



Montana Part C of the IDEA Early Intervention Program Annual Performance Report for July 1, 2017 through June 30, 2018

Executive Summary

Montana's Department of Public Health and Human Services issues contracts to five regional agencies to provide the comprehensive Part C of the IDEA program in their catchment areas. The five agencies were awarded contracts in January 2018 through a Request for Proposal process in which each agency described their systems to ensure compliance with Montana's standards set forth in the most current version of Montana's Part C Compliance Document and related guidance materials; the provisions and regulatory requirements of Part C of IDEA; and the Education Department General Administrative Regulations in 34 CFR Part 80. Each agency is responsible for the establishment of the following within their catchment area:

- Child Find/Referral System
- Procedural Safeguards including Montana's System of Payments
- Multidisciplinary evaluations and child and family assessments
- Individual Family Service Plans
- Service Coordination
- Individualized Services provided by qualified personnel
- Transition prior to the infant or toddler's third birthday

Montana Milestones Part C Early Intervention Program and the five regional agencies used Montana's data management system, the **Early Intervention (EI) Module**, and the reports generated to review the overall compliance and results quality of the program in FFY 2017. Agency personnel used internal records to supplement monitoring processes.

Montana's data management system, the **EI Module**, stores all Indicator data except for Indicator 4, Family Outcomes data, and Indicator 10, Dispute Resolution data. For FFY 2017, the EI Module data was utilized to report upon:

- Indicator 1: Timely Receipt of Services
- Indicator 2: Settings
- Indicator 3 Early Childhood Outcomes
- Indicator 5: Child Find, birth to 1
- Indicator 6: Child Find, birth to 3
- Indicator 7: 45-day timeline
- Indicator 8 Early Childhood Transition

Indicator 4: Family Outcomes data is collected from each agency's annual Family Survey data and self-reported to the Part C Coordinator. **Indicator 9** does not apply to Montana's Part C program. The Part C Coordinator is responsible for monitoring Indicator 10, dispute resolution data.

The monitoring mechanisms capture a representation of compliance and results indicators from the regional agencies in Montana. The agencies develop, implement and monitor improvement strategies using plan-do-study-act cycles to address any non-compliance or quality issues identified. The agency's



personnel provide ongoing status monitoring during Leadership Team calls or meetings with the Part C Coordinator.

General Supervision System

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

The Montana Department of Public Health and Human Services, Developmental Disabilities Program is the lead agency for the implementation of Part C of the Individuals with Disabilities Education Act (IDEA). **Montana Milestones Part C Early Intervention Program** ensures and requires implementation of IDEA through defined contractual expectations in the following:

- SSP/APR/SSIP
- Indicators for monitoring
- Montana Part C Rules and Regulations (compliant with Federal rules and regulations)
- Montana Part C Procedural Safeguards
- Montana Part C System of Payments
- Montana Part C guidance, policies, and procedures
- Interagency agreements
- Dispute resolution: complaints and due process
- General Supervision: monitoring including agencies' self-monitoring
- Training and Technical Assistance
- Remediation Plans

Montana monitors all agencies annually on APR indicators including Indicator 11, the Statewide Systemic Improvement Plan.

Technical Assistance System

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

Montana Milestones Part C Early Intervention currently utilizes Office of Special Education Program's technical assistance teams from WestEd/NCSI, IDC, DaSy, and the National Center for Pyramid Model Innovations. The Part C Coordinator makes available ongoing support and technical assistance on-demand and via Leadership Team meetings. All types of technical assistance are intended to increase the knowledge, skills, and effectiveness of the recipients. The actions taken because of technical assistance received:

- 1) Reorientation to regulatory requirements around multidisciplinary evaluation and eligibility criteria resulted in revised guidance, process, and procedures, learning modules, and extensive revisions to the Early Intervention database to incorporate documentation of implementation of the requirements of multidisciplinary evaluations and eligibility criteria for Montana.
- 2) Revision of ongoing monitoring mechanisms and processes linked to quality and compliance indicators.
- 3) Revision of letters of determination based upon quality and compliance indicators.
- 4) Implementation of visual data to encourage deeper understanding of indicator data.



- 5) Identification of special social and emotional practices to better engage families in the social and emotional development of their children.

The Part C Coordinator and DPHHS administrative team members continue to participate in a **cross-state learning collaborative, Part C Results-Based Accountability**. Montana is also participating in two additional learning collaboratives: **Pyramid Model** (Social-Emotional intervention strategies) **and the Part C SSIP** and the **ITCA Fiscal Cohort V**. Montana is part of two learning communities: **CADRE/ECTA Part C** and **Child Outcomes Summary Process**.

Professional Development System

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

Montana Milestones Part C Early Intervention previously adopted Montana's Comprehensive System of Personnel Development developed by Montana's Office of Public Instruction to support the professional development and certification of Family Support Specialists/Service Coordinators. Montana Milestones created, implemented, and uses an online professional development system in partnership with Montana State University, the MSU Extended University, to promote systemic, consistent and on-demand professional development pertaining to early intervention in Montana. Current learning modules available:

- Mission and Key Principles of Part C of IDEA Early Intervention
- Foundational Pillars of Early Intervention
- Routines-Based Early Intervention™
- Measurement of Engagement, Independence and Social Relationships™

Additional modules (reflective of Montana's SSIP improvement strategies) currently under development and to be added in 2019:

- Montana's Child Outcomes Summary Process;
- Montana's Routines-Based Interview Process (will replace RBI module noted above);
- Functional Assessment and Writing Functional, High-Quality IFSP Outcomes (2 linking modules);
- Montana Eligibility for Part C of the IDEA;
- Documenting Exits for Part C of the IDEA and Transition Process and Procedure (2 linking modules); and
- Montana's Evidence-Based Practice: Routines-Based Early Intervention Model and Fidelity.

Montana's Part C agencies self-identified program leaders who received a series of direct trainings and technical assistance from Montana's technical assistance professional, Monica Mathur-Kaluri of NCSI, to reorient agencies to Montana's Statewide Systemic Improvement Plan (SSIP) and each improvement strategy beginning in January 2018. Additionally, Montana's State Lead, Leslie Fox and team, provided an overview of the Office of Special Education Program's SSIP intent in January 2018 and attended Leadership Team training in June 2018. Montana continues to seek professional development targeting the SSIP improvement strategies to improve Montana's Part C child and family outcomes.



Stakeholder Involvement

The mechanism for soliciting broad stakeholder input on targets in the SSP/APR, including revisions to targets.

Montana Milestones Part C Early Intervention engages in a variety of activities to ensure stakeholder input for the 2017 APR (reporting period of July 1, 2017 to June 30, 2018) for submission by February 1, 2019.

- Montana's Part C Coordinator participates in OSEP's technical assistance conference calls and reviewed SSP/APR materials and instructions to ensure Montana's SSP/APR would follow OSEP requirements, including the involvement by multiple means for stakeholders to provide input and participate in the development of the SPP/APR.
- MT's DPHHS administrative staff were informed and updated on the SSP/APR requirements, including stakeholder input.
- The FSSAC, Montana's ICC, and the regional agencies' representatives participated in the development of the SSP/APR in the following ways: (1) informed of the APR requirements; (2) supplied APR data; and (3) reviewed and provided feedback on data collected.
- Montana's Part C Coordinator reviewed the APR data, obtained clarifications concerning the data as needed, and developed the APR.
- Stakeholder meeting was held on January 11, 2019 to review and provide feedback for the FFY 2017 APR.
- The FSSAC chairperson reviewed and edited the draft to ensure clear and accurate information for the submission of the FFY 2017 APR due February 1, 2019.
- Stakeholder work groups will reconvene in spring 2019 to review Child Outcomes Summary data and Indicator 3 targets.

Reporting to the Public

How the State will report annually to the public on the performance of EI program or provider located in the State on the targets in the SSP/APR as soon as practicable, but not later than 120 days following the State's submission of its APR as required by 34 CFR §303.702(b)(1)(i)(A).

- **Montana Milestones/Part C Early Intervention Program's** APR FFY 2017 will be available on Montana Department of Public Health and Human Services website, <http://dphhs.mt.gov/dsd/developmentaldisabilities/PartC-EarlyInt/PartCReports>, along with websites of Montana's Office of Public Instruction (OPI) Special Education; Parents Let's Unite for Kids (PLUK); and regional contracted agencies.
- Montana State Library will provide a link to access the State's FFY 2017 APR through state libraries' websites. It will also be included in their electronic database catalog.
- The FFY 2017 APR includes Montana's progress or slippage in meeting the measurable targets found for each indicator along with any required remediation.
- The FFY 2017 APR is reported to the Governor and the public as soon as possible after February 1, 2019.



Dissemination of the agencies' FFY 2017 APRs to the Public:

- Each agency's FFY 2017 APR will be available at <http://dphhs.mt.gov/dsd/developmentaldisabilities/PartC-EarlyInt/PartCReports> and at each agency's website.
- Regional agencies' FFY 2017 APRs will be available to the members of the FSSAC, Office of Public Instruction (OPI), and PLUK, and each agency's Boards of Directors, if applicable.
- Each agency's FFY 2017 APR will include progress or slippage in meeting the measurable targets and any identified remediation requirements.
- Each agency's FFY 2017 APRs is reported to the public as soon as possible after February 1, 2019 and no later than April 30, 2019.

Montana: Reporting to the Public: Dissemination of the agencies' FFY 2016 APRs to the Public

Indicators 2, 4, and 5 were not reported publicly in the agencies' FFY 2016 APRs. The following table will be posted at <http://dphhs.mt.gov/dsd/developmentaldisabilities/PartC-EarlyInt/PartCReports>.

Indicator 2: Services in Natural Environments				
Regional Contractor	Total	Home	Community	Other Settings
Benchmark Human Services	131	130	0	1
Child Development Center	219	215	2	2
DEAP	79	79	0	0
ECI	253	249	3	1
Family Outreach	192	190	1	1

Indicator 4: Family Involvement			
Regional Contractor	Indicator 4A	Indicator 4B	Indicator 4C
Benchmark Human Services	Did not report due to change in contractor mid-year.		
Child Development Center	74%	82%	85%
DEAP	91%	97%	97%
ECI	98%	99%	96%
Family Outreach	79%	90%	79%

Indicator 5: Child Find (Birth to One)	
Regional Contractor	Percentage
Benchmark	1.05%
Child Development Center	.96%
DEAP	1.3%
ECI	1.04%
Family Outreach	1.03%



Indicator 1: Timely Provision of Services

Monitoring Priority: Early Intervention Services in Natural Environments

Compliance indicator: 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)

FFY 2013 – FFY 2018 Targets

FFY	2013		2014	2015	2016	2017	2018
Target	100%		100%	100%	100%	100%	100%

FFY 2017	Measurable and Rigorous Target: 100% of infants and toddlers with IFSPs will receive the early intervention services on their IFSPs in a timely manner (within 30 days after the IFSP is signed).
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Actual Target Data for FFY 2017 (July 1, 2017 – June 30, 2018):

REPORT OF PROGRESS – INDICATOR 1				
	Measurable and Rigorous Target FFY 2017	Actual Target Data FFY 2017	Met or Not Met	Actual Target Data FFY 2016
Indicator 1	100%	100%	Met	100%

RAW DATA CALCULATION – INDICATOR 1				
A	B	C	D	E
Total child records reviewed.	Children with IFSPs receiving early intervention services in a timely manner.	Children with IFSPs not receiving early intervention services in a timely manner due to documented exceptional family circumstances.	Percent of children with IFSPs who received early intervention services on their IFSPs in a timely manner or there was a documented exceptional family circumstance that prevented timely service delivery.	Total children not receiving timely service delivery for reason other than documented exceptional circumstances.
131	127	4	100%	0



4 records of children with IFSPs not receiving early intervention services in a timely manner due to documented exceptional family circumstances.

Method Used in Collection of Data:

Indicator 1 data is collected from the State’s data management system, the EI Module, using the *Part C Services Report*, documenting the delivery of services throughout FFY 2017 including both children with their initial IFSPs as well as children with subsequent IFSPs. Montana’s criteria for timely receipt of early intervention services is defined as within 30 days from parent consent to the date IFSP services are initiated.

The data point is collected from the *Part C Services Report*: date-stamped signature page from the IFSP (signaling parental consent for the early intervention services identified) and the IFSP Summary of Services page documenting the duration, intensity, and frequency of intervention services along with the beginning and ending date per service entry. This data is entered by a Family Support Specialist/Service Coordinator and oversight is provided by each agency’s supervisory personnel.

Montana’s Family Support Specialists act as Service Coordinators fulfilling the specific service coordination duty: *Coordinating, facilitating and monitoring the delivery of services to ensure that the services are provided in a timely manner* [34 CFR § 303.34 (b) (6)].

The five-regional agencies randomized 25-30 child records identified in their individual *Part C Services Report* reviewing the data documenting the receipt of early intervention services. When reviewed for FFY 2016, discrepancies were identified in recording the early intervention service dates and parent consent dates. Since that time, individual agencies have taken different training approaches to ensure the validity and monitoring of data to ensure its accuracy.

Data from the *Part C Services Report* for the period of 7/1/17 through 6/30/18:

- 127/131 files reviewed indicated services were provided without delay and according to Part C requirements for children/family.
- 4/131 files reviewed indicated services were delayed due to exceptional family circumstances. Regional agencies indicate each of these 4 child records include documentation of services beginning during FFY 2017.

Correction of Findings of Non-Compliance for FFY 2015:

In accordance with OSEP Memo 09-02, Montana was able to verify that Indicator 1 is now in full compliance with regulatory requirements. Each agency is contractually obligated to implement, monitor, and assess Indicator 1 effective January 2018.

All 14 incidences of non-compliance were reviewed to ensure the early intervention services identified were initiated within 30 days after the IFSP was signed. Each agency was informed of the specific regulatory requirements and each agency developed training and monitoring mechanisms to ensure:

- Family Support Specialists/Service Coordinators update the IFSP signature page for each initial and subsequent IFSP both in the EI Module and any hard copy of the IFSP.



- Family Support Specialists/Service Coordinators update the IFSP Summary of Services page to ensure accurate beginning and ending dates for early intervention services using periodic and six-month reviews if changes have occurred.
- Family Support Specialists/Service Coordinators document early intervention services and links to outcomes on the IFSP Summary of Services page.
- Family Support Specialists/Service Coordinators use the IFSP Medical and Other Services only for those medical and other services that the child or family needs or is receiving through other sources but that are neither required nor funded by Part C.

The Part C Coordinator and agency administrative personnel reviewed Indicator 1 data quarterly throughout FFY 2016 to examine compliance with the regulatory requirements and ensure timely receipt of early intervention services: within 30 days from parent consent to the date IFSP services are initiated. Using the *Part C Services Report* data to review the initial and subsequent IFSPs during quarterly meetings with each agency, the Part C Coordinator and agency personnel were able to confirm and verify that each agency was now in full compliance with Indicator 1, 100% of infants and toddlers with IFSPs receive the early intervention services on their IFSPs in a timely manner, within 30 days of the parent’s consent.

Montana’s electronic IFSP is undergoing refinement as well as the IFSP guidance to more clearly articulate these requirements.

Indicator 2: Services in Natural Environments

Monitoring Priority: Early Intervention Services in Natural Environments

Results indicator: Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings. (20 U.S.C. 1416(a)(3)(A) and 1442)

FFY 2013 – FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target ≥	97%	97%	98%	98%	99%	99%

FFY 2017	Measurable and Rigorous Target: 99% of infants and toddlers with IFSPs will primarily receive early intervention services in the home or programs for typically developing children.
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Actual Target Data for FFY 2017 (July 1, 2017 – June 30, 2018):

REPORT OF PROGRESS – INDICATOR 2				
	Measurable and Rigorous Target FFY 2017	Actual Target Data for FFY 2017	Met or Not Met	Actual Target Data for FFY 2016
Indicator 2	99%	99%	met	98%



A	B	C	D	E
Infants and toddlers with IFSPs receiving services in the home	Infants and toddlers with IFSPs receiving services in community-based settings	Infants and toddlers with IFSPs receiving services in other settings.	Total infants and toddlers with IFSPs reported.	Percent of infants and toddlers with IFSPs receiving services in the home or community-based settings.
830	9	3	842	99%

Method Used in Collection of Data:

Data collected from the State’s data management system, the EI Module, using the *Part C Child Count and Settings Report (Table 2)*, documenting the number of children with IFSPs (collection date: 2nd Friday of November) and their service(s) settings.

Data from the *Part C Child Count and Settings Report* for November 10, 2017:

- 839/842 received early intervention services in the home or a community-based setting.
- 3/842 received early intervention services in other settings.

Indicator 3: Early Childhood Outcomes

Monitoring Priority: Early Intervention Services in Natural Environments

Results indicator: Percent of infants and toddlers with IFSPs who demonstrate improved:

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

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

FFY 2013 – FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target A1 ≥	72%	72%	73%	75%	76%	77%
Target A2 ≥	53%	53%	53%	56%	56%	59%
Target B1 ≥	61%	61%	61%	64%	64%	67%
Target B2 ≥	44%	44%	44%	47%	47%	50%
Target C1 ≥	67%	67%	67%	70%	70%	73%
Target C2 ≥	52%	52%	52%	55%	55%	58%



FFY 2017	Measurable and Rigorous Target
	<p>Outcome A: Positive social-emotional skills (including social relationships)</p> <ol style="list-style-type: none"> The State’s Identified Measurable Result (SiMR) Target: of those children who entered or exited the program below age expectations in Outcome A, 76% substantially increased their rate of growth by the time they turned 3 years of age or exited the program. Target: 56% of children who were functioning within age expectations in Outcome A by the time they turned 3 years of age or exited the program. <p>Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)</p> <ol style="list-style-type: none"> Target: of those children who entered or exited the program below age expectations in Outcome B, 64% substantially increased their rate of growth by the time they turned 3 years of age or exited the program. Target: 47% of children who were functioning within age expectations in Outcome B by the time they turned 3 years of age or exited the program. <p>Outcome C: Use of appropriate behaviors to meet their needs:</p> <ol style="list-style-type: none"> Target: of those children who entered or exited the program below age expectations in Outcome C, 70% substantially increased their rate of growth by the time they turned 3 years of age or exited the program. Target: 55% of children who were functioning within age expectations in Outcome C by the time they turned 3 years of age or exited the program.

Actual Target Data for FFY 2017 (July 1, 2017 – June 30, 2018):

REPORT OF PROGRESS – INDICATOR 3, OUTCOME A						
Positive social-emotional skills (including social relationships)						
	Measurable and Rigorous Target	Actual Target Data FFY 2017	Actual Target Data FFY 2016	Actual Target Data FFY 2015	Actual Target Data FFY 2014	Actual Target Data FFY 2013
Summary Statement 1	76%	64.94%	53.42%	63%	66%	72%
Summary Statement 2	56%	44.13%	35.55%	48%	53%	63%



Of those children who entered or exited the program below age expectations in Outcome A, **65%** substantially increased their rate of growth by the time they turned 3 years of age or exited the program. **Montana did not meet the target.** **44%** of children were functioning within age expectations in Outcome A by the time they turned 3 years of age or exited the program. **Montana did not meet the target.**

REPORT OF PROGRESS – INDICATOR 3, OUTCOME B						
Acquisition and use of knowledge and skills (including early language/communication and early literacy)						
	Measurable and Rigorous Target	Actual Target Data FFY 2017	Actual Target Data FFY 2016	Actual Target Data FFY 2015	Actual Target Data FFY 2014	Actual Target Data FFY 2013
Summary Statement 1	64%	66.66%	55.72%	64%	70%	72%
Summary Statement 2	47%	36.65%	30.73%	38%	42%	56%

Of those children who entered or exited the program below age expectations in Outcome B, **67%** substantially increased their rate of growth by the time they turned 3 years of age or exited the program. **Montana met the target.** **37%** of children were functioning within age expectations in Outcome B by the time they turned 3 years of age or exited the program. **Montana did not meet the target.**

REPORT OF PROGRESS – INDICATOR 3, OUTCOME C						
Use of appropriate behaviors to meet their needs						
	Measurable and Rigorous Target	Actual Target Data FFY 2016	Actual Target Data FFY 2016	Actual Target Data FFY 2015	Actual Target Data FFY 2014	Actual Target Data FFY 2013
Summary Statement 1	70%	67.02%	59.07%	66%	65%	73%
Summary Statement 2	55%	39.90%	35.95%	51%	54%	64%

Of those children who entered or exited the program below age expectations in Outcome C, **67%** substantially increased their rate of growth by the time they turned 3 years of age or exited the program. **Montana did not meet the target.** **40%** of children were functioning within age expectations in Outcome C by the time they turned 3 years of age or exited the program. **Montana did not meet the target.**



RAW DATA CALCULATION – INDICATOR 3						
	Indicator 3 Outcome A Positive social-emotional skills		Indicator 3 Outcome B Acquisition and use of knowledge and skills		Indicator 3 Outcome C Use of appropriate behaviors to meet their needs	
	Number of Children	%	Number of Children	%	Number of Children	%
a. Percent of infants and toddlers who did not improve functioning.	7	2%	8	2%	7	2%
b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers.	115	29%	117	29%	114	28%
c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it.	102	25%	129	32%	120	30%
d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers.	124	31%	121	31%	126	32%
e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers.	53	13%	26	6%	34	8%
Total	N=401	100%	N=401	100%	N=401	100%

Method Used in Collection of Data:

Data collected from the State’s data management system, the EI Module, using the *Part C Child Outcomes Summary Analysis Report*, documenting the number of children with both a baseline and exit Child Outcomes Summary form completed for the period of July 1, 2017 through June 30, 2018 and enrolled in the program for at least six months.



Ongoing State-wide Remediation Required to Improve COS Validity and Reliability:

Concentrated Child Outcomes Summary ratings professional development, with the support of OSEP Technical Assistance Centers, was completed at each agency in July 2017. The anticipated effect of the professional development series and the *IFSP and COS Guidance* document was lower percentages in each category as validity and reliability of rating was increased. The additional result expected was a consistent, systematic method of using the 7-point rating scale, documenting evidence for ratings, and meaningfully engaging the family in the Child Outcomes Summary rating process.

In spring 2018, stakeholders from the Leadership Team reviewed the Child Outcomes Summary data and declined to revise and set targets until an additional year of expected valid and reliable outcomes data was obtained for analysis. A larger stakeholder group will review in-depth data analysis in spring 2019 and make recommendations regarding the targets previously identified.

To ensure continued fidelity to the Child Outcomes Summary Process, a work group developed a process and procedure for annual fidelity checks of each agency's ratings. This will be fully implemented in 2019.

Child Outcomes Data Completeness: Montana's agencies all developed and implemented strategies to measure data completeness throughout FFY 2017 and document circumstances for a child exiting within six months of entry. An additional data management system enhancement was implemented to identify the number of children who entered and exited the Part C of IDEA Program within six months with a further enhancement to be completed in early 2019. Additional training is needed to ensure the continuous collection of accurate data and will be a priority for FFY 2018.

- Montana data completeness for **FFY 2015**: 414 Child Outcomes Summary records including both a baseline and exit/811 exits recorded = **51%**.
- Montana data completeness for **FFY 2016**: 423 Child Outcomes Summary records including both a baseline and exit/732 exits recorded = **57.78%**.
- Montana data completeness for **FFY 2017**: 401 Child Outcomes Summary records including both a baseline and exit/561 exits (excludes 169 child records who entered and exited the Part C of IDEA Program within six months) recorded = **71%**

Indicator 4: Family Involvement

Monitoring Priority: Early Intervention Services in Natural Environments

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

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

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



FFY 2013 – FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target A ≥	93%	93%	94%	94%	95%	95%
Target B ≥	93%	93%	94%	94%	95%	95%
Target C ≥	88%	93%	94%	94%	95%	95%

FFY 2017	Measurable and Rigorous Target
	<p>A. 95% will report early intervention services have helped the family know their rights</p> <p>B. 95% will report early intervention services have helped the family effectively communicate their child’s needs</p> <p>C. 95% will report early intervention services has helped the family help their children develop and learn</p>

Actual Target Data for FFY 2017 (July 1, 2017 – June 30, 2018):

REPORT OF PROGRESS – INDICATOR 4					
	Measurable and Rigorous Target FFY 2017	Actual Target Data FFY 2017	Met or Not Met	Actual Target Data FFY 2016	Actual Target Data FFY 2015
Indicator 4A	95%	75%	Not met	91.5%	88.98%
Indicator 4B	95%	79%	Not met	94.1%	91.67%
Indicator 4C	95%	74%	Not met	93.46%	87.63%

RAW DATA CALCULATION – INDICATOR 4A		
A	B	C
Total surveys received	Total families reporting that early intervention services have helped their family know their rights.	Percent of families reporting that early intervention services have helped their family know their rights.
471	351	74.52%



RAW DATA CALCULATION – INDICATOR 4B		
A	B	C
Total surveys received	Total families reporting that early intervention services have helped their family communicate their children’s needs.	Percent of families reporting that early intervention services have helped their family communicate their children’s needs.
471	370	78.55%

RAW DATA CALCULATION – INDICATOR 4C		
A	B	C
Total surveys received	Total families reporting that early intervention services have helped their family help their children develop and learn.	Percent of families reporting that early intervention services have helped their family help their children develop and learn.
471	348	73.88%

Methods used in collection of data:

The agencies used the Family Outcomes Survey created by the Office of Special Education Programs, Early Childhood Technical Assistance Center, for FFY 2017 and self-reported the data to the Part C Coordinator. The agencies, when combined, denote an overall state-wide survey return rate of 54%.

The two largest races/ethnicities in Montana are white and American Indian or Alaska Native. Although family surveys do not ask for race/ethnicity, return rates of those contractors serving the largest populations of American Indian or Alaska Native (typically on or near reservations) had sufficient return rates to indicate representation from that race/ethnicity category. In addition, parents from every region are provided opportunity to participate in the survey including rural/remote areas as well as urban areas of Montana. Given the small number of families receiving services for each regional agency, it is difficult to obtain specific information about each family’s characteristics without compromising the disclosure of personally identifiable information.

Slippage:

Although each agency is contractually obligated to inform families of their parental rights and procedural safeguards as well as Montana's System of Payments; fewer families responding to the FFY 2017 Family Survey report that early intervention services helped their family know their rights. A work group, including a researcher from Montana State University, has been formed to analyze the survey data and recommend improvement strategies to increase the percentage of families answering affirmatively. This information will be presented to Montana’s ICC, the FSSAC, along with corrective action steps which may or may not include changing the target. Preliminary findings which may have impacted the slippage identified:

- Inconsistent methods across the five regions of collecting the Family Survey data: varied timelines, varied participants’ experience in Part C at the time of the survey, single methods of obtaining data, paper survey, with varied methods of obtaining completed surveys.



- Inconsistent common understanding of what the family outcomes mean and inconsistent method to inform families of why the data is collected and the reason for its use in program planning.
- Inconsistent return rates across regions which will not provide a reliable data picture of Indicator 4 results. For example, one region distributed 143 surveys and received 46 completed surveys for a return rate of 32% while another region distributed 60 surveys and received 52 completed surveys for a return rate of 87%.

Fewer families responding to the Family Survey in FFY 2017 report that early intervention services have helped the family effectively communicate their children's needs. Beginning in June 2018, each regional agency began working toward consistent multidisciplinary evaluation and assessments teams which include 2 or more professional disciplines and the family. Scaling up has begun across Montana with the expectation that the multidisciplinary evaluation and assessment teams will meet the regulatory requirements consistently by September 2019. Family survey data for this outcome will be monitored closely following the scale-up date by both the State as well as the individual agencies. The data will be presented to the FSSAC to obtain the Council's recommendations.

Fewer families responding to the Family Survey in FFY 2017 report that early intervention helped the family help the child develop and learn. The work group will drill down into the family outcomes identified in IFSPs and analyze the data. The group's analysis, hypothesis, and recommendations will be shared with the FSSAC. Potential corrective action steps to be implemented:

- 1) Training of Family Support Specialists/Service Coordinators in the Family Outcomes;
- 2) Develop process and procedure for explaining the Family Survey and timelines for collecting the Family Survey data from a targeted group of families – at the six-month review; and
- 3) Use an electronic version of the survey which will be submitted to the State. Develop a process and procedure for any family that wishes to complete a paper survey.

Indicator 5: Child Find (Birth to One)

Monitoring Priority: Effective General Supervision Part C / Child Find

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

FFY 2013 – FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target ≤	1.39%	1.43%	1.43%	1.46%	1.46%	1.46%

FFY 2017	Measurable and Rigorous Target: 1.46% of all infants and toddlers, birth to 1, with IFSPs compared to national data, 1.15%
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Actual Target Data for FFY 2017 (July 1, 2017 – June 30, 2018):

REPORT OF PROGRESS – INDICATOR 5					
	Measurable and Rigorous Target FFY 2017	Actual Target Data FFY 2017	Met or Not Met	Actual Target Data FFY 2016	Actual Target Data FFY 2015
Indicator 5	1.46%	1.17%	Not met	1.06%	1.07%

Methods used in collection of data:

Data collected from the State’s data management system, the EI Module, using the *Part C Child Count Report (Table 1)* documenting the number of infants, birth to 1, with IFSPs on November 10, 2017.

Montana’s Raw Data:

149 (infants and toddlers, birth to age one) with IFSPs divided by 12,644* (*2016 U.S. Bureau of Census, 2016 State Population Estimates by Age, Sex, Race and Hispanic Origin) times 100 = 1.17% compared to national data, 1.15%. While improved, **Montana did not meet the target.**

Montana continued to implement two strategies effective FFY 2017:

1. Referrals from CHRIS, an electronic data base for referrals from a variety of health professionals and State health agencies, are received electronically by the Part C Coordinator and conveyed to the individual agencies.
2. An agency’s contractual amounts identify the reimbursable amount for the provision of the regional Part C program based upon child count targets. When the number of children served increase meeting the target, contractors receive a larger reimbursable amount per child. When the number of children served decreases below the target, contractors receive a lower reimbursable amount per child. Targeted technical assistance will be provided to agencies struggling to meet their targets.

For FFY 2018 to increase CAPTA referrals: The Part C Coordinator and Child and Family Services personnel are working on a multi-pronged improvement strategy beginning with professional development of the Child and Family Services case workers to increase their understanding of Part C of IDEA. Secondly, a systemic referral system is being developed. Thirdly, the interagency agreement will be revised to include clarification of roles, the referral process including timelines, and surrogate parents.

Indicator 6: Child Find (Birth to Three)

Monitoring Priority: Effective General Supervision Part C / Child Find

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



FFY 2013 – FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target ≤	2.14%	2.14%	2.20%	2.20%	2.20%	2.25%

FFY 2017	Measurable and Rigorous Target: 2.20% of all infants and toddlers, birth to 3 with IFSPs, compared to national data, 2.95%
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Actual Target Data for FFY 2017 (July 1, 2017 – June 30, 2018):

REPORT OF PROGRESS – INDICATOR 6					
	Measurable and Rigorous Target FFY 2017	Actual Target Data FFY 2017	Met or Not Met	Actual Target Data FFY 2016	Actual Target Data FFY 2015
Indicator 5	2.20%	2.21%	Met	2.33%	1.93%

Methods used in collection of data:

Data collected from the State’s data management system, the EI Module, using the *Part C Child Count Report (Table 1)* documenting the number of children, birth to 3, with IFSPs on November 10, 2017.

Montana’s Raw Data:

842 infants and toddlers, birth to three years of age with IFSPs divided by 37,930* (*2016 U.S. Bureau of Census, 2016 State Population Estimates by Age, Sex, Race, and Hispanic Origin) times 100 = 2.219% compared to national data, 2.95%. **Montana met the target.**

Montana continued to implement two improvement strategies in FFY 2017:

1. Referrals from CHRIS, an electronic data base for referrals from a variety of health professionals and State health agencies, are received electronically by the Part C Coordinator and conveyed to the individual agencies.
2. An agency’s contractual amounts identify the reimbursable amount for the provision of the regional Part C program based upon child count targets. When the number of children served increase meeting the target, contractors receive a larger reimbursable amount per child. When the number of children served decreases below the target, contractors receive a lower reimbursable amount per child. Targeted technical assistance will be provided to agencies struggling to meet their targets.

For FFY 2018 to increase CAPTA referrals: The Part C Coordinator and Child and Family Services personnel are working on a multi-pronged improvement strategy beginning with professional development of the Child and Family Services case workers to increase their understanding of Part C of IDEA. Secondly, a systemic referral system is being developed. Thirdly, the interagency agreement will be revised to include clarification of roles, the referral process including timelines, and surrogate parents.



Indicator 7: 45-day timeline

Monitoring Priority: Effective General Supervision Part C / Child Find

Compliance indicator: Percent of eligible infants and toddlers with IFSPs for whom an initial evaluation and initial assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline. (20 U.S.C. 1416(a)(3)(B) and 1442)

FFY 2013 – FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%	100%

FFY 2017	Measurable and Rigorous Target: 100% of all infants and toddlers eligible for Part C services will have completed evaluation(s) and assessment(s) and an initial IFSP meeting conducted within Part C's 45-day timeline.
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Actual Target Data for FFY 2017 (July 1, 2017 – June 30, 2018):

REPORT OF PROGRESS – INDICATOR 7					
	Measurable and Rigorous Target FFY 2017	Actual Target Data FFY 2017	Met or Not Met	Actual Target Data FFY 2016	Actual Target Data FFY 2015
Indicator 7	100%	99.5%	Not met	99.5%	93%

RAW DATA CALCULATION – INDICATOR 7				
A	B	C	D	E
Total child records reviewed	Children with timely evaluation and assessment and initial IFSP.	Children with evaluation and assessment and initial IFSP completed more than 45 days from the child's referral, with documented exceptional family circumstances that caused the delay.	Percent of children with timely evaluation and assessment and initial IFSP or there is a documented exceptional family circumstance that caused the delay in the completion of the evaluation and assessment and initial IFSP.	Children whose evaluation and assessment and initial IFSP were held more than 45 days from the date of the referral for reasons other than documented exceptional family circumstances.
2025	1933	82	99.5%	10



82 IFSPs documented exceptional family circumstances: the child or parent was unavailable at the initial evaluation, the initial assessments of the child and family, or the initial IFSP meeting due to exceptional family circumstances documented in the early intervention records (the IFSP in the EI Module); or the parent did not provide consent for the initial evaluation or the initial assessment, despite documented and repeated attempts by the contracted providers' personnel to obtain parent consent.

10 IFSPs completed after the 45-day timeline did not meet this criterion. 2/10 did not include sufficient documentation in the early intervention records and 8/10 were attributed to two specific staff members.

Methods used in collection of data:

Data is collected from the State's data management system, the EI Module, using the *Part C IFSP Status Report*, documenting the number of children whose IFSPs were not completed within 45 days from their referral date along with reasons for lateness. IFSPs are date-stamped when submitted into the EI Module signifying completion of the IFSP including parent consent providing documentation of compliance to the 45-day timeline.

Correction of Findings of Non-Compliance for FFY 2017:

Each agency is contractually obligated to implement, monitor, and assess Indicator 7 effective January 2018.

All 10 incidences of non-compliance were reviewed to ensure the IFSP was completed and the early intervention services identified were initiated.

The agency identifying eight records as non-compliant had, throughout the year, performed data analysis within their internal monitoring process to discover the eight non-compliant records were attributed to two specific staff members. The agency's administrative team provided the following information to the Part C Coordinator:

- One staff member left employment with the agency; and
- One staff member received a corrective action plan, including the regulatory requirements, which is being monitored to ensure compliance.

The agency identifying two records as non-compliant due to inadequate documentation in the early intervention records. The agency's personnel provided training to their Family Support Specialists/Service Coordinators in July 2017 regarding the regulatory requirements. Following training, the agency's internal monitoring indicates that all IFSPs completed after 45 days include sufficient information to document extenuating family circumstances.

Correction of Findings of Non-Compliance for FFY 2015:

All 12 incidences of non-compliance were reviewed to ensure the IFSP was completed and the early intervention services identified were initiated.



Follow-up training was provided to all contracted agencies focusing upon the regulatory requirements and Montana's methods to monitor the requirements. The State's training for Family Support Specialists/Service Coordinators targeted:

- Required documentation for extenuating family circumstances; and,
- EI Module database timelines including articulating the date stamping business rule for an IFSP when submitted to signify parent consent.

Of the 12 child records found out of compliance, four records were lacking in appropriate documentation within the database. Upon further review of the hard-copy records, the following was found:

- 2/12 no reasons for missing the timeline identified; IFSPs submitted on the 46th and 65th day.
- 2/12 IFSP documentation did not include the extenuating family circumstances causing the inability to complete family assessment; IFSPs submitted on the 47th day and the 60th day.
- 1/12 was found to comply based upon the parent's wet signature date; however, it was entered into the data management system late. Therefore, the automatic date stamp identified the IFSP as out of compliance.

The remaining seven records were found out of compliance due to specific agency reasons:

- 3/12 Family Support Specialist/Service Coordinator received child's file after the 45th day; IFSPs submitted on the 57th day, 63rd day, and 77th day.
- 2/12 Staff turnover; IFSPs submitted on the 57th and 76th day.
- 2/12 Late Intake and Eligibility Review Panel meeting; IFSPs submitted on the 46th day and the 60th day.

Each agency was informed of the specific regulatory requirements acknowledging the agency is responsible for ensuring compliance with the 45-day timeline or documenting the family's extenuating circumstances that led to missing the timeline. In response to contractual obligations, each agency implemented internal monitoring systems including timelines to ensure compliance and work toward eliminating late receipt of files by Family Support Specialists/Service Coordinators. They were also required to identify a means to ensure staff turnover did not negatively impact a child and family's right to a multidisciplinary evaluation, child and family assessment, and initial IFSP meeting within 45-days.

In accordance with OSEP Memo 09-02, Montana was able to verify that Indicator 7 results follow regulatory requirements. Following training focused on the regulatory requirements, each agency implemented internal monitoring systems including timelines to ensure compliance as well as work toward eliminating late receipt of files by Family Support Specialists/Service Coordinators. They were also required to identify a means to ensure staff turnover did not negatively impact a child and family's right to a multidisciplinary evaluation, child and family assessment, and initial IFSP meeting within 45-days. Agency personnel monitored updated Indicator 7 data using the *Part C IFSP Status Report* at least quarterly but often more frequently dependent upon the individualized needs of the Family Support Specialist/Service Coordinator to verify that the regulatory requirements were met. The Part C Coordinator followed up quarterly with her own review using updated Indicator 7 data (*Part C IFSP*



Status Report) to ensure and verify that each contracted agency was in full compliance or corrective action steps were taken.

Indicator 8: Early Childhood Transition

Monitoring Priority: Effective General Supervision Part C / Child Find

Compliance indicator: The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:

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

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

FFY 2013 – FFY 2018 Targets

FFY	2013	2014	2015	2016	2017	2018
Target	100%	100%	100%	100%	100%	100%

FFY 2017	Measurable and Rigorous Target
	<p>100% of all children exiting Part C will receive timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including.</p> <ul style="list-style-type: none"> A. 100% IFSPs with transition steps and services developed at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler’s third birthday; B. 100% Notification (consistent with the opt-out policy adopted by the State) to LEA/SEA 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. 100% Transition conference occurred with the approval of the family at least 90 days, and at the discretion of all parties, not more than nine months, and prior to the toddler’s birthday for toddlers potentially eligible for Part B preschool services.



Actual Target Data for FFY 2017 (July 1, 2017 – June 30, 2018):

REPORT OF PROGRESS – INDICATOR 8					
	Measurable and Rigorous Target FFY 2017	Actual Target Data FFY 2017	Met or Not Met	Actual Target Data FFY 2016	Actual Target Data FFY 2015
Indicator 8A	100%	100%	Met	97.3%	89%
Indicator 8B	100%	100%	Met	100%	92%
Indicator 8C	100%	100%	Met	100%	88%

RAW DATA CALCULATION – INDICATOR 8A			
A	B	C	D
Total child records reviewed.	Children with transition steps and services to support the child’s transition developed at least 90 days and not more than nine months prior to the child’s third birthday.	Children with transition plans that do not include steps and services to support the child’s transition.	Percent of children with transition plans including steps and service developed at least 90 days and not more than nine months prior to the child’s third birthday.
443	443	0	100%
4/443 transitions were for children that were determined eligible for Part C of the IDEA more than 45 days but less than 90 days before the child’s third birthday and the LEA was notified.			

RAW DATA CALCULATION – INDICATOR 8B				
A	B	C	D	E
Total child records reviewed.	Children whose families opted out of notification.	Children with notification to the LEA/SEA at least 90 days prior to the child’s third birthday.	Children for whom the LEA/SEA was not notified (excluding children whose families opted out of notification).	Percent of children with notification to the LEA/SEA at least 90 days prior to the child’s third birthday.
447	20	427	0	100%



RAW DATA CALCULATION – INDICATOR 8C				
A	B	C	D	E
Total child records reviewed.	Children for whom the family did not provide approval to conduct the transition conference due to exceptional family circumstances.	Total child records reviewed less the children for whom the family did not provide approval to conduct the transition and the transition conference was not held due to exceptional family circumstances.	Children with timely transition conference, at least 90 days and not more than nine months prior to the child’s third birthday	Percent of children with timely transition conference, at least 90 days and not more than nine months prior to the child’s third birthday, if child potentially eligible for Part B.
337	59	278	278	100%
59/337 records reviewed documented exceptional family circumstances.				

Methods used in collection of data:

Data for FFY 2017 collected from the State’s data management system, the EI Module, using:

- *Infants and Toddlers Exiting Part C Report*
- *Part B Services Report*
- *Part C Transition Conferences Report*
- *Part C Notification of Potentially Eligible Children Report*

The State's data management system, the EI Module, requires the inclusion of a transition outcome with transition steps and services in every IFSP not more than nine months before the toddler's third birthday. This data is recorded in the system's *Infants and Toddlers Exiting Part C Report*. Enhancements are underway in the EI Module to include a transition planning document at the transition work group's recommendation expected to lead to more comprehensive transition planning.

Correction of Findings of Non-Compliance for FFY 2016:

Each agency is contractually obligated to implement, monitor, and assess Indicator 8 effective January 2018.

Incidence of noncompliance for Indicator 8A (1/115) was reviewed with the individual agency personnel. Inconsistencies within each agency in how transition data was recorded and by whom were identified. A work group made up of representatives from each agency was formed who developed the following outputs to ensure specific regulatory requirements are implemented and then monitored:

- Training: *Documenting Exits for Part C of the IDEA* (includes regulatory requirements);



- Training: *Transition Process and Procedure* (includes regulatory requirements);
- Revision of IFSP to include a Transition Plan including outcomes, timelines, and strategies; and
- Revision of the Transition Invitations to include invitations to LEA personnel as well as other individuals or agencies.

Indicator 8A: The single record in FFY 2016 that did not include a transition plan with steps and services to support the child's transition was unable to be corrected as the child was no longer enrolled in the Part C program. However, training was provided to all agencies to ensure the regulatory requirements around the transition process and procedure were met and documented in the State's database. Additionally, the database itself was refined and modified for the documentation of transition planning with steps and services along with a guidance document to support Family Support Specialists in following the regulatory requirements. In accordance with OSEP Memo 09-02, Montana's Part C Coordinator was able to verify that Indicator 8A is in full compliance based upon updated data reviewed from four sources: *Infants and Toddlers Exiting Part C Report*; *Part B Services Report*; *Part C Transition Conferences Report*; and *Part C Notification of Potentially Eligible Children Report*. Each regional agency also continues to verify ongoing transition plan data through monthly monitoring to ensure compliance.

Indicator 8B: Correction of Non-Compliance FFY 2015 erroneously identified as FFY 2016.

2/130 files reviewed did not identify any reasons for why the LEA/SEA was not notified at least 90 days prior to the child's third birthday. No corrections were made as the children were no longer enrolled in the Part C program. However, upon further analysis in FFY 2016, a database system error was identified that was rectified by the database contractor's technical assistance team that may have caused the omission of the LEA/SEA notification. No additional documentation from the children's files could be found to verify the system error was the culprit for the missing notifications. Agencies were informed of how to generate notifications to the SEA and LEA using the EI Module functionality with the expectation the EI Module will be used consistently across all agencies for this purpose. Training for each agency was completed in September 2018. Therefore, all agencies agreed to monitor ongoing Indicator 8B data using reporting obtained from the database to ensure notification regulatory requirements were met within the timeline described. Ongoing monitoring by the Part C Coordinator and each agency's representative verify the updated data continues to follow the regulatory requirements as per OSEP Memo 09-02.

Indicator 9: Resolution Sessions

Monitoring Priority: Effective General Supervision Part C / General Supervision

Results indicator: Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements (applicable if Part B due process procedures are adopted). (20 U.S.C. 1416(a)(3)(B) and 1442)

This indicator is not applicable to Montana as the Part B due process procedures have not been adopted.



Indicator 10: Mediation

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

Montana did not have any complaints resolved through mediation agreements for FFY 2017.