in 2003 to 1.12 percent in 2004.

***Findings of Noncompliance:***

No findings of non-compliance were issued to counties for Indicator 5.

**Verification of Correction (either timely or subsequent):** NA

**Enforcement Actions Taken if Noncompliance Not Corrected:** NA

***Ongoing Improvement Activities:*****Clarify Policies and Procedures:**

As mentioned above, the ICC convened a Child Find workgroup to explore Wisconsin's targets for Child Find to make suggestions for improved technical assistance from the state. This group has been meeting throughout FFY 2007, FFY 2008, and FFY 2009 and is chaired by the physician who directs the Children and Youth with Special Health Care Needs (CYSHCN) Program. One priority of this group has been to develop a Universal Referral Form, adapted from the guidance of the OSEP funded TRACE Center, that can be used by physicians to make referrals to County Birth to 3 Programs.

**Improved Data Collection and Reporting:** In November of 2008, the Wisconsin Department of Health Services replaced the former Human Service Reporting System (HSRS) database with a user-friendly web-based Program Participation System (PPS) that allows counties to monitor their own progress and slippage on Federal Indicators. The new PPS database technology has improved the comprehensiveness and accuracy of data collection for reporting on Indicators 5 and 6. A Child Enrollment Report will allow counties to access a list of the children in the Birth to 3 Program at any time, including the birth dates and ages of the children. A county interested in observing the progress or slippage of child find efforts would be able to closely monitor the numbers of children under the age of one, or all children in the program. In addition, in 2008 Child Count/Child Find analysis memos were sent to counties with requests to review and reflect on the data, local trends and unique demographics that might influence a county's improvement strategies.

**Targeted Technical Assistance:** NA

**Improved System Administration:** NA

**Provision of Training and Technical Assistance:** NA

**Collaboration and Coordination:**

**Great Lakes Inter-tribal Council:** The Wisconsin Birth to 3 Program continues to partner with the Great Lakes Inter-tribal Council (GLITC) to increase outreach to families who are Native American and strengthen relationships between Birth to 3 Programs and local Tribal partners. A member of the GLITC attends onsite county reviews when there is Tribal Nation representation within the county and portions of the onsite review are designated to discussing partnerships between the county and the tribe, including child find and outreach.

The Birth to 3 Program at the state and local level continue their efforts in public awareness, community linkages and outreach to the medical community, Local Education Agencies, primary physicians and work with Child Protective Services (CPS) in regards to referrals to the County Birth to 3 Program. This work remains ongoing.

During FFY 2010, Wisconsin participated in a state wide initiative partnering with Wisconsin Children and Youth with Special Health Care Needs (CYSHCN). A description of an initiative is below.

**Connections Initiative:** (September 2008-August 2011) Wisconsin was one of six states initially selected for a three-year federal Maternal Child Health Bureau grant, as part of the Combating Autism Act Initiative, whose purpose is to strengthen the state's infrastructure to improve services for children with autism spectrum disorders (ASD) and other developmental disabilities. In year one of the grant, regional trainings on general developmental screening and ASD were conducted in each of the Wisconsin Department of Health Services regions. In year two a series of webcasts for primary care providers were made available. The webcasts covered a range of Medical Home topics including developmental screening using the ASQ, screening for ASD using the M-CHAT, early identification in the primary care setting and referral to services, including Birth to 3 services. Open Forum Technical Assistance Calls were available in conjunction with the webcast series, giving primary care providers an opportunity to receive technical assistance related to the webcast topics.

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

**Suggested Reduced Target for FFY 2010-2012**

FFY	Measurable and Rigorous Target
2010 (2010-2011)	.95%
2011 (2011-2012)	.96%

2012 (2012-2013)	.97%
---------------------	------

Justification to reduce Wisconsin's Birth to 3 Program target percentage of infants and toddlers birth to 1 with IFSPs is as follows:

- During the past FFY the ICC discussed whether there was sufficient justification to reduce the birth to one target going forward. The findings of the committee's work does, in fact, justify a reduction of the current target of 1.18 percent to a baseline of .95 percent beginning in FFY 2010 and ending in FFY 2015 with a target of 0.99 percent. Therefore, beginning in FFY 2010 Wisconsin will implement a target reduction from 1.18 percent to .95 percent.
- Wisconsin has not met their target for indicator 5 (children Birth to 1 year) since the initial SPP target was established in 2004.
- The year in which Baseline was established (2004), proved to be an isolated event when compared to the next 5 subsequent years of Wisconsin's SPP. An exceptionally high rate (1.12 percent) of Wisconsin's children birth to age one were found eligible for Part C services in that year.
- Between the year prior to baseline, 2003, and the year baseline was established, 2004, there was an increase of 28 percent in children birth to one found eligible for Part C services. At the end of Wisconsin's 5 year SPP (2005-2010) it's evident the original target of 1.13 percent, with an annual increase of .01 percent was based on an artificially high and unrealistic target.
- The 2005-2010 SPP suggested the increase of 28 percent from the previous year was evidence of Wisconsin's successful implementation of state improvement activities the year prior. For example, some of the activities noted were increased efforts towards improving NICU partnerships, increased outreach activities targeting families and local communities, increased attention to developing and, in some cases, improving relationships among child protective agencies, and improving referral strategies, specifically for those children with early hearing loss. However, other state trainings and efforts towards policy clarification regarding eligibility during the same time period likely counteracted any realistic increase of eligible children birth to one. This and the improbability of a single year increase of 28 percent in child find made the baseline target of 1.12 percent both unrealistic and unsustainable.
- While Wisconsin was establishing its birth to one target of 1.13 percent based on the prior year (2004) percentage of 1.12, nationally (50 states plus the District of Columbia) the average was .96 percent. For states using broad eligibility, as does Wisconsin, the average percentage of infants and toddlers being served in Part C programs was 1.03 percent. Overall, the majority of states have not met their targets over the four year period between 2006 and 2009.
- The Wisconsin DHS Birth to 3 Program and Technical Assistance network (RESource) staff have documented during annual self assessments and periodic county reviews numerous child find efforts initiated and sponsored by local Birth to 3 programs. During the 2005-2010 SPP, child find efforts have included child care center outreach, attending



pediatric conferences, mass mailings to a variety of potential referral sources, developing MOU's with CAPTA, face to face communication and mailings to local physician clinics, participation in community health fairs and local events and public transportation placards, etc. It's clear Wisconsin Birth to 3 Programs have established a variety of on going child find efforts and continually seek additional supports, materials and creative solutions to maintain child find efforts for children birth to one.

### 2005-2010 SPP

#### Wisconsin Percentage for Birth to one annual targets and actual

	Target	Actual
<b>2005-2006 APR</b>	1.13	.96
<b>06-07</b>	1.14	.95
<b>07-08</b>	1.15	.91
<b>08-09</b>	1.16	.86
<b>09-10</b>	1.17	.98

- Increasing the identification of potentially eligible infants and young children is one of the byproducts of the many ongoing efforts of the Wisconsin's Early Childhood Collaborating Partners (WECCP) <http://www.collaboratingpartners.com/> and its various subcommittees. An essential subcommittee of WECCP is the Healthy Children's committee whose overarching goal is to coordinate, inform, discuss and strengthen efforts among state agencies serving young children in the areas of screening, assessments and interrelated components such as Child Find. Agency representation for WECCP includes Head Start, Wisconsin Early Childhood Association, Wisconsin Alliance for Infant Mental Health, Child Care Resource and Referral Network, Parents Plus of Wisconsin, Wisconsin Department of Public Instruction, and many others.
- Other statewide initiatives affecting child find efforts include the Developmental Delays and Disabilities Screening and Referral Project a three-year project involving work with Wisconsin family physicians to promote early identification of delays and timely referral to Birth to 3. Intended for doctors and general health care professionals to better understand early intervention and the use of developmental screening tools as part of well child check-ups. Additional information and results can be found at <http://www.waisman.wisc.edu/cshcn/whatsnew.php> or <http://www.waisman.wisc.edu/cshcn/pdfs/Project.3D.final.report.6.29.2011.pdf>.
- During much of the implementation of the 2005-2010 SPP data collection was done through the Human Service Reporting System (HSRS). A data collection system implemented in 1987 with limited data tracking elements such as name, birth date, sex, ethnicity and client characteristics. HSRS prevented Birth to 3 programs from reviewing current data but instead provided each county program either a quarterly or annual report. This affected their ability to react to any changes or trends in a timely manner. However, with the

introduction of Wisconsin's Program Participation System (PPS) in 2008 and the recent implementation of a PPS Data Mart, counties will be able to access and query their own data. This data is updated every week, allowing county agencies to view up to date information or data archived years ago for comparison purposes. Once the Data Mart access through the use of Business Objects software, is fully integrated, County Birth to 3 Programs will have the ability to develop their own data queries including Child Find relevant information. For example, referral sources, age of referral, age of initial contact, number of referrals within a given time period, average age of child at initial IFSP, the number of referrals per source, etc. Designated County Birth to 3 program and/or administrative, DHS and RESource staff will have access to the data. Inquiries from an individual level to a regional or state level will be accessible and provide timely information in order to respond to any concerning data trends. The data queries referenced below are now available and updated on a weekly basis. The information illustrates that despite the additional effort put forth by counties and the DHS Birth to 3 Program staff, it appears children are not being referred until well after their first birthday. It's likely that these children were identified as having developmental concerns only after speech delays were identified as the first indication of a possible delay.

- Data Points

Three Year Averages (2008-2011).

All information is based on state averages although county specific data is available and in some case individual agencies.

- Average age of child at initial IFSP 20 months
- Average age of child at initial contact with family 19 months
- Avg. days between initial contact and initial IFSP 45 days
- Referral source and number of referrals to Birth to 3 see below

Wisconsin Referral Sources (FFY 2010)	Count
Tribal Health Center or Tribal CSHCN	29
Tribal School or Tribal Head Start Program	30
Audiologist	78
School District	149
Child Care Provider	199
Head Start Provider	200
Other health care provider	273
CAPTA Referral	301
Other county staff	365
County Social Services Agency	650
Public Health Agency	500
Other	825
Hospital or Specialty Clinic	1,844
Physician	5,751
Parent or relative**	7,642

<b>Total</b>	<b>18,836</b>
--------------	---------------

Data Source: PPS

Child Find birth to one for **ALL states** (Mean, Median and Mode) 2008

Total	51
Mean	1.1217
Median	0.97
Mode	0.66

Total	50
Mean	1.05
Median	0.96
Mode	0.66

Excluding Hawaii (4.48)

Source: U.S. Department of Education, Office of Special Education Programs, Data Analysis System (DANS), OMB #1820-0557: "Infants and Toddlers Receiving Early Intervention Services in Accordance with Part C," 2008. Data updated as of July 15, 2008.  
<https://www.ideadata.org/PartCData.asp>

2005-2010 <b>Wisconsin</b>	5 years
Mean	0.93
Median	0.95
Mode	0.98

During the past FFY the ICC discussed whether there was sufficient justification to reduce the birth to one target going forward. The findings of the committee's work does, in fact, justify a reduction of the current target of 1.18 percent to a baseline of .95 percent beginning in FFY 2010 and ending in FFY 2015 with a target of 0.99 percent

Based on the above graphs and explanations for the indicator 5 slippage Wisconsin is recommending lowering their Indicator 5 target from the 2005-2010 SPP baseline of 1.12 percent and the final SPP target year ending in 2010 of 1.17 percent. As seen in the above graphs the consistent average totals for both the nation (2008) and Wisconsin (2005-2010) range from .97 percent to .95 percent. Wisconsin will adjust their initial baseline target for the new 2010-2015 SPP to .95 percent with .01 increments per year and ending the 2010 SPP with a final target of 0.99 percent. It seems reasonable we begin with a baseline target that is within range of the national average (2008) and Wisconsin's 5 year average. It also appears practical and realistic to increase our target by .01 percent each year of the SPP in order to exceed both Wisconsin's final (actual) percentage of .95 percent and the nation's average (Hawaii included), of .97 percent.

## Part C State Annual Performance Report (APR) for 2010

## Monitoring Priority: Effective General Supervision Part C / Child Find

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

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

**Measurement:**

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

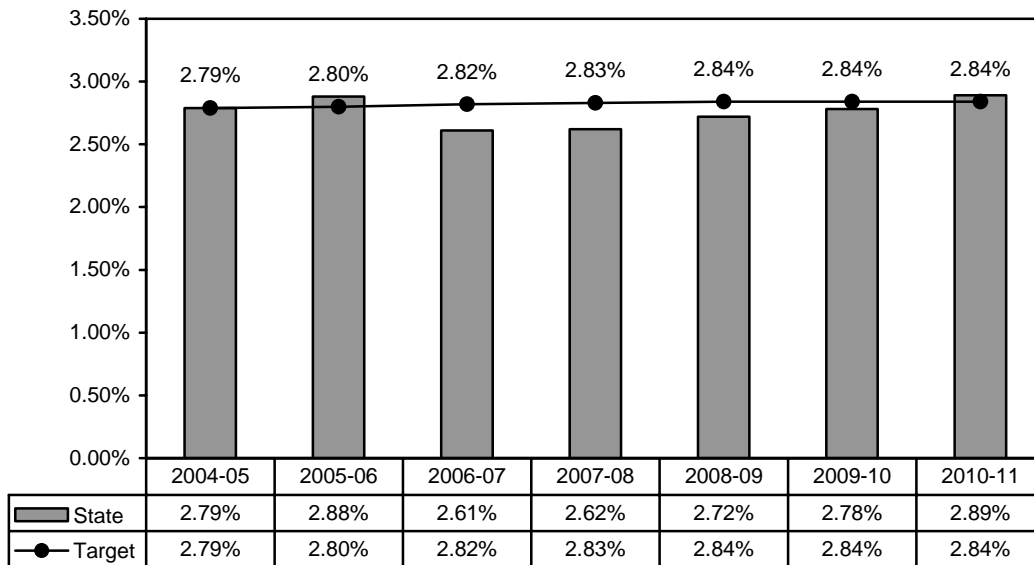
FFY	Measurable and Rigorous Target
2010 (2010-2011)	2.84% of infants and toddlers birth to three with IFSPs

**Actual Target Data for 2010 (2010 – 2011):**

2010 Results	2.89%
-----------------	-------

Results of data for FFY 2010 indicate that Wisconsin served 2.89 percent of infants and toddlers birth to age three with IFSPs compared to the national average of 2.82 percent. Wisconsin continues to serve a higher percentage of children eligible for Part C services birth through age two compared to the national average even though our average for serving children birth to 1 remains below the national average. According to Wisconsin's one-day count on October 1, 2010, 6131 children were enrolled compared to 6000 in FFY 2009. The following figure presents the state's baseline and target data. Figure C6.1 identifies the Wisconsin baseline, target and performance of the percentage of infants and toddlers birth to age three with IFSPs from FFY 2004 (2004-05) to the present.

Figure C6.1 Baseline, target, and performance of percentage of children from Birth to Three Years Participating in Wisconsin Birth to 3.



*Data Source:* Wisconsin SPP 2005-2011; U.S. Department of Education, Office of Special Education Programs, U.S. Department of Education, Office of Special Education Programs, Data Analysis System (DANS), "Report of infants and toddlers receiving early intervention services in accordance with Part C," 2008. Data updated as of July 15, 2009.

<https://www.ideadata.org/PartCData.asp>

### Comparison of Wisconsin to National data

In FFY 2010, the percent of the population of infants and toddlers birth to age three with IFSPs was 2.89 percent. The National percent of the population of infants and toddlers birth to age three with IFSPs was 2.82 percent. Wisconsin was above the national average for FFY 2009 and remains above the average for 2010.

### Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

#### **Data Analysis:**

Wisconsin exceeded its target of 2.84 percent, with 2.89 percent with IFSPs for FFY 2010. This is above the national average. Progress on this indicator continues because Wisconsin Birth to 3 Programs continue to work collaboratively with Head Start, Child Care and schools. County Birth to 3 Programs reported a number of activities in which they participated in joint Child Find activities. In

In FFY 2007, one finding of non-compliance was issued, which was corrected in a timely manner. In FFY 2008 no findings of noncompliance were issued. However, in FFY 2009, it was misreported that a finding of non-compliance was issued when, in fact, no such finding was issued.

Of the 72 counties in Wisconsin, in FFY 2008, twenty-eight (28) counties served at or above Wisconsin's target of 2.84 percent.

***Findings of Noncompliance:*** NA

**Verification of Correction (either timely or subsequent):**

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

***Ongoing Improvement Activities:***

Child Find efforts in Wisconsin are well established and, as the data reveals, we are meeting our target for child find birth to 3. Our emphasis remains on Indicator 5. Please refer to Indicator 5 for information on Wisconsin's child find emphasis.

**Clarify Policies and Procedures:**

**Improve Data Collection and Reporting:** In November of 2008, Wisconsin replaced the former Human Service Reporting System (HSRS) database with a user-friendly web-based Program Participation System (PPS) that allows County Birth to 3 Programs to monitor their own progress and slippage on Federal Indicators. The new PPS database has improved the comprehensiveness and accuracy of data collection for reporting on Indicators 5 and 6. A Child Enrollment Report will allow counties to access a list of the children in the Birth to 3 Program at any time, including the birth dates and ages of the children. A county interested in observing the progress or slippage of child find efforts would be able to closely monitor the numbers of children under the age of one, or all children in the program. In addition, in 2008 Child Count/Child Find analysis memos were sent to counties with requests to review and reflect on the data, local trends and unique demographics that might influence a county's improvement strategies.

**Targeted Technical Assistance:**

NA

**Improved Systems Administration:**

NA

**Provision of Training and Technical Assistance:**

NA

## Part C State Annual Performance Report (APR) for 2010

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

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

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

**Measurement:**

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

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

FFY	Measurable and Rigorous Target
FFY 2010 (2010-2011)	100%

**Actual Target Data for 2010 (2010-2011):****Table C 7.1 Children with an IFSP within the 45-Day Timeline**

Total number of children with initial evaluation, assessment and IFSP	Total number of children that received initial evaluation, assessment and IFSP within 45-day timeline	Resulting Percentage FFY 2010
6,564	6,381	97.21%

Data Source: Wisconsin Program Participation System (PPS) 7/1/10-6/30/11

**History of Wisconsin in meeting Indicator 7 requirement**

<b>2007-08</b>	94.83%
<b>2008-09</b>	96.10%
<b>2009-10</b>	98.21%
<b>2010-11</b>	97.21%

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:*****Data Analysis:***

Wisconsin did not meet its target of 100 percent compliance. Slippage of one percent was seen this year with 97.21 percent of children receiving an evaluation and initial IFSP within the 45 day timeline, calculated from 6,381 of 6,564 children for whom an initial evaluation and initial assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline, or experienced exceptional family circumstances justifying the delay. Of the 6,381 children, 928 children experienced a delay due to exceptional family circumstances. These children are included in both the numerator and denominator. In FFY 2010, 183 children had late IFSPs due to a system reason.

***Findings of Non-Compliance:*****Correction of FFY 2009 Findings of Non-Compliance (if State reported less than 100% compliance):**

1. Number of Findings of Non-Compliance the State made during FFY 2008 (the period from July 1, 2009, through June 30, 2010)	<b>27</b>
2. Number of FFY 2009 Findings of Non-Compliance the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	<b>24</b>
3. Number of FFY 2009 Findings of Non-Compliance <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>3</b>

**Correction of FFY 2009 Findings of Non-Compliance Not Timely Corrected (corrected more than one year from identification of the non-compliance):**

4. Number of FFY 2009 Findings of Non-Compliance not timely corrected (same as the number from (3) above)	<b>3</b>
---	----------



5. Number of FFY 2009 Findings of Non-Compliance the State has verified as corrected beyond the one-year timeline ("subsequent correction")	2
6. Number of FFY 2009 Findings of Non-Compliance <u>not</u> verified as corrected [(4) minus (5)]	1

**Correction of FFY 2009 Findings of Non-Compliance Not Timely Corrected (corrected more than two years from identification of the non-compliance):**

7. Number of FFY 2009 Findings of Non-Compliance not timely corrected (same as the number from (6) above)	1
8. Number of FFY 2009 Findings of Non-Compliance the State has verified as corrected beyond the one-year timeline ("subsequent correction")	0
9. Number of FFY 2009 Findings of Non-Compliance <u>not</u> verified as corrected [(7) minus (8)]	1

**Verification of Correction (either timely or subsequent):**

OSEP staff provided clarification about Wisconsin's verification process for correcting Findings of Non-Compliance in late 2009 during a federal On-Site Review. As a result of that clarification, Wisconsin's Birth to 3 Program adjusted its procedures for verifying correction of Findings of Non-Compliance effective December 2009. This revised process implements the requirements articulated in OSEP Memorandum 09-02 dated October 17, 2008, through a two-step verification process that includes a review of updated system level data and correction of each individual case of non-compliance.

Since implementation of this process, DHS has developed supporting documents included in Appendix D - J outlining the specific actions taken to verify correction of Findings of Non-Compliance.

**Enforcement Actions Taken if Non-compliance Not Corrected:** In 2010, monitoring of the largest county in Wisconsin continued in an effort to achieve 100 percent compliance. The largest County Birth to 3 Program in Wisconsin instituted data monitoring meetings where RESource met with each of the agencies in the county providing Birth to 3 Program services and review their data and the data for the county, identifying gaps and non compliances. Individual agency PIPPs were updated, and the RESource and County Birth to 3 Program coordinator had multiple conversations regarding the actions of the Birth to 3 Program service providers to meet the indicators, what the file reviews were indicating in regards to practice to support 100 percent compliance, and brainstorming how to address issues across agencies providing the Birth to 3 Program services. If the largest County Birth to 3 Program in Wisconsin does not show 100 percent compliance, the County Birth to 3 Program will be required to develop a corrective action plan (CAP) with their State Lead to assure strategies in place will promote 100 percent compliance.

**Correction of FFY 2008 Findings of Non-Compliance (if State reported less than 100% compliance):** NA. All Findings of Non-Compliance due in FFY 2008 have been completed as reported in FFY 2009 Annual Performance Report.

**Correction of FFY 2007 Findings of Non-Compliance (if State reported less than 100% compliance):** NA. All Findings of Non-Compliance due in FFY 2007 have been completed as reported in FFY 2009 Annual Performance Report.

***Ongoing Improvement Activities:***

**Clarify Policies and Procedures:**

County Birth to 3 Programs continue to struggle with the accurate reporting of referral date. With the new Part C Regulations, this date is clear and our state's policies will reflect and practice will utilize this clear definition.

**Improved Data Collection and Reporting:**

A 'Federal Indicator Report' was developed through the data mart ability in Wisconsin's Program Participation System (PPS) to collect data on Indicator 7 in a timely and accurate manner without a lot of manpower to determine the compliance level, noncompliance level and errors that contribute to the compliance. This report was used to determine data for the 2010-2011 APR. In the future, the DHS Birth to 3 Program will be updating the data mart ability to provide County Birth to 3 Programs more opportunities to self-monitor their compliance with Indicator 7.

**Targeted Technical Assistance:** NA

**Improved System Administration:**

Indicator compliance continues to be a strong focus for the Wisconsin Birth to 3 Program. Assuring consistency in how Indicator compliance is addressed has been a focus for the 2010-2011 year. Regular meetings occur between the DHS Birth to 3 Program staff and the County Birth to 3 Program staff, to discuss issues related to Indicator compliance and how to address them consistently across the state.

**Provision of Training and Technical Assistance:**

Training efforts continue for assisting County Birth to 3 Programs in the best use of available professionals. For new staff, there were two "Orientation to Best Practices in Birth to 3" events in FFY 2010. Emphasis is placed on orienting new staff to the federal and state requirements and to understanding family centered services and best practices. Early intervention professionals from around the state attended the "Orientation to Best Practices" sessions and reported increased understanding of federal and state requirements, including timelines for completing IFSPs and the purpose of Wisconsin's Birth to 3 Program in supporting families to enhance their child's development.

**Collaboration and Coordination:** NA

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

There are revisions to the Web Based Data Collection System improvement activity section in the SPP. The additional improvement activity occurred during the FFY 2010 to support consistent monitoring of indicator compliance.

## Part C State Annual Performance Report (APR) for 2010

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

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

- A. Developed an IFSP with transition steps and services at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler's third birthday;
- B. Notified (consistent with any opt-out policy adopted by the State) the SEA and the LEA where the toddler resides at least 90 days prior to the toddler's third birthday for toddlers potentially eligible for Part B preschool services; and
- C. Conducted the transition conference held with the approval of the family at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler's third birthday for toddlers potentially eligible for Part B preschool services.

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

**Measurement:**

- A. Percent =  $\left[ \frac{\text{(\# of children exiting Part C who have an IFSP with transition steps and services)}}{\text{(\# of children exiting Part C)}} \right] \text{ times } 100.$
- B. Percent =  $\left[ \frac{\text{(\# of children exiting Part C and potentially eligible for Part B where notification to the LEA occurred)}}{\text{(\# of children exiting Part C who were potentially eligible for Part B)}} \right] \text{ times } 100.$
- C. Percent =  $\left[ \frac{\text{(\# of children exiting Part C and potentially eligible for Part B where the transition conference occurred)}}{\text{(\# of children exiting Part C who were potentially eligible for Part B)}} \right] \text{ times } 100.$

Account for untimely transition conferences, including reasons for delays.

FFY	Measurable and Rigorous Target
2010 (2010-2011)	100%

**Actual Target Data for FFY 2010:****Indicator 8A: Percent of children exiting Part C who have an IFSP with Transition Steps and Services:**

Children expected, by age, to have an IFSP with Transition Steps	Children with an IFSP With Transition Steps	Percentage
3915	3885	99.23%

*Data Source:* Wisconsin Program Participation System (PPS) for 7/1/10-6/30/11

**Indicator 8B: Percent of children exiting Part C and potentially eligible for Part B where notification to the LEA occurred:**

Potentially Eligible for Part B	LEA Notification	Percentage
3633	3565	98.13%

*Data Source:* Wisconsin Program Participation System (PPS) for 7/1/10-6/30/11

On December 3, 2009, DHS received approval from OSEP to implement an Opt-Out Policy, permitting families to opt out of the referral within a specified period of time, should they object to sharing information with the LEA. Wisconsin began implemented this policy on January 1, 2010. Families that opted out of LEA Notification are not included in our numerator or denominator for children leaving the Birth to 3 Program.

**Indicator 8C: Percent of children exiting Part C and potentially eligible for Part B where the transition conference occurred:**

Potentially Eligible for Part B	Families who provided approval	Children with TPC	Percentage
3633	3343	3279	98.09%

*Data Source:* Wisconsin Program Participation System (PPS) for 7/1/10-6/30/11

On December 3, 2009, DHS received approval from OSEP to implement an Opt-Out Policy, permitting families to opt out of the referral (and thus Transition Planning Conference) within a specified period of time. Should they object to sharing information with the LEA. Wisconsin implemented this policy beginning January 1, 2010. Families that opted out of LEA Notification are not included in our numerator or denominator for children leaving the Birth to 3 Program.

**Table C 8.4: Children with Transition Planning Conferences Held >90 Days Prior to the Child's 3<sup>rd</sup> Birthday**

Children with TPC	TPC was held >90 days prior to child's 3rd birthday	TPC held < 90 days
3279	3154	125
	96.19%	3.81%

*Data Source:* Wisconsin Program Participation System for 7/1/10-6/30/11

### **Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that Occurred for FFY 2010:**

#### ***Data Analysis:***

The Wisconsin Department of Health Services (DHS) and the Wisconsin Department of Public Instruction (DPI) and are committed to a joint effort to improve the transition of children between Part C and Part B 619. These efforts include activities which range from state infrastructure and policy initiatives, to support and professional development at the local level.

Wisconsin demonstrated progress toward the target of 100 percent for all three of the transition indicators. Transition steps documented in the IFSP have increased by .17 percent to 99.23 percent compliance. LEA Notifications have increased by almost 3.5 percent to 98.13 percent compliance. Transition Planning Conferences (TPC) occurring have increased by 1.22 percent to 98.09 percent compliance. Wisconsin is pleased with this outcome of the improvement strategies implemented during 2010 – 2011 in moving closer to 100 percent compliance; additional strategies will be implemented to meet the target in the coming year.

In FFY 2010, 41 families chose to Opt Out of the LEA Notification process. These children were not included in the numerator or denominator for Indicators 8B and 8C. In FFY 2010, of the 3,633 children potentially eligible for Part B, 290 families did not provide approval for a TPC and were not included in the calculations. Of the children who received a TPC, 573 children who experienced some delay due to exceptional family circumstance are included in both the numerator and denominator. Thirty (30) children did not have transition steps documented on their IFSPs. During FFY 2010, Wisconsin had 68 children not referred to the LEA even though they were considered "potentially eligible for services through the LEA." After receiving clarification via the Office of Special Education Programs (OSEP) Early Childhood Transition FAQs and TA call associated with the FAQ, DHS modified the Opt Out Policy procedures. (Additional details are referenced in the Ongoing Improvement Activities section under Clarify Policies and Procedures.) Sixty-four (64) Transition Planning Conferences (TPCs) were late due to system reasons.

There continues to be a growing number of children referred to the Birth to 3 Program less than 90 days before their third birthday (107 in FFY 2010), which results in a delay in the TPC being held. Since this TPC Exception Reason is considered a compliant reason, these children were also included in both the numerator and denominator.

**Findings of Non-Compliance:****Correction of FFY 2009 Findings of Non-Compliance (if State reported less than 100% compliance):**

1. Number of Findings of Non-Compliance the State made during FFY 2009 (the period from July 1, 2009, through June 30, 2010)	<b>95</b>
2. Number of FFY 2009 Findings of Non-Compliance the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	<b>86</b>
3. Number of FFY 2009 Findings of Non-Compliance <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>9</b>

**Correction of FFY 2009 Findings of Non-Compliance Not Timely Corrected (corrected more than one year from identification of the non-compliance):**

4. Number of FFY 2009 Findings of Non-Compliance not timely corrected (same as the number from (3) above)	<b>9</b>
5. Number of FFY 2009 Findings of Non-Compliance the State has verified as corrected beyond the one-year timeline ("subsequent correction")	<b>5</b>
6. Number of FFY 2009 Findings of Non-Compliance <u>not</u> verified as corrected [(4) minus (5)]	<b>4</b>

**Correction of FFY 2009 Findings of Non-Compliance Not Timely Corrected (corrected more than two years from identification of the non-compliance):**

7. Number of FFY 2009 Findings of Non-Compliance not timely corrected (same as the number from (6) above)	<b>4</b>
8. Number of FFY 2009 Findings of Non-Compliance the State has verified as corrected beyond the one-year timeline ("subsequent correction")	<b>0</b>
9. Number of FFY 2009 Findings of Non-Compliance <u>not</u> verified as corrected [(7) minus (8)]	<b>4</b>

**Indicator 8A:** During the FFY 2009 twenty-four (24) counties were issued Findings of Non-Compliance, with 22 of these Findings of Non-Compliance corrected within one year. One of the Findings of Non-Compliance has since been corrected; the correction for one Finding of Non-Compliance has not been verified. The largest County Birth to 3 Program in Wisconsin is demonstrating progress (see chart in section, *Wisconsin's Largest County*, below) but has not yet completed the Finding of Non-Compliance.

**Indicator 8B:** During the FFY 2009, thirty-nine (39) counties were issued Findings of Non-Compliance with 35 of these Findings of Non-Compliance corrected within one year. Two of the Findings of Non-Compliance have since been corrected; correction of two Findings of Non-Compliance have not been verified. The largest County Birth to 3 Program in Wisconsin is demonstrating progress (see chart in section, *Wisconsin's Largest County*, below) but has not yet completed the Finding of Non-Compliance.

**Indicator 8C:** During the FFY 2009 thirty-one (32) County Birth to 3 Programs were issued Findings of Non-Compliance, with 29 of these Findings of Non-Compliance corrected within one year. Two Findings of Non-Compliance have since been corrected; correction of one Finding of Non-Compliance has not been verified. The largest County Birth to 3 Program in Wisconsin is demonstrating progress (see chart in section, *Wisconsin's Largest County*, below) but has not yet completed the Finding of Non-Compliance.

**Verification of Correction (either timely or subsequent):**

OSEP staff provided clarification about Wisconsin's verification process for correcting Findings of Non-Compliance in late 2009 during a federal On-Site Review. As a result of that clarification, Wisconsin's Birth to 3 Program adjusted its procedures for verifying correction of Findings of Non-Compliance effective December 2009. This revised process implements the requirements articulated in OSEP Memorandum 09-02 dated October 17, 2008 through a two-step verification process that includes a review of updated system level data and correction of each individual case of non-compliance. Since Indicator 8 relates to children no longer in the Birth to 3 Program, child level correction is not verified. The majority of the Findings of Non-Compliance given in 2010 were verified via two months of 100 percent data.

Since implementation of this process, DHS has developed supporting documents included in Appendix D – J outlining the specific actions taken to verify correction of Findings of Non-Compliance.

**Enforcement Actions Taken if Non-compliance Not Corrected:**

For FFY 2009, four Findings of Non-Compliance were not completed within one year; they were issued to the state's largest county and one other county. The other County Birth to 3 Program will receive intensive intervention to assure 100 percent compliance, including determining the need for a CAP.

The largest county in Wisconsin has several providers of early intervention services throughout the county. Enforcement action has been taken with the County Birth to 3 Program, including ongoing targeted technical assistance and focused monitoring, contract evaluation, and monthly data analysis requirements. The County Birth to 3 Program participated in a Program in Partnership Plan (PIPP) as well as a Corrective Action Plan including incremental benchmarks ensuring continued progress toward 100 percent compliance. In addition, contract evaluation with the County Birth to 3 Program has occurred, and the County Birth to 3 Program has instituted contract

requirements identifying potential monetary sanctions for the nine provider agencies, contingent on compliance with the federal indicators.

In 2010, the DHS Birth to 3 Program continued monitoring of the largest County in Wisconsin 100 percent compliance. The County Birth to 3 Program instituted data monitoring meetings where RESource staff met with each of the agencies in the county providing Birth to 3 Program services and reviewed their data and the data for the county, identifying gaps and non-compliances. The Indicator 8 PPS report review was part of this process, including educating the agency staff on how to read the report and identify compliance percentages. Individual agency PIPPs were updated. RESource staff and the County Birth to 3 Program coordinator had multiple conversations about what the agencies providing Birth to 3 Program services were doing to meet the transition indicators, what the file reviews were indicating in regards to practice to support 100 percent compliance and brainstorming how to address issues across agencies providing the Birth to 3 Program services. The largest county in Wisconsin updated their CAP using the PIPP process Wisconsin utilizes. The CAP itself will be updated to assure intensive intervention provided by DHS increases compliance to 100 percent.

**Correction of FFY 2008 Findings of Non-Compliance (if State reported less than 100% compliance):**

1. Number of Findings of Non-Compliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009)	<b>62</b>
2. Number of FFY 2008 Findings of Non-Compliance the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	<b>59</b>
3. Number of FFY 2008 Findings of Non-Compliance <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>3</b>

**\* This chart reflects corrected analysis of Findings of Non-Compliance given in FFY 2008.**

**Correction of FFY 2008 Findings of Non-Compliance Not Timely Corrected (corrected more than one year from identification of the non-compliance):**

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



**Correction of FFY 2008 Findings of Non-Compliance Not Timely Corrected  
(corrected more than two years from identification of the non-compliance):**

7. Number of FFY 2008 Findings of Non-Compliance not timely corrected (same as the number from (3) above)	<b>3</b>
8. Number of FFY 2008 Findings of Non-Compliance the State has verified as corrected beyond the one-year timeline ("subsequent correction")	<b>0</b>
9. Number of FFY 2008 Findings of Non-Compliance <u>not</u> verified as corrected [(7) minus (8)]	<b>3</b>

**Indicator 8A:** During the FFY 2008, twenty-one (21) County Birth to 3 Programs were issued a Finding of Non-Compliance for Indicator 8A; twenty (20) were completed within one year. The remaining County Birth to 3 Program, Wisconsin's largest county, has a CAP in place and was demonstrating progress but has not yet completed the Finding of Non-Compliance.

**Indicator 8B:** During the FFY 2008, twenty (20) County Birth to 3 Programs were issued Findings of Non-Compliance for Indicator 8B; nineteen (19) were completed within one year. The remaining County Birth to 3 Program, Wisconsin's largest county, has a CAP in place and is demonstrating progress but has not yet completed the Finding of Non-Compliance.

**Indicator 8C:** During the FFY 2008, twenty-one (21) County Birth to 3 Programs received Findings of Non-Compliance; twenty (20) were completed within one year. The remaining County Birth to 3 Program, Wisconsin's largest county, has a CAP in place and is demonstrating progress but has not yet completed the Finding of Non-Compliance.

**Verification of Correction (either timely or subsequent):**

OSEP staff provided clarification about Wisconsin's verification process for correcting Findings of Non-Compliance in late 2009 during a federal On-Site Review. As a result of that clarification, Wisconsin's Birth to 3 Program adjusted its procedures for verifying correction of Findings of Non-Compliance effective December 2009. This revised process implements the requirements articulated in OSEP Memorandum 09-02 dated October 17, 2008 through a two-step verification process that includes a review of updated system level data and correction of each individual case of non-compliance. Since Indicator 8 relates to children no longer in the Birth to 3 Program, child level correction is not verified. The majority of the Findings of Non-Compliance given in 2010 were verified via two months of 100 percent data.

Since implementation of this process, DHS has developed supporting documents included in Appendix D - J outlining the specific actions taken to verify correction of Findings of Non-Compliance.

**Enforcement Actions Taken if Non-compliance Not Corrected:**

In FFY 2008, three Findings of Non-Compliance were not completed within one year; issued to the state's largest county. This county has several providers of early intervention services throughout the county. Enforcement action has been taken with the County Birth to 3 Program, including ongoing targeted technical assistance and focused monitoring, contract evaluation, and monthly data analysis requirements. The County Birth to 3 Program participated in a Program in

Partnership Plan (PIPP) as well as a Corrective Action Plan including incremental benchmarks ensuring continued progress toward 100 percent compliance. In addition, contract evaluation with the County Birth to 3 Program has occurred, and the County Birth to 3 Program has instituted contract requirements identifying potential monetary sanctions for the nine provider agencies, contingent on compliance with the federal indicators.

**Correction of FFY 2007 Findings of Non-Compliance (if State reported less than 100% compliance):**

1. Number of Findings of Non-Compliance the State made during FFY 2007 (the period from July 1, 2007, through June 30, 2008)	<b>10</b>
2. Number of FFY 2007 Findings of Non-Compliance the State verified as timely corrected (corrected within one year from the date of notification to the EIS program of the finding)	<b>9</b>
3. Number of FFY 2007 Findings of Non-Compliance <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>1</b>

**Correction of FFY 2007 Findings of Non-Compliance Not Timely Corrected (corrected more than one year from identification of the non-compliance):**

4. Number of FFY 2007 Findings of Non-Compliance not timely corrected (same as the number from (3) above)	<b>1</b>
5. Number of FFY 2007 Findings of Non-Compliance the State has verified as corrected beyond the one-year timeline ("subsequent correction")	<b>0</b>
6. Number of FFY 2007 Findings of Non-Compliance <u>not</u> verified as corrected [(4) minus (5)]	<b>1</b>

**Correction of FFY 2007 Findings of Non-Compliance Not Timely Corrected (corrected more than two years from identification of the non-compliance):**

7. Number of FFY 2007 Findings of Non-Compliance not timely corrected (same as the number from (3) above)	<b>1</b>
8. Number of FFY 2007 Findings of Non-Compliance the State has verified as corrected beyond the one-year timeline ("subsequent correction")	<b>0</b>
9. Number of FFY 2007 Findings of Non-Compliance <u>not</u> verified as corrected [(4) minus (5)]	<b>1</b>

**Indicator 8A:** During the FFY 2007, two County Birth to 3 Programs were issued a Finding of Non-Compliance, both of which were corrected within one year.

**Indicator 8B:** During the FFY 2007, two programs were issued Findings of Non-Compliance, one of which was corrected within the twelve month timeline. The largest County Birth to 3 Program in Wisconsin is demonstrating progress but has not yet completed the Finding of Non-Compliance.

**Indicator 8C:** During the FFY 2007 program monitoring process, six counties received Findings of Non-Compliance around Indicator 8C, all of which were corrected within one year.

**Verification of Correction (either timely or subsequent):**

OSEP staff provided clarification about Wisconsin's verification process for correcting Findings of Non-Compliance in late 2009 during a federal On-Site Review. As a result of that clarification, Wisconsin's Birth to 3 Program adjusted its procedures for verifying correction of Findings of Non-Compliance effective December 2009. This revised process implements the requirements articulated in OSEP Memorandum 09-02 dated October 17, 2008 through a two-step verification process that includes a review of updated system level data and correction of each individual case of non-compliance. Since Indicator 8 relates to children no longer in the Birth to 3 Program, child level correction is not verified.

The majority of the Findings of Non-Compliance given in 2010 were verified via two months of 100 percent data.

Since implementation of this process, DHS has developed supporting documents included in Appendix D - J outlining the specific actions taken to verify correction of Findings of Non-Compliance.

**Enforcement Actions Taken if Non-compliance Not Corrected:**

In FFY 2007, one Indicator 8 (8B) Finding of Non-Compliance was not completed within one year; issued to the state's largest county. This county has several providers of early intervention services throughout the county. Enforcement action has been taken with the County Birth to 3 Program, including ongoing targeted technical assistance and focused monitoring, contract evaluation, and monthly data analysis requirements. The County Birth to 3 Program participated in a Program in Partnership Plan (PIPP) as well as a Corrective Action Plan including incremental benchmarks ensuring continued progress toward 100 percent compliance. In addition, contract evaluation with the County Birth to 3 Program has occurred, and the County Birth to 3 Program has instituted contract requirements identifying potential monetary sanctions for the nine provider agencies, contingent on compliance with the federal indicators.

***Wisconsin's Largest County:***

Overall Wisconsin's largest County Birth to 3 Program has been challenged to demonstrate sustained compliance of 100 percent for two consecutive months. Of interest, Wisconsin's largest county has demonstrated significant improvement over the past four years, as evidenced in the table below. They have increased their compliance for all three transition indicators to over 95 percent compliance.

Indicator	8a	8b	8c
<b>7/1/10- 6/30/11</b>	99.16%	97.20%	96.58%
<b>7/1/09- 6/30/10</b>	98.00%	91.92%	88.00%
<b>7/1/08- 6/30/09</b>	94.00%	90.89%	94.00%
<b>7/1/07- 6/30/08</b>	84.47%	88.53%	89.54%

WI Largest County Analysis of Data

**Ongoing Improvement Activities:****Clarify Policies and Procedures:**

The Office of Special Education Programs (OSEP) Early Childhood Transition FAQs, dated December 1, 2009 (as further explained during a conference call held on August 11, 2010), clarified that notice to the LEA consists of sharing limited contact information (child's name, date of birth and parent contact information) along with the information that the child is potentially eligible for services through the LEA. It also clarified for DHS the impact of a family "opting out" of LEA Notification. With these clarifications, Wisconsin modified the Opt Out Policy procedures.

The Interagency Agreement Workgroup, with members from DHS and DPI, are preparing a revised state interagency agreement that describes the responsibilities of each department specific to implementing IDEA 2004 and state policy. The transition of children between the Birth to 3 Program and LEAs including LEA notification and transition planning conferences are major components of the revised agreement. The intent is to utilize the collaborative efforts as a model for local early intervention and early childhood special education programs to develop local agreements and similar documents to support their work together.

**Improved Data Collection and Reporting:**

A 'Federal Indicator Report' was developed through the data mart ability in Wisconsin's Program Participation System (PPS) to collect data on Indicator 8 in a timely and accurate manner without a lot of manpower to determine the compliance level, noncompliance level and errors that contribute to the compliance. This report was used to determine data for the 2010-2011 APR. In the future, Wisconsin will be updating the data mart ability to provide County Birth to 3 Programs more opportunities to self-monitor their compliance with Indicator 8.

Our shared data system (Program Participation System, PPS) is able to directly send notification to the LEA (referrals) with limited child contact information to the LEA. PPS allows the LEA to access referrals on a child through PPS. The LEA receives an e-mail alerting them to the referral in PPS. If the parent grants consent for the sharing of additional information, PPS will also allow the LEA access to the child's outcomes ratings at exit and view the IFSP dates and services the child has received while in the Birth to 3 Program. As the LEA moves through the eligibility determination process, they enter information regarding eligibility status and date of IEP implementation for children determined to be eligible. Continued improvements to the PPS system occur whenever OSEP provides clarification on processes to report in the APR. The system is currently under reconfiguration based upon recent clarifications. Minor changes to the PPS system occurred in 2010 to clarify information being shared between County Birth to 3 Programs and LEAs. Specifically, legal guardian was clarified for Birth to 3 Programs to assure the LEAs received appropriate contact information. Field names were changed to accurately reflect decisions made by parents and the Birth to 3 Program to help the LEA in meeting their timelines and in understanding the level of data provided in the referral (with or without parental consent to share additional information).

**Targeted Technical Assistance:**

DPI and DHS collaboratively accessed technical assistance through a variety of national and federal forums to address the non-compliance issues around Part B Indicator 12 and Part C Indicator 8. The North Central Regional Resource Center (NCRRC) and the National Early Childhood Technical Assistance Center (NECTAC) have been particularly helpful. The August 2010 call with OSEP clarifying the OSEP Early Childhood Transition FAQs document was attended jointly. These TA opportunities were utilized to modify the Wisconsin Opt Out Policy procedures and clarify "referral" for the two departments.

**Improved Systems Administration:**

Data are being monitored regularly to determine that the transition process is being followed and that children have IEPs implemented by their third birthday, an outcome that is dependent upon LEA notification, transition planning, and the transition planning conference. Interagency agreement revisions and ongoing data monitoring are encouraged at the county level to ensure consistent progress in correction of Findings of Non-Compliance and ongoing monitoring of this indicator.

Our General Supervision and Monitoring System incorporates tools to support the monitoring of Findings of Non-Compliance. This system is being analyzed to assure that monitoring and correction of Findings of Non-Compliance are ongoing and a central focus of improvement for Wisconsin's Birth to 3 Programs no later than one year from the identification of the non-compliance.

For County Birth to 3 Programs with Findings of Non-Compliance exceeding the one year period the general supervision system and SPP guides the development of a focused monitoring Corrective Action Plan (CAP) and individualized TA that is designed to address systemic non-compliance as well as be responsive to the circumstances contributing to ongoing need for correction.

**Provision of Training and Technical Assistance:**

The Transition Team is also working to deliver common expectations regarding timely referral from Part C to B, participation of LEA in the transition planning conferences, IFSPs with transition steps, and LEA notification. When Wisconsin provided training to the County Birth to 3 Programs on the Opt Out policy, DPI also provided a webinar training to LEAs on Opt Out.

In addition, County Birth to 3 Programs participated in DHS hosted teleconferences and webinars that DHS scheduled throughout the year, to clarify expectations on data accountability and practices for all the Federal Indicators. In FFY 2010 two sessions were held with transition as the focus. The importance of transition steps in the IFSP for all children leaving the Birth to 3 Program was stressed. In addition, during regional meetings with the County Birth to 3 Programs, DHS provided guidance and training on the use of Written Prior Notice in relationship with the decision of "potential eligibility for services through the LEA."

During FFY 2010, County Birth to 3 Programs met in smaller collaborative groups across the state to explore and create transition agreements with community partners. The RESource staff provided ongoing support and TA to County Birth to 3 Programs as they learned about and altered practice in relation to the Opt Out policy and the new requirements from the OSEP Early Childhood Transition FAQ document.

Ongoing technical assistance is provided to the two County Birth to 3 Programs that continue to have Findings of Non-Compliance not yet corrected. The assigned State Lead for the County Birth to 3 Programs provides regular contact. The RESource staff also provides support to the county in monitoring and improving their Indicator data.

**Collaboration and Coordination:**

In response to the analysis of data related to transition from 2005-2006, DPI and DHS created a Transition Team. One function of this joint team is to review transition data and coordinate local improvement efforts. In the past year, charts to guide practice around the transition of children turning three were developed for both departments and their local agencies to use. A chart on Late Referrals to the Birth to 3 Program and the impact on transition practices was also developed as a

resource for the County Birth to 3 Programs and the LEAs. Both DPI and DHS have included expectations for their contracted training and technical assistance staff to include facilitating local interagency agreements. When Wisconsin provided training to the County Birth to 3 Programs on the Opt Out policy, DPI also provided a webinar training to LEAs on Opt Out.

The Transition Team continues to meet to review and summarize plans as well as develop a coordinated approach to improvement activities. Data is shared during meetings to analyze areas for improvement or systemic issues to be addressed.

Part B Districts and their local Birth to 3 Programs are required to work collaboratively to improve the transition process. Actions include the following:

- Reviewing, revising, and committing to follow interagency agreements on a yearly basis.
- Improving referral processes, through the PPS referral process.
- Working to support parents in making decisions about referral by emphasizing the importance of coordination transition planning, opt out, LEA Notification requirements and coordination of materials to inform and support parents and program staff in collaboration.
- Examining and implementing child find activities to enhance the connection of Part B Districts and local Birth to 3 programs for the purpose of early and appropriate identification.

In FFY 2010 Interagency Agreements were routinely updated between County Birth to 3 Programs and the LEAs to evaluate their progress and compliance on the transition indicators.

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

In the SPP, there is a revision to the improvement activity, Data Collection. The additional improvement activity occurred during the FFY 2010 to support consistent monitoring of indicator compliance.

**Part C State Annual Performance Report (APR) for 2010**

**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.

For any noncompliance not corrected within one year of identification, describe what actions, including technical assistance and/or enforcement that the State has taken.

FFY	Measurable and Rigorous Target
2010 (2010-2011)	100%

**Actual Target Data for FFY 2010 (2010-2011):**

Results 2010	90.78%
-----------------	--------

In FFY 2010, 141 Findings of Non-Compliance issued in FY 2009 were due for correction. Of the 141 Findings of Non-Compliance, 128 were corrected in 2010-2011 FFY and within one year (12 months) of issuance; an additional seven (7) Findings of Non-Compliance were corrected after one year of issuance. Two counties were not able to verify a total of six (6) Findings of Non-Compliance due in this fiscal year. **However, in FFY 2009, it was misreported that a finding of non-compliance was issued when, in fact, no such finding was issued.**

**Indicator 9 Table C-9, refer to Appendix C Pages 97 - 100.**

Table C-9 Findings of Non-Compliance and Percentage of Correction in 12 Months

Data Source: PPS data, On-Site Review Records, and outcomes of Findings of Non-Compliance verification reviews.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage:**

***Data Analysis:***

Slippage in FFY 2010 has been correlated with challenges experienced primarily by the state's largest county. This county has had continuing Findings of Non-Compliance, resulting in the issuance of a Corrective Action Plan (CAP). The county has been able to show dramatic improvement in their compliance and performance percentages over the past few years but continues to have challenges with sustaining 100 percent compliance for 2 consecutive months. This county is an urban county with a variety of complex challenges including staff turnover, a high percentage of families in poverty, high caseload size, increased non-English speaking families, and limited budgets.

Enforcement action has been taken with this county, including ongoing targeted technical assistance, requirement for monthly data analysis to monitor progress towards 100 percent compliance, focused monitoring, contract evaluation. In FY 2010, the county shared provider-specific data on a monthly basis with its nine contracted providers to monitor compliance and performance with each individual provider. It examined the option to identify potential monetary



sanctions for providers based upon compliance with federal indicators and continues to evaluate options for implementation of this strategy. This county also issued PIPPs for each provider agency identifying possible gaps in practice, areas for improvement and support, and compliance percentages. This county regularly consulted with its RESource staff to discuss provider agency performance and potential options for addressing areas of concern.

Though Wisconsin DHS recognizes that this county has not yet reached sustained 100 percent compliance, this county has taken active and deliberate steps toward increasing compliance through ongoing monthly data analysis, implementing required technical assistance, evaluating of conditions on contracts with the nine provider agencies, and in-depth technical assistance with each provider agency. The multiple Findings of Non-Compliance and ongoing challenges of this county have a significant impact on Wisconsin's overall compliance percentage.

Wisconsin expects counties to demonstrate increased and continued success in future years in addressing corrections of Findings of Non-Compliance with further implementation of the items described in the *Ongoing Improvement Activities* section.

Detail regarding the status of Findings of Non-Compliance issued in prior fiscal years for Indicator 8 is included in the *Findings of Non-Compliance* Section of Indicator 8, pages 62- 69.

***Findings of Noncompliance:*****Verification of Correction (either timely or subsequent):**

The criteria for County Birth to 3 Programs to demonstrate correction of Findings of Non-Compliance includes correction of individual child level data and two consecutive months of 100 percent compliance. State staff then verify the county's corrections by comparing county documentation with PPS data to assure the data is accurate. OSEP staff provided clarification about Wisconsin's verification process for correcting Findings of Non-Compliance in late 2009 during a federal On-Site Review. As a result of that clarification, Wisconsin's Birth to 3 Program adjusted its procedures for verifying correction of Findings of Non-Compliance effective December 2009. This revised process outlined above implements the requirements articulated in OSEP Memorandum 09-02 dated October 17, 2008 through a two-step verification process that includes a review of updated system level data and correction of each individual case of non-compliance.

Since implementation of this process, DHS has developed supporting documents included in Appendix D - J outlining the specific actions taken to verify correction of Findings of Non-Compliance. These documents and processes are described in the *Ongoing Improvement Activities* section.

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

Counties who are unable to correct their non-compliance within 12 months are issued a Corrective Action Plan (CAP) and provided targeted technical assistance along with Focused Monitoring, which could include additional On-Site reviews.

For FY 2009, six Findings of Non-Compliance were not successfully verified; they were issued to the state's largest county and one additional county. The state's largest County Birth to 3 Program received a CAP due to ongoing Findings of Non-Compliance. The second County Birth to 3

Program will receive intensive intervention to assure 100 percent compliance, including determining the need for a CAP.

***Ongoing Improvement Activities:*****Clarify Policies and Procedures:**

The DHS Wisconsin Birth to 3 Program issues Findings of Non-Compliance during three primary occasions in a fiscal year: at On-Site Reviews, during the Annual data review, and if a Dispute Resolution situation occurs. In addition, Findings of Non-Compliance are reviewed during Self-Assessment calls, during the development of County Birth to 3 Program PIPPs with RESource staff, and if a concern is identified during the year.

The DHS Birth to 3 Program revised procedures and continued processes for monitoring Findings of Non-Compliance and the verification process for correcting Findings of Non-Compliance with County Birth to 3 programs which included the following documents and activities:

1. Development of an internal policy for DHS Birth to 3 Program procedures for consistent review and verification of county corrections of Findings of Non-Compliance.
2. Development of an internal review tool for consistent documentation of the process of verifying correction of Findings of Non-Compliance.
3. Development of a template for communication of specific child files and documentation required demonstrating child level and system level correction of Findings of Non-Compliance.
4. Development of template letters for standard communication of successful verification of Findings of Non-Compliance documenting the details of the review.
5. Development of template letters for standard communication of the verification processes that were not successful and communicating the need for verification within 12 months of the issuance of the Finding of Non-Compliance.
6. Continued use of a 6-month follow-up letter to County Birth to 3 Programs that reminds them of any Findings of Non-Compliance that were issued to their program for either compliance or performance Indicators and of the need to verify correction of the Finding before the 12 month deadline.

Refer to Appendix D - J for copies of these documents.

**Improved Data Collection and Reporting:**

In addition to program monitoring through the Self-Assessment and the On-Site Program Review monitoring process, DHS monitored programs through targeted data analysis and data verification. In FY 2010-2011, DHS was actively engaged in the development of the Audit and Archive and Data Mart systems, which allow for greater data analysis and accessibility for both statewide and local program data. The Audit and Archive and Data Mart systems provide a mechanism for the state and local programs to develop standardized reports examining the federal indicator performance across the state and in individual counties. It also has the capacity for the development of ad-hoc or on-demand reports accessing any data entered into PPS. These reports provide more specific detail than the reports currently available to counties through PPS. This project is expected to be fully completed within the next two fiscal years.

In FY 2010, 'Federal Indicator Reports' were developed using the Data Mart access to PPS data and produced County Birth to 3 Program compliance percentages, noncompliance percentages,

and errors reports that contributed to a county's overall performance. Reports from the Data Mart were used for issuance of Findings of Non-Compliance to County Birth to 3 Programs and to determine final data for the 2010-2011 APR. In the future, Wisconsin will be updating the Data Mart ability to provide County Birth to 3 Programs more opportunities to self-monitor their compliance with federal reporting indicators.

Revisions were made to the SPP Sections regarding Compliance Indicators to reflect the work that was done with the Data Mart and Audit and Archive systems in FY 2010 and proposed activities that will be continued in FY 2011.

**Targeted Technical Assistance:**

As outlined in the letter from OSEP dated June 20, 2011, Wisconsin was required to access technical assistance and report on the actions taken as a result of that assistance. The Wisconsin Part C Coordinator consulted with federal OSEP and NCRRC staff and accessed national technical assistance trainings and other resources throughout FY 2010-2011 to address issues critical to performance of Wisconsin's Birth to 3 Program. This consultation and technical assistance included: utilization of resources and conversations with staff from the National Early Childhood Technical Assistance Center (NECTAC), the Infant and Toddler Coordinators Association (ITCA), the Office of Special Education Programming (OSEP), the North Central Regional Resource Center (NCRRC), and OSEP meetings and conferences specifically related to sessions addressing Findings of Non-Compliance, data and development of the APR. The Part C Coordinator also had individual meetings with OSEP staff and NCRRC staff that discussed Wisconsin's process for issuing and correcting Findings of Non-Compliance. Finally, Wisconsin Birth to 3 staff participated in the Part C Indicator Webinar Series.

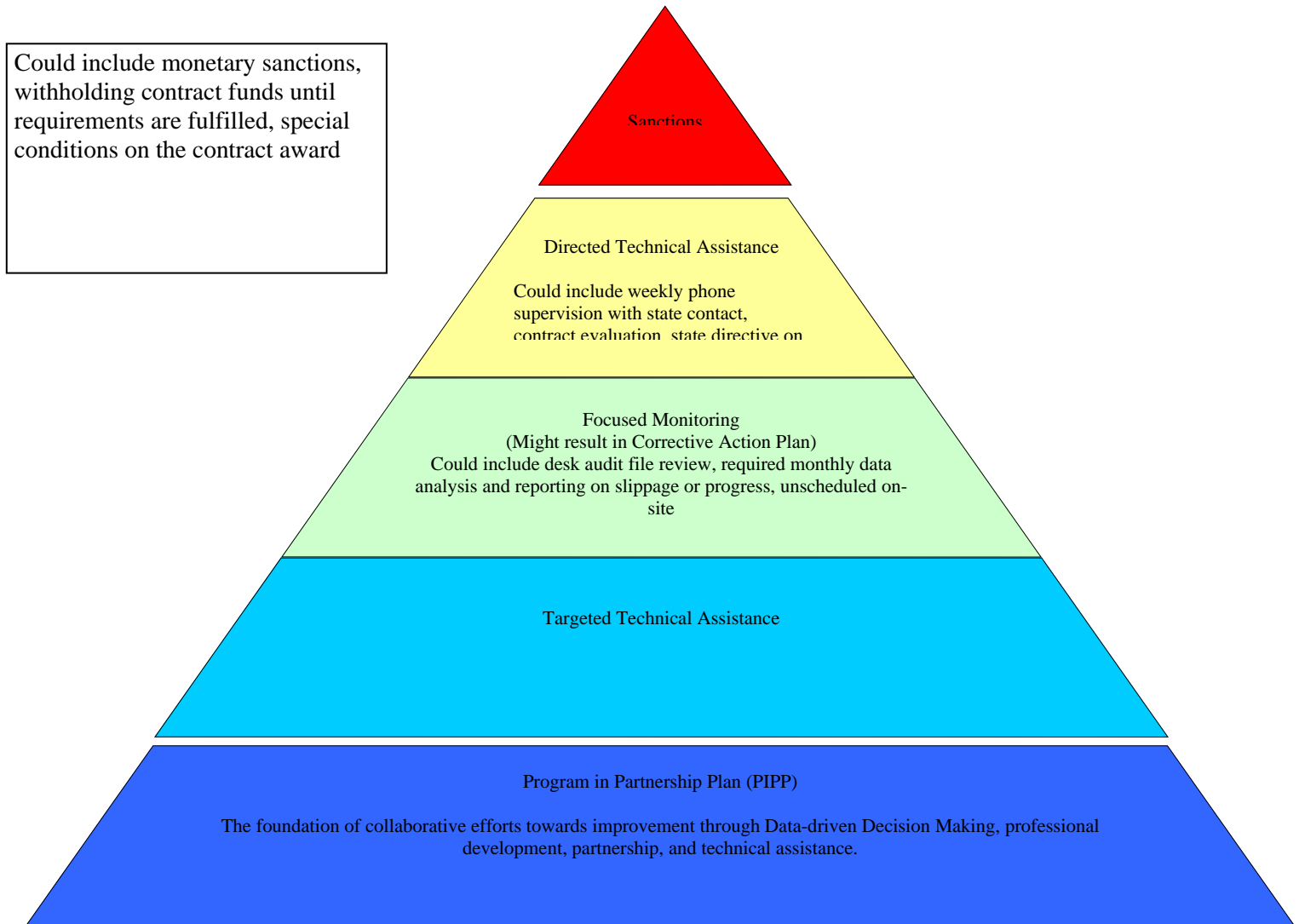
Wisconsin's clarifications to policies and procedures described in the section above titled "Clarify Policies and Procedures" outlines some of the changes made as a result of consultation and direction received by OSEP and NCRRC staff. Through the use of the Data Mart, the Wisconsin Birth to 3 Program created error reports that identified individual County Birth to 3 Program performance and error cases that led to a County Birth to 3 Program not achieving 100 percent compliance. These reports are available on a monthly basis. In addition, Wisconsin increased communication with RESource staff about ongoing Findings of Non-Compliance to facilitate the provision of additional outreach and technical assistance at the local level for those County Birth to 3 Programs who may experience challenges successfully verifying correction of Findings of Non-Compliance within 12 months.

**Improved System Administration:**

When an early intervention program shows noncompliance with federal requirements over a period of time, such as when Findings of Non-Compliance are not corrected within one year, further enforcement activities or sanctions as shown below could be implemented. This process continues the enforcement and sanction process developed in partnership with the ICC in 2007.

The Enforcement Pyramid illustrated in Figure C9.1 represents Wisconsin's sequenced enforcement activities, with emphasis placed on the collaborative partnership foundation and technical assistance preceding more targeted TA or focused monitoring activities. Directed technical assistance and sanctions are reserved for the most severe evidence of systemic non-compliance over an extended period of time.

Figure C9.1 Enforcement Pyramid



Enforcement of this model is consistent with CFR §303.704, using appropriate enforcement mechanisms, which must include, if applicable, the enforcement mechanisms identified in §303.704(a)(1) (technical assistance) and (a)(2) (conditions on the lead agency's funding of EIS programs), (b)(2)(i) (corrective action or improvement plan) and (b)(2)(iv) (withholding of funds, in whole or in part by the lead agency), and (c)(2) (withholding of funds, in whole or in part by the lead agency).

When data reports indicate slippage or areas of concern with program compliance, the State Birth to 3 program implements focused monitoring of a County Birth to 3 Program. This could result in an unscheduled focused monitoring visit or desk audit during the year, outside of the typical four year

cycle. Reports developed using the Data Mart are used to track progress towards 2 consecutive months of 100 percent compliance and to demonstrate timely correction when a Finding of Non-Compliance has been issued; the requirement for County Birth to 3 Programs to have accurate data in PPS on a monthly basis is critical to accuracy of these reports.

Reports from the Data Mart also reveal trends with statewide compliance issues. When broad non-compliance issues surface, focused monitoring for Findings of Non-Compliance related to a specific indicator may be instituted until broad-based corrections with the County Birth to 3 Programs is achieved. This could include tracking of progress or slippage utilizing PPS data and Data Mart reports for each county, implementation of targeted technical assistance, trainings targeted at a specific topic, or partnership with outside programs that may be impacted or involved with the indicator performance, such as Indicator 8. DHS Birth to 3 Program and RESource staff assisted county programs in analyzing the data and determining if counties were maintaining compliance or achieving required benchmarks. DHS issued Findings of Non-Compliance as indicated through the annual data review, On-Site Review, and/or Dispute Resolution process.

A more stringent and formalized individual Corrective Action Plan (CAP) is developed for each Indicator where systemic non-compliance lasting more than 12 months was identified. These counties must report monthly to the DHS team until the Finding of Non-Compliance is resolved. The requirement for a CAP is communicated by the Birth to 3 State Lead, completed by the county with RESource assistance, if appropriate, and formally approved by DHS. CAPs are expected to be completed in the manner and timeframe indicated on the signed CAP.

In FY 2010, the state Birth to 3 team worked with RESource to increase outreach and monitoring with County Birth to 3 Programs that have ongoing Findings of Non-Compliance. A tracking chart with dates Findings of Non-Compliance were issued and corrected, or remain uncorrected, was distributed to RESource and reviewed at All-Team meetings and other times throughout the year for follow-up with County Birth to 3 Programs.

The DHS Birth to 3 Program rearranged county assignments in FY 2010 to align with a regional distribution. This allowed for closer communication and regular check-in meetings with state and regional RESource staff about issues related to County Birth to 3 Programs in a specific region; these check-in meetings address a variety of issues related to County Birth to 3 Programs in a specific region, including any ongoing Findings of Non-Compliance.

Newsletters from the Part C Coordinator to County Birth to 3 Programs communicated Wisconsin's statewide status of Needs Assistance and the need for County Birth to 3 Programs to focus on timely and accurate data reporting. The January 2011 newsletter also informed County Birth to 3 Programs that Birth to 3 programs with a status of 'Needs Assistance or lower' or who have Findings of Non-Compliance that were not satisfied within 12 months may receive focused monitoring and increased technical assistance and or training. Subsequent correspondence communicated the requirement for counties to enter program data for a given month by the 5<sup>th</sup> of the following month. This requirement was created to provide accurate, up to date data for ongoing monitoring of county performance.

**Provision of Training and Technical Assistance:**

The state team continues to sponsor Topic Discussion and Data Discussion teleconferences and webinars, providing County Birth to 3 Programs with information about the data collection and entry requirements to ensure accuracy and consistency in the data entered into PPS. The schedule of training topics, including Regional Meeting topics, is contained within section titled *Provision of Training and Technical Assistance* in Indicator 14.

**Collaboration and Coordination:**

DHS and the Part B 619 staff from the Department of Public Instruction have implemented joint improvement activities, including a shared data system and collaborative training and technical assistance, to address compliance issues related to preschool transition and Child Outcomes. These efforts include activities which range from state infrastructure and policy initiatives, to support and professional development at the local level.

**Program Development:**

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:** No revisions are proposed.

## Part C State Annual Performance Report (APR) for 2010

## 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.

## Percent of Signed, Written Complaints Resolved within the 60-Day Timeline

FFY	Measurable and Rigorous Target
2010 (2010-2011)	100%

## Actual Target Data for FFY 2010 (2010-2011):

FFY Year	Complaints with Reports issued.	Resolved in 60-day timeline	Findings of Non-Compliance	Results
2010 (2010-2011)	1	1	2	100%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:**Data Analysis:**

The Wisconsin DHS Birth to 3 Program's data for FFY 2010 is 100 percent. The Wisconsin Birth to 3 Program had one complaint from a parent concerned that a program had violated the requirements of state and federal law related to early intervention. The complaint determined that the County Birth to 3 Program did not follow the laws related to providing written prior notice (WPN) and providing services as indicated on the Individualized Family Service Plan (IFSP). Two Findings of Non-Compliance were issued to assure the County Birth to 3 Program addressed these issues; one for Indicator 4 (WPN), the other for Indicator 1 (services).

**Findings of Non-Compliance:**

There were two Findings of Non-Compliance given in FFY 2009 for a complaint. They involved the Indicator 4 requirements of written prior notice and parent's involvement in the IFSP meeting. Both Findings of Non-Compliance were completed within one year.

**Verification of Correction (either timely or subsequent):**

Verification of the Findings of Non-Compliance was completed through a Corrective Action Plan (CAP) process. Monthly follow up occurred with the County Birth to 3 Program with review of records for the child and a sample of other children to assure 100 percent compliance. OSEP staff provided clarification about Wisconsin's verification process for correcting Findings of Non-Compliance in late 2009 during a federal On-Site Review. As a result of that clarification, Wisconsin's Birth to 3 Program adjusted its procedures for verifying correction of Findings of Non-Compliance effective December 2009. This revised process implements the requirements articulated in OSEP Memorandum 09-02 dated October 17, 2008 through a two-step verification process that includes a review of updated system level data and correction of each individual case of non-compliance.

**Enforcement Actions Taken if Non-compliance Not Corrected: NA****Ongoing Improvement Activities:**

**Clarify Policies and Procedures:** County Birth to 3 Programs continue to implement procedural safeguards for families participating in the program. Information gathered through the Self-Assessment and Program Review Process as well as the conflict resolution options, namely through interviews with families, file review checklists and parent surveys assist the county and state Birth to 3 Programs in ensuring families receive accurate and complete information about their rights and the requirements of service delivery in Wisconsin Birth to 3 Programs.

County Birth to 3 Programs are continually asked to identify opportunities to clarify a family's rights related to procedural safeguards and share information with families regarding procedures for resolving disputes through the processes of mediation, hearings or complaints. Current strategies to assist counties with this process include reviewing current county policies regarding the distribution of information to families. The IFSP signature page reminds Birth to 3 Program teams to share written parental rights and to review with families to ensure their understanding of their rights in the Birth to 3 Program. DHS provided five trainings during the FFY 2010 to County Birth to 3 Program staff which focused on rights of parents, specifically Written Prior Notice, in the Birth to 3 Program.

**Improved Data Collection and Reporting: NA****Targeted Technical Assistance: NA**

**Improved Systems Administration:** A page on the DHS Birth to 3 website has been designed to specifically inform families about the option of IDEA complaints. This information is found at: <http://www.dhs.wisconsin.gov/children/birthto3/complaints/index.htm>

**Provision of Training and Technical Assistance:** The County Birth to 3 Program with the two Findings of Non-Compliance from a complaint filed were provided with three sessions of technical assistance to support their understanding of the requirements of written prior notice and their progress on correction of the Findings of Non-Compliance.

**Collaboration and Coordination:** Families or providers who contacted the state with questions regarding concerns were encouraged to review and access the various dispute resolution options available.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:** No revisions are proposed.



## Part C State Annual Performance Report (APR) for 2010

**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
2010 (2010-2011)	100%

**Actual Target Data for FFY 2010 (2010-2011):**

2010 Results	0%
-----------------	----

One due process hearing was requested in FFY 2010. The timeline was extended due to the parties choosing to try mediation first. The mediation session did not result in a resolution; the due process hearing was held. The due process hearing occurred within 63 days of the due process hearing request.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:****Data analysis:**

In FFY 2009, the Wisconsin Birth to 3 Program received no due process hearing requests. This one in FFY 2010 was the first one in several years. Wisconsin determined that mediation, with consent of both parties, is an appropriate method to try and resolve the issue; thus it was tried first.

**Findings of Non-Compliance:**

NA

**Verification of Correction (either timely or subsequent):** NA

**Enforcement Actions Taken if Non-compliance Not Corrected:** NA

**Ongoing Improvement Activities:**

**Clarify Policies and Procedures:** The Wisconsin Birth to 3 Program applies the Part C due process hearing requirements. The Wisconsin Department of Administration (DOA), the state

agency that conducts the due process hearings, identified the need to update administrative rule, DHS Ch. 90, to reflect the 30-day timeline for due process hearings. The Wisconsin Birth to 3 Program will be revising DHS Ch. 90 to reflect this change along with the other Part C Regulation changes required to be completed by July 1, 2013.

A Birth to 3 Hearing Handbook is under development to assist families who request due process hearings. Upon completion, it will be posted on the DHS Wisconsin Birth to 3 website. It will also be reviewed through trainings with County Birth to 3 Programs to assist program staff in supporting requests for hearings along with information regarding procedures for resolving disputes through the processes of mediation, hearings or complaints. Current strategies to assist counties with this process include reviewing current county policies regarding the distribution of information to families.

**Improved Data Collection and Reporting:** NA

**Targeted Technical Assistance:** NA

**Improved Systems Administration:** A page on the DHS Wisconsin Birth to 3 website has been designed to specifically inform families about the option of due process hearings. This information is found at: <http://www.dhs.wisconsin.gov/children/birthto3/hearings/index.htm>

**Provision of Training and Technical Assistance:** Information about the Wisconsin Birth to 3 Program was shared with the DOA hearing officers during their annual training session. In the coming year, the goal is for the Birth to 3 Program to attend the training and have a session.

**Collaboration and Coordination:** To ensure objectivity and neutrality, another state agency, the Wisconsin DOA, conducts the due process hearing upon request. In 2010, discussions around the Birth to 3 Program due process hearing requirements occurred, as it was the first request in several years.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:** No revisions are proposed.

## Part C State Annual Performance Report (APR) for 2010

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

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

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

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

FFY	Measurable and Rigorous Target
2010 (2010-2011)	NA

**Actual Target Data for FFY 2010 (2010-2011):**

NA

The DHS Wisconsin Birth to 3 Program uses Part C requirements and does not use Part B due process procedures. DHS encourages County Birth to 3 Programs to attempt to resolve disputes with parents at the local level, but reminds counties and providers that any local procedures cannot take the place of State-level due process early intervention procedures available to families.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:**

**Data Analysis:** NA

**Findings of Non-Compliance:** NA

**Verification of Correction (either timely or subsequent):**

**Enforcement Actions Taken if Non-compliance Not Corrected:**

**Ongoing Improvement Activities:** NA

**Clarify Policies and Procedures:**

**Improved Data Collection and Reporting:**

**Targeted Technical Assistance:**

**Improved Systems Administration:**

## **APR – Part C (4)**

Wisconsin  
State

**Provision of Training and Technical Assistance:**

**Collaboration and Coordination:**

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:** No revisions are proposed.

## Part C State Annual Performance Report (APR) for 2010

**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
2010 (2010-2011)	100%

**Actual Target Data for FFY 2010 (2010-2011):**

2010 Results	0%
-----------------	----

Three mediations were requested in FFY 2010. For two of the mediation requests, one of the parties did not agree to mediation. One mediation session occurred; the mediation session did not result in resolution.

The data reported in this APR does not match the Table 618 data reported in November 2011. While gathering data to report in this APR, documentation from the mediation provider was found indicating there were three mediations requested, not two. The third mediation request did not get documented on the form used to report on the Table 618 in November. This was a system error.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:****Data Analysis:**

Three mediations were requested in FFY 2010. One resulted in no agreement, while the other two did not result in actual mediation sessions occurring.

**Findings of Non-Compliance:** NA**Verification of Correction (either timely or subsequent):**

**Enforcement Actions Taken if Non-compliance Not Corrected:*****Ongoing Improvement Activities:*****Clarify Policies and Procedures:**

County Birth to 3 Programs continue to address the priority of procedural safeguards for families and share information with families regarding procedures for resolving disputes through the processes of mediation, hearings or complaints. Current strategies to assist counties with this process include reviewing current county policies and practices regarding the distribution of information about rights to families through the Self-Assessment and On-Site processes.

Wisconsin Birth to 3 Programs instituted the written prior notice requirements in May 2010 which ensures that parents understand the decisions made regarding services for their child and participate in decision making as partners.

**Improved Data Collection and Reporting:** The Wisconsin Birth to 3 Program will put forth a clear process of transferring data from one source to another to assure no future misreporting occurs.

**Targeted Technical Assistance:** NA

**Improved Systems Administration:** NA

**Provision of Training and Technical Assistance:**

Specific outreach activities were planned for the FFY 2010 to promote this process for families and Birth to 3 Programs to utilize. The contracted agency presented information on the mediation option to Wisconsin's largest county's social workers and to FACETS staff. A session at The Wisconsin Council of Administrators of Special Services conference was also conducted by the contracted agency. Five trainings to County Birth to 3 Programs occurred in the past fiscal year to support the use of Written Prior Notice which included providing families with information about their rights.

**Collaboration and Coordination:**

In FFY 2010, DHS continued to contract with the mediation service, Burns Mediation Services, LLC, to offer a neutral party to receive the request for mediation. DHS wanted to be sure that calling "the State" was not stopping parents or County Birth to 3 Programs from making requests for mediation services.

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

No revisions are proposed.

## Part C State Annual Performance Report (APR) for 2010

**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, personnel, 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

FFY	Measurable and Rigorous Target
2010 (2010-2011)	100%

**Actual Target Data for FFY 2010 (2010-2011):**

Results 2010 (2010-2011)	88.50%
--------------------------------	--------

The Part C Indicator 14 Data Rubric, refer to Appendix K, was utilized to determine compliance, the valid and reliable data reported for each indicator, complete data submitted for Table 1, 2, 3 and 4 to WESTAT, including passing edit checks; responses to data notes were not required for the WESTAT data submitted in this fiscal year.

This percent performance reflects the following activities: Wisconsin's submission of the completed FY 2010 APR on time with all Indicator data reported; submission of four 618 reports of which two were submitted timely and two reports that were submitted six (6) days after the deadline; review of the same four 618 reports that passed the edit check, three reports contained complete data, and did not lead to Data Note requests or explanations. The fourth report that did not contain complete data is explained below.

The data reported in this APR does not match the Table 618 data reported in November 2011 related to data included in the 618 Dispute Resolution report. While gathering data to report in this APR, documentation from the mediation provider was found indicating there were three mediations requested, not two. The third mediation request did not get documented on the form used to report on the Table 618 in November. This was a system error.

WESTAT allowed resubmission of the November 2011 Dispute Resolution report. This report was revised and submitted to WESTAT on April 13, 2012.

Of the three mediations requested in FFY 2010, two requests moved forward to the next steps in the mediation process. For those two mediation requests, one of requests did not occur because one of the parties to that dispute did not agree to mediation. One mediation session occurred, and that mediation session did not result in resolution.

#### **Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:**

##### ***Data Analysis:***

The FY 2010 APR contains all required data, including Indicator 3 – Child Outcomes data from FY 2009 that was not submitted in that year's APR. During FY 2010, the state actively worked on development of the Audit and Archive and Data Mart reporting systems to create detailed reports and analysis of statewide and county performance data.

The two data reports submitted six days late were due to a delay in final review of the data included in those reports. Slippage in Wisconsin's compliance percentage related to Indicator 14 was due to the delay in submitting these two reports and discovery of additional data that should have been included in the original 618 Dispute Resolution submission. All future reports will be reviewed in a timely manner to assure submission by the required date and that accurate data is reported.

##### ***Findings of Noncompliance:***

##### **Verification of Correction (either timely or subsequent):**

OSEP staff provided clarification about Wisconsin's verification process for correcting Findings of Non-Compliance in late 2009 during a federal On-Site Review. As a result of that clarification, Wisconsin's Birth to 3 Program adjusted its procedures for verifying correction of Findings of Non-Compliance effective December 2009. This revised process implements the requirements articulated in OSEP Memorandum 09-02 dated October 17, 2008 through a two-step verification process that includes a review of updated system level data and correction of each individual case of non-compliance.

Since implementation of this process, DHS has developed supporting documents included in Appendix D - J outlining the specific actions taken to verify correction of Findings of Non-Compliance. These documents and processes are described in the Ongoing Improvement Activities section.

##### **Enforcement Actions Taken if Noncompliance Not Corrected:**

There were no enforcement actions taken for Indicator 14 in FY 2010.



**Ongoing Improvement Activities:****Clarify Policies and Procedures:**

Policies and procedures were clarified through regular trainings and meetings as outlined in the *Provision of Training and Technical Assistance* section below, which included regular WisLine conference call trainings, twice-annual Regional Meetings, and formal communications from the Part C Coordinator to County Birth to 3 Program Administrators.

**Improved Data Collection and Reporting:**

In FY 2010-2011, DHS was actively engaged in the development of the Audit and Archive and Data Mart systems, which allow for greater data analysis and accessibility for both statewide and local program data. The Audit and Archive and Data Mart systems provide a mechanism for the state and local programs to develop standardized reports examining the federal indicator performance across the state and in individual counties. It also has the capacity for the development of ad-hoc or on-demand reports accessing any data entered into PPS. These reports provide more specific detail than the reports currently available to counties through PPS.

In FY 2010, 'Federal Indicator Reports' were developed using the Data Mart access to PPS data and produced County Birth to 3 Program compliance percentages, noncompliance percentages, and errors reports that contributed to a county's overall performance. Reports from the Data Mart were used for issuance of Findings of Non-Compliance to County Birth to 3 Programs and to determine final data for the 2010-2011 APR. In the future, Wisconsin will be updating the Data Mart ability to provide County Birth to 3 Programs more opportunities to self-monitor their compliance with federal reporting indicators.

Using the Data Mart, state Birth to 3 staff conducted in-depth review processes of Child Outcomes data for FY 2010. This included developing an error report to identify missing data and impossible combinations, communicating errors cases to County Birth to 3 Programs, requiring correction of errors, and providing training regarding common errors in Child Outcomes data.

In FY 2010, the state Birth to 3 program communicated the requirement for counties to enter data for a given month by the 5<sup>th</sup> of the following month. This requirement was created to provide accurate, up to date data for ongoing monitoring of county performance. The capacity of the Data Mart, use of error reports, and requirement for County Birth to 3 Programs to report data on a monthly basis increases the state's capacity to assure that the data included on federal reports is timely and accurate.

**Targeted Technical Assistance:**

The Wisconsin Birth to 3 Program is finalizing development of data systems to assure that all federally-required data is available and accurate for timely submission. With the Data Mart capability, the Wisconsin Birth to 3 Program expects to have access to all necessary data for timely and accurate federal reporting. Targeted technical assistance was not determined necessary since the development of the Data Mart was an ongoing state initiative that encountered unexpected delays in development in FY 2009, resulting in the lack of Indicator 3 - Child Outcomes data in the 2009 APR.

**Improved Systems Administration:**

County Birth to 3 Programs are expected to have data entered into PPS on a monthly basis by the 5<sup>th</sup> day of the subsequent month. In FY 2010, the Part C Coordinator communicated a reminder to counties to complete data entry on a monthly basis to assure that data is up to date and correct so

that monthly reports run by the Wisconsin Birth to 3 Program have accurate reports for monitoring County Birth to 3 Programs and statewide performance.

**Provision of Training and Technical Assistance:**

Leadership to counties continued to occur throughout the year as documented throughout this report. Monthly Topic and Data teleconferences, Birth to 3 and Birth to 6 Regional meetings, and Orientation to Best Practices have provided ongoing opportunities to support leaders in the timely and accurate reporting of data. Data requirements clarification processes continue to be a major focus. These were supported with a series of Data & Topic Discussion teleconferences, webinars and Regional Meetings as described below:

FFY 2010 Data & Topic Discussions	
Date	Topic
July (2)	PPS and Wisconsin Early Childhood Social Emotional Initiatives
September	Family Outcomes
October - Fall Regional Meetings	Transition data and process Written Prior Notice Indicator 14 – Timely and accurate data
November	Child Outcomes
December	EHDI (Early Hearing Detection and Intervention)
January	Wisconsin Surveillance of Autism and other Developmental Disabilities System
February	PPS
March	Written Prior Notice (2 trainings)
April - Spring Regional Meetings	General Supervision Child Outcomes
May	Augmentative and Alternative Communication
June	PPS and Data Mart

A Birth to 3 Leadership Conference entitled “Building Capacity and Learning from One Another” was held in May 2011. This conference focused on information sharing among County Birth to 3 Programs and highlighted ARRA activities and program development. At the Leadership Event, the Part C Coordinator also communicated the goal to have all County Birth to 3 Programs implement the Evidence-Based Practice of Primary Coach Approach to Teaming over the next 5-7 years. Many counties across the state began implementing practices included in the Primary Coach Approach to Teaming in FY 2010; other counties will focus on learning more about the principles and planning initial implementation steps in FY 2011.

**Collaboration and Coordination:**

This Indicator requires in-depth and ongoing coordination and collaboration within the state Department of Health Services in the development of the data reporting system, between state and local Birth to 3 staff, and among the State Birth to 3 team, including RESource and WPDP.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:** No revisions proposed.

Appendix A  
State of Wisconsin APR FY 2010  
February 1, 2012

### 2010 Wisconsin Procedure for Family Outcome Survey Distribution

For FFY 2010 Wisconsin distributed the revised ECO Family survey to all families active in the Birth to 3 Program in October 2010. The surveys were distributed to families in October and November 2010 by the agency providing their child's early intervention services. The paper survey was available in English or Spanish; with additional translations available via the ECO website or the Minnesota Department of Education website. Families were provided a postage paid return envelope that was to be mailed to DHS. Families were given the option of entering their responses directly into an English, web-based application. Families were provided a phone number for Wisconsin Family Assistance Center for Education, Training and Support (FACETS), a Parent Training and Information Center, to contact if they needed assistance (e.g. translation, data entry, etc.) with completion of the survey. When the data was analyzed, under the section "Knowing Your Rights" on the revised ECO Family Outcomes Survey, the data for the fourth question, "...giving you useful information about available options when your child leaves the program" was omitted if the respondent answered a question that the fourth question did not pertain to their family at this time. This resulted in 778 surveys not including the question about transition in the set of questions that determined Indicator 4A compliance.

To ensure validity and reliability of the data, each survey was identified by an ID number to assure that each family only completed one survey. Agencies providing early intervention services had no access to the completed surveys. The data was carefully entered into a web-based survey by neutral professionals from WPDP from paper surveys returned directly to the DHS by families. A DHS Birth to 3 staff reviewed the summarized data resulting from the data entered into the web-based survey.

Results of the survey responses were compiled and summarized and a percent of compliance for each question was sent to the County Birth to 3 Programs for their own analysis and inclusion in their annual Self Assessment report. County Birth to 3 Programs were given the number of surveys distributed and the number returned unless they distributed a total of less than ten surveys.

Appendix B  
State of Wisconsin APR FY 2010  
February 1, 2012

**WISCONSIN BIRTH TO 3 FAMILY OUTCOMES SURVEY**

Thank you for your interest in completing the Family Outcomes Survey regarding your experience with the Birth to 3 Program. This is a survey for parents of infants and toddlers who participate in early intervention, known in Wisconsin as the Birth to 3 Program. The survey asks questions that will provide the State with information regarding the effectiveness of the Birth to 3 Program.

We are required to collect this information by federal law. The law is the Individuals with Disabilities Education Act (IDEA 2004) which guides the Birth to 3 Program. Your answers to this survey will help us give better services to infants and toddlers and their families. Your privacy is also important. All data maintained at the state level will be completely confidential. You can be sure that the local Birth to 3 Program will not know your individual family answers. Your answers will be used to direct program improvement where necessary and will not affect your child's individual Birth to 3 Program services.

Thank you for taking the time to fill out the survey. Before you start, please read the Consent Statement on the next page.

**CONSENT STATEMENT**

**Please read this Consent Statement carefully. See Contact Information below if you have any questions about agreeing to fill out the survey or need assistance.**

**Reasons for the Survey:** The Office of Special Education of the U.S. Department of Education requires the Department of Health Services (DHS) to collect information. Some of the information must be about how the Birth to 3 Program services have helped your family. The information helps the DHS and local county Birth to 3 programs give better services to young children and their families.

**Risks of filling out the Survey:** There are no risks to you if you fill out this survey. Your answers will not change the services that the Birth to 3 Program gives to your child.

**Privacy:** Your answers to this survey are kept private. All data maintained at the state level will be completely confidential. You can be sure that the local Birth to 3 Program will not know your individual family answers.

**Voluntary nature of filling out the Survey:** DHS is required to collect information from parents about how the Birth to 3 Program has helped your family. You are not required to give the information. You can decide to fill out the survey or not fill out the survey. Your decision will not change your relationship with DHS or your county Birth to 3 Program.

**Contact Information:** If you need assistance to complete the survey, please contact FACETS at 414-374-4645 or toll free at 877-374-0511, ext. 109.

1. If you agree with the statements above, please mark Yes below.

☐ Yes  
☐ No

2. Survey ID:

Please enter your Survey ID from the label on the front of your survey. Your Survey ID is the 10-digit number.

**SECTION A: Family Outcomes**

**Instructions:** Section A of the Family Outcomes Survey focuses on the ways in which you support your child's needs. For each statement below, please select which option best describes your family right now: not at all, a little, somewhat, almost, or completely.

	Not at all	A little	Somewhat	Almost	Completely
<b>Outcome 1: Understanding your child's strengths, needs, and abilities</b>					
1. We know the next steps for our child's growth and learning.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. We understand our child's strengths and abilities.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. We understand our child's delays and/or needs.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. We are able to tell when our child is making progress.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<b>Outcome 2: Knowing your rights and advocating for your child</b>					
5. We are able to find and use the services and programs available to us.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. We know our rights related to our child's special needs.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. We know who to contact and what to do when we have questions or concerns.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. We know what options are available when our child leaves the program.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9. We are comfortable asking for services & supports that our child and family need.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<b>Outcome 3: Helping your child develop and learn</b>					
10. We are able to help our child get along with others.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
11. We are able to help our child learn new skills.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
12. We are able to help our child take care of his/her needs.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13. We are able to work on our child's goals during everyday routines.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<b>Outcome 4: Having support systems</b>					
14. We are comfortable talking to family and friends about our child's needs.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
15. We have friends or family members who listen and care.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
16. We are able to talk with other families who have a child with similar needs.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
17. We have friends or family members we can rely on when we need help.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
18. I am able to take care of my own needs and do things I enjoy.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<b>Outcome 5: Accessing the community</b>					
19. Our child participates in social, recreational, or religious activities that we want.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
20. We are able to do things we enjoy together as a family.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
21. Our medical and dental needs are met.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22. Our child care needs are met.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
23. Our transportation needs are met.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
24. Our food, clothing, and housing needs are met.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
25. Comments:					

--



**SECTION B: Helpfulness of Early Intervention**

**Instructions:** Section B of the Family Outcomes Survey focuses on the helpfulness of early intervention. For each question below, please select how helpful early intervention has been to you and your family over the past year: Not at all helpful, a little helpful, somewhat helpful, very helpful, or extremely helpful.

	Not at all helpful	A little helpful	Somewhat helpful	Very helpful	Extremely helpful
<b>Knowing your rights</b>					
<b>How helpful has early intervention been in...</b>					
1. giving you useful information about services and supports for you and your child?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. giving you useful information about your rights related to your child's special needs?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. giving you useful information about who to contact when you have questions or concerns?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. giving you useful information about available options when your child leaves the program?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. explaining your rights in ways that are easy for you to understand?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Do you feel Question #4 above about receiving information regarding options when your child leaves the program is applicable to your family at this time? <input type="radio"/> Yes <input type="radio"/> No					
<b>Communicating your child's needs</b>					
<b>How helpful has early intervention been in...</b>					
7. giving you useful information about your child's delays or needs?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. listening to you and respecting your choices?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9. connecting you with other services or people who can help your child and family?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10. talking with you about your child and family's strengths and needs?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
11. talking with you about what you think is important for your child and family?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
12. developing a good relationship with you and your family?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<b>Helping your child develop and learn</b>					
<b>How helpful has early intervention been in...</b>					
13. giving you useful information about how to help your child get along with others?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
14. giving you useful information about how to help your child learn new skills?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
15. giving you useful information about how to help your child take care of his/her needs?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
16. identifying things you do that help your child learn and grow?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
17. sharing ideas on how to include your child in daily activities?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
18. working with you to know when your child is making progress?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
19. Comments:					



**SECTION C: Basic Demographics – Please complete for data purposes**

1. County you live in:\* (this question is required)

2. Please choose your provider from the label on your survey. \* This question is required.

- |  |  |
|--|--|
| <input type="radio"/> Do not live in Milwaukee or Dane | <input type="radio"/> Milwaukee—Lutheran Social Services |
| <input type="radio"/> Milwaukee—Penfield               | <input type="radio"/> Milwaukee—St. Francis              |
| <input type="radio"/> Milwaukee—MCFI                   | <input type="radio"/> Milwaukee—Next Door Foundation     |
| <input type="radio"/> Milwaukee—CBVI                   | <input type="radio"/> Milwaukee—Curative                 |
| <input type="radio"/> Milwaukee—CCDH                   | <input type="radio"/> Dane—Bridges for Families          |
| <input type="radio"/> Milwaukee—Easter Seals           | <input type="radio"/> Dane—Connections                   |

3. Your child's age today:

- ☐ Birth to 1 year  
☐ 1 – 2 years  
☐ 2 – 3 years  
☐ Over 3 years

4. Your child's age when you started in early intervention:

- ☐ Birth to 1 year  
☐ 1 – 2 years  
☐ 2 – 3 years

5. Amount of time your family has participated in early intervention:

- ☐ Less than 6 months  
☐ 6 – 12 months  
☐ Between 1 and 2 years  
☐ Over 2 years

6. Please share with us your average family annual income.

- ☐ \$0 - \$20,000  
☐ \$20,001 - \$40,000  
☐ \$40,001 - \$60,000  
☐ \$60,001 - \$80,000  
☐ \$80,001 - \$100,000  
☐ \$100,001 - \$150,000  
☐ Over \$150,000

7. Your child's race:

- ☐ White  
☐ Black or African-American  
☐ Asian or Pacific Islander  
☐ American Indian or Alaskan Native  
☐ Multi-racial

8. Is your child Hispanic or Latino?

- ☐ Yes  
☐ No

9. Your child's gender:

- ☐ Male  
☐ Female

Thank you for taking the Birth to 3 Family Outcomes Survey. This information will assist the State of WI in assessing the early intervention programs and their work with families of children under the age of three with delays or disabilities. Your information will be kept confidential. Thank you again.

# APR – Part C (4)

Wisconsin  
State

Appendix C  
State of Wisconsin APR FY 2010  
February 1, 2012

## Wisconsin INDICATOR C-9 WORKSHEET

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2009 (7/1/09 through 6/30/10)	(a) # of Findings of noncompliance identified in FFY 2009 (7/1/09 through 6/30/10)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
1. Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	15	15	14
	Dispute Resolution: Complaints, Hearings	0	0	0
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	2	2	2
	Dispute Resolution: Complaints, Hearings	2	2	2

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2009 (7/1/09 through 6/30/10)	(a) # of Findings of noncompliance identified in FFY 2009 (7/1/09 through 6/30/10)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
5. Percent of infants and toddlers birth to 1 with IFSPs	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
6. Percent of infants and toddlers birth to 3 with IFSPs		0	0	0
7. Percent of eligible infants and toddlers with IFSPs for whom an initial evaluation and initial assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	27	27	24
	Dispute Resolution: Complaints, Hearings	0	0	0
8. Percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has: A. Developed an IFSP with transition steps and services at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler's third birthday;	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	24	24	22
	Dispute Resolution: Complaints, Hearings	0	0	0
8. Percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the lead agency has: B. Notified (consistent with any opt-out policy adopted by the State) the SEA and the LEA where the child resides at least 90 days prior to the toddler's third birthday for toddlers potentially eligible for Part B preschool services; and	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	39	39	35
	Dispute Resolution: Complaints, Hearings	0	0	0

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2009 (7/1/09 through 6/30/10)	(a) # of Findings of noncompliance identified in FFY 2009 (7/1/09 through 6/30/10)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
8. Percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has: C. Conducted the transition conference held with the approval of the family at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler's third birthday for toddlers potentially eligible for Part B preschool services.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	32	32	29
	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
Sum the numbers down Column a and Column b			141	128

## APR – Part C (4)

Wisconsin  
State

Percent of noncompliance corrected within one year of identification = 90.78  
(column (b) sum divided by column (a) sum) times 100

Appendix D  
State of Wisconsin APR FY 2010  
February 1, 2012

***Birth to 3 Policy Guidance Document:***  
Procedure for Verification of Finding of Non-Compliance Correction

***Date:*** 08/31/11

***Revision Date:*** 1-24-12

***Purpose:*** This Policy Guidance Document is provided to support process of verifying corrections to Findings of Non-Compliance.

There is a strong commitment to following the guidelines provided by the federal government in 09-02 Memo. To that end, this guidance document outlines the process the Department of Health Services (DHS) will follow to ensure prompt response and correction of Findings of Non-Compliance. Wisconsin uses a two-pronged approach--child level and system level correction.

**The process includes the following steps:**

The DHS or the County Birth to 3 Program identifies 2 consecutive months of 100 percent compliance with the Indicator for which a Finding of Non-Compliance was given.

1. Child level correction.

When a Finding of Non-Compliance is given, DHS identifies the children for which the data did not meet the requirement.

- a. DHS provides a list of children to the County Birth to 3 Program with a request for file documentation to verify that the data is consistent with the Program Participation System (PPS).
- b. The file documentation varies depending upon the Indicator being verified. An example of file documentation for Indicator 1 could include case notes, daily notes, or billing for service(s).

2. System level correction

System level correction is defined as two consecutive months of 100 percent compliance. The data in PPS is used when appropriate to show the two consecutive months of compliance.

- a. DHS selects a sample of the children in the two consecutive months of data and provides it to the County Birth to 3 Program with a request to send file documentation to verify that the data is consistent with the Program Participation System (PPS).
- b. The type of file documentation to show verification is the same as expected at the child level.

When reviewing the documentation sent by the County Birth to 3 Program, DHS Birth to 3 staff will do the following actions:

1. Look for clear documentation of the Indicator being met; for Child Level Correction, this includes verification of the action required in the Indicator was completed. For System Level Correction, this includes verification that the action required in the Indicator was completed and in compliance with the requirement.
2. Verify the data is the same, comparing the file documentation to PPS data.
3. Determine if Finding of Non-Compliance was successfully corrected.
4. Send a letter to the County Birth to 3 Program on DHS letterhead communicating the outcome of the review. This letter includes the following information:



- a. Date Finding of Non-Compliance was given
- b. Identification of Finding/Indicator involved
- c. Date of review
- d. Two months reviewed for verification of correction
- e. Level of review, i.e. Child level, System level or both levels
- f. Outcome of verification process

**Supporting documents:**

1. Verification list template
2. Findings of Non-Compliance review tool
3. Outcome of Review Process letter to county

## APR – Part C (4)

Wisconsin  
State

Appendix E  
State of Wisconsin APR FY 2010  
February 1, 2012

### Birth to 3 Findings of Noncompliance: Verification of Corrected Findings Tool

County Name:	Date File Reviewed:	Reviewer Initials:
--------------	---------------------	--------------------

Directions: Complete this tool using the information submitted by the County Birth to 3 Program to demonstrate their correction of a Finding of Non-Compliance. If a county did not receive a Finding of Non-Compliance for one of the Indicators listed below or has not reached 100 percent compliance, document NA.

<b>Indicator 1.</b> Acceptable documentation includes: copy of IFSP page that includes the IFSP start date and actual service start date; case note, therapist note, agency log, or other agency documentation that includes the start date of the specific service.					
Type of correction	Child's initials	PPS date	File Date	Type of documentation provided	Correction verified? Y or N.
Individual Child Correction					
System Correction					

Did the county provide information to demonstrate correction of this Finding of Non-Compliance?  
Yes ☐ or No ☐

<b>Indicator 7.</b> Acceptable documentation includes: The signature page of the IFSP or case note or other agency documentation that includes the start date of the IFSP with a signature.					
Type of correction	Child's initials	PPS date	File Date	Type of documentation provided	Correction verified? Y or N.
Individual Child Correction					
System Correction					

Did the county provide information to demonstrate correction of this Finding of Non-Compliance?  
☐ Yes or ☐ No

## APR – Part C (4)

Wisconsin  
State

<b>Indicator 8A.</b> Acceptable documentation includes: a copy of the IFSP page documenting that transition steps were included or any other supporting documentation verifying that action.					
Type of correction	Child's initials	PPS date	File Date	Type of documentation provided	Correction verified? Y or N.
System Correction					

Did the county provide information to demonstrate correction of this Finding of Non-Compliance?  
Y ☐ or N ☐

<b>Indicator 8B.</b> Acceptable documentation includes: a copy of the transition page in PPS showing the date the referral was sent to the LEA and/or other supporting documentation verifying that action.					
Type of correction	Child's initials	PPS date	File Date	Type of documentation provided	Correction verified? Y or N.
System Correction					

Did the county provide information to demonstrate correction of this Finding of Non-Compliance?  
Y ☐ or N ☐

<b>Indicator 8C.</b> Acceptable documentation includes: a copy of the transition planning page of the IFSP with the TPC date, case note, or other documentation verifying this action (TPC invite in 2011 only).					
Type of correction	Child's initials	PPS date	File Date	Type of documentation provided	Correction verified? Y or N.
System Correction					

Did the county provide information to demonstrate correction of this Finding of Non-Compliance?  
Y ☐ or N ☐

Appendix F  
State of Wisconsin APR FY 2010  
February 1, 2012

**(Name) County Desk Audit Verification Request**

Date

This request is based upon clarification from the Office of Special Education Programs (OSEP) for verifying correction of a Finding of Non-compliance. Findings of Non-compliance are determined “corrected” through: a) two consecutive months of compliance; AND b) a review of the child(ren)’s files initially showing the non-compliance to verify subsequent correction of the non-compliance.

Your county has been found to be at 100 percent compliance for the Indicator(s) listed in your Finding of Non-compliance letter attached. To verify this compliance, please send (name), your DHS Birth to 3 State Lead, documentation from the child’s file as indicated below that verifies the data this verification was based upon in PPS. Please send this documentation by April 29, 2011.

**Indicator 1:** 100 percent of infants and toddlers must receive the early intervention service on their IFSP in a timely manner, within 30 days of parental consent on the IFSP.  
(20 U.S.C. 1416(a) (3) (A) and 1442)

For the children listed below, send documentation of the actual first date that the service began, along with documentation of the exact reason for the delay. Possible reasons may include Service Coordinator notes about family cancellations, child illness, scheduling conflicts, etc.

*Child Correction (To verify child specific data that caused finding to be given have been corrected.)*<sup>8</sup>

Child      Date of birth      Service

*System Correction (To verify child specific data used to verify corrections is accurate.)*

Child      Date of birth      Service

**Indicator 7:** 100 percent of eligible infants and toddlers with IFSPs must receive an evaluation and assessment and an initial IFSP meeting conducted within the Part C 45-day timeline. (20 U.S.C. 1416(a) (3) (B) and 1442)

For the children listed below, send documentation that an initial IFSP meeting was held, along with documentation of the exact reason for the delay. Possible reasons may include Service Coordinator notes about family cancellations, child illness, scheduling conflicts, etc.

*Child Correction (To verify child specific data that caused finding to be given have been corrected.)*<sup>8</sup>

Child      Date of birth

*System Correction (To verify child specific data used to verify corrections is accurate.)*

Child      Date of birth

**Indicator 8:** 100 percent of all children exiting Part C at age three must receive timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including:  
A. IFSP with transition steps

## APR – Part C (4)

Wisconsin  
State

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

For the children listed below, send documentation that transition steps (8A), referral (8B - the second step of LEA Notification), and/or TPC (8C) was completed, along with documentation of the exact reason for the delay. Possible reasons may include Service Coordinator notes about family cancellations, child illness, scheduling conflicts, etc.

*System Correction (To verify child specific data used to verify corrections is accurate.)*

<u>Child</u>	<u>Date of birth</u>	<u>8 A,B or C</u>
--------------	----------------------	-------------------

Please submit to (name) at (info) or by fax at (608)261-8884.

## APR – Part C (4)

Wisconsin  
State

Appendix G  
State of Wisconsin APR FY 2010  
February 1, 2012

Date

Name  
Birth to 3 Program Administrator  
Name County  
(address)  
(address)

Dear (name):

This letter confirms that NAME County Birth to 3 Program successfully verified correction for Findings of Non-Compliance that were given for Indicator #.

A verification process was conducted on (date reviewed) to review the documentation submitted for correction of Indicator (#; description). Two levels of data were reviewed for correction. *Child level correction included review of correction of identified errors cases for Fiscal Year XX-XX (include if Child Level verification is required).* System level correction was verified for the period from (1<sup>st</sup> consecutive month) through (2<sup>nd</sup> consecutive month). The verification process included a comparison of the documentation submitted from (NAME) County with the dates entered into PPS for Indicator (#).

(NAME) County verified 100 percent compliance with Indicator (#). Based on this data, (name) County has met the requirement of providing (indicator description). This is no longer considered a Finding of Non-Compliance for (name) County.

We appreciate the attention you have given this issue, and the hard work demonstrated to reach compliance. It is important that the good work (name) County did to achieve this indicator continues. We encourage you to assess the strategies that resulted in this improvement and continue embedding these in your practice to assure that the changes can be sustained and continue to support your county in meeting the indicators.

Thank you for your hard work and commitment to the Birth to 3 Program.

Sincerely,

(State lead name)  
(State lead title)  
Department of Health Services

cc: (name), Birth to 3 Program Director  
(name), RESource  
file

## APR – Part C (4)

Wisconsin  
State

Appendix H  
State of Wisconsin APR FY 2010  
February 1, 2012

(date)

Name  
County Birth to 3 Program Administrator  
Name County Birth to 3 Program  
Address.  
City, State, Zip

Dear (name):

In our efforts to support (name) County in reaching compliance with federal Compliance Indicators for your Birth to 3 Program, we are evaluating your possible continued need for technical assistance to assure you have the means to achieve compliance with these Indicators.

It has been approximately (X) months since (name) County received the Notice of Findings of Non-Compliance letter on (insert date) outlining any Findings of Non-compliance that need to be addressed within 12 months (*Indicator 9*). In order to verify correction of the Finding of Non-Compliance, you will need to identify two consecutive months of data in PPS showing 100 percent compliance with the Indicator(s) included in the (date) letter. A two-pronged data verification process will be conducted that includes a review of the child-specific files that resulted in the Finding of Non-Compliance and a sample of files that demonstrate two months of 100 percent compliant data.

OPTIONAL SENTENCE: (name) County successfully verified correction of Indicators (insert) as confirmed in a letter to your county dated (date). However, DHS has not been contacted by (name) County regarding the correction of the following Findings of Non-compliance for Indicator(X). We recommend reviewing the PIPP strategies and county compliance on this Indicator; if you need to modify strategies, please contact your RESource person.

If I can support you in completing the verification process for the identified Findings of Non-Compliance referenced above, please contact me.

Sincerely,

(State Lead name)

*\*\*Email to county contact(s), RESource and Area Coordinator*

## APR – Part C (4)

Wisconsin  
State

Appendix I  
State of Wisconsin APR FY 2010  
February 1, 2012

(date)

Name  
County Birth to 3 Program Administrator  
Name County Birth to 3 Program  
Address.  
City, State, Zip

Dear (name):

In our efforts to support (name) County in reaching compliance with federal Performance Indicators for your Birth to 3 program, we are evaluating your possible continued need for technical assistance to assure you have the means to achieve compliance with these indicators.

It has been approximately (X) months since (name) County received a Notice of Findings of Non-Compliance outlining any Findings of Non-compliance that need to be addressed within 12 months (*Indicator 9*). A two-pronged data verification process will be conducted that includes a review of the child-specific files that resulted in the Finding of Non-Compliance and a sample of files that demonstrate two months of 100 percent compliant data.

The PPS data can not show if (NAME) County has completed the following Findings of Non-Compliance: Indicator # (describe the Indicator). If you are ready to verify these processes are in place, please contact me and we will determine how to proceed with the verification process. If you are not ready, we recommend reviewing the PIPP strategies and county compliance on this Indicator; if you need to modify strategies, please contact your RESource person.

If there is any way we can support you in completing the identified Findings of Non-Compliance, please let us know.

Sincerely,

(State Lead name)

*\*\*Email to county contact(s), RESource and Area Coordinator*



## APR – Part C (4)

Wisconsin  
State

Appendix J  
State of Wisconsin APR FY 2010  
February 1, 2012

Date

Name  
Birth to 3 Program Administrator  
Name County  
(address)  
(address)

Dear (name):

This letter indicates that NAME County Birth to 3 Program did not successfully verify correction for Findings of Non-Compliance that were given for Indicator #.

A verification process was conducted on (date reviewed) to review the documentation submitted for correction of Indicator (#: description). Two levels of data were reviewed for correction. *Child level correction included review of correction of identified errors cases for Fiscal Year XX-XX (include if Child Level verification is required).* System level correction was verified for the period from (1<sup>st</sup> consecutive month) through (2<sup>nd</sup> consecutive month). The verification process included a comparison of the documentation submitted from (NAME) County with the dates entered into PPS for Indicator (#).

(NAME) County Birth to 3 Program did not verify 100 percent compliance with Indicator (#). Based on this data, (name) County has not met the requirement of providing (indicator description). This remains a Finding of Non-Compliance for (name) County due for correction by (one year from date Finding issued).

We encourage you to assess the strategies that resulted in improved performance on this Indicator and continue examining your practice to assure that the changes will result in successful verification of correction.

Thank you for your hard work and commitment to the Birth to 3 Program.

Sincerely,

(State lead name)  
(State lead title)  
Department of Health Services

cc: (name), Birth to 3 Program Director  
(name), RESource  
File

## APR – Part C (4)

Wisconsin  
State

Appendix K  
State of Wisconsin APR FY 2010  
February 1, 2012

### Indicator 14 Rubric FFY 2010 APR Wisconsin

Indicator 14 - SPP/APR Data			
APR Indicator	Valid and reliable	Correct calculation	Total
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

618 Data – Indicator 14					
Table	Timely	Complete Data	Passed Edit Check	Responded to Date Note Requests	Total
Table 1 – Child Count Due Date: 2/2/11	1	1	1	NA	3
Table 2 – Program Settings Due Date: 2/2/11	1	1	1	NA	3
Table 3 – Exiting Due Date: 11/2/11	0	1	1	N/A	2
Table 4 – Dispute Resolution Due Date: 11/2/11	0	0	1	N/A	1
				<b>Subtotal</b>	9
<b>618 Score Calculation</b>			<b>Grand Total</b> (subtotal x 2.5)		22.5

Indicator #14 Calculation	
A. APR Grand Total	35.00
B. 618 Grand Total	22.50
C. APR Grand Total (A) + 618 Grand Total (B) =	57.50
Total N/A in APR	0.00
Total N/A in 618	5.00
<b>Base</b>	<b>65.00</b>
D. Subtotal (C divided by Base*) =	0.885
E. Indicator Score (Subtotal D x 100) =	88.5

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