

**Part C State Annual Performance Report (APR) for FFY 2011****Overview of the Annual Performance Report Development:**

The CNMI Public School System (PSS), Early Intervention (IDEA Part C) facilitated a process for ensuring broad stakeholder involvement in the development of the CNMI IDEA Part C 2011-2012 Annual Performance Report (APR). Stakeholders included the Interagency Coordinating Council (ICC), early intervention staff and the Board of Education. The review process included a discussion of OSEP's CNMI Part C determination letter issued on July 2012, the response table, current performance data, and improvement activities. In order to evaluate the effectiveness of SPP Improvement activities, stakeholders were presented with the CNMI trend data for each Indicator. The *Evaluating SPP/APR Improvement Activities-12/16/09* resource from the National Early Childhood Technical Assistance Center and the Regional Resource Center (RRC) Program was reviewed for prioritizing areas of focus for improving performance. As noted in the Improvement Activity Table for each indicator, the improvement activities are organized in several categories that the stakeholders felt would have an impact on the indicator data. With technical assistance provided by the University of Guam Center for Excellence in Developmental Disabilities Education, Research, and Service (Guam CEDDERS), the stakeholders reviewed the trend data from each indicator and engaged in a discussion of the indicator progress or slippage, previous year's activities, and whether the improvement activities needed to be revised, deleted, continued, or moved to another indicator.

The development of the 2011-2012 APR included the following activities:

- **July 2012:** OSEP's Part C "Determination" Letter and Response Table were disseminated to the Interagency Coordinating Council, the CNMI Board of Education and Early Intervention program staff. The Determination Letter and Response Table were also posted on the PSS website for public dissemination.
- **August 27, 2012:** Public School System State level professional development for early intervention personnel. OSEP's June 27, 2012 determination letter and response table were shared with the early intervention personnel as well as preliminary discussions regarding OSEP's view on results data.
- **October 9-11, 2012:** CNMI participated in the "WRRC Regional Leadership Forum" sponsored by the Western Regional Resource Center (WRRC). The focus of the forum was to discuss the implications of OSEP's new Results Driven Accountability (RDA) system and how the Pacific jurisdictions were going to meet the new requirements. The forum included conference calls with OSEP representatives on fiscal accountability and how results driven accountability will be used in the upcoming determinations. A second conference call with OSEP provided an opportunity for OSEP to discuss the APR and SPP revisions for this year's reporting due in February 2013.
- **November 16 and December 19, 2012:** Preliminary APR data were shared and discussed with ICC members and early intervention staff during a regularly scheduled ICC meetings. Using the *5 Why Analysis*, ICC members and EI staff engaged in meaningful conversations to drill down the data in an effort to determine the root cause of slippage in some indicators. Upon identifying the reasons why, the ICC used CREI (Concern, Requirement, Evidence, Impact) Problem Statement template as a way to determine future improvement activities the ICC used this method to select priorities for the PSS. Guam CEDDERS provided technical support during CNMI's ICC meeting,
- **December 19, 2012:** Guam CEDDERS provided technical support during CNMI's ICC meeting and EI staff are the main stakeholder group for CNMI's Part C Program. Guam CEDDERS presented information on OSEP's Results Driven Accountability and how OSEP will make determinations in 2012-2013. ICC members reviewed the DRAFT FFY 2011 APR with the trend data presented for each indicator in comparison with national data. ICC members provided input to the APR and agreed that the targets should remain as presented last year. ICC feedback on the APR has been incorporated into the final APR for submission.

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- **January 29, 2013:** The Early Intervention (EI) Interim Coordinator discussed and prioritized specific improvement activities with the EI staff based on the conversation with the ICC in December 2012. The focus of this discussion was to determine the roles and responsibilities of the EI staff during specific improvement activities. The discussion also included the program's standard operating procedures as well as the program's priorities, based on the FFY 2011 APR data.
- **February 11, 2013:** The EI Interim Coordinator met with the Commissioner of Education and the Associate Commissioner for Curriculum, Instruction and Assessment to discuss final revisions to the FFY 2011 APR prior to submitting the FFY 2011 APR to the Board of Education for Adoption.
- **February 13, 2013:** The FFY 2011 APR was submitted to the Instructional Services and Assessment (ISA) subcommittee of the Board of Education for review and approval.
- **February 14, 2013:** The Board of Education approved the CNMI FFY 2011 Part C APR.

**OSEP Memorandum 13-7, December 12, 2012**

OSEP Memorandum 13-7 provided additional instructions for the development of the FFY 2011 APR. OSEP provided options for each state/entity to consider in the APR development. CNMI Part C is reporting the following options chosen:

- **Indicator 8:** CNMI Part C did not elect to implement the IDEA Part C Final Regulation during FFY 2011. Indicator 8 is based on the regulations as they existed prior to the revisions related to transition in the Final Regulations.
- **Indicator 14:** CNMI Part C chooses to wait for OSEP's calculation of CNMI's compliance with Indicator 14 requirements. As communicated by OSEP during the December 2012 TA call, states/entities will have an opportunity to respond to OSEP's Indicator 14 calculation during "clarification" period anticipated in April 2013.
- **Improvement Activities:** CNMI Part C chooses to keep the same format for its improvement activities under each indicator as in previous years, instead of creating one set of improvement activities for the APR referenced to each indicator.

CNMI will continue to use the following format to report on improvement activities within each Indicator. The improvement activities are organized by areas of priority needs for improvement and color-coded to show the "status" of each improvement activity. Not all indicators utilized every category of improvement as there might not have been a need for that indicator. The improvement activities listed as "completed" in the 2010-2011 APR (color coded in pink) were removed from this APR.

The improvement categories identified are as follows:

Improve Data Collection and Reporting  
Improve Administration and Monitoring  
Review Policies and Procedures  
Training and Professional Development  
Provide Technical Assistance  
Collaboration and Coordination  
Increasing and or Adjusting FTE's  
Other

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The following table displays the “status” of the improvement activity with the color codes:

Completed	Rose
Continuing	Lavender
Revised	Light Blue
New	Light Green
Moved or Deleted	Yellow

**Public Dissemination**

- By February 15, 2013, the CNMI will update the complete revised SPP with the status of improvement activities reported in the FFY 2011 APR. The complete revised SPP will be posted with the APR on the PSS website at: [http://www.cnmipss.org/?page\\_id=925](http://www.cnmipss.org/?page_id=925).
- By June 30, 2013, upon receipt of OSEP’s Determination Letter and Response Table for CNMI’s FFY 2011 (2011-2012) Part C APR, CNMI PSS will post OSEP’s Determination Letter and Response Table with CNMI’s FFY 2011 Part C APR and complete revised SPP on the PSS website at: [http://www.cnmipss.org/?page\\_id=925](http://www.cnmipss.org/?page_id=925) for the SPP/APR and [http://www.cnmipss.org/?page\\_id=710](http://www.cnmipss.org/?page_id=710) for the Determination Letters.

CNMI will disseminate and make available hard copies of CNMI’s IDEA Part C 2011-2012 APR to the CNMI Interagency Coordinating Council (ICC), parents, and public and private agencies/ organizations, including, at least, the following:

The CNMI Office of the Governor	Community Guidance Center
The CNMI Legislative Committee on Education	State Mental Health Planning Council
Offices of the Mayor for Saipan, Rota, and Tinian	CNMI Traumatic Brain Injury Project
Public School System Board of Education	Commonwealth of Autism Commission
Department of Public Health	State Independent Living Council
Secretary of Commonwealth Health Center	State Rehabilitation Council
The Protection and Advocacy System Office	Office of Vocational Rehabilitation
The Developmental Disabilities Council	

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**Overview of the Annual Performance Report Development:**

Refer to page 1 of this APR for development description.

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

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

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

**Measurement:**  
 Percent = [(# of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner) divided by the (total # of infants and toddlers with IFSPs)] times 100.  
  
 Account for untimely receipt of services, including the reasons for delays.

FFY	Measurable and Rigorous Target
<b>2011 (2011-2012)</b>	100% of infants and toddlers with an IFSP will receive EI services on their IFSP in a timely manner

**Actual Target Data for FFY 2011 (2011 - 2012):**

Data reported for the period of July 1, 2011 to June 30, 2012

a.	b.	c.	d.	e.	f.
Total # of children with an initial and/or subsequent IFSP who should have received all services in a timely manner.	# of children with an Initial and/or subsequent IFSP with <b>ALL</b> Services Received in a Timely Manner.	# of children with Initial and/or subsequent IFSPs with Untimely Services.	Of # in (c), # of children with an Initial and/or subsequent IFSP with Untimely Services due to a Valid Reason (exceptional family circumstance).	Of # in (c), # of children Initial and/or subsequent IFSP with Untimely Services due to an Invalid reason (To be accounted for).	# and % of children with Initial and/or subsequent IFSP with ALL Services Received in a Timely Manner (plus Untimely due to Valid Reason) % = (b + d/a x 100).
<b>38</b>	<b>32</b>	<b>6</b>	<b>6</b>	<b>0</b>	(32+6)/38 x 100= <b>100%</b>

- Column (a) is the total number of children with an initial and/or subsequent IFSP who should have received services in a timely manner. Services include initial and any other services added to the IFSP during the report period of July 1, 2011 to June 30, 2012.
- Column (b) is the total number of children with an initial and/or subsequent IFSP with ALL services provided in a timely manner.
- Column (c) is the total number of children with an initial and/or subsequent IFSP with untimely services.
- Column (d) is the total number of children with initial and/or subsequent IFSP with untimely services due to a valid reason (exceptional family circumstance or circumstance beyond the program control).
- Column (e) is the total number of children who did not receive service in a timely manner due to an invalid reason (to be accounted for).

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- Column (f) is the percent of children with an initial and/or subsequent IFSP who received all services in a timely manner, including untimely, due to valid reasons.

Timely Service Data reported for the period of July 1, 2011 to June 30, 2012 is taken from the database of the total count. The CNMI performance was 38/38 or 100% with timely IFSP services. There were 6 untimely services. However, the delays were due to exceptional family circumstances as described in Table 1 below. The CNMI’s definition of Exceptional Family Circumstances is consistent with OSEP’s November 2010 definition. CNMI includes exceptional family circumstances to both the numerator and denominator.

Table 1: Reasons Due to Exceptional Family Circumstances

Number of Families	Reasons due to Exceptional Family Circumstances (Valid Reasons) 2011 - 2012
4	Families requested to reschedule Initial service due to child and/or parent illness, family off Island or other appointments that could not be rescheduled.
2	Families no show or not home and no call.

CNMI Definition of Timely Service:

The CNMI’s definition of “Timely Services” is the “initial start-date” on the IFSP which is established by the IFSP team, including the parent. There are no other allowable time periods such as 30 days from when the parent consent to each service. Parents and EI providers decide the start date of each service. The discussion typically involves taking into consideration parents work schedules or events the child and family may be involved in or child care schedules.

**Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2011:**

**CNMI met the target** for indicator 1, and therefore, as per **OSEP’s Memorandum 13-7**, CNMI is not required to provide an explanation of: a) progress; b) no change in actual target data from the data for FFY 2010; or c) slippage.

**OSEP FFY 2010 APR Response Table, June 2012:**

OSEP appreciates CNMI’s efforts in achieving compliance with the timely service provision requirements in 34 CFR §§303.340(c) 303.342(e) and 303.344(f)(1).

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2012:** This is a compliance indicator therefore the targets were not revised.

**CNMI met the target** for indicator 1, and therefore, as per **OSEP’s Memorandum 13-7**, CNMI is not required to discuss improvement activities for: a) compliance indicators where the State reports 100% compliance for FFY 2011; and b) results indicators where the State has met its FFY 2011 target.

As discussed on page 2 of this APR, the improvement activities are organized by areas of priority needs for improvement and color coded to show the “status” of each improvement activity. The following table displays the “status” of the improvement activity with the color codes:

Completed	Rose
Continuing	Lavender
Revised	Light Blue
New	Light Green
Moved or Deleted	Yellow

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2012-2013 IMPROVEMENT ACTIVITY TABLE

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
Improve Data Collection and Reporting	Conduct internal monitoring procedures (random file reviews) to ensure procedures are followed and infants and toddlers receive early intervention services as stated on their IFSP's in a timely manner.	Monthly through FFY 2012	Data Manager	<u>Continuing</u> 2012- 2013
	Conduct "random" observations of initial and annual IFSP meetings to ensure decisions regarding service start dates are based on family need.	Monthly Beginning September 2010 through FFY 2012	EI Coordinator	<u>Continuing</u> 2012 - 2013
Improve Administration and Monitoring	To ensure identification and immediate correction of non-compliances, IFSP's are reviewed by the data manager and expected service start dates are logged into the data base. Upon completion of the initial service, the dated <i>Initial Service Form</i> is submitted to data manager. The database calculates the dates. If a service is not provided as stipulated in the IFSP, a <i>Reason for Delay</i> form must be attached which will indicate the reason for the delay. If the reason is due to a family circumstance, the database will indicate "valid."	July 2010 July 2011 July 2012 July 2013	Data Manager	<u>Continuing</u> 2012 - 2013
	Service Coordinators continue to verify EI personal calendars and monthly calendars that are sent home to families.	Upon Completion of the IFSP through FFY 2012	Service Coordinators	
Review and Revise Policies and Procedures	Review policies, procedures, and practices and revise if necessary to ensure alignment with regulations and make changes and/or corrections to procedures.	Annually in June 2010 June 2011 June 2012 June 2013	EI Coordinator  EI Coordinator and EI Staff	<u>Continuing</u> 2012 - 2013
Training and Professional Development	Conduct training on the IFSP process to ensure compliance requirements are met on the implementation of the EI procedures.	Annually in September 2010, 2011, 2012	EI Coordinator	<u>Continuing</u> 2012 - 2013
	Conduct training for parents, ICC members and EI staff on the revised policies and procedures that align with the new Part C IDEA 2011	March 2012 and Annually thereafter through FFY 2012	EI Coordinator	<u>Continuing</u> 2012 - 2013

**Part C State Annual Performance Report (APR) for FFY 2011**

**Overview of the Annual Performance Report Development:**

Refer to page 1 of this APR for development description.

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

**Indicator 2:** Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings. (20 U.S.C. 1416(a)(3)(A) and 1442)

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

FFY	Measurable and Rigorous Target
<b>2011 (2011-2012)</b>	On December 1, 2011, 96% of infants and toddlers with IFSP will receive early intervention services in the home or community-based settings.

**Actual Target Data for FFY 2011 (2011-2012):**

a.	b.	c.	d.
618 Reported Data Submitted February 1, 2011	Total # of Children with an IFSP	# of Children Served at Home or Community-based settings	% of Children Served at Home or Community-based settings
<b>December 1, 2011</b>	<b>40</b>	<b>39</b>	39/40 x 100 = <b>97.5%</b>

*Data Source: Table 2 of Information Collection 1820-0557 (618 Data Table collected on December 01, 2011)*

On December 1, 2011, the CNMI served a total of 40 infants and toddlers with disabilities. Thirty-nine (39/40) or 97.5% received EI services primarily in their homes or in community-based settings. Based on the 2011-2012 performance, the CNMI **exceeded its target** of 96%. One child, 18 months old received services at the Children’s Developmental Assistance Center (C\*DAC) at the time the child count was taken.

**Data Collection and Verification:**

In order to ensure IFSP teams make service-setting decisions on an individualized basis and adhere to regulations regarding the natural environment requirements, a file review was conducted on the 1 IFSP where services were provided in settings other than the home or community settings. The IFSP did include a justification for the service location based on the family’s request. Although there is no requirement to increase this percentage, services are provided in the child’s natural environment including child care settings.

**Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2011:**

**CNMI met the target** for indicator 2, and therefore, as per **OSEP’s Memorandum 13-7**, CNMI is not required to provide an explanation of: a) progress; b) no change in actual target data from the data for FFY 2010; or c) slippage.

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**OSEP FFY 2010 APR Response Table, June 2012:**

CNMI's FFY 2010 data for provision of services to infants and toddlers in natural environments are at or greater than 95%. There is no expectation that an increase in that percentage is necessary. OSEP appreciates CNMI's efforts to improve performance and assumes that CNMI is monitoring to ensure that IFSP teams are making service setting decisions on an individualized basis and in compliance with 34 CFR § § 303.12, 303.18, and 303.344 (d) (I) (ii).

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2012: The CNMI will not revise its targets at this time.**

**CNMI met the target** for indicator 2, and therefore, as per **OSEP's Memorandum 13-7**, CNMI is not required to discuss improvement activities for: a) compliance indicators where the State reports 100% compliance for FFY 2011; and b) results indicators where the State has met its FFY 2011 target.

As discussed on page 2 of this APR, the improvement activities are organized by areas of priority needs for improvement and color coded to show the "status" of each improvement activity. The following table displays the "status" of the improvement activity with the color codes:

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**2012-2013 IMPROVEMENT ACTIVITY TABLE**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
Improve Administration and Monitoring	Conduct internal monitoring procedures (random file reviews) to ensure procedures are followed and infants and toddlers receive early intervention services as stated on their IFSP's in a timely manner in their natural environment.	Monthly random file checks through FFY 2012	EI Coordinator and Data Manager	<u>Continuing</u> 2012 - 2013
	Continue to conduct random observations of IFSP meetings to ensure conversations regarding service locations are based on family preference and need.	Quarterly on a random schedule through FFY 2012	Data Manager And EI Coordinator	<u>Continuing</u> 2012 - 2013
Training and Professional Development	Continue to provide staff development opportunities in order to attain or maintain certification requirements	March 2010 March 2011 March 2012	EI Coordinator	<u>Continuing</u> 2012 - 2013
	Continue to provide staff development opportunities on EI Services in Natural Environments, Family Centered Services and Outcome Measurements.			All PSS staff is required to maintain 60 hours of PD per year (PSS provides 10 Professional Development days per year).

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Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
	Provide training and professional development on quality practices in early intervention and attendance and participation in the Measuring and Improving Child and Family Outcomes.	September 2012	EI Providers	<u>Continuing</u> 2012 - 2013
	Continue training on new Teacher Evaluation including self-assessment to new providers.	December 2012	EI Coordinator	<u>Continuing</u> 2012 - 2013
	Continue training for parents, ICC members and EI staff on the revised policies and procedures that align with the new Part C regulations as amended in September 2011.	March 2012	EI Coordinator Resource: Guam CEDDERS, ECTAC	<u>Continuing</u> 2012 - 2013

**Part C State Annual Performance Report (APR) for FFY 2011**

**Overview of the Annual Performance Report Development:**

Please see page 1 of this APR for description of report development.

**Monitoring Priority:** Early Intervention Services in Natural Environment

**Indicator 3:** Percent of infants and toddlers with IFSPs who demonstrate improved:  
 A. Positive social-emotional skills (including social relationships);  
 B. Acquisition and use of knowledge and skills (including early language/communication); and  
 C. Use of appropriate behaviors to meet their needs.

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

**Measurement:**  
 Outcomes:  
 A. Positive social-emotional skills (including social relationships);  
 B. Acquisition and use of knowledge and skills (including early language/communication); and  
 C. Use of appropriate behaviors to meet their needs.  
 Progress categories for A, B and C:  
 a. Percent of infants and toddlers who did not improve functioning = [(# of infants and toddlers who did not improve functioning) divided by (# of infants and toddlers with IEPs 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 (# of infants and toddlers with IEPs 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 IEPs 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 IEPs 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 IEPs assessed)] times 100.

**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.

**Table 1: Target Data and Actual Target Data for FFY 2011 (2011 - 2012):**

Summary Statements	Targets FFY 2011 (% of children)	Actual FFY 2011 (% of children)
<b>Outcome A: Positive social-emotional skills (including social relationships)</b>		
1. Of those infants and toddlers who entered or exited early intervention below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program.	77%	$(c + d) / (a + b + c + d)$ $(6 + 4) / (0 + 7 + 6 + 4)$ <b>10/17 = 58.8%</b>
2. The percent of infants and toddlers who were functioning within age expectations in Outcome A by the time they turned 3 years of age or exited the program.	65%	$(d + e) / \text{TOTAL}$ $(4+6)/23$ <b>10/23 = 43.5%</b>

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Summary Statements	Targets FFY 2011 (% of children)	Actual FFY 2011 (% of children)
<b>Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>		
1. Of those infants and toddlers who entered or exited early intervention below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program.	55%	$(c + d) / (a + b + c + d)$ $(9 + 7) / (0 + 6 + 9 + 7)$ <b>16/22 = 72.7%</b>
2. The percent of infants and toddlers who were functioning within age expectations in Outcome B by the time they turned 3 years of age or exited the program.	33%	$(d + e) / \text{TOTAL}$ $(7+1)/23$ <b>8/23 = 34.8%</b>
<b>Outcome C: Use of appropriate behaviors to meet their needs</b>		
1. Of those infants and toddlers who entered or exited early intervention below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program.	82%	$(c + d) / (a + b + c + d)$ $(7 + 11) / (0 + 2 + 7 + 11)$ <b>18/20 = 90%</b>
2. The percent of infants and toddlers who were functioning within age expectations in Outcome C by the time they turned 3 years of age or exited the program.	77%	$(d + e) / \text{TOTAL}$ $(11+3)/23$ <b>14/23 = 60.9%</b>

Progress Data for Part C Children FFY 2011

A. Positive social-emotional skills (including social relationships):	Number of children	% of children
a. Percent of children who did not improve functioning	0	<b>0%</b>
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	7	$(7/23) = 30.4\%$
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	6	$(6/23) = 26.1\%$
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	4	$(4/23) = 17.4\%$
e. Percent of children who maintained functioning at a level comparable to same-aged peers	6	$(6/23) = 26.1\%$
Total	N = 23	<b>100%</b>
B. Acquisition and use of knowledge and skills (including early language/communication):	Number of children	% of children
a. Percent of children who did not improve functioning	0	0%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	6	$(6/23) = 26.1\%$
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	9	$(9/23) = 39.1\%$
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	7	$(7/23) = 30.4\%$
e. Percent of children who maintained functioning at a level comparable to same-aged peers	1	$(1/23) = 4.3\%$
Total	N = 23	<b>100%</b>
C. Use of appropriate behaviors to meet their needs:	Number of children	% of children
a. Percent of children who did not improve functioning	0	0%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	2	$(2/23) = 8.7\%$
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	7	$(7/23) = 30.4\%$
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	11	$(11/23) = 47.8\%$
e. Percent of children who maintained functioning at a level comparable to same-aged peers	3	$(3/23) = 13.0\%$
Total	N = 23	<b>100%</b>

**Part C State Annual Performance Report (APR) for FFY 2011****Outcome A: Positive Social-Emotional Skills**

- **Summary Statement 1:**
  - CNMI performance was **58.8%** (10/17). The CNMI did not meet its target of 77% of infants and toddlers who substantially increased in their rate of growth by the time they turned 3 years of age or exited the program.
- **Summary Statement 2**
  - **43.5%** (10/23) of the infants and toddlers were functioning within age expectation by the time they turned 3 years of age or exited the program. The CNMI did not meet the target of 65%.

**Outcome B: Acquisition and Use of Knowledge and Skills**

- **Summary Statement 1:**
  - CNMI performance was **72.7%** (16/22) . The CNMI exceeded its target of 55% of infants and toddlers who substantially increased their rate of growth by the time they turned 3 years of age or exited the program.
- **Summary Statement 2:**
  - **34.8%** (8/23) of the infants and toddlers were functioning within age expectation by the time they turned 3 years of age or exited the program. The CNMI exceeded the target of 33% for this year.

**Outcome C: Use of Appropriate Behaviors to Meet Their Needs**

- **Summary Statement 1:**
  - CNMI performance was **90.0%** (18/20). The CNMI exceeded its target of 82% of infants and toddlers who substantially increased their rate of growth by the time they turned 3 years of age or exited the program.
- **Summary Statement 2:**
  - CNMI performance was **60.9%** (14/23). The CNMI did not meet its target of 77% of infants and toddlers functioning within age expectation by the time they turned 3 years of age or exited the program.

**Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2011:**

The CNMI uses the Early Childhood Child Outcome Summary Form to report on a child's progress in the three outcome requirements. A child who rates 6 or 7 is considered to be "comparable to age peers." The "Outcome Team" is the IFSP team, including the parent, who incorporates the Outcome Measurement process into the IFSP process. The CNMI continues to use the Hawaii Early Learning Profile (HELP) as a formal measurement tool with other assessment data such as, but not limited to, parent interview, medical reports, and observations. The CNMI's Part C Eligibility does not include infants and toddlers who are at risk.

The CNMI monitors the Early Childhood Outcome Measurement System to ensure the data is accurate, includes all children who meet the criteria for the measurements, and are conducted within specified timelines. The CNMI has not changed the measurement system, but continues to refine the process for gathering information from parents and other caregivers.

The CNMI will continue to use the Early Childhood Outcomes (ECO) format to calculate the OSEP reporting requirements and will make changes to the database as necessary. The Data Manager inputs measurements 1 and 2 into the ECO format that provides the number and percent of infants and toddlers in the five measurement categories in the three early childhood outcomes measures. In addition, the ECO format provides the percent of infants and toddlers who entered below age expectation and who substantially increased their rate of growth at the time they exited the program (Summary Statement 1) and the percent of infants and toddlers who were functioning within age expectation by the time they

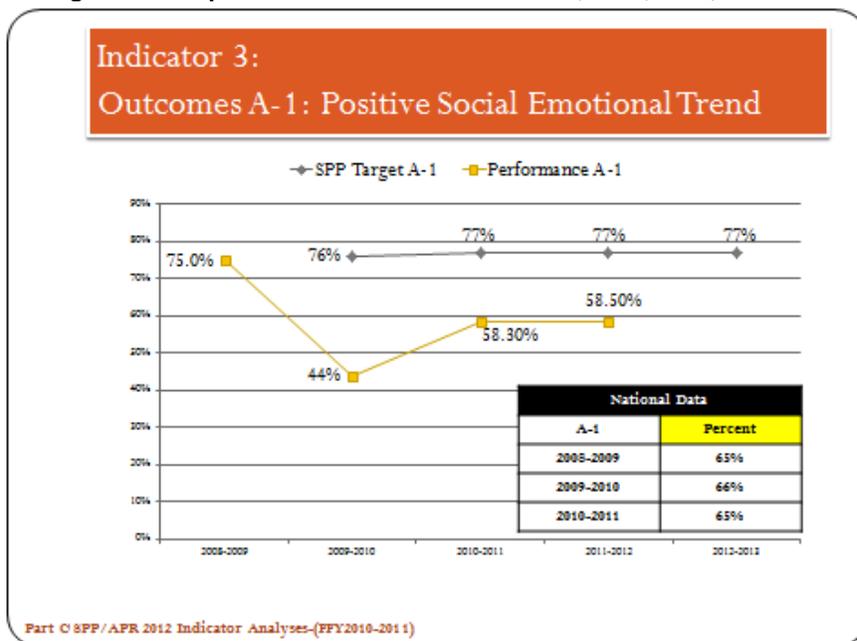
**Part C State Annual Performance Report (APR) for FFY 2011**

exited the program (Summary Statement 2). The Part C Coordinator and Data Manager will continue to monitor and analyze “irregular” or inconsistent data to identify possible errors.

In comparison with National Data taken Part C SPP/APR 2012 Indicator Analysis (FFY2010- 2011), the early intervention program as indicated in Figures 1 and 2 are below the national percent for Outcome A-1 and A-2. As indicated in Figure 2, CNMI continues to show a downward trend for the past 3 years. In September, October and November 2012, the CNMI Interagency Coordinating Council (ICC) held an orientation with technical support by Guam CEDDERS on the Results Driven Accountability (RDA) process. During the meetings, the ICC members along with the early intervention staff discussed trend data for each indicator and set the Part C priorities based on low performance for the past 3 years. As a result of the review and discussion, the ICC identified Indicator 3 measurement A-1 and A-2 as one of the priorities that the Council will review and develop specific action steps. During the meetings, the ICC members were engaged in the “5 Why Analysis” process for this indicator. Upon identifying the reasons why CNMI Part C have not met the target for this indicator, the Council used CREI (Concern, Requirement, Evidence, Impact) Problem Statement template as a way to determine future improvement activities. Based on feedback from the Council new improvement activities have been identified.

As indicated in Figure 1, the baseline data gathered in FFY 2008 was reported at 75% with CNMI showing slippage in 2009 at 44%. However, for the past 2 years CNMI has shown an upward trend in performance with a 58.3% improvement in 2010 and 58.5% in 2011, a 14% improvement since 2009. Though CNMI did not meet the target for the past 3 years, CNMI will continue to provide training to parents and staff in understanding strategies that support positive social-emotional development that are culturally sensitive to CNMI’s island community.

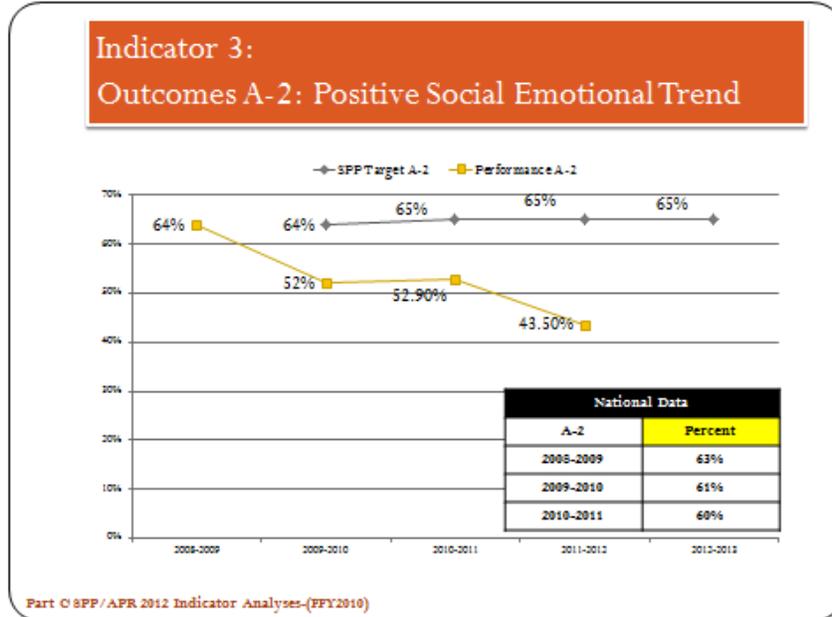
**Figure 1: Comparison of Outcome A-1 for 2008, 2009, 2010, and 2011**



As indicated in Figure 2, CNMI’s baseline data for 2008 was reported at 64%. In 2009, CNMI showed a decrease in performance at 52% with a slight improvement in 2010 at 52.9%. In 2011, CNMI reported a significant decrease in performance at 43.5% a 9.4% decrease from 2010. As indicated earlier, the ICC and EI staff is closely looking at ways to improve performance for this measurement with consideration and respect for cultural diversity within CNMI’s island communities.

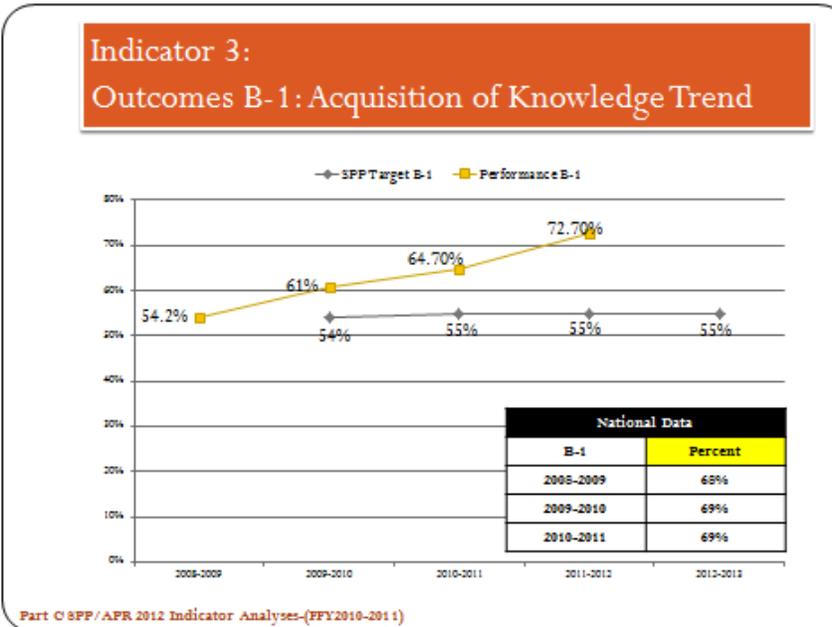
Part C State Annual Performance Report (APR) for FFY 2011

Figure 2: Comparison of Outcome A-2 for 2008, 2009, 2010, and 2011



As indicated in Figure 3, the baseline data in 2008 was reported at 54.2% with CNMI showing progress in 2009 at 61% and continued to show improvement over the years with a performance of 72.7% for FFY 2011, an 11.7% increase since 2009. For the past 3 years, CNMI have shown an increase in performance and continues to exceed the targets and is performing above the national trend data for this Outcome.

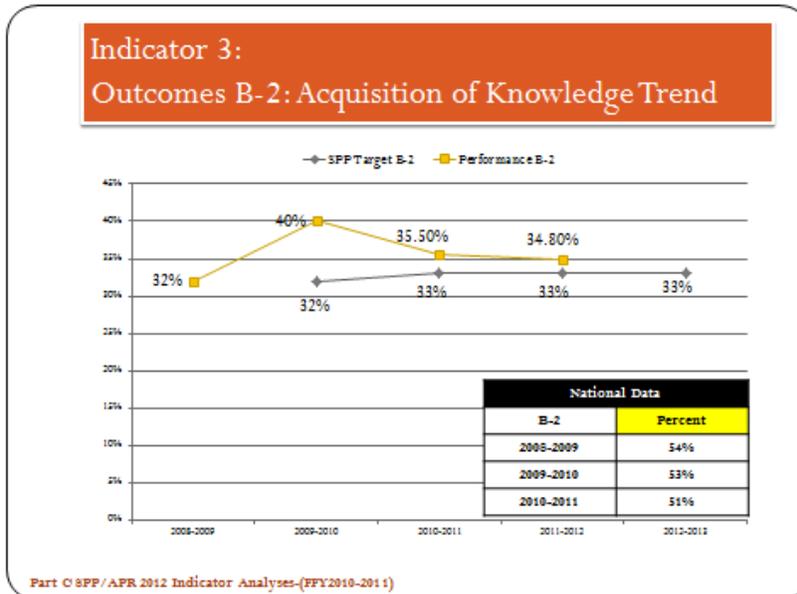
Figure 3: Comparison of Outcome B-1 for 2008, 2009, 2010, and 2011



**Part C State Annual Performance Report (APR) for FFY 2011**

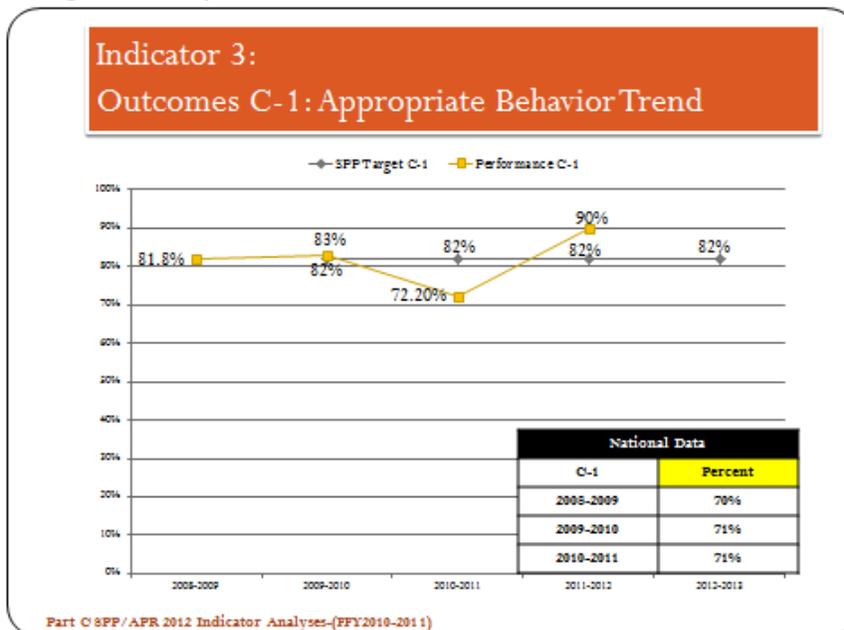
As indicated in Figure 4, the baseline data for FFY 2008 was at 32%. CNMI for the past 3 year continues to show progress above the baseline percent with a performance of 40% in 2009, 35.5% in 2010, and 34.8% in 2011. CNMI has exceeded its baseline target for the past 3 years.

**Figure 4: Comparison of Outcome B-2 for 2008, 2009, 2010, and 2011**



As indicated in Figure 5, the baseline data was reported at 81.8% in FFY 2008 with CNMI showing progress in 2009 at 83% with a slight decrease in 2010 at 72.2%, and then an increase in performance at 90% for FFY 2011, a 17.8% increase since 2010. CNMI met its target of 82% for this reporting period and continues to exceed the national trend data for the past 3 years.

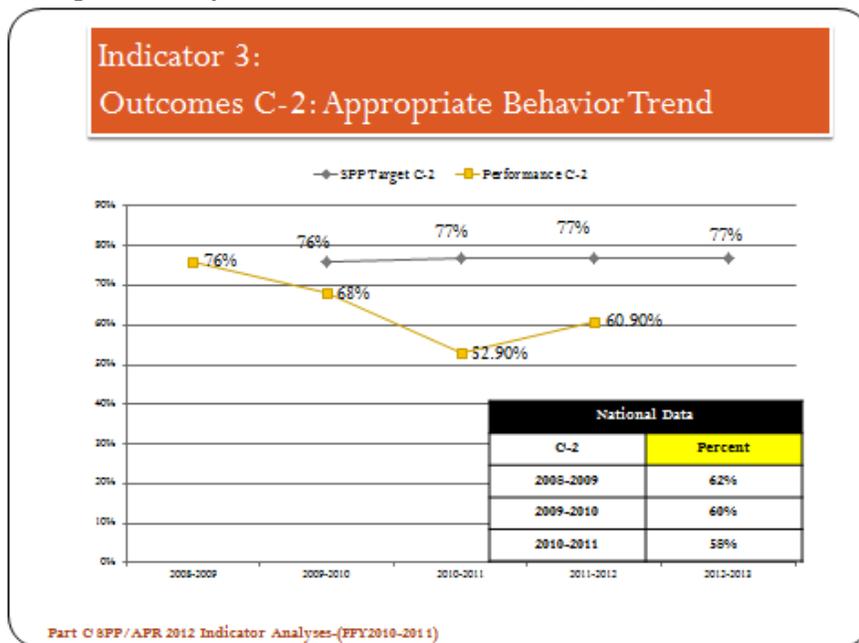
**Figure 5: Comparison of Outcome C-1 for 2008, 2009, 2010, and 2011**



**Part C State Annual Performance Report (APR) for FFY 2011**

As indicated in Figure 6, the baseline data was reported at 76% in FFY 2009 with CNMI continuing to show a downward trend in performance for the past 3 years. However, CNMI is performing comparably well, for the past 3 years, in comparison to national trend data for this measurement which indicate that some children will continue to require support.

**Figure 6: Comparison of Outcome C-2 for 2008, 2009, 2010, and 2011**



**OSEP FFY 2010 APR Response Table, June 2012:**

OSEP appreciates CNMI’s efforts to improve performance and looks forward to CNMI’s data demonstrating improvement in performance in FFY 2011 APR. CNMI must report progress data and actual target data for FFY 2011 in the FFY 2011 APR

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2012:**

The CNMI met 3 of the 6 targets for this reporting period. The CNMI did not revise the targets, however, based on recommendations of the Council new improvement activities were identified.

The improvement activities are organized by areas of priority needs for improvement and color-coded to show the “status” of each improvement activity. The following table displays the “status” of the improvement activity with the color codes:

Completed	Rose
Continuing	Lavender
Revised	Light Blue
New	Light Green
Moved or Deleted	Light Yellow

Part C State Annual Performance Report (APR) for FFY 2011

2012-2013 IMPROVEMENT ACTIVITY TABLE

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
Improve Administration and Monitoring	Continue to monitor the "information" on the Child Outcomes to ensure the information is based on functions rather than skills development. The Part Coordinator and Data manager continue to review the outcome data for irregularities and/or inconsistent data.	Annually in December	EI Coordinator and Data Manager	<u>Continuing</u> 2012 - 2013
Review and Revise Policies and Procedures	Continue to review the process as necessary to ensure the measurements reflect the Outcome requirements.	As necessary	EI Coordinator and Data Manager  Resource: Guam CEDDERS	<u>Continuing</u> 2012 - 2013
	Revise Outcome Manual inclusive of forms and resources and Update Outcome Parent Brochure to incorporate Parent Participation.	December 2012	EI Coordinator	<u>Continuing</u> 2012 - 2013
Training and Professional Development	Continue to Provide "cross training" opportunities with families and providers to ensure the focus of the outcome process is based on functionality rather than individual developmental skills development to include strategies in early literacy, language, and communication.	Fall 2007 Spring 2008 Spring 2010 Spring 2012 Spring 2013	EI Coordinator  Resources: ECO; Guam CEDDERS;	<u>Continuing</u> 2012 - 2013
	Conduct training for parents, ICC members, and EI staff on the revised policies and procedures that align with the new Part C regulations as amended in September 2011.	March 2012 and Annually Thereafter	EI Coordinator  Resource: Guam CEDDERS, ECTAC, WRRC	<u>Continuing</u> 2012 - 2013
	In collaboration with Community Partners, provide parent training on positive social emotional relationship and strategies to support their child's development.	Annually through FFY 2012	Part C Coordinator Guam CEDDERS	<u>New Activity</u> 2012 - 2013
Collaboration and Coordination	Collaborate and cross train with EC SPED to ensure consistency in measurements and strategies to increase knowledge and skills in strategies that promote growth and development in the area of social/emotional, early literacy (early language and communication), and self-help skills.	Fall 2007 Fall 2009 Fall 2010 Fall 2011 Fall 2012	EI Coordinator  Resources: Guam CEDDERS; ECTAC	<u>Continuing</u> 2012 - 2013

**Part C State Annual Performance Report (APR) for FFY 2011**

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
Collaboration and Coordination	Provide training for EI providers on the significance and impact of social emotional development on the child's future successes in school. Training shall include how to address children identified as having social emotional challenges.	FFY 2012	Part C Coordinator Guam CEDDERS ECTAC  Nat'l Training Institute Addressing Challenging Behaviors	New Activity 2012 - 2013

**Part C State Annual Performance Report (APR) for FFY 2011**

**Overview of the Annual Performance Report Development:**

Please see page 1 of this APR for description of report development.

**Monitoring Priority:** Early Intervention Services in Natural Environment

**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 need; and
- C. Help their children to develop and learn

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

**Measurement:**

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

FFY	Measurable and Rigorous Target
<b>(2011-2012)</b>	(A) Maintain 91% Know their rights (B) Maintain 91% Effectively communicate their children's needs (C) Maintain 90% Help their children learn and grow

**Actual Target Data for FFY 2011 (2011 - 2012):**

**As per OSEP's instructions, the CNMI Part C Family Survey used for 2008 - 2009 is not attached because the same survey was used and provided in the FFY 2006 APR.** The family survey instruments were distributed to all families who received services during this report year, including families who may have exit prior to the December 1 child count. The surveys were disseminated in 3 "respondent groups:"

- **"New"** representing families who received services for 6 months or less,
- **"Ongoing"** for families who received services for more than 6 months but less than 30 months, and
- **"Exiting"** for families who received services for at least 30 months.

Families were asked to respond to each survey statement by choosing a number from 1 through 5 that represented their level of disagreement or agreement with the statement. The "New" survey included statements related to the knowledge and skills of families entering the program. The "Ongoing" survey items included statements that reflected the expectations of receiving continued services, including 6-month and annual IFSP reviews. The "Exiting" survey included specific statements related to transition.

**Part C State Annual Performance Report (APR) for FFY 2011**

There are three measurements that are collected and reported based on survey results pertaining to parents reporting how early intervention services have helped the family:

- A. Know their rights;
- B. Effectively communicate their need; and
- C. Help their children to develop and learn.

The following Table 1 provides the summary breakdown of the number of questions for each respondent group for the 3 measurements:

**Table 1: Number of Survey Questions for Each Measurement by Respondent Groups**

Respondent Group	A. Know their rights	B. Effectively communicate their need	C. Help their children to learn
"NEW"	5	6	4
"ONGOING"	5	4	4
"EXITING"	3	3	7

Of the 72 surveys distributed, 38/72 or 53% were completed and submitted by June 2012. The percentage of returns decreased by 6% for FFY 2011, however FFY 2010 had a return rate of 59% with only 56 surveys were disseminated that year and 33 were returned compared to the 38 that were returned for this reporting period.

Of the 38 surveys returned, 12 were from "New" families, 16 were from "Ongoing" families, and 10 were from "Exiting" families. These families or "respondent groups" were representative of the population served in the CNMI, which included families from the islands of Saipan, Rota, and Tinian. Table 2, provides the summary data of the families or "respondent groups" that completed the 2011 - 2012 Part C Family Survey:

**Table 2: Percent of Families who Report that Early Intervention Services has Helped their Family in Measurement A, B, and C for FFY 2011**

	A. Know Your Rights	B. Effectively Communicate their children's needs	C. Help their Children Develop and Learn
<b>New</b>	59 responses indicated "Agree" out of 60 possible responses. <b>59/60= 98%</b>	71 responses indicated "Agree" out of 72 possible responses. <b>71/72= 99%</b>	43 responses indicated "Agree" out of 48 possible responses. <b>43/48 = 89%</b>
<b>Ongoing</b>	78 responses indicated "Agree" out of 80 possible responses. <b>78/80 =98%</b>	64 responses indicated "Agree" out of 64 possible responses. <b>64/64 = 100%</b>	63 responses indicated "Agree" out of 64 possible responses. <b>63/64 = 98%</b>
<b>Exit</b>	22 of the 30 possible responses indicated "Agree." <b>22/30 = 73%</b>	20 of the 30 possible responses indicated "Agree." <b>20/30= 67%</b>	59 of the 70 possible responses indicated "Agree." <b>59/70 = 84%</b>
<b>Overall % Agreement of Respondents</b>	159 overall responses that indicate "agree" of the 170 possible responses. <b>159/170=94%</b>	155 overall responses that indicate "agree" of the 166 possible responses. <b>155/166 = 93%</b>	165 overall responses that indicate "agree" of the 182 possible responses. <b>165/182 = 91%</b>

**Part C State Annual Performance Report (APR) for FFY 2011**

For this reporting period, CNMI exceeded the targets for all 3 measures. As indicated in Table 2, the overall percentage of families who report that early intervention services have helped their family: A) Know their rights is at 159/170 or 94% exceeding the target by 3%; B) Effectively communicate their children’s needs at 155/166 or 93% exceeding the overall target by 2%; and C) Help their children develop and learn was at a performance of 165/182 or 91% exceeding the target by 1% for this reporting period.

**Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2011:**

**CNMI met the target** for indicator 4, and therefore, as per **OSEP’s Memorandum 13-7**, CNMI is not required to provide an explanation of: a) progress; b) no change in actual target data from the data for FFY 2010; or c) slippage.

**OSEP FFY 2010 APR Response Table, June 2012:**

OSEP appreciates CNMI’s efforts to improve performance.

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2011:** The CNMI will not revise targets at this time however, based on stakeholder input there are two (2) additional improvement activities identified.

**CNMI met the target** for indicator 4, and therefore, as per **OSEP’s Memorandum 13-7**, CNMI is not required to discuss improvement activities for: a) compliance indicators where the State reports 100% compliance for FFY 2011; and b) results indicators where the State has met its FFY 2011 target.

As discussed on page 2 of this APR, the improvement activities are organized by areas of priority needs for improvement and color coded to show the “status” of each improvement activity. The following table displays the “status” of the improvement activity with the color codes:

Completed	Rose
Continuing	Lavender
Revised	Light Blue
New	Light Green
Moved or Deleted	Yellow

**2012-2013 IMPROVEMENT ACTIVITY TABLE**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
Improve Data Collection and Reporting	Conduct Surveys throughout the year appropriate to where families are in the EI System. <ul style="list-style-type: none"> <li>The survey results will be tallied and reported once per year.</li> <li>Families sign a “receipt slip” as they receive the survey. A record of the receipt slip is used to determine the number of surveys that were disseminated.</li> <li>Surveys will continue to be provided with envelopes that can be mailed back, dropped off or picked up by providers.</li> </ul>	July 2007, 2008, 2009, 2010, 2011, 2012	EI Coordinator Service Coordinators	<u>Continuing</u> 2012 - 2013

Part C State Annual Performance Report (APR) for FFY 2011

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
	<ul style="list-style-type: none"> <li>Continue to conduct Parent Forums as another means to gather information regarding parent's knowledge of rights, ability to communicate their needs and ability to help their child as a result of participation in Early Intervention Services.</li> <li>The information gathered at forums is not to be used in the percentage calculations of the surveys however, it is used to verify and validate survey results.</li> </ul>			
Collaboration and Coordination	Continue to Conduct Forums in conjunction with the DD Council Public Awareness activities and Protection and Advocacy.	March 2007, 2009, 2011, 2012	EI Coordinator EI Providers  Guam CEDDERS	<u>Continuing</u> 2012 - 2013
Technical Assistance	Share survey results with CEDDERS Guam to assist with the analysis of the results. Use the results for program improvement.  Continue to review survey results with EI providers and drill down the results and comments to target areas for improvement	September 2009 2010 2011 2012	CEDDERS Guam ECTAC	<u>Continuing</u> 2012 - 2013
Training and Professional Development	Conduct training for parents, ICC members, and EI staff on the revised procedural safeguards (Parent Rights) that align with the new Part C regulations as of September 2011.	March 2013	EI Coordinator Resource: Guam CEDDERS, ECTAC	<u>New Activity</u> 2012 - 2013
	Participate in training opportunities that focus on the importance of Social/Emotional Development and the relationship it has with overall learning and development.	March 2013	EI Coordinator EI Providers  Resource: ECTAC Guam CEDDERS	<u>New Activity</u> 2012 - 2013
Collaboration and Coordination	Share results with Health Care providers, specifically results that indicate need for better awareness of early intervention program for new parents.	September 2009 2010 2011 2012	EI Coordinator	<u>Continuing</u> 2012 - 2013

**Part C State Annual Performance Report (APR) for FFY 2011**

**Overview of the Annual Performance Report Development:**

Please see page 1 of this APR for description of report development.

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

**Indicator 5: Percent of Infants and Toddlers birth to 1 with IFSP's compared to National Data**

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

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

FFY	Measurable and Rigorous Target
(2011-2012)	On December 1, 2011, the CNMI will serve <b>.91%</b> of children under age one.

**Actual Target Data for FFY 2011 (2011-2012):**

**618 Child Count**

Year December 1	# Served Under Age 1	CNMI 2010 Census Population Data	CNMI % Served Under Age 1	National Data	CNMI Target
2011	3	1072	(3/1072 x 100) <b>.27%</b>	1.03%	.91%

**Data Source:** U.S. Department of Education, Office of Special Education Programs, Data Analysis System (DANS), OMB #1820-0557, Table C1-9, last updated July 2012.

The CNMI's target for this past year was to serve at least .91% of infants below age one. The CNMI performance indicated that 3/1027 or .27% of infants below age one were served. The CNMI did not meet the target and the National baseline of 1.03% as reported in Table C1-9 last updated in July 2012.

**Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2011:**

The CNMI has experienced a significant slippage in the number of children served birth to one and total birth through 3. Although, the public awareness and child find efforts are effective as demonstrated in last year's increase in children birth to one, the CNMI experienced significant labor and immigration challenges, which affected many of our families. In November 2011, U.S. Immigration took effect in the CNMI and guest workers lost their immigration status and their ability to work in the CNMI. Many families exited the CNMI and those who continue to stay here without status withdrew from services. Although all families were reassured that eligibility for early intervention program and eligibility for service is not dependent on immigration status, some families withdrew from service waiting on the final regulations and possible extension of the guest worker timeline. At the last hour U.S. Immigration provided waivers to the guest workers until 2014, which allowed guest workers to retain employment and continue to remain on island. The uncertainty of labor and immigration status has impacted the number of children served in the Early Intervention Program. CNMI annual live birth data and children served indicate that the majority of children born here are of families considered guest workers.

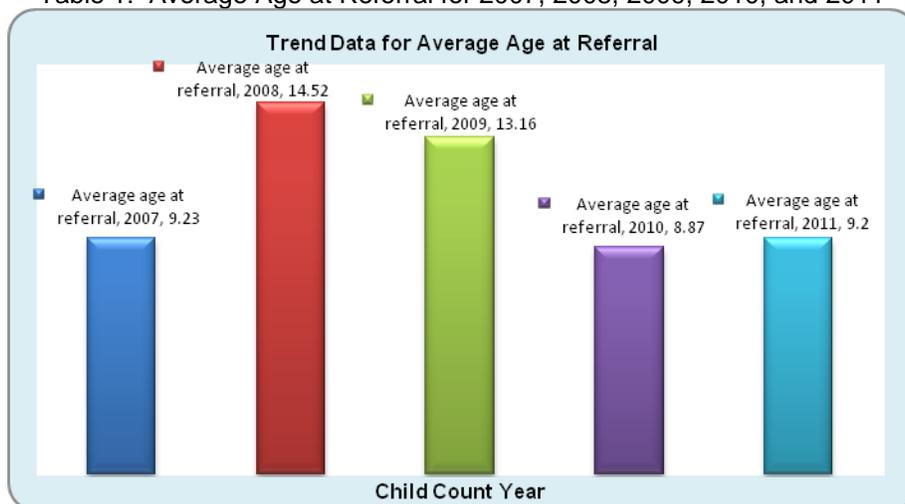
**Part C State Annual Performance Report (APR) for FFY 2011**

However, due to the immigration waivers until December 2014, updated child count as of December 01, 2012, which will be reported in FFY 2012 indicates eleven (11) children birth to 1 or 1.02% and fifty nine (59) children birth to three or 1.83% were served.

The CNMI will continue child find efforts that were proven effective strategies in 2010 to ensure that all children are located, identified, and provided services.

In the last few years, CNMI has also focused on reducing the age at referral. Of the number and percentage of the infants and toddlers with an IFSP on December 1, 2011, the average age at referral was 9.2 months, a slight increase over last year of 8.5 months. Although the average age at referral is not typically reported in the APR, this is an indicator the Early Intervention Program has been monitoring for several years. When this data was first reviewed 7 years ago, the average age children were referred was 18 months old.

Table 1: Average Age at Referral for 2007, 2008, 2009, 2010, and 2011



In September, October and November 2012, the CNMI Interagency Coordinating Council (ICC) held an orientation with technical support by Guam CEDDERS on the Results Driven Accountability (RDA) process. During the meetings, the ICC members along with the early intervention staff discussed trend data for each indicator and set the Part C priorities based on low performance for the past 3 years. As a result of the review and discussion, the ICC identified Indicators 5 and 6 as one of the priorities that the Council will review and develop specific action steps. During the meetings, the ICC members were engaged in the “5 Why Analysis” process for this indicator. Upon identifying the reasons why CNMI Part C have not met the target for this indicator, the Council used CREI (Concern, Requirement, Evidence, Impact) Problem Statement template as a way to determine future improvement activities. Based on feedback from the Council new improvement activities have been identified.

Listed below are some of the child find and public awareness outreach activities that are ongoing throughout the year to ensure all children are located and identified. The child find and public awareness activities are collaborative effort with the CNMI EHDI program, MCH Statewide Early Childhood Comprehensive System, Head Start, DD Council, Child Care and Protection and Advocacy.

- Weekly advertisements in the local newspapers regarding overall child development, early signs of Autism, and Newborn Hearing Screenings.
- Training of public health nurses, well baby nurses and private clinics.
- Presentations at the Head Start Partnership meetings.
- Dissemination of Welcome packets to the well-baby clinics and to all new mothers prior to leaving the hospital.

**Part C State Annual Performance Report (APR) for FFY 2011**

- Round table discussion on public awareness and child find strategies with primary referral sources, providers, and interagency council members.
- Referral information disseminated to all private clinics that included information to be given to parents of premature infants, procedures to make a referral, developmental checklists, an established condition list, and referral forms.
- Daily visits to Neonatal Intensive Care Unit (NICU), Nursery and the Pediatric ward at the Commonwealth Health Center (CHC) by an EI staff to pick up referrals and converse with parents regarding Early Intervention services.
- Attendance and participation at community events that focus on Child Development.
- Partnership in the MCH Statewide Early Childhood Comprehensive System including the development of a comprehensive calendar for all agencies.

**OSEP FFY 2010 APR Response Table, June 2012:**

OSEP appreciates CNMI's efforts to improve performance.

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2012:**

The CNMI did not revise its targets at this time, however, based on stakeholder input, three (3) new improvement activities were identified.

As discussed on page 2 of this APR, the improvement activities are organized by areas of priority needs for improvement and color coded to show the "status" of each improvement activity. The following table displays the "status" of the improvement activity with the color codes:

Completed	Rose
Continuing	Lavender
Revised	Light Blue
New	Light Green
Moved or Deleted	Yellow

**2012-2013 IMPROVEMENT ACTIVITY TABLE**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/Resources</b>	<b>Status</b>
Improve Administration and Monitoring	Continue daily check for referrals at NICU and all clinics.  Continue distribution of <i>Developmental Checklist</i> to Public Health and Private Nurses.  Continue to distribute the Welcome New Baby packets for parents.	Daily through FFY 2012	Service Coordinator	<u>Continuing</u> 2012 - 2013  The Service Coordinator continues the NICU and PEDS daily visit.

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Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/Resources	Status
Training and Professional Development	Conduct training and orientation to hospital staff (NICU staff, doctors, well baby clinic nurses and doctors and private clinic doctors) on the referral procedures and the revised timelines to make a referral within 7 days. Referral procedures will include information specific to parents with premature infants or infants with other physical risk factors associated with learning or developmental complications and the benefits of early intervention for premature infants.	Annually in January of the year through FFY 2012	EI Coordinator with Clinic Representatives Private Clinics	<u>Continuing</u> 2012 - 2013  This activity is successful and will continue to be implemented. The CNMI has a high turnover of pediatricians. New doctors need to know of the EI system here and how to make referrals.
Collaboration and Coordination	Conduct orientation with Department of Youth Service on the CAPTA regulations and guidance and the Referral process for eligible children.  Conduct orientation with Child Care Child Care Licensing Agency on the referral process and procedures.	Spring 2011 Spring 2012	EI Coordinator and Service Coordinators	<u>Continuing</u> 2012 - 2013
	Continue to coordinate public and private community child find and public awareness efforts with MCH, Head Start, Division of Youth Services, Protection and Advocacy, Developmental Disabilities Council, Child Care.	Annually in coordination with the DD Council Advocacy Month through 2012	EI Coordinator with Agency Reps	<u>Continuing</u> 2012 - 2013
	Continue collaboration with the MCH Early Childhood Comprehensive System (ECCS) "Big Steps for Little Feet". • Participate in Monthly Meetings	Monthly Team meetings, the last Thursday of the month	MCH staff to coordinate effort with EI team	<u>Continuing</u> 2012 - 2013
	Create a policy in collaboration with Commonwealth Healthcare Corporation (CHC) and other early childhood partners to ensure that all new mothers receive informational packet of all services and support available in the CNMI	By April 2013	CHC EI Coordinator Other EC programs	<u>New Activity</u> 2012 - 2013
	Conduct training for parents, ICC members, and EI staff on the revised policies and procedures that align with the new Part C regulations.	March 2012 and Annually Thereafter	EI Coordinator Resource: Guam CEDDERS, NECTAC	<u>Continuing</u> 2012 - 2013
Conduct prenatal training in collaboration with the hospital.	Annual FFY 2012	Hospital Staff, EI Coordinator	<u>New Activity</u> 2012 - 2013	
In collaboration with other early childhood serving agencies in facilitating a Parent Advocacy Leadership Training	Annually beginning FFY 2012	Child Care Program, Home Visiting Program, and Head Start	<u>New Activity</u> 2012 - 2013	

**Part C State Annual Performance Report (APR) for FFY 2011**

**Overview of the Annual Performance Report Development:**

Please see page 1 of this APR for description of report development.

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

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

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

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

FFY	Measurable and Rigorous Target
(2011-2012)	On December 1, 2011, the CNMI will serve 2% of children birth to 3 years old.

**Actual Target Data for FFY 2011 (2011 - 2012):**

**618 Child Count**

Year December 1	# Children with IFSP B to three	CNMI Census Population Data	% CNMI Birth through 2 with IFSP	National Data	CNMI Target
2011	40	3216	1.24 (40/3216 x 100)	2.79%	2%

Data Source: U.S. Department of Education, Office of Special Education Programs, Data Analysis System (DANS), OMB #1820-0557, Table C1-9, last updated July 2012.

The number and percentage of children served birth to three years old decreased as of the December 1, 2011 child count. The CNMI did not meet its target of 2% for overall children served and is under the National Average as reported on Table C1-9 last updated on July 2012.

**Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2011:**

The Early Intervention Program, in collaboration with the Department of Public Health and other agencies, the ICC and EI Providers are continuously looking at different ways to address child find activities to ensure all eligible infants and toddlers are identified, located and served. Since the child find and public awareness activities cover children to age 3, the discussion of improvement activities completed and an explanation of the slippage is described in Indicator 5.

**OSEP FFY 2010 APR Response Table, June 2012:**

OSEP looks forward to CNMI's data demonstrating improvement in performance in the FFY 2011 APR.

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2012:**

Although the CNMI did not meet its target, the target was not revised at this time. Discussion regarding the target and stakeholder input is in the complete SPP. See discussion in Indicator 5 for New Improvement Activities, Timelines, and Resources added for Indicator 5 and 6 of this APR.

**Part C State Annual Performance Report (APR) for FFY 2011**

**Overview of the Annual Performance Report Development:**

Please see page 1 of this APR for description of report development.

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

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

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

**Measurement:**

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

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

FFY	Measurable and Rigorous Target
<b>(2011-2012)</b>	<b>100%</b> of infants and toddlers with IFSPs will have an evaluation and assessment and an initial IFSP meeting conducted within Part C’s 45-day timeline.

**Actual Target Data for FFY 2011 (2011 - 2012):**

Report Period:	a.	b.	c.	d.	e.
July 2011 to June 2012	# of Evals Assessments and Initial IFSP meetings required to be conducted	# Completed Timely (within 45-day timeline)	# Completed Untimely for <b>valid</b> reasons	# completed but untimely for Invalid Reason (to be accounted for)	# and % Required (Timely Eval Plus untimely for valid reasons) % = (b + c/a x 100)
Evaluation and Assessment and Initial IFSP meetings	<b>43</b>	<b>40</b>	<b>3</b>	<b>0</b>	40+ 3/43 x 100 <b>100%</b>

The data for this indicator is taken from the data base and reflects the report period of July 2011 to June 2012

Of the 43 evaluations, assessments and Initial IFSP meetings required to be held within the 45-day timeline, 41 were conducted within the timeline and 2 were not due to exceptional family circumstances documented on a *Reason for Delay Form* and filed in the child’s IFSP folder. CNMI includes exceptional family circumstances to both the numerator and denominator in the calculations for this indicator. The data for this indicator are taken from the database of all children at the end of the report period, June 30, 2012. The CNMI continues to demonstrate compliance in this indicator.

**Reasons for Delay:**

- One child remained in the hospital due to significant medical issues, which was complicated by mother’s deportation off the island. Dad requested to reschedule Initial evaluation and IFSP several times.

**Part C State Annual Performance Report (APR) for FFY 2011**

- Two children’s family requested to reschedule Initial evaluation and IFSP due to personal family matters.

**Data Collection and Verification:**

The Children’s Developmental Assistance Center is the entry point for all referrals. When referrals are received from any referral source, the Data Manager posts the referral date and referral source into the database. The database automatically generates the 45-day timeline that the evaluation and initial IFSP meeting must occur. The Data Manager disseminates the “referral” information to Service Coordinators on a rotating basis. The Service Coordinators make initial contact with the family and schedule Initial evaluation and IFSP dates and locations.

Upon completion of the evaluation and initial IFSP meetings, these documents are submitted to the Data Manager for verification and posting in the database. The database is formatted to “red flag” dates that fall outside the 45-day timeline. For any “delays” in the process, or red flags, a *Reason for Delay* form is also submitted to the Data Manager. The Data Manager “determines” if the reason is due to an exceptional family circumstance, or a systemic issue. The “valid” or “invalid” reason is also logged into the database. At the end of the reporting year, the Data Manager draws down the data for inclusion in the APR.

**Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2011:**

**CNMI met the target** for indicator 7, and therefore, as per **OSEP’s Memorandum 13-7**, CNMI is not required to provide an explanation of: a) progress; b) no change in actual target data from the data for FFY 2010; or c) slippage.

**OSEP FFY 2010 Response Table, June 2012:**

OSEP appreciates CNMI’s efforts in achieving compliance with the 45-day timeline requirements in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a).

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2012:**

**CNMI met the target** for indicator 7, and therefore, as per **OSEP’s Memorandum 13-7**, CNMI is not required to discuss improvement activities for: a) compliance indicators where the State reports 100% compliance for FFY 2011; and b) results indicators where the State has met its FFY 2011 target.

As discussed on page 2 of this APR, the improvement activities are organized by areas of priority needs for improvement and color coded to show the “status” of each improvement activity. The following table displays the “status” of the improvement activity with the color codes:

Completed	Rose
Continuing	Lavender
Revised	Light Blue
New	Light Green
Moved or Deleted	Yellow

**Part C State Annual Performance Report (APR) for FFY 2011**

**2012-2013 IMPROVEMENT ACTIVITY TABLE**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
Improve Administration and Monitoring	<p>Continue to conduct internal reviews to ensure timeliness of evaluations and initial IFSP meetings.</p> <p>The Data Manager continues to monitor the referral dates and evaluation and IFSP meeting dates. Heads up notices are provided to service coordinators to prevent time lags.</p>	Random/Monthly through FFY 2012	EI Coordinator Data Manager	<u>Continuing</u> 2013 - 2013
Training and Professional Development	<p>Provide training with EI Providers and Service Coordinators to ensure all EI Providers and Services Coordinators understand and implement the revised policies and procedures as per the new Part C regulations.</p> <p>Professional Development continues to be a priority for the CNMI EI Program. In order for staff and families to stay abreast of best practice and to keep updated on new requirements, PSS Policies and procedures, all PSS staff are required to attend at least 10 Staff Development events throughout the year.</p> <p>The EI providers will provide the opportunity to attend the Measuring Family and Child Outcomes conference</p>	<p>April 2012 and Annually Thereafter</p> <p>10 Professional Development days are scheduled every school year through 2012</p>	<p>PSS PD Requirements</p> <p>EI Providers HR Office</p>	<u>Continuing</u> 2012 - 2013
Revision to Policies and Procedures	Review and revise initial evaluation, initial assessment and initial IFSP policies and procedures to align with the new Part C regulations.	June 2012	EI Coordinator PSS BOE Legal Counsel ICC Guam CEDDERS	<u>Continuing</u> 2012 - 2013

**Part C State Annual Performance Report (APR) for FFY 2011**

**Overview of the Annual Performance Report Development:**

Please see page 1 of this APR for description of report development.

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

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

- A. IFSPs with transition steps and services;
- B. Notification to the LEA, if 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)

**Measurement:**

- A. Percent = [(# of children exiting Part C who have an IFSP with transition steps and services) divided by the (# of children exiting Part C)] times 100.
- B. Percent = [(# of children exiting Part C and potentially eligible for Part B where the notification to the LEA occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.
- C. Percent = [(# of children exiting Part C and potentially eligible for Part B where the transition conference occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100. Account for untimely transition conferences, including the reasons for delays.

FFY	Measurable and Rigorous Target
<b>(2011-2012)</b>	<b>100%</b> of all children exiting Part C received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including: (A) IFSPs with transition steps and services; (B) Notification to the LEA, if potentially eligible for Part B; and (C) Transition conference if child is potentially eligible for Part B.

**Actual Target Data for FFY 2011 (2011 - 2012):**

As per OSEP Memorandum 13-7, the CNMI did not elect to implement the IDEA Part C Final Regulation during FFY 2011. The CNMI received the grant award indicating that the Policies and Procedures that align with the new Part C Regulations were approved in June 2012.

**Measurement A: Steps and Services**

(a) Total Exits	(b) IFSP with Steps and Services Required	(c) Total # IFSP with Steps and Service Included	(d) Exits for Other Reasons Steps and Services Not Required	(e) Total % (b/c) x100
30	25	25	5	25/25 x 100= 100%

**Column (a):** There were a total of 30 children who exited from Early Intervention during the report year.

**Column (b):** Of the 30 who exited, 25 required Transition Steps and Services, 5 did not.

**Column (c):** 25 IFSP's included steps and services

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**Column (d):** 5 exited for other reasons and steps and services were not required, (3 withdrew, 1 no longer eligible, 1 moved off island).

**Column (e):** 100% of the IFSP's required to have steps and services did included steps and services

**Measurement B: LEA Notification for Potentially Eligible Part B Children**

(a) Total # Potentially Eligible for Part B and Required LEA Notification	(b) Total # LEA Notifications	(c) Total % (b/c) x100
23	23	$23/23 \times 100\% = 100\%$

**Column (a):** 23 children were **potentially eligible** for Part B services and required LEA Notifications.

**Column (b):** 23 LEA Notifications were sent and received by Part B.

**Column (c):** 100% LEA Notifications

Twenty three (23) children were **potentially eligible** for special education services. Notifications for all 23 children were provided to the Special Education Program (the LEA). Data for this indicator was verified through a review of the LEA notifications sent to the Special Education Program.

At least four times a year (March, June, September, December) the Early Intervention Program Data Manager submits a list of children to the Special Education Program who will be turning three during the year. The notification includes the child's name and residence and the parents' names, residential locations and contact information. EI retains a copy of the LEA Notifications that were provided to the Special Education Program as verification that the LEA notification was provided.

In the CNMI, children **potentially eligible for Part B services** are defined as those children who, based on current evaluation, assessment and IFSP information, continue to demonstrate a 25% delay in one or more areas of development or have an established condition that has a high probability of resulting in a disability that aligns with the Part B eligibility definitions or categories and because of that condition or disability, the child may need special education and related services. The determination of whether the child is **potentially eligible** for Part B is made by that toddler's IFSP team. Part B eligibility is determined by the Part B providers.

Individual "referral notice" is sent to the Special Education Program which triggers the Part B child find process. Upon parental consent to release information, pertinent information such as evaluation reports, current IFSPs, Outcome Measurement information, and other information is sent to the Special Education Program team to prepare for the transition conference. Upon approval of the parent, a Transition Conference is scheduled and meeting invitations are sent to receiving special education teams and the preschool providers. The CNMI does not have an "opt out" policy for parents to opt out of the referral.

**Measurement C: 90 Day Transition Conference for Potentially Eligible Part B Children**

(a) Total # Transition Conferences Required	(b) Total # Timely Transition Conference Held	(c) Untimely Transition Conference with Valid Reason	(d) Total % (b/c) x100
23	21	2	$(23/21 + 2) \times 100 = 100\%$

**Column (a):** 23 required Transition Conferences 90 days before the child's third birthday.

**Column (b):** 21 Transition Conferences held in a timely manner

**Column (c):** 2 Transition Conferences were untimely due to parent request

**Column (d):** 100% of Transition Conferences held within timeline

21 of the 23 required Transition Conferences were conducted in a timely manner, 2 were not due to exceptional family circumstances, which were documented on the *Reason for Delay* form in the child's

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file. Both families asked to reschedule meetings due to personal family matters. The Transition Conferences, although late, did occur before their 3<sup>rd</sup> birthday.

**Data Collection and Verification:**

Service Coordinators are required to submit all documentation related to the transition requirements to the Data Manager. This includes copies of the referral to special education, copies of the invitation of the Transition Conference meeting, copies of the Prior Written Notices, the IFSP Transition Steps and Service Plan, and the Transition Conference notes. The Data Manager verifies the information contained in the IFSP and “dates” before posting the data in the database. The database includes the date of the LEA (Special Education Program) notification, the date steps and services were discussed with the family, the date of the Transition Conference with EC SPED providers, and the age of the child on the conference date. The database is formatted to red flag less than 90 days from the Transition Conference date and third birthday. The Data base now includes timeline requirements for LEA notification and Steps and Services in the Transition Plan. For any Transition Conferences held less than 90 days from the third birthday, a *Reason or Delay* form is attached and submitted to the Data Manager. The Data Manager is responsible to verify the reasons and makes a determination of valid (exceptional family circumstance) or invalid (system issue).

**Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2011:**

**CNMI met the target** for indicator 8, and therefore, as per **OSEP’s Memorandum 13-7**, CNMI is not required to provide an explanation of: a) progress; b) no change in actual target data from the data for FFY 2010; or c) slippage.

**OSEP FFY 2010 APR Response Table, June 2012:**

OSEP appreciates CNMI’s efforts in achieving compliance with the IFSP Transition content requirements in 34 CFR §§ 303.148 (b)(4) and 303.344 (h) and 20 U.S.C. 1436 (a)(3) and (d)(8).

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2011:**

**CNMI met the target** for indicator 8, and therefore, as per **OSEP’s Memorandum 13-7**, CNMI is not required to discuss improvement activities for: a) compliance indicators where the State reports 100% compliance for FFY 2011; and b) results indicators where the State has met its FFY 2011 target.

As discussed on page 2 of this APR, the improvement activities are organized by areas of priority needs for improvement and color coded to show the “status” of each improvement activity. The following table displays the “status” of the improvement activity with the color codes:

Completed	Rose
Continuing	Lavender
Revised	Light Blue
New	Light Green
Moved or Deleted	Yellow

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2012-2013 IMPROVEMENT ACTIVITY TABLE

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
Improve Administration and Monitoring	<p>Monthly Heads Up” notices to Service Coordinators and EI providers that indicate the upcoming birthdays and transition requirements</p> <p>Continue “random” checks of IFSP’s to ensure timelines are met.</p> <p>The EI providers will continue to Calendar time sensitive events.</p>	Monthly through 2012	Data Manager	<u>Continuing</u> 2012 - 2013
Improve Data Collection and Reporting	<p>Add new data elements will be added to the data base to align with the new Part C Regulations:</p> <ul style="list-style-type: none"> <li>• 90 requirements for LEA Notification</li> <li>• 90 day requirements for Transition Plan (steps and services)</li> </ul> <p>Any other timeline requirements as per the new Part C Regulations.</p>	June 2012	EI Coordinator EI Data Manager	<u>Completed Activity</u> 2011 - 2012.
Training and Professional Development	<p>Conduct training on the revised Transition policies and procedures, including training on the Transition Directives.</p> <p>Review IFSP forms to ensure transition requirements are included in the IFSP forms.</p>	April 2012	EI Coordinator EI Data Manager  Guam CEDDRERS ECTAC	<u>Continuing</u> 2012 - 2013

**Part C State Annual Performance Report (APR) for FFY 2011**

**Overview of the Annual Performance Report Development:**

Please see page 1 of this APR for description of report development.

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

**Indicator 9:** General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects non-compliance 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 non-compliance corrected within one year of identification:

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

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

States are required to use the "Indicator 9 Worksheet" to report data for this indicator.

FFY	Measurable and Rigorous Target
<b>(2011-2012)</b>	The CNMI identifies and corrects <b>100%</b> of non-compliance as soon as possible but in no case later than one year from identification.

**Actual Target Data for FFY 2011 (2011-2012):**

**INDICATOR C-9 WORKSHEET**

Indicator/Indicator Clusters	General Supervision System Components	# of System Issued Findings in FFY 2010 (7/1/10 to 6/30/11)	(a) # of Findings of noncompliance identified in FFY 2010 (7/1/10 to 6/30/11)	(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	0	0	0
	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	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
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	Dispute Resolution: Complaints, Hearings	0	0	0

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Indicator/Indicator Clusters	General Supervision System Components	# of System Issued Findings in FFY 2010 (7/1/10 to 6/30/11)	(a) # of Findings of noncompliance identified in FFY 2010 (7/1/10 to 6/30/11)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
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	0	0	0
	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	0	0	0
	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	0	0	0
	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: 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	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
OTHER AREAS OF NONCOMPLIANCE: • IFSP Content • IFSP 6 month reviews §303.342(b) • Annual IFSP §303.342 (c).	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	6 (Service Coordinators)	15	15
	Dispute Resolution: Complaints, Hearings	0	0	0
<b>Sum the numbers down Column a and Column b</b>			15	15
Percent of noncompliance corrected within one year of identification = (column (b) sum divided by column (a) sum) times 100			<b>15/15 x100</b>	<b>100%</b>

**Describe the Process for Selecting EIS Programs for Monitoring**

The CNMI Early Intervention (EI) Program is a unitary system with one program. EI providers are individuals who provide early intervention services to eligible infants, toddlers and their families. The CNMI early intervention program is a relatively small program; therefore, annual monitoring activities include a review of all IFSP files.

Consistent with the May 2011 revisions to the monitoring procedures, the FFY 2010 monitoring activities included:

- **Internal Monitoring:** The internal monitoring procedures included the self-assessment process and annual data drawdown. The self-assessment process reviewed all IFSP files using the updated Child Record Review Checklist for procedural compliance. The annual data drawdown assessed compliance with the SPP compliance indicators and IDEA related requirements for other procedural and timeline requirements.
  - In FFY 2010, a total of 15 findings of noncompliance were issued through the self-assessment process. Findings of noncompliance issued were related requirements for

**Part C State Annual Performance Report (APR) for FFY 2011**

IFSP required content, timely 6-month reviews, and timely annual reviews, as listed in the “Other Areas of Noncompliance” in the Indicator C-9 worksheet.

- In FFY 2010, the annual data drawdown did not result in findings of noncompliance, as the areas of procedural and timeline noncompliance were captured in the self-assessment process.
- External Monitoring: The external monitoring of 5 priority areas was conducted in October 2011, outside of the FFY 2010 identification of noncompliance period. However, the data reviewed included the FFY 2010 data. No new findings of noncompliance were issued based on the external monitoring, as the areas of procedural and timeline noncompliance were captured in the self-assessment process.
- Dispute Resolution System: CNMI did not receive any formal complaints or hearing requests in FFY 2010, as reported in the FFY 2010 APR for Indicators 10 and 11.

The following breakdown is provided, with an explanation of the verification of timely correction of FFY 2010 findings of noncompliance:

**Correction of FFY 2010 Findings of Noncompliance Timely Corrected (corrected within one year from identification of the noncompliance):**

1. Number of findings of noncompliance CNMI made during FFY 2010 (the period from July 1, 2010 through June 30, 2011) (Sum of Column a on the Indicator B15 Worksheet)	<b>15</b>
2. Number of findings CNMI verified as timely corrected (corrected within one year from the date of notification to the school of the finding) (Sum of Column b on the Indicator C9 Worksheet)	<b>15</b>
3. Number of findings <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>0</b>

**Correction of FFY 2010 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance):**

4. Number of FFY 2010 findings not timely corrected (same as the number from (3) above)	<b>0</b>
5. Number of findings CNMI has verified as corrected beyond the one-year timeline (“subsequent correction”)	<b>0</b>
6. Number of findings <u>not</u> yet verified as corrected [(4) minus (5)]	<b>0</b>

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

Consistent with OSEP Memorandum 09-02, CNMI reports verifying timely correction of FFY 2010 findings of noncompliance through: (1) correction of all instances of noncompliance; and (2) verification that for the identified noncompliance, CNMI is correctly implementing the specific regulatory requirements demonstrated through a review of additional data. Explanation of the verified timely correction for the FFY 2010 findings of noncompliance as follows:

**Other Areas of Noncompliance: 15 Related Requirements**

The FFY 2010 self-assessment process resulted in the identification of 15 individual instances of noncompliance: 9 for missing required documentation of IFSP content sections, such as start date, frequency, and method of service delivery; 4 for untimely IFSP 6 month reviews (§303.342(b)); and 2 for untimely annual IFSP (§303.342(c)). A *Written Notification of Findings* was issued to the Part C Service Coordinators responsible for the case management of these IFSPs. The notice included the required

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correction for the child-specific noncompliance and additional data to be reviewed related to the areas of noncompliance. The notice acknowledged the completion of the child-specific noncompliance related to the timeline requirements, such as the 6-month reviews and annual reviews, which were all completed but over the required timeline. The notice included the requirement for providing subsequent data demonstrating 100% compliance for the areas of noncompliance.

Consistent with OSEP Memo 09-02, the specific actions taken to verify correction included a database review of the individual correction and additional data for the IFSP 6-month review and annual IFSP timeline requirements. Individual IFSP file reviews were conducted for the individual correction and additional data for the IFSP content related correction of noncompliance. As a result, a *Written Notice of Timely Correction* was issued to the Part C Service Coordinators after the child-specific instances of noncompliance were corrected, additional data reviewed demonstrated 100% compliance with the requirements, and evidence of the completion of training on the IFSP regulatory requirements.

**Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2011:**

The CNMI reports 100% (15/15) compliance with Indicator 9 for timely correction of findings of noncompliance identified in FFY 2010, which represents continued compliance with verification of timely correction of findings of noncompliance reported in previous years. Further, there are no outstanding noncompliance findings from previous reporting periods.

**CNMI met the target** for indicator 9, and therefore, as per **OSEP’s Memorandum 13-7**, CNMI is not required to provide an explanation of: a) progress; b) no change in actual target data from the data for FFY 2010; or c) slippage.

**OSEP FFY 2010 APR Response Table, June 2012**

Statement from the Response Table	State’s Response
OSEP appreciates CNMI’s efforts in timely correcting findings of noncompliance identified in FFY 2009.	The CNMI appreciates OSEP’s recognition of CNMI’s efforts to timely correct noncompliance.
When reporting in the FFY 2011 APR on the correction of findings of noncompliance identified in FFY 2010, CNMI must report that for each finding of noncompliance identified in FFY 2010, CNMI verified that it: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or the CNMI data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memorandum 09-02, dated October 17, 2008. In the FFY 2011 APR, CNMI must describe the specific actions that were taken to verify the correction.	CNMI assures implementation of OSEP Memorandum 09-02 for verification of timely correction, as reflected in the actual target data section of this indicator.
In reporting on Indicator 9 in the FFY 2011 APR, CNMI must use the Indicator 9 Worksheet.	The CNMI used Indicator 9 Worksheet to complete this indicator.

**Part C State Annual Performance Report (APR) for FFY 2011**

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2012:**

**CNMI met the target** for indicator 9, and therefore, as per **OSEP’s Memorandum 13-7**, CNMI is not required to discuss improvement activities for: a) compliance indicators where the State reports 100% compliance for FFY 2011; and b) results indicators where the State has met its FFY 2011 target.

As discussed on page 2 of this APR, the improvement activities are organized by areas of priority needs for improvement and color coded to show the “status” of each improvement activity. The following table displays the “status” of the improvement activity with the color codes:

Completed	Rose
Continuing	Lavender
Revised	Light Blue
New	Light Green
Moved or Deleted	Yellow

**2012-2013 IMPROVEMENT ACTIVITY TABLE**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
Improve Administration and Monitoring	Conduct file review activities (child record reviews, self-assessments, and peer reviews), to catch an issue before it becomes a non-compliance.	Internal file reviews December of the Year through 2012	Part C Coordinator and Data Manager	<u>Continuing</u> 2012 - 2013
	Conduct external monitoring in accordance with the revised monitoring procedures, every other year.	July 2011 through 2012	External Monitor	<u>Continuing</u> 2012 - 2013
Training and Professional Development	Training on the EISS Monitoring procedures will be provided to early intervention providers, parents, Interagency Coordinating Council members, and Board of Education members.	Annually November 2010 March 2011 March 2012	Part C Coordinator	<u>Continuing</u> 2012 - 2013
Provide Technical Assistance	Early Childhood Coordinator will provide progress updates according to the EISS Monitoring procedures to the Commissioner of Education and ICC.	Quarterly through 2012	Part C Coordinator	<u>Continuing</u> 2012 - 2013
Review and Revise Policies and Procedures	The Child Record Review Checklist will be reviewed and revised to ensure that it aligns with Part C Regulations.	November 2012	Part C Coordinator	<u>Continuing</u> 2012 - 2013

**Part C State Annual Performance Report (APR) for FFY 2011**

**Overview of the Annual Performance Report Development:**

Please see page 1 of this APR for description of report development.

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

**Indicator 12:** Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements (applicable if Part B 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
<b>2011 (2011-2012)</b>	Targets will be set once baseline data is established with in 10 or more resolution sessions.

**Actual Target Data for FFY 2011 (2011-2012):**

No requests for due process hearings were received, therefore no resolution sessions were conducted, as reported in the 618 Table 4.

**OSEP FFY 2010 APR Response Table, June 2012:**

OSEP looks forward to reviewing CNMI's data in the FFY 2011 APR.

**Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2011:**

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2012:**

**Part C State Annual Performance Report (APR) for FFY 2011**

**Overview of the Annual Performance Report Development:**

Please see page 1 of this APR for description of report development.

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

**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
<b>2011 (2011-2012)</b>	Targets will be set once baseline data is established with 10 or more mediations.

**Actual Target Data for FFY 2011 (2012 - 2011):**

No mediations were conducted during this report period, as reported in the 618 Table 4.

**OSEP FFY 2010 APR Response Table, June 2012:**

OSEP looks forward to reviewing CNMI's data in the FFY 2011 APR.

**Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2011:**

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2012:**

**Part C State Annual Performance Report (APR) for FFY 2011**

**Overview of the Annual Performance Report Development:**

Please see page 1 of this APR for description of report development.

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

**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:**

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

States are required to use the “Indicator 14 Data Rubric” for reporting data for this indicator.

FFY	Measurable and Rigorous Target
<b>2011 (2011-2012)</b>	<b>100%</b> of required data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.

**Actual Target Data for 2011 (2011-2012):**

As indicated in the Overview Section of this APR, CNMI Part C chooses to wait for OSEP’s calculation of CNMI’s compliance with Indicator 14 requirements. As communicated by OSEP during the December 2012 TA call, states/entities will have an opportunity to respond to OSEP’s Indicator 14 calculation during “clarification” period anticipated in April 2013.