

## CNMI Part C Annual Performance Report (APR) for FFY 2009

### Overview of the Annual Performance Report Development:

The CNMI Public School System (PSS), Early Intervention Program (IDEA Part C Program) facilitated a process for ensuring broad stakeholder involvement in the development of the CNMI IDEA Part C 2009-2010 Annual Performance Report (APR) and the State Performance Plan, particularly the extension of the targets which is further discussed in the SPP. Stakeholders included the CNMI Interagency Coordinating Council (ICC) members, Early Intervention (EI) providers, parents, Head Start Community partners, and Public Health's Early Childhood Comprehensive System, *Big Steps for Little Feet*, partners. The review process included a discussion of OSEP's CNMI Part C determination letter issued on June 3, 2010, the response table, current performance data, improvement activities, revisions to SPP targets and areas that work well and/or need improvement. In order to evaluate the effectiveness of SPP and APR Improvement Activities, the stakeholders used the *Evaluating SPP/APR Improvement Activities - 12/16/09* resource from the National Early Childhood Technical Assistance Center and the RRC. As noted in the Improvement Activity Table for each indicator, the improvement activities are organized in several categories that the stakeholders feel will 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 data from each indicator and engaged in a discussion of the indicator progress or slippage, reviewed the previous year's activities and made decisions as to whether the improvement activity needed to be revised, deleted, continued or move to another indicator and for some indicators, revised the targets. The stakeholders also added new activities for some indicators.

- **July 2010:** OSEP's Part C "Determination" Letter and Response Table were disseminated to parents, the ICC, and CNMI BOE members. The Determination Letter and Response Table were also posted on the PSS website for public dissemination. The ICC and BOE were pleased with OSEP's determination of "meets requirements" for the Part C Program, as this implies that infants and toddlers with developmental delays and/or disabilities and their families in the CNMI receive and benefit from systematic and coordinated Early Intervention Services.
- **September 1-3, 2010:** Professional Development on Transition and the revised Monitoring Procedures. The Part C Coordinator conducted discussions with Early Intervention (EI) and Early Childhood Special Education (EC SPED) providers regarding OSEP's "Determination" of the CNMI Part C Program, with a focus on the transition process, particularly the new guidance on late referrals to Part C. In order for the CNMI to continue to demonstrate compliance with the transition requirements, the EI and EC SPED providers engage in continuous discussion during monthly combined meetings of what is working well and possible issues that may present problems with the transition process. The EI and EC SPED providers feel the operating procedures put in place several years ago are working; however, it needs to include procedures for late referrals. The Part C Coordinator also reviewed the revised monitoring procedures and Data Collection and Reporting procedures.
- **September 9, 2010:** ICC Meeting: Preliminary APR data was shared with the ICC. Guam CEDDERS facilitated a discussion to gather stakeholder input for the OSEP visit as well as the parent interviews. The stakeholder input was provided to OSEP during the visit.
- **October 13, 2010:** The Part C Coordinator met with Service Coordinators and Social Workers to discuss child find, evaluation, and timely service data (Indicators 1, 5, 6 and 7). Suggestions were made as to what additional supports or procedure revisions need to be in place to ensure compliance with these indicators.
- **November 1-5, 2010:** The CNMI participated in an "APR Clinic" sponsored by the Western Regional Resource Center (WRRRC). The regional training, held in San Francisco, was designed to provide additional insights for addressing the requirements in the SPP/APR indicator narratives.

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- **December 21, 2010:** With technical assistance from Guam CEDDERS, a presentation was held on the DRAFT APR report during an ICC special meeting. ICC members were provided an e-file via email a week prior to the meeting and hard copies of the draft APR/SPP was provided during the meeting. The ICC members reviewed all the indicator data, the programs progress or slippage in each indicator and the improvement activities. The ICC members suggested additional improvement activities for some indicators with “slippage” or otherwise performance that may not have met the target. The ICC Members also requested an additional week to review the draft APR/SPP to submit their written recommendations for inclusion into the SPP/APR.
- **December 29, 2010:** The SPP and APR were presented to the Board of Education subcommittee for Special Education and Early Intervention Programs for review and comments prior to submission to the full BOE. The SEEIP subcommittee chairperson requested that for next year, a draft of the APR and SPP be submitted to the subcommittee at least 2 weeks prior to the submission to the full BOE. The subcommittee reviewed the targets, performance and improvement activities.
- **January 4, 2011:** The APR and SPP were presented to the Board of Education for concurrence. The BOE, after clarification was provided on some indicator improvement activities, performance data, and targets, concurred on the APR and SPP.
- **February, 2011:** Final Part C APR submitted to OSEP.

The CNMI will continue to use the following format to report on improvement activities. 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 2008-2009 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**

- By February 1, 2011, the complete revised SPP will be posted on the website on the PSS website at: <http://www.cnmipss.org/state-level-programs/curriculum-instruction-assessment/early-intervention-program/>.
- By June 30, 2011, upon submission of CNMI's 2009-2010 Part C APR to OSEP and OSEP's response to the APR, CNMI PSS will post CNMI's 2009-2010 Part C APR on the PSS website at: <http://www.cnmipss.org/state-level-programs/curriculum-instruction-assessment/early-intervention-program/>.
- The CNMI will disseminate and make available hard copies of the CNMI's 2009-2010 APR to parents, and to public and private agencies/organizations including, at least, the following:

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

**CNMI Part C Annual Performance Report (APR) for FFY 2009****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.

<b>FFY</b>	<b>Measurable and Rigorous Target</b>
<b>2009 (2009-2010)</b>	100% of infants and toddlers with an IFSP will receive EI services on their IFSP in a timely manner

**Actual Target Data for FFY 2009:**

Data reported for the period of July 1, 2009 to June 30, 2010

a.	b.	c.	d.	e.	f.
Total # of children with an initial and/or subsequent IFSP who should have received all services in a timely manner	# of children with an Initial and/or subsequent IFSP with <b>ALL</b> Services Received in a Timely Manner	# of children with Initial and/or subsequent IFSPs with Untimely Services	Of # in (c), # of children with an Initial and/or subsequent IFSP with Untimely Services due to a Valid reason (exceptional family circumstance and extreme weather conditions)	Of # in (c), # of children Initial and/or subsequent IFSP with Untimely Services due to an Invalid reason (To be accounted for)	# and % of children with Initial and/or subsequent IFSP with ALL Services Received in a Timely Manner (plus Untimely due to Valid Reason) % = (b + d/a x 100)
<b>39</b>	<b>35</b>	<b>4</b>	<b>4</b>	<b>0</b>	(35+4 /39 x 100) = <b>100%</b>

- Column (a) is the total number of children with an initial and/or subsequent IFSP who should have received services in a timely manner. Services include initial and any other services added to the IFSP during the report period of July 1, 2009 to June 30, 2010.
- 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.

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- Column (d) is the total number of children with initial and/or subsequent IFSP with untimely services due to a valid reason (exceptional family circumstance or circumstance beyond the program control).
- Column (e) is the total number of children who did not receive service in a timely manner due to an invalid reason (to be accounted for).
- 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, 2009 to June 30, 2010 is taken from the database system of the total count. The CNMI performance was 100% with timely IFSP services. There were 4 "late" services however, the delay was due to exceptional family circumstances and cancelled flights to the island of Rota due to bad weather. The CNMI includes exceptional family services or inclement weather to both the numerator and denominator.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009:**

**CNMI Definition of Timely Service:** The CNMI's definition of "Timely Services" is the "start date" of each service listed on the IFSP. At this time, there is no other allowable time period such as 30 days from when the parent consent to each service. The start date of the service is decided by the parent and EI providers. The discussion involves talking with the parent about the best day and time to begin the service. Considerations to start dates include;

- Parents' work schedules and their "off" days as many parents want to be home during the visits if they are working parents. The consideration also includes the best start days and times for relatives who may be taking care of the child or child care schedules.
- If the child is scheduled for any other events or activities such as surgeries or other off island medical treatments.
- If the parents and family will be off island for other personal reasons.

The Service Coordinators continue to monitor the personal calendars of EI providers and compare the dates with the calendars that are sent home to the family. This "practice" was suggested several years ago to prevent errors in EI provider personal calendars and calendars that are provided to the family compared to the actual start date on the IFSP.

Listed below is a table of the CNMI's valid and invalid reasons for delays. Invalid reasons include systemic issues that cause a delay in a service. Valid reasons are typically due to exceptional family circumstances and/or extreme weather conditions or natural disasters. The process used to verify the timely service is the "Contact Sheets". For every service day, a Contact Sheet is prepared with the expected outcome for the day, the activities for the day, how well the child performed and a section for parents to share any new developments that may have occurred from the last service day. The Contact Sheet is signed and dated by the parent or caregiver. If the service is an initial service, that is indicated on the Contact Sheet.

**Table 1: CNMI's Definitions of "Valid" and "Invalid" Reasons of Delay:**

<b>Reasons Due to Systemic Issues (Invalid Reasons)</b>	<b>Reasons due to Exceptional Family Circumstances (Valid Reasons)</b>
Scheduling Difficulties	Child or Family Illness
Staff Shortages	Family Moved and could not be located
Reporting or Data errors	Family not responding to contact attempts
Errors in staff calendaring	Family requested delay or to rescheduled
	Family missed appointment
	Family withdrew child from program
	Extreme weather conditions or natural disaster

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CNMI's definition is consistent with OSEP's November 2009 definition of Family Circumstances

<b>Number of Families</b>	<b>Reasons due to Exceptional Family Circumstances (Valid Reasons) 2009-2010</b>
2	Families requested to reschedule due to child and/or parent illness
2	Inclement weather. No flights to the Island of Rota

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

Level of compliance (actual target data) State reported for FFY 2008 for this indicator: **98%**

1. Number of findings of non-compliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009)	<b>1</b>
2. Number of FFY 2008 findings the State verified as timely corrected (verified as corrected within one year from the date of notification to the EIS program of the finding)	<b>1</b>
3. Number of FFY 2008 findings <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>0</b>

**Correction of FFY 2008 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance) and/or Not Corrected:**

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

**Verification of Correction of FFY 2008 noncompliance or FFY 2008 findings (either timely or subsequent):**

Timely Service Data reported for the period of July 1, 2008 to June 30, 2009 was taken from the database system of the total count. The CNMI performance was 98% with timely IFSP services. There were 45 children with initial IFSP's or subsequent IFSP's with "new" services added to their IFSP's. One (1) family did not receive services in a timely manner due to an invalid reason. The service was subsequently provided 21 days later. Therefore the "individual child" noncompliance was corrected.

Consistent with OSEP Memorandum 09-02, CNMI is correctly implementing the specific regulatory requirements for Indicator 1, as verified by the submission of subsequent data collected through the database from January 2009 to June 2009. There were 7 new families (new IFSP's or subsequent IFSPs with new services added) and 7 families were provided all services in a timely manner (7/7 x 100 =100% of subsequent data). Additional verification of correction is the data submitted in this report. 100% of infants and toddlers received their services in a timely manner.

**Describe the specific actions that the State took to verify the correction of findings of noncompliance identified in FFY 2008:**

The Data Manager issued a *Written Notice of Findings* (formerly referred to as a Corrective Action Plan) to the Service Coordinator. Included in the *Written Notice of Findings* was the area of non-compliance, the data sources used to generate the report and supporting evidence, and corrective action required by

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the Service Coordinator to demonstrate the Service Coordinator is correctly implementing the regulatory requirements and timelines.

The EI Coordinator and Data Manager reviewed all subsequent IFSP's (7) and Contact Forms (7) that were submitted in order to verify that services were provided to all infants and toddlers according to the agreed upon start date on the IFSP from January 2009 to June, 2009.

**Additional Information Required by the OSEP APR Response Table for this Indicator (if applicable)**

Statement from the Response Table	State's Response
<p>Because CNMI reported less than 100% compliance for FFY 2008, CNMI must report on the status of correction of noncompliance reflected in the data CNMI reported for this indicator. When reporting the correction of noncompliance, CNMI must report, in its FFY 2009 APR, that it has verified for noncompliance reflected in the data reported for this indicator, that CNMI: (1) is correctly implementing 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or the CNMI State data system; and (2) has initiated services, although late, for any child whose services were not initiated in a timely manner, unless the child is no longer within the jurisdiction of CNMI's EIS program, consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09- 02). In the FFY 2009 APR, CNMI must describe the specific actions that were taken to verify the correction. If CNMI does not report 100% compliance in the FFY 2009 APR, CNMI must review its improvement activities and revise them, if necessary.</p>	<p>CNMI has verified correction of the noncompliance in this indicator. The CNMI is correctly implementing 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) as demonstrated by 100% compliance of updated data subsequently collected through the CNMI data system and has initiated services, although late, for the child whose service was not initiated in a timely manner as per OSEP Memo 09- 02. The CNMI described the specific actions that were taken to verify the correction.</p> <p><i>The Data Manager issued a Written Notice of Findings (formerly referred to as a Corrective Action Plan) to the Service Coordinator. Included in the Written Notice of Findings was the area of noncompliance, the data sources used to generate the report and supporting evidence, corrective action required by the Service Coordinator to demonstrate the Service Coordinator is correctly implementing the regulatory requirements and timelines.</i></p> <p><i>The EI Coordinator and Data Manager reviewed all subsequent IFSP's (7) and Contact Forms (7) that were submitted in order to verify that services were provided to all infants and toddlers according to the agreed upon start date on the IFSP from January 2009 to June, 2009.</i></p>

The CNMI EI program staff and Part C Coordinator reviewed the policies and procedures for timely services to ensure alignment with regulations. Currently, the procedures describe the "start date" of services as the start date indicated and agreed upon in the IFSP. EI providers considered revising the procedures to allow for a time period such as within 30 days of the IFSP date to initiate services. The EI providers, however, did not feel a revision to procedure was necessary at this time. Nonetheless, the CNMI will continue to review the procedures and practices and will make revisions if necessary, to include procedures for an alternate start date for staff emergencies, or circumstances beyond the program's control such as extreme weather conditions.

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

This is a compliance indicator therefore the targets were not revised. As per OSEP instructions, additional targets through 2012 were added to the complete SPP. Discussion regarding the targets and stakeholder input is in the complete SPP.

Completed	Rose
Continuing	Lavender
Revised	Light Blue
New	Light Green

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Moved or Deleted	Yellow
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**2010-2011 IMPROVEMENT ACTIVITY TABLE**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
Improve Data Collection and Reporting	Conduct 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 2012	Data Manager	Revised Activity 2010-2011 This activity is revised to be consistent with the August 2010 updates to the Monitoring Procedures.
	The Data Manager and or EI Coordinator will conduct "random participation in an IFSP meeting to ensure initial service dates are decided by the team and are family centered as opposed to the convenience of the EI provider.  The Data Manager and or EI Coordinator will conduct random spot check with families regarding the initial service dates.	Monthly Beginning September 2010 through 2012	Data Manager EI Coordinator	New Activity 2010-2011
Improve Administration and Monitoring	To ensure identification and immediate correction of non-compliances, IFSP's are reviewed by the data manager and dates are logged into the data base immediately upon completion of the IFSP. If a service is not provided as stipulated in the IFSP, and there is no <i>Reason for Delay</i> form indicating a family circumstance, the Service Coordinator and EI Provider are given a notice and must respond as to when the service will be provided.	July 2010 July 2011 July 2012	RP: Data Manager	Revised Activity 2010-2011 This activity is revised to be consistent with the August 2010 updates to the Monitoring Procedures.
	Service Coordinators will verify EI Provider personal calendars to ensure correct services dates are indicated in their calendars.	Upon Completion of the IFSP through 2012	RP: Service Coordinators	<u>Completed and Continuing Activity</u> 2010-2011
Review and Revise Policies and Procedures	Review and revise policies and procedures, if necessary to ensure alignment with	Annually in June 2010 June 2011	RP: Part C Coordinator	Completed and Continuing Activity 2010-2011

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<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
	regulations and make changes and/or corrections to procedures.	June 2012	Part C Coordinator and EI Staff	
	Revise IFSP forms to align with procedures and allow for more "discussion" in the sections on measurable family and child outcomes and family concerns, priorities and resources and service provisions.	January 2011 Pilot the new/revised forms by Jan.	EI Coordinator EI Providers Parents	New Activity 2010-2011
Training and Professional Development	Conduct training on the IFSP process to ensure consistency on the implementation of the EI procedures	Annually in September 2010 2011 2012	Part C Coordinator	New Activity 2010-2011

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Refer to page 1 of this APR for development description.

<b>Monitoring Priority: Early Intervention Services In Natural Environments</b>
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**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)

<b>Measurement:</b> 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.
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<b>FFY</b>	<b>Measurable and Rigorous Target</b>
<b>2009 (2009-2010)</b>	On December 1, 2009, 97.5% of infants and toddlers with IFSP will receive early intervention services in the home or community-based settings.

**Actual Target Data for 2009 (2009-2010):**

<b>a.</b>	<b>b.</b>	<b>c.</b>	<b>d.</b>
618 Reported Data Submitted February 1	Total # of Children with an IFSP	# of Children Served at Home or Community-based settings	% of Children Served at Home or Community-based settings
<b>December 1, 2009</b>	<b>50</b>	<b>47</b>	$47/50 \times 100 =$ <b>94%</b>

On December 1, 2009 CNMI served a total of 50 infants and toddlers with an IFSP. Forty Seven (47) or 94% received EI services primarily in their homes or community-based settings. Based on the 2009-2010 performance, the CNMI did not meet its target of 97.25%. Three children received services at the Children's Developmental Assistance Center (CDAC) at the time the child count was taken.

**OSEP Response Table June 2010:**

CNMI's actual target data for provision of services to infants and toddlers in natural environments are at or greater than 95%. There is no expectation that an increase in that percentage is necessary. OSEP appreciates CNMI's efforts to improve performance and assumes that CNMI is monitoring to ensure that IFSP teams are making service setting decisions on an individualized basis and in compliance with 34 CFR §§303.12, 303.18, and 303.344(d)(1)(ii).

**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 is conducted on all IFSPs where services are provided in settings other than the home or community settings. All IFSPs with service settings other than the home or community setting must have a justification for why the service is provided in that setting. In this report year, all IFSPs (3) included a justification for the service location. All were based on the family's request to provide the services to their children in a location other than their home. Some families are uncomfortable, possibly for cultural reasons, to have providers in their homes. Although the EI providers respect family decisions for whatever the reason, they do explain the benefits to

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the child and family when providing services in the child's natural environment. In order to monitor compliance for this indicator and to ensure service location decisions are based on requirements, the Part C Coordinator uses several sources of "data" and strategies, including:

- Random "observations" of IFSP meetings by Part C Coordinator to ensure conversations with families regarding service locations are based on the "family" not at the convenience of providers.
- Review responses and comments to questions in the *Family Surveys*.

The following are statements or comments were taken directly from the 2009-2010 surveys:

*"We are so glad, although my child has a hearing loss, the CDAC is a big help for my child. Since they **start to visit** ----- he improves a lot the way he talk."*

*"Aside from every session CDAC staff had with my son where I saw their effort to help him, our family also treasures the friendship that was built between us. My son (who has Autism) even hugs them often when **they visit** him in our house."*

*"For my son being a good listener **to the visitors**. That my son already starts to face other people."*

*"We/my son receive more services when we moved to Saipan. Teachers discusses about my son's progress and suggestion on how to improve my son's abilities and capabilities. Techniques are shared."*

*"The CDAC help me a lot, mostly **when they visit my son** ----- . They help us how to develop what his doing, they give also something that can help -----."*

*"My positive experience is that they really help my son improve talking **and helping me at home** by telling me what I should do to improve him. Now my son is really talking making a four letter sentence. Improved speech pattern, better able to articulate needs, wants, will soon be able to enter Head Start."*

*"----- can identify the pictures of the family members. ----- developed the motor skills of walking. ----- showed happiness when **CDAC teachers visit her**. ----- know how to kiss hands to older people, wave goodbye."*

*"Some positive experience with my family has had in CDAC was when my daughter learn to focus on one thing, learning words to tell and more things especially she always feel excited and happy when **they visit her**."*

*"Additional manpower and **continue visiting the child with disability**."*

*"We suggest that the provider will not **only visit the house** but also expose the child to the center that there are other children where the child can interact."*

### **Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009:**

In order to ensure EI Providers and families make EI service setting location decisions based on the what the family has defined as a natural environment for their child in the CNMI, EI providers and parents are provided various training opportunities on what is considered "best practice" in Early Intervention. EI Providers are given opportunities to attain continuing education units both on- and off-island, attend in-service training and are encouraged to participate in online courses and webinars. EI providers are also encouraged to avail themselves of the resources provided by technical assistance providers such as WRRRC, NECTAC and ECO. In addition to continuing education units or in service training specific to their field of work, PSS encourages providers to cross train and attend state wide professional development that focus on the overall strategic priorities of the Public School System.

In 2009-2010, EI providers were given the opportunity to enroll in masters degree programs and certification programs for autism and continuing education units through an online program which featured short courses specific to their profession. These professional development opportunities were funded through the basic Part C grant and Part C ARRA funds. The table below is a list of all the professional development opportunities made available to EI providers this past year.

Professional Development  
SY 2009-2010

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Date	Name of Presentation	Presenters	Location	PD Hours
9/1/09	Using the Four Step Process	Jean Clayton, Univ. of Kentucky	Saipan	8
9/3-9/4/09	Improving Outcomes & Support Systems for Young Children with Disabilities	Elaine Eclavea, Consultant, Univ. of Guam CEDDERS	Saipan	16
10/2/09	PSS-Statewide Development	Dr. Rita Sablan, Don Johnston	Saipan	4
12/2-12/4/09	Pacific CIMAP Regional Low Vision Training	Ed Wikdall, Donna McNear,	Guam	24
12/11-12, 2009	Training on Deaf and Hard of Hearing	Dr. Angie Mister, Audiologist	Saipan	
2/10/10	Scaffolding Early Learning Overview	Cynthia Bjork, McREL	Saipan	3
2/10/10	Formative Assessment	Sammye Wheeler-Clouse, McREL	Saipan	3
2/18/10	Training on Individuals with Disabilities Education Act	Gail ImObersteg, Esq.	Saipan	2
2/20/10	Saturday Session with Nurses on the referral process for Early Intervention	Lydia Santos, Viola Kaipat, Delores Itibus, Julie Lieto	Saipan	4
5/3/10	Vision Screening for Babies	Kelly Phillips	Saipan	3
7/12-7/16/2010	The CIA for Infants, Toddlers, and Preschoolers with Disabilities	Caroline Gooden, M.S. University of Kentucky	Guam	40
8/30-31, 2010	Developing Measurable Goals	Carol Kosnitsky	Saipan	16
9/1/10	Routines Based Interview Overview/IFSP outcomes	Christine Hunter, Robin Palacios, Jerry Diaz	Saipan	8

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

After through review of the improvement activities implemented over the past few years and the EI Program's slippage in meeting the targets, the ICC made a decision to lower the target by 1.5 percentage points or at the baseline data mark of 96% for the additional targets through 2013. The additional targets were added to the SPP. Discussion regarding the targets and stakeholder input is in the complete SPP.

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

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<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
Improve Administration and Monitoring	Conduct internal monitoring procedures (random file reviews) to ensure procedures are followed and infants and toddlers receive early intervention services as stated on their IFSP's in a timely manner.	Monthly random file checks <b>through 2012</b>	RP: Part C Coordinator and Data Manager	Revised Activity 2010-2011 This activity is revised to be consistent with the August 2010 updates to the Monitoring Procedures.
	As suggested by the parents and the ICC, Spot check with parents through text messaging or emails to ensure conversations at IFSP meetings regarding service locations are based on parent decisions, not provider convenience. Conversations should also include options for community settings in the CNMI. Drill down the data to determine if it is the same families every year that services are not provided in their natural environment.	Quarterly on a random schedule <b>through 2012</b>	Data Manager And EI Coordinator	New Activity 2010-2011
Training and Professional Development	Continue to provide staff development opportunities on EI Services in Natural Environments, Family Centered Services and Outcome Measurements.	March 2010 March 2011 <b>March 2012</b>	RP: Part C Coordinator Resource: Guam CEDDERS NECTAC, ECO Center	Continuing Activity 2010-2011  All PSS staff are required to maintain 60 hours of PD per year (PSS provides 10 Professional Development days per year).
	One EI provider will attain a certification in Autism	Beginning January 2010 and ending December 2010	EI providers ARRA Funds	To be Completed December 2010
	EI providers will be provided opportunities to attain or maintain CEU's through an online Total Access CEU program; SpeechPathology.Com	August 2009 through June 2010	EI Providers ARRA Funds	Completed Activity June 2010 Five EI providers participated in the Total Access program and attained continuing education units
	One EI providers enrolled in a Masters Degree program to attain a degree in Early Intervention with Certification.	Enrolled in January 2010 to be completed by June 2012	EI Providers ARRA Funds	Completed January 2010 The Student is currently enrolled and expected to complete the program by May 2010

**CNMI Part C Annual Performance Report (APR) for FFY 2009****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 (use for FFY 2008-2009 reporting):**

**Summary Statement 1:** Of those infants and toddlers who entered or exited early childhood special education below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they turned 6 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 6 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 2009:**

Summary Statements	Targets FFY 2009 (% of children)	Actual FFY 2009 (% of children)
<b>Outcome A: Positive social-emotional skills (including social relationships)</b>		
1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they exited the program	76%	44% c + d / (a+b+c+d)

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

		$(2+6)/(1+9+2+6)$ <b>8/18 = 44%</b>
<b>2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program</b>	<b>64%</b>	52% (d+e) / TOTAL <b>13/25= 52%</b>
<b>Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>		
<b>1 Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program</b>	<b>54%</b>	61% c + d) / (a+b+c+d) (6+8) / (1+8+6+8) <b>14/23 = 61%</b>
<b>2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program</b>	<b>32%</b>	40% (d+e) / TOTAL <b>10/25 = 40%</b>
<b>Outcome C: Use of appropriate behaviors to meet their needs</b>		
<b>1 Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they exited the program</b>	<b>82%</b>	83% c + d) / (a+b+c+d) (5+10) / (1+2+5+10) <b>15/18=83%</b>
<b>2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program</b>	<b>76%</b>	68% (d+e) / TOTAL <b>17/25=68%</b>

## Progress Data for Part C Children FFY 2009

<b>A. Positive social-emotional skills (including social relationships):</b>	<b>Number of children</b>	<b>% of children</b>
a. Percent of children who did not improve functioning	1	(1/25)= <b>4%</b>
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	9	(9/25)= <b>36%</b>
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	2	(2/25)= <b>8%</b>
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	6	(6/25)= <b>24%</b>
e. Percent of children who maintained functioning at a level comparable to same-aged peers	7	(7/25)= <b>28%</b>
Total	N=25	100%

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<b>B. Acquisition and use of knowledge and skills (including early language/communication):</b>	<b>Number of children</b>	<b>% of children</b>
a. Percent of children who did not improve functioning	1	(1/25)= <b>4%</b>
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	8	(8/25)= <b>32%</b>
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	6	(6/25)= <b>24%</b>
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	8	(8/25)= <b>32%</b>
e. Percent of children who maintained functioning at a level comparable to same-aged peers	2	(2/25)= <b>8%</b>
Total	N=25	100%
<b>C. Use of appropriate behaviors to meet their needs:</b>	<b>Number of children</b>	<b>% of children</b>
a. Percent of children who did not improve functioning	1	(1/25)= <b>4%</b>
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	2	(2/25)= <b>8%</b>
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	5	(5/25)= <b>20%</b>
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	10	(10/25)= <b>40%</b>
e. Percent of children who maintained functioning at a level comparable to same-aged peers	7	(7/25)= <b>28%</b>
Total	N= 25	100%

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2009:**

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

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

### CNMI Part C Annual Performance Report (APR) for FFY 2009

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.

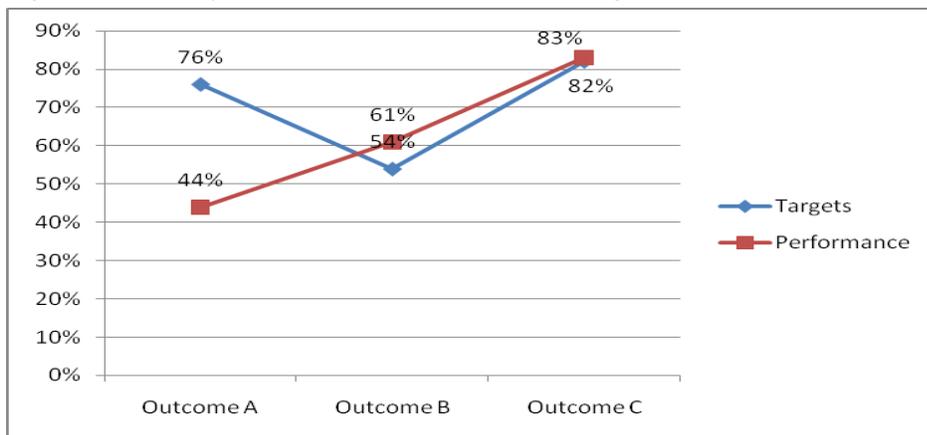
There were twenty-five (25) children with IFSPs who met the criteria for Measurement 2 documenting entry and exit COSF for this reporting period.

For Summary Statement 1 For Outcome A: Positive social-emotional skills, CNMI’s performance was at **44%** and did not meet of the children substantially increased in their rate of growth by the time they exited the program. For Summary Statement 2, **52%** of the children were functioning within age expectation by the time they exited the program, CNMI did not meet the target of 64%. The Figures 1 and 2 displays the performance for Summary Statement I and 2 to the targets set for this reporting period.

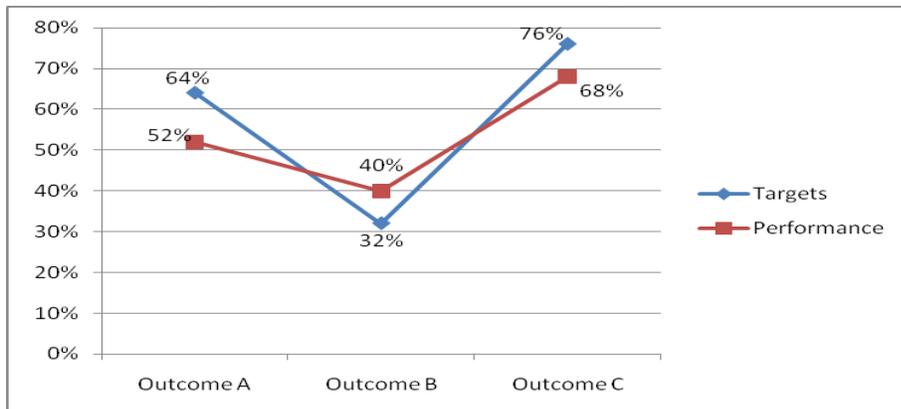
For Outcome B: Acquisition and use of knowledge and skills, CNMI exceeded that target (54%) for Summary Statement 1 by 7% reporting **61%** of the children substantially increased their rate of growth by the time they exited the program. For Summary Statement 2, **40%** of the children were functioning within age expectation, exceeding the target of 32% for this year.

For Outcome C: Use of appropriate behaviors to meet their needs, CNMI met the target for Summary Statement 1 indicating that **83%** of the children substantially increased their rate of growth by the time they exited the program. For Summary Statement 2, **68%** of the children were functioning within age expectation by the time they exited the program. CNMI did not meet the target of 76% for Outcome C Summary Statement 2.

**Figure 1: Summary Statement 1 Performance and Target Data for FFY 2009-2010**



**Figure 2: Summary Statement 2 Performance and Target Data for FFY 2009-2010**



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In an effort to determine possible reasons for not meeting the Summary Statements 1 and 2 for Outcome A, a drill down of the 25 toddlers who exited this reporting period was conducted. Eleven (11 or 44%) received Measurement 1 (entry data) prior to 12 months of age. The table below provides progress data of the eleven toddlers, noting that one did not improve functioning and five children improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers. EI staff discussed possible reasons for the slippage which may be due to the following;

- Young children under age 1 may have similar skills in the area of social emotional development as typical children their age and as the child gets older the disability becomes more apparent; and
- EI providers becoming more comfortable in rating young children in this area.

<b>Outcome A: Positive social-emotional skills (including social relationships):</b>	<b>Number of children under age 1 at Entry</b>
a. Number of children who did not improve functioning	1
b. Number of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	5
c. Number of children who improved functioning to a level nearer to same-aged peers but did not reach	1
d. Number of children who improved functioning to reach a level comparable to same-aged peers	2
e. Number of children who maintained functioning at a level comparable to same-aged peers	2
Total	N=11

Ongoing training on strategies in enhancing the overall development of young children are held quarterly for early intervention staff. In July 2010, early intervention staff attended training entitled: *The CIA for infants, Toddlers, & Preschoolers with Disabilities* facilitated by Guam CEDDERS. The purpose of the training was to provide a comprehensive understanding of the assessment of young children with disabilities and using the assessment results to develop appropriate outcomes for children and families. The training targeted assessment instruments used for assessing infants, toddlers and preschoolers and in developing meaningful outcomes for children.

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

Although the CNMI did not meet the targets in Outcome A, the CNMI did not revise the targets. Additional targets through 2012 were added to the complete SPP. Discussion regarding the targets and stakeholder input is in the complete SPP.

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

Completed	Rose
Continuing	Lavender
Revised	Light Blue

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New	Light Green
Moved or Deleted	Light Yellow

**2010-2011 IMPROVEMENT ACTIVITY TABLE**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
Improve Administration and Monitoring	Continue to monitor the "information" on the Child Outcomes to ensure the information is based on functions rather than skills development. The Part C and Data manager reviewed the outcome data for irregularities and/or inconsistent data. None were found.	Annually in December through 2012	RP: Part C Coordinator and Data Manager	Completed and Continuing Activity 2010-2011
Review and Revise Policies and Procedures	Continue to review the process as necessary to ensure the measurements reflect the Outcome requirements. No changes were made to the process or procedures in 2009-2010 year.	As necessary through 2012	RP: Part C Coordinator and Data Manager  Resource: Guam CEDDERS	Continuing Activity 2010-2011
	Develop a comprehensive Outcome Manual inclusive of forms and resources.	Fall 2008	RP: EI and EC Special Education Providers	Completed 2009-2010
	Design an informational brochure for parents on the Outcome Measurements.	Fall 2008	RP: EI and EC Special Education Providers	Complete 2009-2010
Training and Professional Development	Revise the Parent Brochure to include suggestions gathered from the family forum.	Spring 2010	EI Providers Part C Coordinator	Completed Activity 2009-2010
	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	RP: Part C Coordinator  Resources: ECO; Guam CEDDERS; NMC UCEDD	Continuing Activity 2010-2011
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	RP: Part C Coordinator  Resources: Guam CEDDERS; ECO; NMC UCEDD	Continuing Activity 2010-2011

**CNMI Part C Annual Performance Report (APR) for FFY 2009****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
(2009-2010)	(A) Maintain 91% Know their rights (B) Maintain 91% Effectively communicate their children's needs (C) Maintain 90% Help their children learn and grow

**Actual Target Data for 2009-2010:**

**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 exited 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.

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:

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- 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 develop and learn
"NEW"	5	6	4
"ONGOING"	5	4	4
"EXITING"	3	3	7

Of the 60 surveys distributed, 25 or 42% (25/60) were completed and submitted by June 2010. The percentage of returns for the past 3 years continues to stay in the 40<sup>th</sup> percentile. In 2008, the return rate was at 42% (32/77); 2009 was at 44% (30/89). The return rate may be attributed to the method used to distribute the surveys throughout the year compared to the distribution process of a one-time "dissemination event" to all families conducted for the past three years of surveys.

Of the 25 surveys returned, 9 were from "New" families, 10 were from "Ongoing" families, and 6 were from "Exiting" families. The following Table 2, provides the summary data of the families or "respondent groups" that completed the 2009-2010 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

	A. Know Your Rights	B. Effectively Communicate their children's needs	C. Help their Children Develop and Learn
<b>New</b>	44 responses indicated "Agree" out of 44* possible responses <b>44/44= 100%</b>	52 responses indicated "Agree" out of 54 possible responses <b>52/54= 96%</b>	35 responses indicated "Agree" out of 36 possible responses <b>35/36 = 97%</b>
<b>Ongoing</b>	45 responses indicated "Agree" out of 45* * possible responses <b>45/45 = 100%</b>	37 responses indicated "Agree" out of 40 possible responses <b>37/40 = 93%</b>	36 responses indicated "Agree" out of 40 possible responses <b>36/40 = 90%</b>
<b>Exit</b>	18 of the 18 possible responses indicated "Agree" <b>18/18 = 100%</b>	18 of the 18 possible responses indicated "Agree" <b>18/18 = 100%</b>	42 of the 42 possible responses indicated "Agree" <b>42/42 = 100%</b>
<b>Overall % Agreement of Respondents</b>	107 overall responses that indicate "agree" of the 107 possible responses.	107 overall responses that indicate "agree" of the 112 possible responses.	113 overall responses that indicate "agree" of the 118 possible responses.

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

	<b>107/ 107 = 100%</b>	<b>107/112 = 96%</b>	<b>113/ 118=96%</b>
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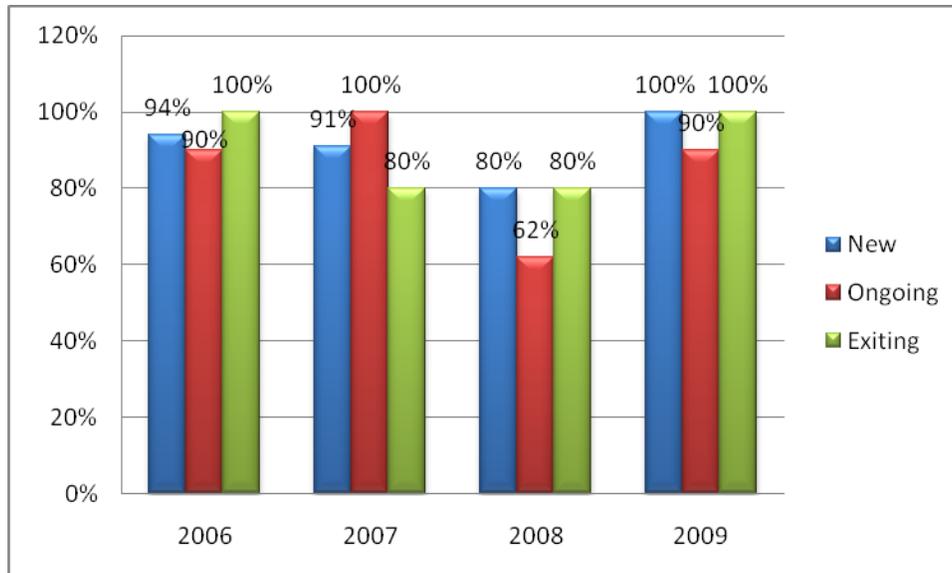
(\*) Indicate that there was 1 survey item that was left blank and was not included in the denominator.

(\*\*) Indicate that there were 5 survey items that were left blank and were not included in the denominator.

“New” families consistently rated all three measurements areas with 96% or greater agreement.  
 “Ongoing” families rated “Help Their Children Develop and Learn” lowest at 90%, whereas “Exiting” families rated all three measures the highest in agreement (100%).

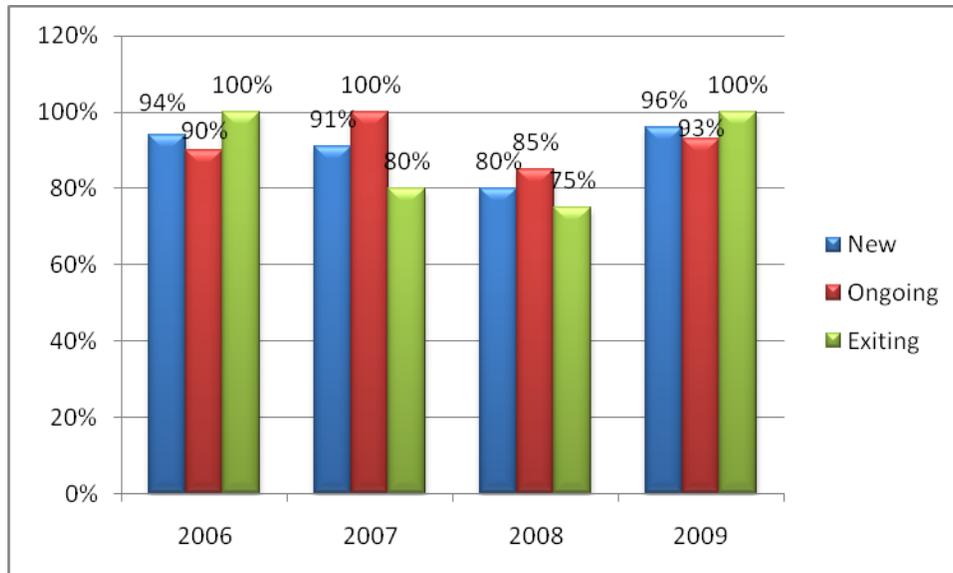
The following Figures provide a visual comparison of the “group” and overall respondent results for 2006-2007, 2007-2008, 2008-2009 and 2009-2010.

**Figure 1: Percent of Part C Families Who Responded That They ‘Know Their Rights’ – FFYs 2006, 2007, 2008, 2009**

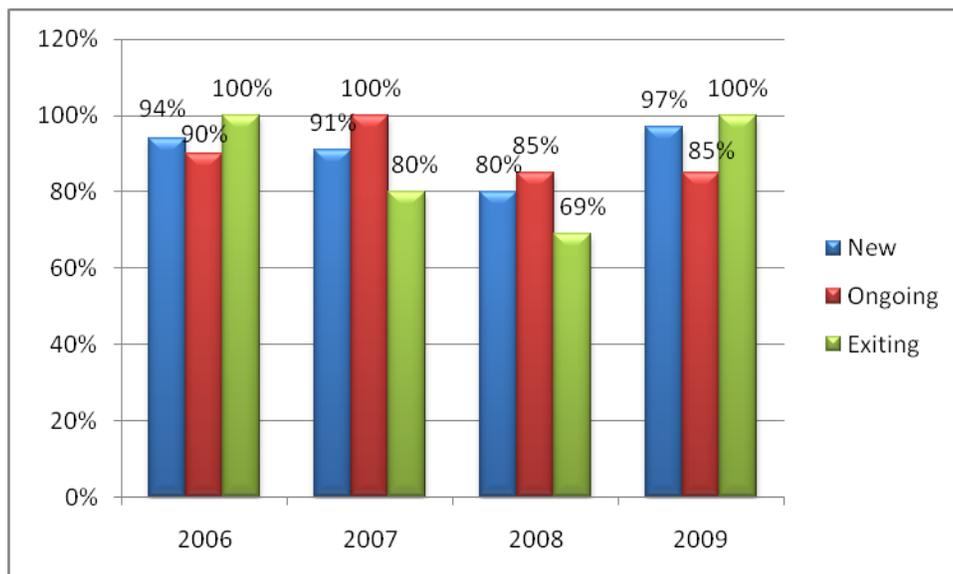


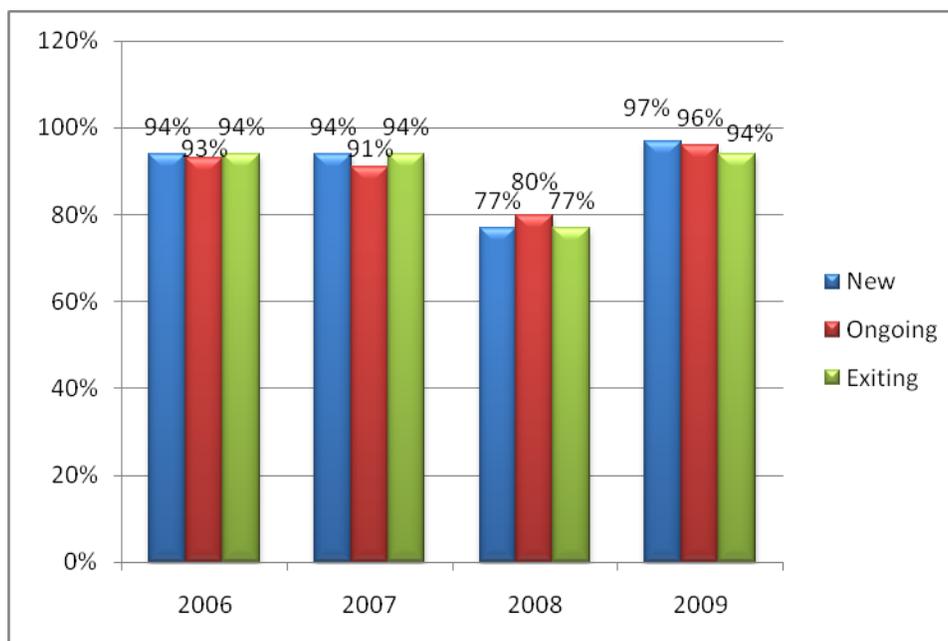
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**Figure 2: Percent of Part C Families Who Responded that Part C Services 'Effectively Communicate Their Children's Needs' – FFY's 2006, 2007, 2008, 2009**



**Figure 3: Percent of Part C Families Who Responded that Part C Services 'Helps Their Children Develop and Learn' – FFYs 2006, 2007, 2008, and 2009**



**CNMI Part C Annual Performance Report (APR) for FFY 2009****Figure 4: Overall Percent of Part C Families Who Responded Per Category Question (A, B, & C) – FFYs 2006, 2007, 2008, and 2009****OSEP Response Table June 2010:**

OSEP appreciates CNMI's efforts to improve performance.

**Discussion of improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009:**

For the 2009-2010 reporting period, the family surveys were distributed throughout the year to all families of children receiving early intervention services. Service coordinators and providers hand-delivered the surveys to the families during home visits or scheduled meeting times. The families were given the option of submitting the surveys directly to the Children's Developmental Assistance Center (C\*DAC), by mail, or through their service coordinator or provider.

For this reporting period, CNMI exceeded the targets for all 3 measures. As indicated in Figures 1, 2, 3, and 4, the overall percentage of families who report that early intervention services have helped their family: A) know their rights; B) effectively communicate their children's needs; and C) Help their children developed and learn has increased from last reporting period. In fact, in comparing with previous years, CNMI is at the highest overall performance for this indicator since 2006.

The following are comments extracted from the surveys as written, validates the families positive perceptions of the EI Program and the strong relationship and commitment of the EI staff.

What are some positive experiences your family has had with the Early Intervention Service System (EISS or C\*DAC for Children's Developmental Assistance Center)?

- Improved speech pattern, ability to articulate needs and wants, and will soon be able to enter Head Start.
- My positive experiences are that they really helped my son improve talking and helped me with him at home by telling *me what I should do to improve his movement. Now my son is really talking making a four sentence.*
- *The CDAC help me a lot, mostly when they visit my son. They helped us develop what he is doing. They gave also some things that can help my son.*

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- *I learned how to be more attentive to my girl to help her learning and hearing disabilities. I like how they give advice... because to me they seem to work like a charm.*
- *We've learned a lot from CDAC. We learned how to teach our children better and help them better.*
- *We/ my son received more services when we moved to Saipan. The Teachers discuss my son's progress and make suggestions on how to improve my son's abilities and capabilities. Techniques are shared.*
- *For my son being a good listener to the sisters that my son already start to face other people.*
- *Aside from every session CDAC staff had with my son where I saw their effort to help him, our family also treasures the friendship that was built between us. My son (who has autism) even hugs them often when they visit him in our house.*
- *We so glad, although my child has a minor hearing loss, the CDAC is a big help to my child. Since they started to visit my son, he has improved his ability to talk.*
- *Since the CDAC start teaching my son, he has learned more and is more active than before. I thank the CDAC providers for helping me and my son with Medicaid, SSI, and everything they've done.*
- *I would like to give many thanks to PSS and especially the CDAC for their help and for teaching us about our child's needs, and their advice to what is good and bad.*
- *Taught me how to help improve my child's growth and development*
- *Some positive experience with my family has had with CDAC was when my daughter learned how to focus on one thing. My daughter is learning more words to tell and, most especially, she is excited and happy when they visit her.*
- *They help us a lot even in the medical needs of our baby. They teach us what to do for our baby in terms of medical check-up, hearing, etc.*
- *They are nice and have taught us a lot of good things to help our child.*
- *My son can identify the pictures of our family members, developed the motor skills of walking, showed happiness when CDAC teachers visit her. She knows how to kiss hand to older people and wave bye.*

As a result of input from EI providers and stakeholders last year, "happy and sad" faces were added to the surveys as a "visual" indicating agreement and disagreement on the rating of each question to assist families to understand the rating system of survey.

To ensure families understand their rights, training opportunities were provided to parents and EI providers this past year. Ms. Gail ImObersteg provided training on IDEA (Part C and B) as it pertains to IFSP's and IEP's and the families roles in the process. to hearing officers as well as parents, teachers and EI providers.

As is stated above taken form the comment section of the surveys, the majority of families report that EI Services have helped them with their child development. This is largely due the consistent and ongoing training provided to EI Providers.

The following are several comments from "new" parents suggest recommendations of how EI providers could support the needs of their child and family:

- That the providers not only visit at the house but also expose their child to the centers where there are other children, so their child will have many opportunities to interact with other children.
- Maybe some more hands-on activities.
- To help families who don't have a child/ren with a disability.

The Part C Coordinator and EI providers will use the comments shared by parents to develop and or incorporate more opportunities for families to interact with each other.

**Revisions, with Justification, to Proposed Targets/ Improvement Activities/ Timelines/ Resources for 2010:** The CNMI will not revise targets at this time. The surveys will continue to be disseminated to all families with an IFSP. Additional targets through 2012 were included in the complete SPP.

As discussed on page 3 of this APR, the improvement activities are organized by areas of priority needs for improvement and color-coded to show the "status" of each improvement activity. The following table displays the "status" of the improvement activity with the color codes:

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

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

**2010-2011 IMPROVEMENT ACTIVITY TABLE**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
Improve Data Collection and Reporting	<p>Conduct Surveys throughout the year appropriate to where families are in the EI System.</p> <ul style="list-style-type: none"> <li>The survey results will be tallied and reported once per year.</li> <li>Families sign a "receipt slip" as they receive the survey. A record of the receipt slip is used to determine the number of surveys that were disseminated.</li> <li>Surveys will continue to be provided with envelopes that can be mailed back, dropped off or picked up by providers.</li> </ul>	July 2007, 2008, 2009, 2010, 2011, 2012	RP: Part C Coordinator Service Coordinators	Continuing Activity 2010-2011
Improve Administration and Monitoring	<p>Conduct Parent Forums as another means to gather information regarding parent's knowledge of rights, ability to communicate their needs and ability to help their child as a result of participation in Early Intervention Services. Forums may be conducted in conjunction with the DD Council Public Awareness activities. The information gathered at forums may not be used in the percentage calculations. However, it will be used to verify and validate survey results.</p>	March 2007, 2009, 2011, 2012	RP: Part C Coordinator EI Providers  Guam CEDDERS	<p>December 2008 and February 2009 Family Forums were conducted in December and February:</p> <p>The format of the forums was a slide show of pictures of their children engaged in the "outcomes." Parents were given opportunities to share what an "outcome" means for their child and family, and how the child outcomes relate to the 3 family outcome measures.</p>
Technical Assistance	<p>Share survey results with CEDDERS Guam to assist with the analysis of the results. Use the results for program improvement.</p>	September 2009 2010 2011 2012	CEDDERS Guam NECTAC	Continuing Activity 2010-2011
Collaboration and Coordination	<p>Share results with Health Care providers, specifically results that indicate need for better awareness of early intervention program for new parents.</p>	September 2009 2010 2011 2012	Part C Coordinator	Continuing Activity 2010-2011

**CNMI Part C Annual Performance Report (APR) for FFY 2009****Overview of the Annual Performance Report Development:**

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

<b>Monitoring Priority:</b> Effective General Supervision Part C / Child Find
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**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
(2009-2010)	On December 1, 2009, the CNMI will serve <b>.89%</b> of children under age one.

**Actual Target Data for 2009 (2009-2010):****618 Child Count**

Year December 1	# Served Under Age 1	CNMI 2000 Census Population Data	CNMI % Served Under Age 1	Compared to National Data	Compared to CNMI Target of .89% for Reporting Year
2009	10	1297	.77 (10/1297 x 100)	1.03	.77

Data Source: U.S. Department of Education, Office of Special Education Programs, Data Analysis System (DANS), OMB #1820-0557, Table C-13, last updated August 3, 2010.

**OSEP Response Table June 2010:**

OSEP looks forward to CNMI's data demonstrating improvement in performance in the FFY 2009 APR, due February 1, 2011.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009:**

Although the CNMI did not meet its target of .89%, there was considerable growth in the number and percentage of children served birth to age one compared to last year, .31%. The CNMI is slightly under the National Average of 1.03%.

The increase in the number and percentage of children served can be attributed to the coordinated child find efforts of the EI providers and other agencies and special interest groups. During this report year, public awareness and child find efforts included developmental screening information on children's shot cards, weekly advertisements in the newspapers, the Saturday training sessions with Public Health and the NICU nurses, radio and TV advisements, particularly for the Newborn Hearing Screenings.

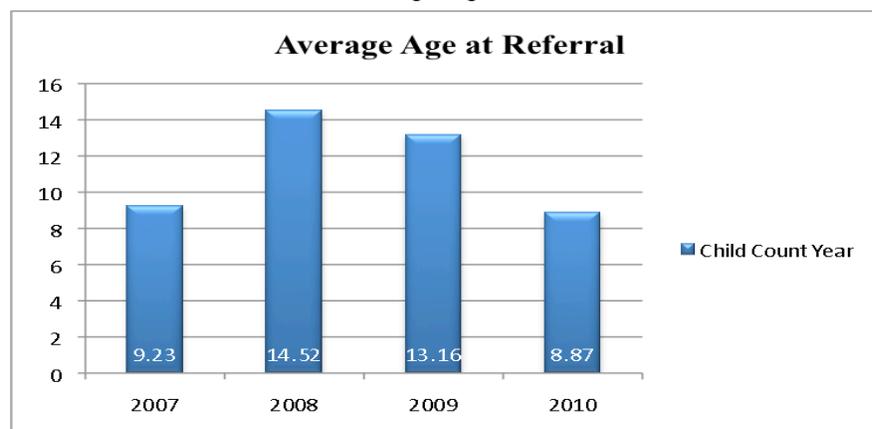
## CNMI Part C Annual Performance Report (APR) for FFY 2009

Although child find and public awareness activities primarily focus on the health care system, the Part C program has taken a slightly different approach to public awareness. The focus is now on educating parents on how to take an active role in their child's development, how and what to ask regarding their child's development, how to ask about their child's hearing screening results and how to ask if their child's development is typical and if not, where to go for assistance.

In collaboration with the Maternal Child Health, Early Childhood Comprehensive System Project – *“Big Steps for Little Feet”* full page developmental charts are printed weekly in the local newspapers with information on how to access free developmental screenings and where to go if a parent has concerns or just wants to monitor their baby's development. Advertisements also encourage parents to ask their health care providers about their child's development.

It is worthy to note, that although the CNMI did not meet its 2009 target of the number and percentage served, of the infants and toddlers with an IFSP on December 1, 2010, the average age at referral was 8.5 months, a decrease of about 5 months over the last two years. The average age at referral is not typically reported in the APR, this is an indicator the Early Intervention Program has been monitoring for several years. When the data for this CNMI specific indicator was first looked at, the average age children were referred was 18 months old.

Table 1: Average Age at Referral



Listed below are child find and public awareness outreach activities that are ongoing throughout the year to ensure all children are located and identified:

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

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- Partnership in the MCH Statewide Early Childhood Comprehensive System including the development of a comprehensive calendar for all agencies.

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

The CNMI has not revised its targets at this time. Additional targets through 2012 were added to the complete SPP. Discussion regarding the targets and stakeholder input is in the complete SPP.

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

**2010-2011 IMPROVEMENT ACTIVITY TABLE**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/Resources</b>	<b>Status</b>
Improve Administration and Monitoring	Continue daily check for referrals at NICU and all clinics.  Continue distribution of pocket size <i>Developmental Checklist</i> to Public Health and Private Nurses.	Daily <b>through 2012</b>	RP: Social Worker	Continue Activity 2010-2011  The Social Worker continues the NICU and PEDS daily visit.
Training and Professional Development	Conduct Referral Process and Procedure training at all clinics in order to reach new physicians and nurses, including private physicians. <ul style="list-style-type: none"> <li>• Training includes a referral packet with developmental checklists, EISS Brochures (to be given to parents), established condition list, referral forms, and explanation of how to make a referral.</li> <li>• Training also includes the benefits of early intervention for premature infants.</li> </ul>	Annually in January of the year\ <b>through 2012</b>	RP: Part C Coordinator with Clinic Representatives Private Clinics	Continuing Activity 2010-2011 This activity is successful and will continue to be implemented. The CNMI has a high turnover of pediatricians. New doctors need to know of the EI system here and how to make referrals.

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	In order to keep pediatricians or physicians up to date and informed of early intervention services in the CNMI, periodic and consistent face to face meetings with the docs will be scheduled to discuss what's working well and what can be improved regarding referrals to EI.	Annually in December through 2012	RP: Part C Coordinator and EI providers	Continue Activity 2010-2011 Although the "Lunch" with the Docs was anticipated to occur two times a year, it only occurred once in this report year.
	The EI providers will continue to have <i>Lunch with the Doc's</i> to discuss the referral process, updating screening procedures, how EI providers can assist the public health staff etc.	Annually in December through 2012	RP: Part C Coordinator and EI providers	Continue Activity 2010-2011 Saturday session with Nurses will be conducted. The focus for the nurses will be on developmental screenings and the referral process.
	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 providers on the referral process. Coordinate with Child Care licensing board on "coarse and certification requirements"	Spring 2011 Spring 2012	Part C Coordinator	New Activity 2010-2011
	To develop a Professional Development plan for physicians and general health care providers in collaboration with the University of Georgetown "Bright Futures Tool and Resource Kit: Linking Research to Practice.	Spring 2010	Collaboration with CEDDERS Guam and Georgetown University	Delete Activity 2010-2011 It was difficult to get physicians to commit to this activity, particularly with the high turnover of physicians.
	Provide training for early intervention providers to address family concerns, priorities and outcomes.	June 2010	Collaboration with CEDDERS Guam	Completed Activity June 2010

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Collaboration and Coordination	<p>Coordinate community child find and public awareness efforts with MCH, Head Start, Division of Youth Services, Protection and Advocacy, Developmental Disabilities Council, and Child Care.</p> <p>Develop an Outreach Plan with Agency Representatives and EI Providers, the event, the target audience, activities, who is responsible and the funding resources. Community service within the island as an outreach for EI service.</p>	Annually in coordination with the DD Council Advocacy Month <b>through 2012</b>	RP: Part C Coordinator with Agency Reps	<p>Completed and Continuing Activity 2010-2011</p> <p>To be moved to the MCH ECCS Community partnership group who has taken on the roles and responsibilities of community child find and public awareness activities.</p>
	<p>Continue collaboration with the MCH Early Childhood Comprehensive System (ECCS) "<i>Big Steps for Little Feet</i>".</p> <ul style="list-style-type: none"> <li>Participate in Monthly Meetings</li> </ul>	Monthly Team meetings, the last Thursday of the month	RP: MCH staff to coordinate effort	<p>Continue Activity 2010-2011</p> <p>The ECCS partners meet monthly to work on goal setting and implementation of activities and tasks.</p>
	<ul style="list-style-type: none"> <li>Developmental Screening Tool for use by Public Health Nurses has not been completed.</li> <li>The ECCS team has had ongoing discussions and reviewed many screening tools however, have not narrowed down what tool to be used at this time.</li> </ul>	<b>January 2008 through 2012</b>	RP: ECCS Team	Continue Activity 2010-2011
	The EI program will select and implement a screening tool specific for Autism	December 2011	Part C Coord. and EI providers	<p>Continue Activity 2010-2011</p> <p>This activity has not been completed. Will continue the effort to implement a screening for Autism.</p>

**CNMI Part C Annual Performance Report (APR) for FFY 2009****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
(2009-2010)	On December 1, 2009, the CNMI will serve 1.8% of children birth to 3 years old.

**Actual Target Data for 2009 (2009-2010):****618 Child Count**

Year December 1	# Children with IFSP B- three	CNMI Census Population Data	% CNMI Birth through 2 with IFSP	Measurement B % National Data	Compared to CNMI Target of 1.8 % for Reporting Year
<b>2009</b>	<b>50</b>	<b>3600</b>	<b>1.39</b> (50/3600 x 100)	<b>2.67</b>	<b>1.39</b>

Data Source: U.S. Department of Education, Office of Special Education Programs, Data Analysis System (DANS), OMB #1820-0557, Table C-13, last updated August 3, 2010.

The number and percentage of children served birth to three decreased as reported on December 1, 2009. The CNMI did not meet its target of 1.8% and is under the National Average.

**OSEP Response Table June 2010:**

OSEP looks forward to CNMI's data demonstrating improvement in performance in the FFY 2009 APR, due February 1, 2011.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009:**

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

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

### **CNMI Part C Annual Performance Report (APR) for FFY 2009**

Although the CNMI did not meet its targets, the target was not revised at this time and additional targets through 2012 were added to the complete SPP. Discussion regarding the targets and stakeholder input is in the complete SPP. See discussion in Indicator 5 for New Improvement Activities, Timelines, and Resources added for Indicator 5 and 6 of this APR.

**CNMI Part C Annual Performance Report (APR) for FFY 2009****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
(2009-2010)	<b>100%</b> of infants and toddlers with IFSPs will have an evaluation and assessment and an initial IFSP meeting conducted within Part C's 45-day timeline.

**Actual Target Data for 2008 (2009-2010):**

Report Period:	a.	b.	c.	d.	e.
July 2009 to June 2010	# of Evals Assessments and Initial IFSP meetings required to be conducted	# Completed Timely (within 45-day timeline)	# Completed Untimely for <b>valid</b> reasons	# completed but untimely for Invalid Reason (to be accounted for)	# and % Required (Timely Eval Plus untimely for valid reasons) % = (b +c/a x 100)
Evaluation and Assessment and Initial IFSP meetings	<b>42</b>	<b>41</b>	<b>1</b>	<b>0</b>	41+1/42x100 <b>100%</b>

The data for this indicator is taken from the data base and reflects the report period of July 2009 to June 2010

Of the 42 evaluations, assessments and Initial IFSP meetings required to be held within the Part C 45-day timeline, 41 were within the timeline and 1 was not due to an exceptional family circumstance documented in the child's IFSP on a *Reason for Delay Form*. The family requested the evaluation to be conducted at the Children's Developmental Assistance Center; however, they did not show up and could not be located for several months after. The family was eventually located through the assistance of public health staff and the evaluation and initial IFSP meeting was conducted 84 days later. 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, 2010.

**CNMI Part C Annual Performance Report (APR) for FFY 2009****OSEP Response Table June 2009:**

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

**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. The initial contact involves an explanation of the "Early Intervention Program", the evaluation and IFSP process, conducting an initial family assessment of the family's immediate needs and concerns, scheduling meetings with the EI providers, providing a *Prior Written Notice* and obtaining the parental consent (consent for evaluations, consent for medical records, etc.). Evaluations and IFSP meetings typically take place in the family home unless exceptional circumstances prevent it or the family requests a different location.

The Service Coordinators are responsible for "presenting" the initial intake information to the EI providers and scheduling the evaluation and IFSP meetings with them based on the family preference during calendaring sessions. Time sensitive processes are scheduled first to ensure timelines are met. The Service Coordinators submit to the data manager documentation such as copies of the *Prior Written Notices*, copies of the IFSP meeting invitations, intake information and any other contact notes pertaining to the parent information including parent cancellations, refusal to consent to the evaluations, or change of schedules.

Upon completion of the evaluation and initial IFSP meetings, the 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 report year, the Data Manager draws down the data for inclusion in the APR.

Occasional, when a parent requests the evaluation to take place in a location other than their home and do not show up, the Service Coordinators elicit assistance from public health staff to locate the families or remind families of their appointments when they come in for Well Baby checkups and get current phone contact numbers or residence.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009:**

The CNMI continues to demonstrate compliance in this indicator. Several years ago, the CNMI implemented a Standard Operating Procedure to ensure evaluations and initial IFSP meetings with the families were conducted in a timely manner, including families on Rota and Tinian. The procedures include; heads up notices provided to Service Coordinators and EI providers with "time" reminders and continuous monitoring of "timelines" by the Data Manager and Part C Coordinator to ensure the CNMI does not fall behind. The EI providers conduct monthly "calendaring" and schedule time sensitive processes as a team to ensure timelines are met. The "strategies" or procedures appear to be working as the CNMI continues to demonstrate compliance with this indicator.

Last year, the EI providers expressed a need to for additional training and support in the development of IFSP's that focus primarily on family's priorities, concerns, and outcomes particularly for infants in the NICU and infants and toddlers with low incident disabilities such as visually impaired. During this report year, several professional development opportunities were provided to address the training needs of EI providers including:

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

- *Using the 4 Step Process to Develop Child and Family Outcomes*
- *Improving Outcomes and Supports Systems for Young Children*
- *The Pacific CIMAP Regional Low Vision Training*
- *The Vision Screening Process for Young Babies*
- *Routines Based Interviews*

The accomplishments the CNMI has experienced in this indicator are due primarily to the targeted and focused training provided to EI Providers throughout the year and to the personal commitment of EI providers.

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

This is a compliance indicator, therefore, the targets will not be adjusted. After thorough review of the improvement activities implemented this past year and the CNMI performance, the ICC did not feel that additional improvement activities were needed at this time. Additional targets through 2012 were added to the complete SPP. Discussion regarding the targets and stakeholder input is in the complete SPP.

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

**2010-2011 IMPROVEMENT ACTIVITY TABLE**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
Improve Administration and Monitoring	Continue to conduct internal monitoring to ensure timeliness of evaluations and initial IFSP meetings.  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	Random/Monthly <b>through 2012</b>	RP: Part C Coordinator Data Manager	Continuing Activity 2010-2011
Training and Professional Development	Provide continuous and ongoing training with EI Providers and Service Coordinators to ensure all EI Providers and Services	10 Professional Development days are scheduled every school year <b>through 2012</b>	RP: PSS Policies and Procedures	Continuing Activity 2010-2011

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
	<p>Coordinators understand and implement PSS Policies and Procedures regarding the IFSP process.</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>A listing of the professional development provided to EI Staff and families is also described in indicator 2 of this APR.</p>			
	Provide training for EI providers and Service Coordinators on the development of IFSP's for families whose infants are in NICU.	September 2009 February 2010 July 2010	CEDDERS University of Kentucky	Completed Activity 2009-2010
Revision to Policies and Procedures	The current practice to demonstrate parents received a copy of their procedural safeguard notice includes their signature on the Parents Rights booklet. A copy of the booklet is retained in their IFSP. This will be revised to be a signed statement indicating they have received a copy and understand their rights and know where to obtain further assistance if they do not understand their rights.	January 2011	EI Coordinator	<u>New Activity</u> 2010-2011

**CNMI Part C Annual Performance Report (APR) for FFY 2009****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:** Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including:

- A. IFSPs with transition steps and services;
- B. Notification to LEA, if child potentially eligible for Part B;
- C. Transition conference, if child potentially eligible for Part B.

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

**Measurement:**

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

Account for untimely transition conferences, including reasons for delays.

FFY	Measurable and Rigorous Target
(2009-2010)	<b>100%</b> of all children exiting Part C will receive timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday including steps and services, LEA notification if potentially eligible for part B and transition conferences at least 90 days prior to child's third birthday if the child is potentially eligible for Part B.

**Actual Target Data for 2009 (2009-2010):**

Total Exited:	a. Total # Required	b. # With Transition Steps & Services	c. Not Conducted with valid reason	Percent (b/a x100)
41				
<b>Measurement A: Transition Steps and Services</b>	<b>36</b>	<b>36</b>	<b>0</b>	(36/36x 100) = <b>100%</b>
<b>Measurement B: LEA Notification</b>	<b>34</b>	<b>34</b>	<b>0</b>	(34/34 x 100) = <b>100%</b>
<b>Measurement C: Transition Conference</b>	<b>33</b>	<b>32</b>	<b>1</b>	(33 + 1 /34 x 100) = <b>100%</b>

There were a total of 41 children who exited Part C services during this report period. Of the 41, 5 were not included in Measurement A, B, or C because they exited for other reasons (deceased, moved off-

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island, or withdrawn by parent). The data for this count is taken from the database of the full report year, July 1, 2009 to June 30, 2010 of the total number of children who exited.

Measurement A: Steps and Services

Thirty-six (36) IFSPs were required to include steps and services to support the child's transition from Part C to Part B pre-school and/or other community services. All IFSPs included steps and services as verified by the Data Manager. The Data Manager reviews all IFSPs of children exiting Part C and verifies the IFSP to ensure it contains the required steps and services. The Data Manager logs into the database, "yes" or "no" for this requirement. "No's" are red flagged and the Data Manager returns the IFSP to the Service Coordinator for immediate action. There were zero (0) "No's" during this report period.

Measurement B: LEA Notification of children who are potentially eligible for Part B Services

Thirty Four (34) children were **potentially eligible** for special education services. Notifications for all 34 children were provided to the Special Education Program (the LEA). At least four times a year (September, December March and June) 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 and parents' names, residential locations and contact information. The LEA notification is not considered a "referral". EI retains a copy of the LEA Notifications that were provided to the Special Education Program as verification that the LEA notification was provided. At least 5 months prior to the child's third birthday, an 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 any other information are sent to the Special Education Program team to prepare for the transition conference. Upon approval of the parent, Transition Conferences are 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.

Children **Potentially Eligible for Part B Services** in the CNMI, are defined as those children who, based on current evaluation, assessment and IFSP information, continue to demonstrate a 25% delay in one or more areas of development or have an established condition that has a high probability of resulting in a disability and 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.

Measurement C: 90-Day Transition Conference

There were 34 children, who were potentially eligible for Part B services and LEA notification were sent. Of the 34 children, 32 had Transition Conference no later than 90 days before the child turned three years old.

1 child did not have a Transition Conference due to a late referral to Part C, less than 90 days before his third birthday.

1 did not have Transition Conference 90 days before his third birthday due to an exceptional family circumstance. The child and family left on a medical referral to San Diego for 6 months and returned two months before the child's birthday. The Transition Conference, although late, did occur two months before his birthday.

**CNMI Part C Annual Performance Report (APR) for FFY 2009****OSEP Response Table June 2010:**

OSEP appreciates CNMI's efforts in achieving compliance with the requirements in 34 CFR §§303.148(b)(4) and 303.344(h).

**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. There are no timeline requirements in the database for LEA notification, the Transition Conference invitation or for the steps and service discussion with the family. 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). For this report period, there were no conferences held less than 90 days from the child's third birthday.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009:**

CNMI reports compliance with all transition requirements for this reporting year. The two conferences that were not conducted were due to valid reasons; one child and family were not on-island and one was a late referral to Part C.

The CNMI has maintained compliance in this indicator over the past few years. This is due to the consistent monitoring of this indicator, the procedures put in place several years ago which define the roles and responsibilities of the service coordinators and providers, the "heads up" notices, the combined EI and EC meetings, and maintaining the timelines in the database. The CNMI's accomplishments are also due to the targeted and focused training on the transition requirements, procedures and the personal commitment of EI and EC providers.

In last year's APR, additional improvement activities were added to the APR in regards to late referrals to Part C (less than 45 days, less than 90 days etc), the roles and responsibilities of Parts C and B for late referrals, and the CNMI's definition of potentially eligible for Part B. The Transition Procedures have been revised and now include guidance for late referrals, combined evaluations for late referrals, and the CNMI's definition of potentially eligible for Part B.

The Part C Coordinator and Data Manager continue to monitor this indicator on a monthly basis to prevent non-compliance from occurring. The CNMI EI program is relatively small and all staff is housed in one facility, which allows for a quick or immediate response to possible issues that may cause non-compliance. The CNMI is correctly implementing the regulatory requirements for Indicator 8 as demonstrated by a review of the transition policies and procedures and data collection and reporting mechanisms.

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

This is a compliance indicator, therefore, the targets will not be adjusted. After throughout review of the improvement activities implemented this past year and the CNMI performance, the ICC did not feel that additional improvement activities were needed at this time. Additional targets through 2012 were added to

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

the complete SPP. Discussion regarding the targets and stakeholder input is in the complete SPP. This is a compliance indicator; therefore the CNMI will not adjust targets.

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

**2010-2011 IMPROVEMENT ACTIVITY TABLE**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
Improve Administration and Monitoring	<p>Monthly Heads Up” notices to Service Coordinators and EI providers that indicate the upcoming birthdays and transition requirements</p> <p>Continue “random” checks of IFSP’s to ensure timelines are met.</p> <p>The EI providers will continue to Calendar time sensitive events.</p>	Monthly through 2012	RP: Data Clerk	Continuing activity 2010-2011
Improve Data Collection and Reporting	<p>New data elements will be added to the data base in order to further monitor the transition process. The database will include:</p> <ul style="list-style-type: none"> <li>• Date Part C received the referral</li> <li>• Date EI provided notification to the LEA,</li> <li>• Date of the individual referral to SPED</li> <li>• Date the meeting invitation was provided to the EC SPED team.</li> </ul>	October 2009	Part C Coord. EI Data Manager	Completed Activity 2009-2010.
Revise Policies and Procedures	<p>Revise the Transition Procedure to include new guidance on referrals to Part C &gt; than 90 days and &gt; than 45 days</p> <p>The CNMI will also use the <i>Early Childhood Transition from Part C to Part B Timeline Requirements</i> developed by NECTAC as guidance for activities for both Part C and B.</p>	Spring 2010  Sprint 2010	Data Manager and Service Coordinators  NECTAC	Completed Activity 2009-2010

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

**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 (see Attachment A).

FFY	Measurable and Rigorous Target
(2009-2010)	The CNMI identifies and corrects <b>100%</b> of non-compliance as soon as possible but in no case later than one year from identification.

**Actual Target Data for 2009 (2009-2010): 100%**

**Indicator C-9 Worksheet**

Indicator/Indicator Clusters	General Supervision System Components	# of System Issued Findings in FFY 2008 (7/1/08 to 6/30/09)	(a) # of Findings of non-compliance identified in FFY 2008 (7/1/08 to 6/30/09)	(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: APR Data Review, Individual File Review	1	1	1
	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	Monitoring Activities: APR Data Review, Individual File Review	0	0	0

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Indicator/Indicator Clusters	General Supervision System Components	# of System Issued Findings in FFY 2008 (7/1/08 to 6/30/09)	(a) # of Findings of non-compliance identified in FFY 2008 (7/1/08 to 6/30/09)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
settings.	Dispute Resolution: Complaints, Hearings	0	0	0
3. Percent of infants and toddlers with IFSPs who demonstrate improved outcomes	Monitoring Activities: APR Data Review, Individual File Review	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: APR Data Review, Individual File Review	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
5. Percent of infants and toddlers birth to 1 with IFSPs	Monitoring Activities: APR Data Review, Individual File Review	0	0	0
6. Percent of infants and toddlers birth to 3 with IFSPs	Dispute Resolution: Complaints, Hearings	0	0	0
	Monitoring Activities: APR Data Review, Individual File Review	0	0	0
7. Percent of eligible infants and toddlers with IFSPs for whom an evaluation/assessment/an initial IFSP meeting were conducted within Part C's 45-day timeline.	Monitoring Activities: APR Data Review, Individual File Review	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to pre-school and other appropriate community services by their third birthday including: A. IFSPs with transition steps and services;	Monitoring Activities: APR Data Review, Individual File Review	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0

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Indicator/Indicator Clusters	General Supervision System Components	# of System Issued Findings in FFY 2008 (7/1/08 to 6/30/09)	(a) # of Findings of non-compliance identified in FFY 2008 (7/1/08 to 6/30/09)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to pre-school and other appropriate community services by their third birthday including: B. Notification to LEA, if child potentially eligible for Part B	Monitoring Activities: APR Data Review, Individual File Review	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
8. Percent of all children exiting Part C who received timely transition planning to support the child's transition to pre-school and other appropriate community services by their third birthday including: C. Transition conference, if child potentially eligible for Part B.	Monitoring Activities: APR Data Review, Individual File Review	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: APR Data Review, Individual File Review	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
<b>Sum the numbers down Column a and Column b</b>			<b>1</b>	<b>1</b>
<b>Percent of noncompliance corrected within one year of identification =(column (b) sum divided by column (a) sum) times 100]</b>			<b>(b)/(a)X100=</b>	<b>100%</b>

**Describe the process for selecting EIS programs for Monitoring**

The CNMI Early Intervention 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 all files of children with an IFSP are selected for monitoring purposes. The "files" are reviewed according to the designation of Service Coordinators.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009:**

The CNMI Early Intervention Monitoring Procedures were revised and now include a purpose statement, an overview of the CNMI Early Intervention (EI) Program, an overview of the PSS general supervision requirements, a description of the integrated monitoring system components and schedule of activities,

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

internal and external monitoring procedures, the self-assessment process, database draw down process, focused monitoring procedures, reporting requirements, enforcement procedures (incentives and sanctions) and a definition of a “finding” and “correction” consistent with OSEP 09-02 Memo. *The revised Monitoring Procedures was presented to OSEP prior to the visit in November 2010.*

**PSS Integrated Monitoring System Components**

The PSS implements effective monitoring activities that are integrated across several components of the general supervision system. The integrated monitoring activities assess the level of performance of the IDEA requirements resulting in the identification of noncompliance and correction of the noncompliance as soon as possible but no later than one year after the noncompliance has been identified. Multiple data sources and methods are used to monitor the Early Intervention Program to ensure continuous examination of performance for compliance and results.

The PSS monitoring activities for the Early Intervention Program include on-site, off-site, and focused monitoring procedures conducted through internal and external processes of programs and services provided for infants and toddlers with disabilities. The internal process is facilitated by personnel within the Early Intervention Program. The external process is facilitated by the PSS Federal Programs Monitor or a contracted consultant, as designated by the Commissioner of Education.

Other data sources used to validate the effectiveness and the quality of the Early Intervention Program are parent surveys, family forums, and staff and community interviews. Data collected from monitoring activities are used to report and/or verify compliance or performance on State Performance Plan (SPP) targets that most closely align with improving developmental results and functional outcomes for infants and toddlers with disabilities and their families.

Internal Monitoring Procedures include two main processes: a mid-year self-assessment process and an annual draw down from the database. In December, Service Coordinators conduct a review process with supervision by the Early Intervention (EI) Coordinator. The purpose for the Service Coordinators participating in the review process is to provide a learning opportunity for identifying and correcting areas of procedural non-compliance shown through documentation in the child records. The EI Coordinator assigns the child's records to each Service Coordinator to ensure, as much as possible, a non-biased review process. This means that a Service Coordinator does not review records from his/her caseload. The file review is to ensure all required IFSP components are there as well as review the quality of the IFSP.

External Monitoring occurs every two (2) years. The PSS conducts a compliance review of Monitoring Priorities by an external monitor. The external monitor is defined as a person or entity outside of the Early Intervention Program, which could be the PSS Federal Monitor or a contracted consultant. PSS ensures that the external monitor is knowledgeable regarding IDEA Part C regulations, the monitoring procedures, and the PSS Early Intervention Program. The purpose of the external monitoring process is to identify the occurrence of noncompliance and to verify the reliability and accuracy of the data in the database, particularly of the monitoring priorities: 45-day evaluation, assessment and initial IFSP, 6 month IFSP reviews, annual IFSP reviews, timely services, and 90-day transition conferences.

Focused Monitoring is a process that purposefully selects priority areas to examine for compliance and results while not specifically examining other areas for compliance. The Early Intervention Program implements a system of focused monitoring, when necessary, to identify and correct persistent noncompliance with IDEA requirements, including as a review of the quarterly progress report to the CNMI Interagency Coordinating Council (ICC). Focused Monitoring utilizes data from file reviews, the data base, the dispute resolution system, parent surveys and previous corrective action plans to select Service Coordinators or Service Providers that demonstrate difficulty implementing regulatory requirements (those with significant noncompliance or low performance). Monitoring is focused on the specific processes related to the indicators that put Service Coordinator or Service Provider on the Focus

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

Monitoring list and is aimed at helping the Service Coordinator or Service Provider improve their compliance and performance on those indicators.

**Note: For this indicator, report data on the correction of findings of noncompliance the State made during FFY 2008 (July 1, 2008 through June 30, 2009) and verified as corrected as soon as possible and in no case later than one year from identification.**

**Timely Correction of FFY 2008 Findings of Noncompliance (corrected within one year from identification of the noncompliance):**

1. Number of findings of noncompliance the State made during FFY 2008 (the period from July 1, 2008, through June 30, 2009) (Sum of Column a on the Indicator C 9 Worksheet)	<b>1</b>
2. Number of findings the State verified as timely corrected (corrected within one year from the date of notification to the EIS programs of the finding) (Sum of Column b on the Indicator C 9 Worksheet)	<b>1</b>
3. Number of findings <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>0</b>

**Verification of Correction of FFY 2008 findings (either timely or subsequent)**

The CNMI EI program used the C-9 Worksheet to report the data for this indicator. Prior to the revisions in the monitoring procedures in 2009-2010, a "finding" was defined as a written notice called a "Corrective Action Plan". A written "Corrective Action Plan" included the date the "Corrective Action Plan" was issued, the area of noncompliance found, the data sources, the required evidence of change, required corrective action measures to be taken, and verification of correction of the individual instances of noncompliance and correction of the systemic issues on noncompliance.

In September, 2009, a written "Corrective Action Plan" was issued to the Service Coordinator responsible for the family who did not receive timely services. Since the individual child was corrected and the subsequent data indicated that all families received their services in a timely manner, the corrective actions included a recommendation to review and revise, if necessary, the procedures allow for exceptional circumstances on the part of providers. The EI providers reviewed and concluded that the procedures did not need to be revised at this time as the issues of untimely service is not persistent or systematic, only occurred once in the year.

**Describe the specific actions that the State took to verify the correction in FFY 2009 of findings of noncompliance identified in FFY 2008:**

Consistent with OSEP Memorandum 09-02, the CNMI is correctly implementing the specific regulatory requirements for Indicator 1. In June 2009, the database was drawn down and indicated 100% (7/7 x 100) of the families received services in a timely manner from February 2009 to June 2009. This data is subsequent data from the IFSP with untimely services which occurred in January 2009.

**OSEP Response Table June 2010**

Statement from the Response Table	State's Response
OSEP appreciates CNMI's efforts in timely correcting noncompliance identified in FFY 2007.	The CNMI appreciates OSEP's recognition of our effort to timely correct non compliances
In reporting on correction of any future identified noncompliance, CNMI must report that it verified that noncompliance identified: (1) is correctly implementing	As described above, the CNMI verified the correction of the individual instance of non-compliance and verified 100% of subsequent data (7) families received all services

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

Statement from the Response Table	State's Response
the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or the CNMI data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of CNMI's EIS program, consistent with OSEP Memo 09-02. In the FFY 2009 APR, CNMI must describe the specific actions that were taken to verify the correction.	on their IFSPs in a timely manner.
In addition, in reporting on Indicator 9 in the FFY 2009 APR, CNMI must use the Indicator 9 Worksheet. Further, in responding to Indicator 1 in the FFY 2009 APR, CNMI must report on correction of the noncompliance described in this table under that indicator.	The CNMI used Indicator 9 Worksheet to complete this indicator and reported the correction in Indicator 1 of this report.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2010:** This is a compliance indicator; therefore targets will not be adjusted. Additional targets through 2012 were added to the complete SPP.

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

**2010-2011 IMPROVEMENT ACTIVITY TABLE**

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
Improve Administration and Monitoring	Conduct quality assurance activities (child record reviews, self-assessments, and peer reviews), to catch an issue before it becomes a non-compliance. The Revised Monitoring Procedures now define "quality assurance activities" and "corrective action plans" as internal and external monitoring reports. Timelines and specific activities for the internal and external processes have been revised	Internal file reviews December of the Year through 2012	RP: Part C Coordinator and Data Manager	Revised Activity 2010-2011 to be consistent with the August 2010 updates to the Monitoring Procedures. 2010-2011
	Conduct external monitoring in accordance with the revised monitoring procedures, every other year.	July 2011 through 2012	RP: External Monitor	Revised Activity 2010-2011 to be consistent with the August 2010 updates to the Monitoring Procedures. 2010-2011

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
Review and Revise Policies and Procedures	Revise Transition procedure to include new guidance on late referrals to Part C and B	Spring 2010	Part C Coordinator ICC	Completed Activity in 2009-2010
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	RP: Part C Coordinator	Continuing Activity 2010-2011  Completed and will continue as new procedures are established or put in place.
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	RP: Part C Coordinator	Revised Activity 2010-2011 To be consistent with the August 2010 updates to the Monitoring Procedures. 2010-2011
Review and Revise Policies and Procedures	The Child Record Checklist will be reviewed and revised to ensure the all IDEA Part C requirements are included on the checklist.	November 2010	Data Manger and part C Coordinator	New Activity 2010-2011 To be consistent with the August 2010 updates to the Monitoring Procedures. 2010-2011

**CNMI Part C Annual Performance Report (APR) for FFY 2009****Overview of the Annual Performance Report Development:**

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

<b>Monitoring Priority:</b> Effective General Supervision Part C / Child Find
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**Indicator 10:** Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to particular complaint.

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

**Measurement:**

Percent = [(1.1(b) + 1.1(c)) divided by 1.1] times 100

<b>FFY</b>	<b>Measurable and Rigorous Target</b>
(2009-2010)	<b>100%</b> of signed written complaints with reports issued are resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.

**Actual Target Data for 2009 (2009-2010):**

No complaints were filed in this report period, as reported in the 618 Table 4.

**OSEP Response Table June 2010:**

OSEP looks forward to reviewing CNMI's data in the FFY 2008 APR, due February 1, 2011.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009:**

The CNMI conducted training for Hearing Officers and Mediators in March 2010 to ensure Hearing Officers and Mediators are knowledgeable in IDEA. The CNMI will analyze complaint findings, hearing officer directives, and mediation agreements to address and correct systemic issues once a baseline is established. The CNMI continues to provide all parents the Procedural Safeguard Notice that includes steps to be taken to file a formal complaint. **These activities will continue through 2012.**

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2010:** This is a compliance target, therefore will not be revised. Additional targets through 2012 were added to the complete SPP.

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

**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 11:** Percent of fully adjudicated due process hearing requests that were fully adjudicated within the applicable timeline.

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

**Measurement:**

Percent = [(3.2(a) + 3.2(b)) divided by 3.2] times 100.

FFY	Measurable and Rigorous Target
(2009-2010)	<b>100%</b> of due process hearing requests are fully adjudicated within the applicable timeline.

**Actual Target Data for 2009 (2009-2010):**

No requests for due process hearings were received during this report period, as reported in the 618 Table 4.

**OSEP Response Table June 2010:**

OSEP looks forward to reviewing CNMI's data in the FFY 2008 APR, due February 1, 2011.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009:**

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2010.** This is a compliance indicator, therefore, the targets will not be adjusted. Additional targets through 2012 were added to the complete SPP.

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

**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
(2009-2010)	Targets will be set once baseline data is established with in 10 or more resolution sessions.

**Actual Target Data for 2009 (2009-2010):**

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

**OSEP Response Table June 2010:**

OSEP looks forward to reviewing CNMI's data in the FFY 2008 APR, due February 1, 2011.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009:**

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

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

**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
(2009-2010)	Targets will be set once baseline data is established with 10 or more mediations.

**Actual Target Data for 2009 (2009-2010):**

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

**OSEP Response Table June 2010;**

OSEP looks forward to reviewing CNMI's data in the FFY 2008 APR, due February 1, 2011.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009:**

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

**CNMI Part C Annual Performance Report (APR) for FFY 2009****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 (see Attachment B).

<b>FFY</b>	<b>Measurable and Rigorous Target</b>
(2009-2010)	<b>100%</b> of required data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.

**Actual Target Data for 2009 (2009-2010):**

The CNMI Data is overall 100% accurate and reliable. The CNMI used the Indicator 14 Scoring Rubric (self-calculating rubric) to determine performance for this report year and as a result, scored 100%.

**Part C Indicator 14 Data Rubric**  
**Indicator 14 - SPP/APR Data**

<b>APR Indicator</b>	<b>Valid and reliable</b>	<b>Correct calculation</b>	<b>Total</b>
1	1	1	2
2	1	1	2
3	1	1	2
4	1	1	2
5	1	1	2
6	1	1	2
7	1	1	2
8A	1	1	2
8B	1	1	2
8C	1	1	2
9	1	1	2
10	1	1	2
11	1	1	2
12	1	1	2
13	1	1	2
		<b>Subtotal</b>	30
<b>APR Score Calculation</b>	<b>Timely Submission Points</b> - If the FFY 2009 APR was submitted on-time, place the number 5 in the cell on the right.		5
	<b>Grand Total</b> - (Sum of subtotal and Timely Submission Points) =		35

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

Indicator 14 - 618 Data					
Table	Timely	Complete Data	Passed Edit Check	Responded to Date Note Requests	Total
Table 1 – Child Count Due Date: 2/1/10	1	1	1	1	4
Table 2 – Program Settings Due Date: 2/1/10	1	1	1	1	4
Table 3 – Exiting Due Date: 11/1/10	1	1	1	NA	3
Table 4 – Dispute Resolution Due Date: 11/1/10	1	1	1	N/A	3
				<b>Subtotal</b>	14
			<b>Weighted Total (subtotal X 2.5)</b>		35
Indicator # 14 Calculation					
A. APR Total				35.00	
B. 618 Total				35.00	
C. APR Grand Total (A) + 618 Grand Total (B) =				70.00	
				Total NA in APR	0.0
				Total NA in 618	0.0
				<b>Base</b>	<b>70.00</b>
D. Subtotal (C divided by Base*) =				1.00	
E. Indicator Score (Subtotal D x 100) =				<b>100.0</b>	

**OSEP Response Table June 2010:**

OSEP appreciates CNMI's efforts in achieving compliance with the timely and accurate data reporting requirements in IDEA sections 616, 618, and 642 and 34 CFR §§76.720 and 303.540. In reporting on Indicator 14 in the FFY 2009 APR, CNMI must use the Indicator 14 Data Rubric.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009:**

Measurement (a): All reports (child count, including race and ethnicity, settings, exiting, personnel, dispute resolution, Annual Performance Reports and State Performance Plans) were submitted electronically to DAC and OSEP on time. The timely submissions were confirmed by DAC (for 618) and OSEP for the SPP and APR.

Measurement (b): CNMI's data is valid and reliable. The data represents the correct time period, correct calculations, and indicator measurements, consistent with IDEA 618 submission requirements and consistent with previous years' data. There were no missing sections or data note requests that needed a response. As indicated on the OSEP Response Table, June 2010, there were no issues regarding the CNMI's data. The CNMI has implemented the activities in the last few years to ensure the data collected and reported is accurate, valid and reliable. New data fields were added to the database as well as data edits needed to indicate noncompliance. EI staff is updated on how to record the data requirements on their contact sheets and logs.

The CNMI Early Intervention Program recently completed a *Data Collection and Reporting Guide* that describes the process for collecting and reporting data. The guide defines who collects and reports the data, how the data is used to make informed decisions regarding program improvement, the data collection protocols and timelines. The *Data Collection and Reporting Guide* is a living document which can be updated as needed, to include additions or revisions to the data collection and report process. The *Data Collection and Reporting Guide* was presented to stakeholders for comments. The stakeholders included the Early Intervention providers, the ICC, the Commissioner of Education, the

**CNMI Part C Annual Performance Report (APR) for FFY 2009**

Board of Education subcommittee for Special Education and Early Intervention Programs. A copy was also given to OSEP prior the OSEP visit in November 2010.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2010:** This is a compliance indicator; therefore targets will not be adjusted. After thorough review of the improvement activities implemented this past year and the CNMI performance, the ICC added additional improvement activities to this indicator. Additional targets through 2012 were added to the complete SPP. Discussion regarding the targets and stakeholder input is in the complete SPP.

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

**2010-2011 IMPROVEMENT ACTIVITY TABLE**

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
Improve Data Collection and Reporting	Post all required data on PSS Website to meet public reporting requirements	Annually in June (in line with APR/SPP posting requirements <b>through 2012</b> )	RP: Part C Coordinator and Web master	Continuing Activity 2010-2011
	New data elements will be added to the database in order to further monitor the transition process. The database will include: <ul style="list-style-type: none"> <li>• Date Part C received the referral</li> <li>• Date EI provided notification to the LEA,</li> <li>• Date of the individual referral to SPED</li> </ul> Date the meeting invitation was provided to the EC SPED team.	October 2009	Data Manager	Completed Activity 2009-2010
Improve Administration and Monitoring	The CNMI will continue to collect, verify and report all required data in a timely manner.	By Required Timelines <b>through 2012</b>	RP: Data Manager	Continuing Activity 2010-2011
	Complete and Dissimilate Data Collection and Reporting manual to all EI providers, COE, BOE and ICC members.  Continue to review and revise the <i>Data Collection and Reporting Guide</i> as needed to incorporate any new requirements or processes	November 2010  Review and Revise as needed <b>through 2012</b>	Data manager Part C Coordinator	New Activity 2010-2011

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<p>Provide Technical Assistance</p>	<p>If data turned in is inaccurate, the Part C Coordinator will work directly with the EI Provider responsible for the inaccurate data.</p> <p>Continue to monitor the collection and submission of data</p>	<p>As Needed through 2012</p>	<p>RP: Part C Coordinator</p>	<p>Continuing Activity 2010-2011</p>
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