

Part C State Annual Performance Report (APR) for FFY 2012

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 2012-2013 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 1, 2013, the compliance matrix, the response table, current performance data, and improvement activities. 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 2012-2013 APR included the following activities:

- **July 2013:** OSEP's Part C "Determination" Letter, Compliance Matrix, 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, 2013:** Public School System State level professional development for early intervention personnel. OSEP's July 1, 2013 Part C Determination Letter, Compliance Matrix, and Response Table were shared with the early intervention personnel as well as preliminary discussions regarding OSEP's view on results data.
- **September 25, 2013:** An ICC presentation on the OSEP's new Results Driven Accountability (RDA) system and how RDA will be used in upcoming determination was held and reviewed preliminary APR data.
- **October 29 – November 1, 2013:** CNMI participated in the "WRRRC Regional Leadership Forum" sponsored by the Western Regional Resource Center (WRRRC). The focus of the forum was to discuss quality practices and to share strategies for designing and implementing the State Systemic Improvement Plan (SSIP).
- **November 18, 2013:** Guam CEDDERS provided technical support during CNMI's ICC meeting and early intervention staff are the main stakeholder group for CNMI's Part C Program. Guam CEDDERS reviewed OSEP's Results Driven Accountability and how OSEP will make determinations in 2012-2013. ICC members reviewed the DRAFT FFY 2012 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.
- **December 1, 2013:** ICC members were provided a draft copy of the APR and were given an opportunity to provide feedback. ICC feedback on the APR has been incorporated into the final APR for submission.
- **December 16, 2013:** The APR Executive Summaries with indicator trend data was provided to the PSS Commissioner of Education's Leadership Team for review and input.
- **January 9, 2014:** During the ICC Quarterly Meeting, the Early Intervention (EI) Interim Coordinator provided members with the APR Executive Summary with indicator trend data. The ICC certified the final version of the APR FFY 2012 APR.

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- **January 10, 2014:** The APR was presented to the Fiscal, Personnel and Accountability subcommittee of the Board of Education for review and approval.
- **January 17, 2014:** The Board of Education approved the CNMI FFY 2012 Part C APR for submission to OSEP.

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 2011-2012 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

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

CNMI has posted its complete revised SPP, which includes any revisions to the SPP based on the FFY 2011 APR submission in 2013, on the PSS website at: http://www.cnmipss.org/?page_id=925.

- **By February 15, 2014,** the CNMI will update the complete revised SPP with the status of improvement activities reported in the FFY 2012 APR. The complete revised SPP will be posted with the APR on the PSS website at: http://www.cnmipss.org/?page_id=925.
- **By June 30, 2014,** upon receipt of OSEP’s Determination Letter and Response Table for CNMI’s FFY 2012 (2012-2013) Part C APR, CNMI PSS will post OSEP’s Determination Letter and Response Table with CNMI’s FFY 2012 Part C APR and complete revised SPP on the PSS website at: http://www.cnmipss.org/?page_id=925 for the SPP/APR and 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 2012-2013 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	The Developmental Disabilities Council
Public School System Board of Education	Secretary of Commonwealth Healthcare Corporation
The Protection and Advocacy System Office	

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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
2012 (2012-2013)	100% of infants and toddlers with an IFSP will receive early intervention (EI) services on their IFSP in a timely manner

The CNMI did not identify findings of non-compliance in FFY 2011..

Actual Target Data for FFY 2012 (2012 - 2013):

Data reported for the period of July 1, 2012 to June 30, 2013

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 ALL 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).
95	95	0	0	0	95/95x 100= 100%

- 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, 2012 to June 30, 2013.
- 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).

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- 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).
- 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, 2012 to June 30, 2013 is taken from the database of the total count. The CNMI performance was 95/95 or 100% with timely IFSP services.

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 2012:

CNMI met the target for indicator 1, and therefore, as per **OSEP's Memorandum 14-3** CNMI is not required to provide an explanation of: a) progress; b) no change in actual target data from the data for FFY 2011; or c) slippage.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2013: 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 14-3**, October 30, 2013, CNMI is not required to discuss improvement activities for: a) compliance indicators where the State reports 100% compliance for FFY 2012; and b) results indicators where the State has met its FFY 2012 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. Although this FFY 2012 reporting year is the last year of the FFY 2005-2012 SPP, CNMI has updated the status of each improvement activity, including the continuation, if appropriate, of the improvement activity in FFY 2013.

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

2013-2014 IMPROVEMENT ACTIVITY TABLE

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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>
	Conduct "random" observations of initial and annual IFSP meetings to ensure decisions regarding service start dates are based on family need.	Monthly Beginning Sept 2010 through FFY 2012	EI Coordinator	<u>Continuing</u>
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." Service Coordinators continue to verify EI personal calendars and monthly calendars that are sent home to families.	July 2010 July 2011 July 2012 July 2013 Upon Completion of the IFSP through FFY 2012	Data Manager Service Coordinators	<u>Continuing</u>
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>
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>
	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>

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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 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
2012 (2012-2013)	On December 1, 2012, 96% of infants and toddlers with IFSP will receive early intervention services in the home or community-based settings.

Actual Target Data for FFY 2012 (2012-2013):

a.	b.	c.	d.
618 Reported Data Submitted February 1, 2012	Total # of Children with an IFSP	# of Children Served at Home or Community-based settings	% of Children Served at Home or Community-based settings
December 1, 2012	59	58	58/59 x 100 = 98.3%

Data Source: Table 2 of Information Collection 1820-0557 (618 Data Table collected on December 01, 2012)

On December 1, 2012, the CNMI served a total of 59 infants and toddlers with disabilities. Fifty-eight (58/59) or 98.3% received EI services primarily in their homes or in community-based settings. Based on the 2012-2013 performance, the CNMI **exceeded its target** of 96%. One child, 23 months old received services at the Children’s Developmental Assistance Center (C*DAC) at the time the child count was taken. The family was offered other community settings, however both parents preferred the center due to privacy issues.

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 2012:

CNMI met the target for indicator 2, and therefore, as per **OSEP’s Memorandum 14-3**, October 30, 2013, CNMI is not required to provide an explanation of: a) progress; b) no change in actual target data from the data for FFY 2012; or c) slippage.

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Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2013: The CNMI will not revise its targets at this time.

CNMI met the target for indicator 2, and therefore, as per **OSEP’s Memorandum 14-3**, October 30, 2013, CNMI is not required to discuss improvement activities for: a) compliance indicators where the State reports 100% compliance for FFY 2012; and b) results indicators where the State has met its FFY 2012 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. Although this FFY 2012 reporting year is the last year of the FFY 2005-2012 SPP, CNMI has updated the status of each improvement activity, including the continuation, if appropriate, of the improvement activity in FFY 2013.

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

2013 - 2014 IMPROVEMENT ACTIVITY TABLE

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
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>
	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>
Training and Professional Development	Continue to provide staff development opportunities in order to attain or maintain certification requirements Continue to provide staff development opportunities on EI Services in Natural Environments, Family Centered Services and Outcome Measurements.	March 2010 March 2011 March 2012	EI Coordinator	<u>Continuing</u> 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>
	Continue training on new Teacher Evaluation including self-assessment to new providers.	December 2012	EI Coordinator	<u>Continuing</u>
	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>Completed 2012</u>

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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 2012 (2012 - 2013):

Summary Statements	Targets FFY 2012 (% of children)	Actual FFY 2012 (% of children)
Outcome A: Positive social-emotional skills (including social relationships)		
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%	$(c + d) / (a + b + c + d)$ $(6 + 7) / (0 + 3 + 6 + 7)$ 13/16 = 81.3%
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%	$(d + e) / \text{TOTAL}$ $(7+6)/22$ 13/22 = 59.1%

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Summary Statements	Targets FFY 2012 (% of children)	Actual FFY 2012 (% of children)
Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)		
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%	$(c + d) / (a + b + c + d)$ $(8 + 8) / (1 + 5 + 8 + 8)$ 16/22 = 72.7%
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%	$(d + e) / \text{TOTAL}$ $(8+0)/22$ 8/22 = 36.4%
Outcome C: Use of appropriate behaviors to meet their needs		
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%	$(c + d) / (a + b + c + d)$ $(5 + 4) / (0 + 5 + 5 + 4)$ 9/14 = 64.3%
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%	$(d + e) / \text{TOTAL}$ $(4 + 8)/22$ 12/22 = 55%

Progress Data for Part C Children FFY 2012

A. Positive social-emotional skills (including social relationships):	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	3	$(3/22) = 13.6\%$
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	6	$(6/22) = 27.3\%$
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	7	$(7/22) = 31.8\%$
e. Percent of children who maintained functioning at a level comparable to same-aged peers	6	$(6/22) = 27.3\%$
Total	N = 22	100%
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	1	$(1/22) 4.5\%$
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	5	$(5/22) = 22.7\%$
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	8	$(8/22) = 36.4\%$
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	8	$(8/22) = 36.4\%$
e. Percent of children who maintained functioning at a level comparable to same-aged peers	0	0%
Total	N = 22	100%
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	5	$(5/22) = 22.7\%$
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	5	$(5/22) = 22.7\%$
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	4	$(4/22) = 18.2\%$
e. Percent of children who maintained functioning at a level comparable to same-aged peers	8	$(8/22) = 36.4\%$
Total	N = 22	100%

Part C State Annual Performance Report (APR) for FFY 2012**Outcome A: Positive Social Emotional Skills**

- Summary Statement 1:
 - CNMI performance was 81.3% (13/16). The CNMI **met** 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:
 - CNMI performance was 59.1% (13/22). The CNMI **did not meet** its target of 65% of infants and toddlers functioning within age expectation by the time they turned 3 years of age or exited the program.

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:
 - CNMI performance was 36.4% (8/22). The CNMI **met** its target of 33% of infants and toddlers functioning within age expectation by the time they turned 3 years of age or exited the program.

Outcome C: Use of Appropriate Behaviors to Meet their Needs

- Summary Statement 1:
 - CNMI performance was 64.3% (9/14). The CNMI **did not meet** 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. The CNMI dropped from last year which was at 90%.
- Summary Statement 2:
 - CNMI performance was 55% (12/22). 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 2012:

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.

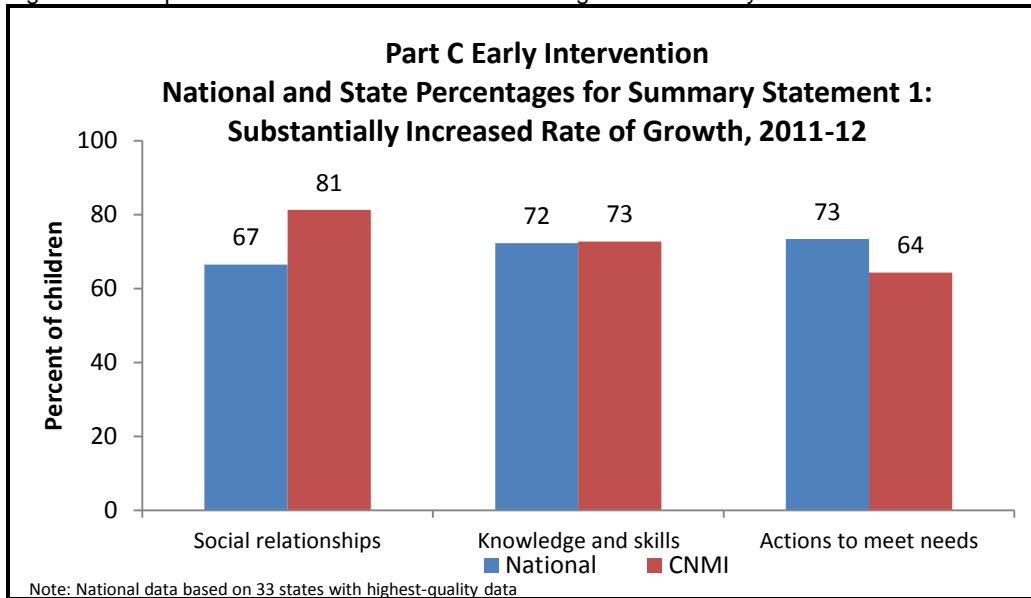
The CNMI will continue to use the Early Childhood Outcomes (ECO) format to calculate the OSEP reporting requirements and will make changes to the database as necessary. The Data Manager inputs measurements 1 and 2 into the ECO format that provides the number and percent of infants and toddlers in the five measurement categories in the three early childhood outcomes measures. In addition, the

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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 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.

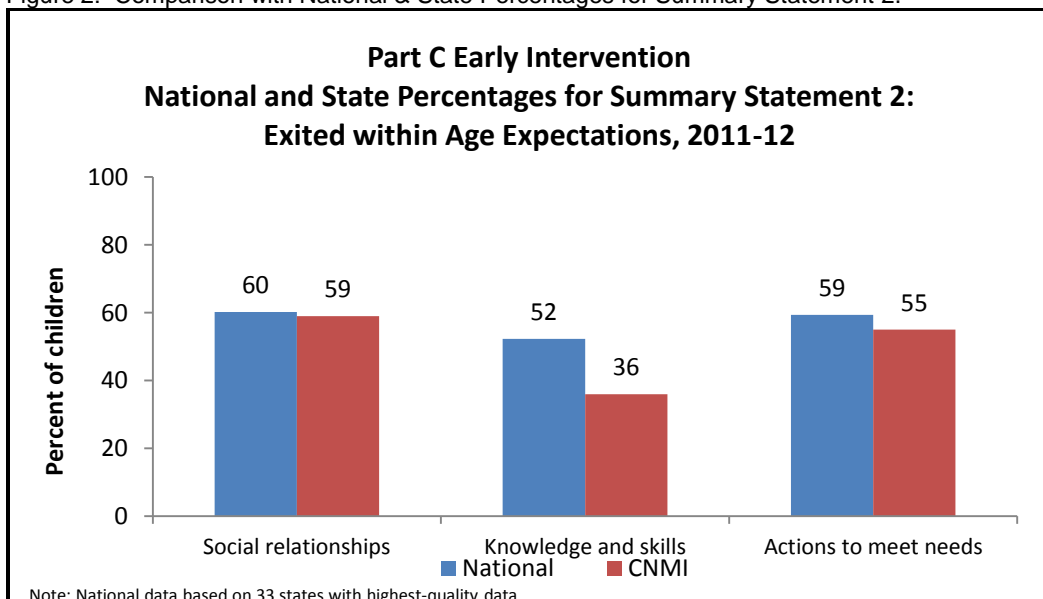
In comparison with National Data taken Part C SPP/APR 2012 Indicator Analysis, CNMI is performing above National average for Outcomes A & B and below National average for Outcome C: Actions to Meet Your Needs. (See Figure 1)

Figure 1: Comparison with National & State Percentages for Summary Statement 1.



As indicated in Figure 2, CNMI is performing below National average in all 3 of the Outcome Measures for Summary Statement 2.

Figure 2: Comparison with National & State Percentages for Summary Statement 2.



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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 EI 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 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.

The EI program participated in the following trainings to support improving results of infants and toddlers with disabilities and their families:

- In October 2012, providers attended the “*Measuring and Improving Child and Family Outcomes*” Conference in Minnesota. The 2 day event focused on the ECO Center framework to evaluate progress towards an optimal measurement system. The conference also focused on specific improvement practices relevant to child and family outcome areas and that are aimed at improving child outcomes.
- In December 2012, staff participated in a presentation entitled: “*Effective Strategies and Tips for Early Childhood Language Interpreters*” that was facilitated by Guam CEDDERS. The focus of this training was to provide translators with the background knowledge with the Early Hearing and Detection Intervention Program as well as Early Intervention services.
- In March 2013, a Vision Training conducted by the CNMI Public School System’s vision specialist. EI providers were briefed with examples of vision disorders and how such concerns affect a child’s overall development. Accommodations were discussed and specific strategies were identified to address to meet the needs of infants and toddlers with vision concerns.
- In March 2013, staff participated in the “*10th Annual Addressing Challenging Behavior Institute*”. The focus of this institute was to promote social emotional competence among service providers as well as improve child and family outcomes in the 3 outcome areas. By focusing on the whole child approach, the Pyramid Model allows providers to identify, accommodate and develop specific strategies to be used with families receiving Early Intervention services.
- In April 2013, EI service providers participated in training entitled: *Primary Service Coaching Model* facilitated by Guam CEDDERS. In efforts to encourage active family engagement throughout their child’s development, service providers were provided with the tools needed to be a supportive Primary Service Coach. The CNMI encourages team collaboration among providers and parents in order to promote overall child growth and development.

OSEP FFY 2011 APR Response Table: Results Data Summary Notes, July 2013

REQUIRED ACTIONS: CNMI must report progress data and actual target data for FFY 2012 in the FFY 2012 APR. **CNMI Response:** Refer to the Actual Target and Discussion Sections of this Indicator.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2013: The CNMI will not revise its targets at this time.

The improvement activities are organized by areas of priority needs for improvement and color-coded to show the “status” of each improvement activity. Although this FFY 2012 reporting year is the last year of the FFY 2005-2012 SPP, CNMI has updated the status of each improvement activity, including the continuation, if appropriate, of the improvement activity in FFY 2013.

Part C State Annual Performance Report (APR) for FFY 2012

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

2013-2014 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>
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>
	Revise Outcome Manual inclusive of forms and resources and Update Outcome Parent Brochure to incorporate Parent Participation.	December 2012	EI Coordinator	<u>Completed 2012</u>
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>
	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>

Part C State Annual Performance Report (APR) for FFY 2012

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
	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>Continuing</u>
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>
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	<u>Continuing</u>

Part C State Annual Performance Report (APR) for FFY 2012

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
(2012-2013)	
(2012-2013)	<p>(A) Maintain 92% Know their rights</p> <p>(B) Maintain 92% Effectively communicate their children's needs</p> <p>(C) Maintain 91% Help their children learn and grow</p>

Actual Target Data for FFY 2012 (2012 - 2013):

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 2012

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 113 surveys distributed, 80/113 or 71% were completed and submitted by June 2013. The percentage of returns increased by 18% for FFY 2012 for this reporting period.

Of the 80 surveys returned, 31 were from “New” families, 14 were from “Ongoing” families, and 35 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 2012 - 2013 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 2012

	A. Know Your Rights	B. Effectively Communicate their children’s needs	C. Help their Children Develop and Learn
New	149 responses indicated “Agree” out of 155 possible responses. 149/155 = 96%	179 responses indicated “Agree” out of 186 possible responses. 179/186 = 96%	113 responses indicated “Agree” out of 124 possible responses. 113/124 = 91%
Ongoing	67 responses indicated “Agree” out of 70 possible responses. 67/70 = 95.7%	53 responses indicated “Agree” out of 56 possible responses. 53/56 = 94.6%	52 responses indicated “Agree” out of 56 possible responses. 52/56 = 92.8%
Exit	99 of the 105 possible responses indicated “Agree.” 99/105 = 94%	101 of the 105 possible responses indicated “Agree.” 101/105 = 96%	241 of the 245 possible responses indicated “Agree.” 241/245 = 98%
Overall % Agreement of Respondents	315 overall responses that indicate “agree” of the 330 possible responses. 315/330 = 96%	333 overall responses that indicate “agree” of the 347 possible responses. 333/347 = 96%	406 overall responses that indicate “agree” of the 425 possible responses. 406/425 = 95.5%

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)

Part C State Annual Performance Report (APR) for FFY 2012

Know their rights is at 315/330 or 96% exceeding the target by **4%**; B) Effectively communicate their children’s needs at 333/347 or 96% exceeding the overall target by **4%**; and C) Help their children develop and learn was at a performance of 406/425 or 95.5% exceeding the target by **4.5%** 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 2012:

CNMI met the target for indicator 4, and therefore, as per **OSEP’s Memorandum 14-3**, October 30, 2013, CNMI is not required to provide an explanation of: a) progress; b) no change in actual target data from the data for FFY 2011; or c) slippage.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2013: The CNMI will not revise its targets at this time.

CNMI met the target for indicator 4, and therefore, as per **OSEP’s Memorandum 14-3**, October 30, 2013, CNMI is not required to discuss improvement activities for: a) compliance indicators where the State reports 100% compliance for FFY 2012; and b) results indicators where the State has met its FFY 2012 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. Although this FFY 2012 reporting year is the last year of the FFY 2005-2012 SPP, CNMI has updated the status of each improvement activity, including the continuation, if appropriate, of the improvement activity in FFY 2013.

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

2013-2014 IMPROVEMENT ACTIVITY TABLE

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
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"> The survey results will be tallied and reported once per year. 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. Surveys will continue to be provided with envelopes that can be mailed back, dropped off or picked up by providers. Continue to conduct Parent Forums as another means to 	July 2007, 2008, 2009, 2010, 2011, 2012	EI Coordinator Service Coordinators	<u>Continuing</u>

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Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
	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. <ul style="list-style-type: none"> 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. 			
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>
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>
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>Continuing</u>
	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>Continuing</u>
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>

Part C State Annual Performance Report (APR) for FFY 2012

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
(2012-2013)	On December 1, 2012, the CNMI will serve .91% of children under age one.

Actual Target Data for FFY 2012 (2012-2013):

618 Child Count

Year December 1	# Served Under Age 1	CNMI 2010 Census Population Data	CNMI % Served Under Age 1	National Data	CNMI Target
2012	11	1072	(11/1072 x 100) 1.02%	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 11/1027 or 1.02% of infants below age one were served. The CNMI **met** target and CNMI is slightly below the national average by .01%.

Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2012:

CNMI met the target for indicator 5, and therefore, as per **OSEP's Memorandum 14-3**, October 30, 2013, CNMI is not required to provide an explanation of: a) progress; b) no change in actual target data from the data for FFY 2012; or c) slippage.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2013: The CNMI will not revise its targets at this time.

CNMI met the target for indicator 5, and therefore, as per **OSEP's Memorandum 14-3**, October 30, 2013, CNMI is not required to discuss improvement activities for: a) compliance indicators where the State reports 100% compliance for FFY 2012; and b) results indicators where the State has met its FFY 2012 target.

See discussion in Indicator 6 for Improvement Activities, Timelines, and Resources.

Part C State Annual Performance Report (APR) for FFY 2012

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
(2012-2013)	On December 1, 2012, the CNMI will serve 2% of children birth to 3 years old.

Actual Target Data for FFY 2012 (2012 - 2013):

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
2012	59	3216	1.83% (59/3216 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 increased as of the December 1, 2012 child count from 40 from FFY 2011 to 59 children with IFSP children birth to 3 in FFY 2012. The CNMI did not meet its target, however, showed an increase of .59% from last year. The CNMI is at 1.83% for 2012. CNMI serves less than 1% compared to the National Average.

Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2012:

During the months of 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. At these meetings, the ICC members were also 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 the CREI (Concern, Requirement, Evidence, Impact) Problem Statement template as a way to determine future improvement activities. Based on feedback from the ICC, new improvement activities have been identified.

The child find and public awareness activities are a collaborative effort with the CNMI EHDI program, MCH Statewide Early Childhood Comprehensive System, Head Start, DD Council, Child Care and Protection and Advocacy. 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:

Part C State Annual Performance Report (APR) for FFY 2012

- 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.
- Dissemination of Welcome Packets to the well-baby clinics and to all new mothers prior to leaving the hospital.
- 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.

With recommendations from the ICC and the State Board of Education, the CNMI focused efforts on new child find activities in efforts to meet the target for this indicator.

In September 2012, the Early Intervention Program was provided a 1 hour radio slot. A description of services was discussed and callers were encouraged to call in and ask questions regarding services. The interview was replayed throughout the month as well. Services providers also conducted a "Meet n Greet" with Private Daycare Providers, with several children receiving early intervention services. Service providers discussed the referral and eligibility process and provided the child care centers with referral forms, developmental checklists and contact information.

In October 2012, the EI Program participated in a *Baby Fair*. Pamphlets, developmental checklists, and informational booklets were handed out to participants. Service providers were available and spoke to participants about their roles and services. As a result of participating in these events, the Early Intervention Program received 3 referrals. Also during this month, service providers presented to college students about EI services, specifically the referral and eligibility process.

From November 2012 to February 2013, the Early Intervention service providers met with 6 private and public health clinics. Each clinic was provided with a folder that contained referral forms, developmental check lists and the CNMI's Established Condition List, as well as contact information. Service providers met with other agencies such as Women Infant Children (WIC) and the HOME Visiting Program (Maternal Infant Early Childhood Home Visitation Program).

From April 2013 - June 2013, the EI program conducted major outreach activities on Tinian and Rota. On Rota, a free television advertisement was made and aired throughout the day on one of the local channels. Early Intervention Interim Coordinator met with the Mayor of Rota and discussed child find activities. The Mayor was very supportive and provided the team with agency individuals who could assist with our efforts. Service providers walked around the villages, house to house, and provided families with Early Intervention pamphlets. Developmental checklists were placed outside of stores and in public and private office spaces, including the health center. Families were provided with developmentally appropriate board books that were purchased by the Early Childhood Comprehensive Service System: Big Steps, Little Feet- a partner of the Early Intervention Program. Service providers were recognized by the people of Rota due to the Early Intervention T-Shirts that were purchased for child find purposes. A Head Start representative has been assigned as the liaison to take in referrals for the Early Intervention Program and inform the Program should there be families in need of services. While on Rota, service providers also conducted screenings and as a result, referred 3 children to the Early Intervention Program. As a result of the outreach activities, 3 children were evaluated and 2 children qualified for Early Intervention services.

Part C State Annual Performance Report (APR) for FFY 2012

On Tinian, EI providers met with nurses at the Health Center and provided referral forms, developmental checklists, Established Condition Lists, and contact information. Early Intervention Interim Coordinator met with the Resident Director of the Health Clinic who supported the child find activities. Poster size Early Intervention advertisements were placed in the waiting area of the Clinic and at the Head Start buildings. Service providers also went from store to store and put up fliers for public awareness. Tinian residents were able to identify providers by the T-Shirts (child find uniforms) that were worn. As a result of the public awareness and child find efforts on Tinian, the Early Intervention Program received 3 referrals and all 3 qualified for Early Intervention services.

During an ICC and Parent Night meeting on November 18, 2013, activities were discussed and the Early Intervention Program was encouraged to continue with the Public Awareness and Child Find Activities, since there was an increase in numbers, especially on Rota and Tinian. The Early Intervention Program was also encouraged to place advertisements in laundry mats, local village stores, and at the Children’s Clinic. Since there are new providers at the hospital and a new Physician’s Assistant assigned to the Children’s Clinic, the team was encouraged to meet with the new staff and provide folders containing referral forms, developmental checklists, Established Condition lists and contact information. Parents also provided input and encouraged the team to use TV advertisements with Parent testimonials, weekly advertisements in the local and church newspapers.

The CNMI will continue child find efforts that were proven effective strategies in 2012 to ensure that all children are located, identified, and provided services.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2013: The CNMI will not revise its targets at this time.

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. Although this FFY 2012 reporting year is the last year of the FFY 2005-2012 SPP, CNMI has updated the status of each improvement activity, including the continuation, if appropriate, of the improvement activity in FFY 2013.

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

2013-2014 IMPROVEMENT ACTIVITY TABLE

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/Resources	Status
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> 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>
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>
	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>
	Continue collaboration with the MCH Early Childhood Comprehensive System (ECCS) "Big Steps for Little Feet". <ul style="list-style-type: none"> Participate in Monthly Meetings 	Monthly Team meetings, the last Thursday of the month	MCH staff to coordinate effort with EI team	<u>Continuing</u>
	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>Continuing</u>
Training and Professional Development	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>
	Conduct prenatal training in collaboration with the hospital.	Annual FFY 2012	Hospital Staff, EI Coordinator	<u>Continuing</u>
	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>Continuing</u>

Part C State Annual Performance Report (APR) for FFY 2012

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
(2012-2013)	100% 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.

The CNMI did not identify findings of non-compliance in FFY 2011

Actual Target Data for FFY 2012 (2012 - 2013):

Report Period:	a.	b.	c.	d.	e.
July 2012 to June 2013	# of Evals Assessments and Initial IFSP meetings required to be conducted	# Completed Timely (within 45-day timeline)	# Completed Untimely for valid 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	73	70	3	0	70+ 3/73 x 100 100%

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

Of the 73 evaluations, assessments and Initial IFSP meetings required to be held within the 45-day timeline, 70 were conducted within the timeline and 3 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, 2013. The CNMI continues to demonstrate compliance in this indicator.

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Reasons for Delay:

- Three families were not at home for the scheduled evaluation due to valid family circumstances. The three families did make contact with their service coordinators to reschedule the IFSP meetings. IFSP meetings, although untimely did occur. All three files contain a Reason for Delay form.

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 2012:

CNMI met the target for indicator 7, and therefore, as per **OSEP’s Memorandum 14-3**, October 30, 2013, CNMI is not required to provide an explanation of: a) progress; b) no change in actual target data from the data for FFY 2012; or c) slippage.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2013: This is a compliance indicator therefore the targets were not revised.

CNMI met the target for indicator 7, and therefore, as per **OSEP’s Memorandum 14-3**, October 30, 2013, CNMI is not required to discuss improvement activities for: a) compliance indicators where the State reports 100% compliance for FFY 2012; and b) results indicators where the State has met its FFY 2012 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. Although this FFY 2012 reporting year is the last year of the FFY 2005-2012 SPP, CNMI has updated the status of each improvement activity, including the continuation, if appropriate, of the improvement activity in FFY 2013.

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 2012

2013-2014 IMPROVEMENT ACTIVITY TABLE

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
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>
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>
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>

Part C State Annual Performance Report (APR) for FFY 2012

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 toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:

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

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

Measurement:

- A. Percent = [(# of toddlers with disabilities exiting Part C who have 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 their third birthday) divided by the (# of toddlers with disabilities exiting Part C)] times 100.
- B. Percent = [(# of toddlers with disabilities exiting Part C where notification (consistent with any opt-out policy adopted by the State) to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services) divided by the (# of toddlers with disabilities exiting Part C who were potentially eligible for Part B)] times 100.
- C. Percent = [(# of toddlers with disabilities exiting Part C where the transition conference occurred 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) divided by the (# of toddlers with disabilities exiting Part C who were potentially eligible for Part B)] times 100.

Account for untimely transition planning under 8A, 8B and 8C, including the reasons for delays.

FFY	Measurable and Rigorous Target
(2012-2013)	<ul style="list-style-type: none"> A. 100% of toddlers with disabilities exiting Part C have 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 their third birthday B. 100% of toddlers with disabilities exiting Part C where notification to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services. C. 100% of toddlers with disabilities exiting Part C where the transition conference occurred 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.

Part C State Annual Performance Report (APR) for FFY 2012

Actual Target Data for FFY 2012 (2012 - 2013):

Measurement A: Steps and Services

(a) Total Exits	(b) IFSP with Transition Steps and Services at least 90 day, and not more than 9 months of their 3 rd Birthday	(c) Total # IFSP with Transition Steps and Service Included	(d) Exits for Other Reasons Steps and Services Not Required	(e) Total % (b/c) x100
40	33	33	7	33/33 x 100= 100%

Column (a): There were a total of 40 children who exited from Early Intervention during the report year.

Column (b): Of the 40 who exited, 33 required Transition Steps and Services.

Column (c): 33 IFSP's included steps and services

Column (d): Seven (7) exited for other reasons and steps and services were not required: Four (4) were late referrals and did not require steps and services and three (3) toddlers withdrew from EI Program.

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

The CNMI did not identify findings of non-compliance in FFY 2011.

Measurement B: SEA and LEA Notification occurred at 90 days prior to their third birthday for Potentially Eligible Part B Children

(a) Total # Potentially Eligible for Part B and Required SEA and LEA Notification	(b) Total # SEA and LEA Notifications were sent out at least 90 days prior to toddler's third birthday	(c) Total % (b/c) x100
34	34	34/34 x 100% = 100%

Column (a): 34 children were **potentially eligible** for Part B services and required **SEA and LEA Notifications** at least 90 days prior to their third birthday.

Column (b): 34 **SEA and LEA Notifications** occurred at least 90 days prior to the toddler's third birthday and received by Part B.

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

The CNMI did not identify findings of non-compliance in FFY 2011.

Thirty-four (34) children were **potentially eligible** for special education services. Notifications for all 34 children were provided prior to the toddler's third birthday to the Special Education Program (**the SEA/LEA**). **The CNMI does not have any LEA's**. Data for this indicator was verified through a review of the **SEA/LEA notifications** sent to the Special Education Program.

On the first Friday of every month, and as late referrals come in, 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 **SEA/LEA Notification** that were provided to the Special Education Program as verification that the **SEA/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

Part C State Annual Performance Report (APR) for FFY 2012

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: Transition Conference are held at least 90 Days and not more than nine months prior to the toddler’s third birthday 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) Transition Conference that Families Did Not Approve	(e) Total % (b+c/a-d) x100
34	31	2	1	(31+2/34-1) x 100 = 100%

- Column (a):** 34 required Transition Conferences with approval of the family at least 90 days and not more than nine months before the child’s third birthday.
- Column (b):** 31 Transition Conferences held in a timely manner.
- Column (c):** 2 Transition Conferences were untimely due to exceptional family circumstances.
- Column (d):** 1 Transition Conference not approved by family.
- Column (e):** 100% of Transition Conferences held within timeline

The CNMI did not identify findings of non-compliance in FFY 2011.

31 of the 34 required Transition Conferences were conducted in a timely manner, 2 were not timely due to exceptional family circumstances, which were documented on the *Reason for Delay* form in the child’s file. Both families asked to reschedule meetings due to personal family matters. The Transition Conferences, although late, did occur before their 3rd birthday. One Transition Conference did not occur because the family did not approve for a transition conference to take place.

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 2012:

Part C State Annual Performance Report (APR) for FFY 2012

CNMI met the target for indicator 8A, 8B, and 8C, and therefore, as per **OSEP’s Memorandum 14-3**, October 30, 2013, CNMI is not required to provide an explanation of: a) progress; b) no change in actual target data from the data for FFY 2012; or c) slippage.

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 8, and therefore, as per **OSEP’s Memorandum 14-3**, October 30, 2013, CNMI is not required to discuss improvement activities for: a) compliance indicators where the State reports 100% compliance for FFY 2012; and b) results indicators where the State has met its FFY 2012 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. Although this FFY 2012 reporting year is the last year of the FFY 2005-2012 SPP, CNMI has updated the status of each improvement activity, including the continuation, if appropriate, of the improvement activity in FFY 2013.

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

2013-2014 IMPROVEMENT ACTIVITY TABLE

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
Improve Administration and Monitoring	Monthly Heads Up” notices to Service Coordinators and EI providers that indicate the upcoming birthdays and transition requirements Continue “random” checks of IFSP’s to ensure timelines are met. The EI providers will continue to Calendar time sensitive events.	Monthly through 2012	Data Manager	<u>Continuing</u>
Training and Professional Development	Conduct training on the revised Transition policies and procedures, including training on the Transition Directives. Review IFSP forms to ensure transition requirements are included in the IFSP forms.	April 2012	EI Coordinator EI Data Manager Guam CEDDERS ECTAC	<u>Continuing</u>

Part C State Annual Performance Report (APR) for FFY 2012

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
(2012-2013)	The CNMI identifies and corrects 100% of non-compliance as soon as possible but in no case later than one year from identification.

Actual Target Data for FFY 2012 (2012-2013):

INDICATOR C-9 WORKSHEET

Indicator/Indicator Clusters	General Supervision System Components	# of System Issued Findings in FFY 2011 (7/1/11 to 6/30/12)	(a) # of Findings of noncompliance identified in FFY 2011 (7/1/11 to 6/30/12)	(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	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0

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Indicator/Indicator Clusters	General Supervision System Components	# of System Issued Findings in FFY 2011 (7/1/11 to 6/30/12)	(a) # of Findings of noncompliance identified in FFY 2011 (7/1/11 to 6/30/12)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
1 with IFSPs 6. Percent of infants and toddlers birth to 3 with IFSPs	Dispute Resolution: Complaints, Hearings	0	0	0
7. Percent of eligible infants and toddlers with IFSPs for whom an initial evaluation and initial assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	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 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	1 (Service Coordinator Supervisor)	2	2
	Dispute Resolution: Complaints, Hearings	0	0	0
Sum the numbers down Column a and Column b			2	2
Percent of noncompliance corrected within one year of identification = (column (b) sum divided by column (a) sum) times 100			2/2 x100	100%

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 CNMI 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 2011, a total of 2 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 2012

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

- In FFY 2011, 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. The annual data drawdown for the FFY 2011 APR compliance indicators also resulted in no findings of noncompliance, as indicated in the 100% compliance reported for Indicators 1, 7, and 8.
- **External Monitoring:** The external monitoring of 5 priority areas was conducted in October 2011. However, because the data reviewed included FFY 2010 data, the results of the external monitoring were reviewed in the FFY 2011 APR Indicator 9 as part of the verification of correction of FFY 2010 findings of noncompliance. As described in the FFY 2011 APR Indicator 9, 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 in FFY 2010.

Consistent with the May 2011 revisions to the monitoring procedures, the external monitoring will be conducted every two years. Therefore, with the reporting of the last external monitoring occurring in October 2011, the next external monitoring is scheduled in FFY 2013.

- **Dispute Resolution System:** CNMI did not receive any formal complaints or hearing requests in FFY 2011, as reported in the IDEA 618 Table 7.

The following breakdown is provided, with an explanation of the verification of timely correction of FFY 2011 findings of noncompliance:

Correction of FFY 2011 Findings of Noncompliance Timely Corrected (corrected within one year from identification of the noncompliance):

1. Number of findings of noncompliance CNMI made during FFY 2011 (the period from July 1, 2011 through June 30, 2012) (Sum of Column a on the Indicator B15 Worksheet)	2
2. Number of findings CNMI verified as timely corrected (corrected within one year from the date of notification to the provider of the finding) (Sum of Column b on the Indicator C9 Worksheet)	2
3. Number of findings <u>not</u> verified as corrected within one year [(1) minus (2)]	0

Correction of FFY 2011 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance):

4. Number of FFY 2011 findings not timely corrected (same as the number from (3) above)	0
5. Number of findings CNMI has verified as corrected beyond the one-year timeline (“subsequent correction”)	0
6. Number of findings <u>not</u> yet verified as corrected [(4) minus (5)]	0

Verification of Correction (either timely or subsequent)

Consistent with OSEP Memorandum 09-02, CNMI reports verifying timely correction of FFY 2011 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

Part C State Annual Performance Report (APR) for FFY 2012

FFY 2011 findings of noncompliance as follows:

Other Areas of Noncompliance: Two (2) Related Requirements

The FFY 2011 internal monitoring self-assessment process resulted in the identification of two individual instances of noncompliance: One for untimely IFSP 6 month reviews (§303.342(b)) and one for untimely annual IFSP (§303.342(c)). A *Written Notification of Findings* was issued to the supervisor of the Part C Service Coordinators responsible for the case management of these IFSPs, as the individual Part C Service Coordinators resigned from the Part C Program at the time the notifications were to be issued. The *Written Notification of Findings* included the required 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 for the 6-month review and annual review, 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. As a result, a *Written Notice of Timely Correction* was issued to the supervisor of the Part C Service Coordinators after additional data reviewed demonstrated 100% compliance with the requirements. As mentioned earlier, at the time the self-assessment was conducted, the child-specific instances of noncompliance were completed but over the required timeline.

Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2012:

The CNMI reports 100% (2/2) compliance with Indicator 9 for timely correction of findings of noncompliance identified in FFY 2011, 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 14-3**, CNMI is not required to provide an explanation of: a) progress; b) no change in actual target data from the data for FFY 2011; or c) slippage.

OSEP FFY 2011 APR Response Table: Compliance Data Summary Notes, July 2013

Required Actions	State’s Response
<p>When reporting in the FFY 2012 APR on the correction of findings of noncompliance, CNMI must report that it verified that for each finding of noncompliance identified in FFY 2011 that: (1) it 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) it has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the CNMI EIS program, consistent with OSEP Memo 09-02.¹ In the FFY 2012 APR, CNMI must describe the specific actions that were taken to verify the correction. In addition, in reporting on Indicator 9 in the FFY 2012 APR, must use and submit the Indicator 9 Worksheet.</p>	<p>CNMI assures implementation of OSEP Memorandum 09-02 for verification of timely correction, as reflected in the Actual Target Data section of this indicator.</p> <p>CNMI used the C9 Worksheet in the Actual Target Data section of this indicator.</p>

¹ OSEP Memorandum 09-02 (OSEP Memo 09-02), dated October 17, 2008, requires that the State report that it verified that each EIS program or provider with noncompliance: (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 a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider.

Part C State Annual Performance Report (APR) for FFY 2012

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2013:

CNMI met the target for indicator 9, and therefore, as per **OSEP’s Memorandum 14-3**, CNMI is not required to discuss improvement activities for: a) compliance indicators where the State reports 100% compliance for FFY 2012; and b) results indicators where the State has met its FFY 2012 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. Although this FFY 2012 reporting year is the last year of the FFY 2005-2012 SPP, CNMI has updated the status of each improvement activity, including the continuation, if appropriate, of the improvement activity in FFY 2013.

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

Completed	Rose
Continuing	Lavender
Revised	Light Blue
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Moved or Deleted	Yellow

2013-2014 IMPROVEMENT ACTIVITY TABLE

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
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> 2013 - 2014
	Conduct external monitoring in accordance with the revised monitoring procedures, every other year.	July 2011 through 2012	External Monitor	<u>Continuing</u> 2013 - 2014
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> 2013 - 2014
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> 2013 - 2014
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>Completed</u>

Part C State Annual Performance Report (APR) for FFY 2012

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
2012 (2012-2013)	Targets will be set once baseline data is established with in 10 or more resolution sessions.

Actual Target Data for FFY 2012 (2012-2013):

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

OSEP FFY 2011 APR Response Table, July 1, 2013:

CNMI reported no resolution sessions were held during the reporting period. CNMI reported fewer than ten resolution sessions held in FFY 2011. CNMI is not required to provide targets or improvement activities until any fiscal year in which ten or more resolution were held.

Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2012:

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2013:

Part C State Annual Performance Report (APR) for FFY 2012

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
2012 (2012-2013)	Targets will be set once baseline data is established with 10 or more mediations.

Actual Target Data for FFY 2012 (2012 - 2013):

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

OSEP FFY 2012 APR Response Table, July 1, 2013:

CNMI reported no mediations were held during the reporting period. CNMI reported fewer than ten mediations held in FFY 2011. CNMI is not required to provide targets or improvement activities until any fiscal year in which ten or more mediations were held.

Discussion of Improvement Activities Completed and Explanation of Slippage, if the State did not meet its target that occurred for FFY 2012:

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2013:

Part C State Annual Performance Report (APR) for FFY 2012

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
2012 (2012-2013)	100% of required data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.

Actual Target Data for 2012 (2012-2013):

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 November 2013 TA call, states/entities will have an opportunity to respond to OSEP’s Indicator 14 calculation during “clarification” period anticipated in April/May 2014.