

**CNMI Part C Annual Performance Report (APR) for FFY 2010****Overview of the Annual Performance Report Development:**

The CNMI Public School System (PSS), Early Intervention (IDEA Part C) facilitated a process for ensuring broad stakeholder involvement in the development of the CNMI IDEA Part C 2010-2011 Annual Performance Report (APR). Stakeholders included the Interagency Coordinating Council (ICC), early intervention staff and the Special Education Early Intervention Program subcommittee of the Board of Education. The review process included a discussion of OSEP's CNMI Part C determination letter issued on June 20, 2011, the response table, current performance data, and improvement activities. In order to evaluate the effectiveness of SPP Improvement activities, stakeholders were presented with the CNMI trend data for each Indicator. The *Evaluating SPP/APR Improvement Activities-12/16/09* resource from the National Early Childhood Technical Assistance Center and the Regional Resource Center (RRC) Program was reviewed for prioritizing areas of focus for improving performance. As noted in the Improvement Activity Table for each indicator, the improvement activities are organized in several categories that the stakeholders felt would have an impact on the indicator data. With technical assistance provided by the University of Guam Center for Excellence in Developmental Disabilities Education, Research, and Service (Guam CEDDERS), the stakeholders reviewed the trend data from each indicator and engaged in a discussion of the indicator progress or slippage, previous year's activities, and whether the improvement activities needed to be revised, deleted, continued, or moved to another indicator.

The development of the 2010-2011 APR included the following activities:

- **July 2011:** OSEP's Part C "Determination" Letter and Response Table were disseminated to the Interagency Coordinating Council, the CNMI Board of Education and Early Intervention program staff. The Determination Letter and Response Table were also posted on the PSS website for public dissemination.
- **September 2011:** The Early Intervention Program staff reviewed preliminary APR data and improvement activities to begin the drill down process. Reviewing the APR process, the data and improvement activities was significant as the Early Intervention program has 3 new staff members who have not previously been involved in this process.
- **November 7-9, 2011:** CNMI participated in the "NCRRC-WRRC Cross-Regional Summit" sponsored by the North Central Regional Resource Center (NCRRC) and the Western Regional Resource Center (WRRC). The Summit, held in Denver, Colorado, was designed to assist states/entities with their APR submissions, which included a review of national data for the results indicators.
- **December 15, 2011:** Guam CEDDERS provided technical support during CNMI's ICC meeting, the main stakeholder group for CNMI's Part C Program. Guam CEDDERS presented information on the OSEP Big Picture Trend and upcoming Continuous Improvement Visits (CIV), which was a presentation from the August 2011 OSEP Mega Conference. ICC members then reviewed the FFY 2010 DRAFT APR with the trend data presented for each indicator in comparison with national data. Evaluating the effectiveness of the improvement activities was discussed in length that the ICC members requested a full-day session to walk through an evaluation process for determining the effectiveness of improvement activities for impacting improved performance and results. ICC members provided input to the APR and agreed that the targets should remain as presented last year. The ICC feedback on the FFY 2010 APR has been incorporated into the final APR for submission.
- **January 9, 2012:** The DRAFT FFY 2010 APR was presented to the Special Education Early Intervention Program Subcommittee of the Board of Education. BOE members thoroughly reviewed the data and improvement activities related to each indicator. The BOE subcommittee reviewed the targets, performance, and improvement activities. The BOE feedback on the FFY 2010 APR has been incorporated into the final APR for submission.

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- **January 12, 2012:** The final FFY 2010 APR was submitted to the Board of Education (BOE) for adoption.
- **February 1, 2012:** Final CNMI Part C APR submitted to OSEP.

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 2009-2010 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 June 30, 2012, upon submission of CNMI's 2010-2011 Part C APR to OSEP and OSEP's response to the APR, CNMI PSS will post CNMI's 2010-2011 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 2010-2011 APR to parents, and to public and private agencies/organizations including, at least, the following:

The CNMI Office of the Governor	Community Guidance Center
The CNMI Legislative Committee on Education	State Mental Health Planning Council
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

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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>2010 (2010-2011)</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 2010 (2010 - 2011):**

Data reported for the period of July 1, 2010 to June 30, 2011

a.	b.	c.	d.	e.	f.
Total # of children with an initial and/or subsequent IFSP who should have received all services in a timely manner.	# of children with an Initial and/or subsequent IFSP with <b>ALL</b> Services Received in a Timely Manner.	# of children with Initial and/or subsequent IFSPs with Untimely Services.	Of # in (c), # of children with an Initial and/or subsequent IFSP with Untimely Services due to a Valid Reason (exceptional family circumstance).	Of # in (c), # of children with 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) % = $(b + d/a \times 100)$ .
<b>50</b>	<b>41</b>	<b>9</b>	<b>9</b>	<b>0</b>	$(41 + 9/50 \times 100)$ <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, 2010 to June 30, 2011.
- Column (b) is the total number of children with an initial and/or subsequent IFSP with ALL services provided in a timely manner.
- Column (c) is the total number of children with an initial and/or subsequent IFSP with untimely services.
- Column (d) is the total number of children with initial and/or subsequent IFSP with untimely services due to a valid reason (exceptional family circumstance or circumstance beyond the program control).

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- Column (e) is the total number of children who did not receive service in a timely manner due to an invalid reason (to be accounted for).
- Column (f) is the percent of children with an initial and/or subsequent IFSP who received all services in a timely manner, including untimely, due to valid reasons.

Timely Service Data reported for the period of July 1, 2010 to June 30, 2011 is taken from the database of the total count. The CNMI performance was 100% with timely IFSP services. There were 9 untimely services however, the delays were due to exceptional family circumstances as described in Table 1 below. The CNMI's definition of Exceptional Family Circumstances is consistent with OSEP's November 2010 definition. CNMI includes exceptional family circumstances to both the numerator and denominator.

Table 1: Reasons for Exceptional Family Circumstances

Number of Families	Reasons due to Exceptional Family Circumstances (Valid Reasons) 2010 - 2011
6	Families requested to reschedule Initial service due to child and/or parent illness, family off Island or other appointments that could not be rescheduled.
3	Families no show or not home and no call.

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

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

**Data Collection and Verification:**

The process used to verify the timely service start dates and monthly services dates is the *Contact Sheet* that is prepared by EI providers. The *Contact Sheet* includes the expected outcomes and activities planned for the visit and strategies families can use to enhance their child's development. If the service is an initial visit, the date is indicated on the *Contact Sheet*, which is signed and dated, by the parent or caregiver on the day the service is provided. For services that are untimely due to an exceptional family circumstance, the reason is documented on a *Reason for Delay* form which is filed in the child IFSP folder.

The EI program is in the process of reviewing and revising the timely service provisions to include procedures for collecting and reporting a "revised initial start date" based on a family's request and the documentation or form used to collect *timely service* data. Currently, if a family reschedules an initial service date, the data taken and reported is that the service was "untimely" due to an exceptional family circumstance. The revised procedures will include the process used to determine a "revised start date" and if the service was provided on the revised start date.

The documentation used to report "timely services" and monthly service provisions is a *Contact Sheet*. Although this data collection process works, the EI providers feel a single form specific to documenting the initial start date is more efficient. The form will indicate the service, the agreed upon start date as is written on the IFSP, a revised start date if necessary, with an explanation based on the family's request, and the parent signature.

In April, 2011, the EI Coordinator conducted training with all EI providers and data manager on the required content of IFSP's under 34 CFR §303.344, including, but not limited to: 34 CFR §§303.344(a)(1); 303.344(d)(1) and (1)(i); and 34 CFR §303.344(f)(1). Prior to the training, the EI Coordinator conducted observations of new referral evaluations, initial IFSP meetings, annual IFSP meetings, 6-month review

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meetings and transition conferences. The purpose of the observations was to determine how EI service provisions are discussed with families, how the present level of the child's functioning is determined and how initial start dates for EI services are determined. Information from the observations was used to develop the training agenda.

**OSEP Response Table June 2011:**

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

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2011:** This is a compliance indicator therefore the targets were not revised.

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

**2011-2012 IMPROVEMENT ACTIVITY TABLE**

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
Improve Data Collection and Reporting	Conduct internal monitoring procedures (random file reviews) to ensure procedures are followed and infants and toddlers receive early intervention services as stated on their IFSP's in a timely manner.	Monthly through 2012	Data Manager	<u>Continuing Activity 2011 - 2012</u>  This activity is revised to be consistent with the August 2010 updates to the Monitoring Procedures.
	The EI Coordinator will continue to conduct "random" observations of initial and annual IFSP meetings to ensure decisions regarding service start dates are based on family need.	Monthly Beginning September 2010 through 2012	Data Manager EI Coordinator	<u>Continuing Activity 2011 - 2012</u>
Improve Administration and Monitoring	To ensure identification and immediate correction of non-compliances, IFSP's are reviewed by the data manager and expected service start dates are logged into the data base. Upon completion of the initial service, the dated Contact Sheet is submitted to data manager. The database calculates the dates. If a service is not provided as stipulated in the IFSP, a <i>Reason for Delay</i> form must be attached which will	July 2010 July 2011 July 2012	Data Manager	<u>Continuing Activity 2011 - 2012</u>  This activity was revised to be consistent with the August 2010 updates to the Monitoring Procedures.

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Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
	<p>indicate the reason for the delay. If the reason is due to a family circumstance, the database will indicate "valid".</p> <p>Service Coordinators continue to verify EI personal calendars and monthly calendars that are sent home to families.</p>	Upon Completion of the IFSP through 2012	Service Coordinators	
Review and Revise Policies and Procedures	Review policies, procedures, and practices and revise if necessary, to ensure alignment with Part C regulations as amended in September 2011 and make changes and/or corrections to procedures if necessary.	Annually in June 2010 June 2011 June 2012	Part C Coordinator and EI Staff	<u>Continuing Activity</u> 2011 - 2012
	Revise IFSP forms to aligned 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	<u>Completed Activity</u> 2011 - 2012  The IFSP forms were revised and several sections were reformatted to allow for a better "flow" in the IFSP process.
	<p>Revise procedures to document timely services based on a "revised start date" if necessary.</p> <p>Revise IFSP forms to add a section for a Revised Start Date</p> <p>Develop and implement a form to document the initial start date that is submitted to data manager specific start dates.</p>	By December 2011	RP: EI Coordinator EI Staff  Resource: NECTAC, WRRRC, and Guam CEDDERS	<u>New Activity</u> 2011 - 2012
Training and Professional Development	<p>Conduct training on the IFSP process to ensure compliance requirements are met on the implementation of the EI procedures.</p> <p>In September 2010 and April, 2011, the EI staff was required to participate in training on the IFSP process and required content of the IFSP.</p>	Annually in September 2010 2011 2012	Part C Coordinator	<u>Continuing Activity</u> 2011 - 2012

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Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
	Conduct training for parents, ICC members, and EI staff on the revised policies and procedures that align with the new Part C IDEA 2011.	March 2012 and Annually Thereafter	RP: Part C Coordinator  Resource: Guam CEDDERS	<u>New Activity</u> <u>2011-2012</u>



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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>2010 (2010 - 2011)</b>	On December 1, 2010, 96% of infants and toddlers with IFSP will receive early intervention services in the home or community-based settings.

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

<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, 2010</b>	<b>56</b>	<b>54</b>	$54/56 \times 100 =$ <b>96%</b>

On December 1, 2010, the CNMI served a total of 56 infants and toddlers with disabilities. Fifty Four (54) or 96% received EI services primarily in their homes or in community-based settings. Based on the 2010-2011 performance, the CNMI met its target of 96%. Two children received services at the Children's Developmental Assistance Center (C\*DAC) at the time the child count was taken. Of the two children, one child was below age 1 and one child between one and two years old.

**OSEP Response Table June 2011:**

OSEP looks forward to CNMI's data demonstrating improvement in performance in the FFY 2010 APR, due February 1, 2012.

**Data Collection and Verification:**

In order to ensure IFSP teams make service-setting decisions on an individualized basis and adhere to regulations regarding the natural environment requirements, a file review was conducted on the 2 IFSPs where services were provided in settings other than the home or community settings. The IFSP's did include a justification for the service location based on the family's request. Some families are uncomfortable, possibly for cultural reasons, to have providers in their homes. EI providers respect the family's decision and they do explain the benefits to the child and family when services are provided in the child's natural environment.

In order to ensure service location decisions are based on family need or choice, the ICC suggested to "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. This activity was not completed however, random "observations" of initial evaluation meetings, annual IFSP meetings and



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6 month review meetings was conducted. The observations indicated that service location decisions are based on the family preference and need. In addition to the observations, parent responses and comments to questions in the *Family Surveys* was reviewed for indications or suggestions that service location decisions were not based on provider convenience. Listed below are some of the family responses and comments in reference to service delivery.

### 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)?

- *For me it's good experience with C\*DAC because I really did meet the goal, more knowledge to learn, thank you so much*
- *There was a sense of camaraderie and importance between our family and C\*DAC staff.*
- *They were very helpful and understanding with my child's needs*
- *They always provided suggestions/feedback for my child.*
- *Good feeling when they come and visit at home for my child. I really appreciate that.*
- *I really like how each teacher acts and talks to \_\_\_\_\_ as if he was their own.*
- *Help us understand why our child is behind with and makes us more interested in making her learn new things.*
- *I was able to learn how to communicate with my child especially at the start of the program.*
- *You guys come and help for \_\_\_\_\_. \_\_\_\_\_ can say out the words in the picture.*
- *All teachers are supporting and encouraging our mind to take better care of our child. They work with patience and with love, which influenced us a lot. Never give up.*
- *Staff is willing to share experience as "parent," which is very helpful for family with first baby.*
- *Not only do things helpful for baby's development, but also do other social things for baby's family.*
- *My husband and I saying it's a big help and pleasure to us that they have like this program, because in the first place ourselves are not prepared for this kind of problem, but because you have this program it's kind a big help to prepare ourselves, feel comfortable, helping us how to handle, and especially for doing step by step how and what we gonna do us a team to developed my son.*
- *All the members are very supportive. They always give all the needs of our child that can really help on our child development.*
- *Being a parent to a child with D's is new to me, and C\*DAC has provided information and service to help with this new experience.*
- *We have people we could talk to, and people who give us some suggestions that help a lot to the progress of our child. Also it helps us by helping our child to have her Medicaid for her medical needs.*
- *Please continue visiting homes.*
- *You guys good – You coming to the house to teach \_\_\_\_\_. Everybody is doing good.*
- *For me and my husband are pretty much happy with services that you provide. Important thing is your patience, your kindness and specially team work is there. We're ok with that I don't have to say anymore or any suggestions. Thank you for the team.*
- *It's pretty good effect to my family. I don't think of any improving, it's very comfortable with them, their service is very good.*
- *I guess continuing for home visit.*
- *Keep doing their best and help parents meet other parents for support and to share their unique experience.*
- *As for me, CDAC has been very kind and understanding to us. So I would rather say that hope they would always stay the same to all families not only to us.*
- *I think that the early intervention provides the equal and accurate service in which can help the parents improve their child by teaching new things the child is not familiar or does not know*

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

Improvement activities included a drill down of the service delivery data to determine if it is the same families every year that services are not provided in their natural environment. This was done and it was determined that it is not the same families who receive services in locations other than the child's natural environment. Typically, those families change their mind after several months and request that the service be provided in their home or where ever their child and family may be during the day.

In May 2011, the Part C Coordinator attended the "*Pacific TA Meeting: Quality Practices in Early Intervention and Preschool Programs*" sponsored by NECTAC and other TA Providers in Honolulu, Hawaii. The purpose of this four-day training was to provide information and skill-building activities to

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support staff in implementing quality practices as well as measuring child outcomes to assist the Pacific jurisdictions in making program improvements and yielding better results for young children with disabilities and their families. As a result of attending this meeting, a presentation was conducted by the Part C Coordinator in partnership with Guam CEDDERS for the EI staff. One of topics for discussion was on an article entitled: “*Seven Key Principles: Looks Like/Doesn’t Look Like*”, developed by the NECTAC Work Group on Principles and Practices for Natural Environments. CNMI reviewed their process and practices to ensure it reinforces the seven key principles. CNMI continues to promote family centered principles in meeting the needs for infants and toddlers with disabilities and their families. CNMI continues to provide ongoing professional development training to ensure EI providers have the skills for ensuring families priorities, needs, and concerns are addressed.

The Public School System personnel policies require all staff to attain 60 contact hours of professional development in order to maintain certification. EI staffs are provided several opportunities throughout the year to attain and/or maintain continuing education units both on and off-island, to attend in-service trainings 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, NECTAC, ECO, and WRRRC. In addition to continuing education units or in service training specific to their field of work, PSS encourages providers to cross train and attend PSS state wide professional development that focus on the overall strategic priorities of the Public School System.

In 2010-2011, one EI provider completed a certification in Autism, and one provider successfully completed a 3 semesters of a master’s degree with specialization in Early Intervention/Autism. The table below is a list of other professional development opportunities made available to EI providers this past year.

Professional Development  
SY 2010-2011

Date	Name of Presentation	Presenters	Location	PD Hours
July 2010	The CIA for Infants, Toddlers, and Preschoolers with Disabilities	Caroline Gooden, M.S. University of Kentucky	Guam	40
August, 2010	Developing Measurable Goals	Carol Kosnitsky	Saipan	16
September 2010	Routines Based Interviews Overview/IFSP outcomes	Christine Hunter, Robin Palacios, Jerry Diaz	Saipan	8
March 2011	Listening and Spoken Language Institute for Early Interventionist	Dr. Teresa Caraway, Phd.CCC-SLP, LSLC Cert. AVT Wendy DeMoss. M.S. CCC-SLP, LSLC Cert. AVT	Saipan	40
May 2011	The Incredible Years	UOG CEDDERS, Guam Department of Public Health	Guam	24

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2011.** The CNMI will not revise the targets agreed upon.

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

**2011-2012 IMPROVEMENT ACTIVITY TABLE**

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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 in their natural environment.	Monthly random file checks through 2012	Part C Coordinator and Data Manager	<u>Continuing Activity 2011 - 2012</u>  This activity is revised to be consistent with the August 2010 updates to the Monitoring Procedures.
	Continue to conduct random observations of IFSP meetings to ensure conversations regarding service locations are based on family preference and need.  Continue to 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 through 2012	Data Manager And EI Coordinator	<u>Revised Activity 2011 - 2012</u>
Training and Professional Development	Continue to provide staff development opportunities in order to attain or maintain certification requirements:	March 2010 March 2011 March 2012	Part C Coordinator PSS Human Resource Office	<u>Continuing Activity 2011 - 2012</u>
	Professional Development for 2011-2012 will focus on Outcome Measurements, Quality Practices in Early Intervention, Routines Based Intervention and participation in the Measuring and Improving Child and Family Outcomes.	October 2011		
	Schedule training on PSS new Teacher Evaluation system.	December 2011	Part C. Coordinator	
	Implement new Teacher Evaluation included self-assessment.	January 2012	Part C Coordinator	
	Conduct training for parents, ICC members, and EI staff on the revised policies and procedures that align with the new Part C regulations as of September 2011.	March 2012 and Annually Thereafter	RP: Part C Coordinator  Resource: Guam CEDDERS, NECTAC	<u>New Activity 2011-2012</u>

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Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
Review and Revise Policies and Procedures	Review and revise if necessary policies and procedures to ensure alignment with Part C regulations as amended in September 2011.	June 2012	PR: Part C Coordinator ICC  Resources: Guam CEDERRS NECTAC WRRRC	<u>New Activity</u> <u>2011-2012</u>

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

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

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

**Indicator 3:** Percent of infants and toddlers with IFSPs who demonstrate improved:

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

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

**Measurement:**  
Outcomes:

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

Progress categories for A, B and C:

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

**Summary Statements for Each of the Three Outcomes (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 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 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 2010 (2010-2011):**

Summary Statements	Targets FFY 2010 (% of children)	Actual FFY 2010 (% of children)
<b>Outcome A: Positive social-emotional skills (including social relationships)</b>		
<b>1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially</b>	<b>77%</b>	<b>58.3%</b>

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increased their rate of growth by the time they exited the program.		$(c + d) / (a + b + c + d)$ $(3 + 4) / (0 + 5 + 3 + 4)$ <b>7/12 = 58.3%</b>
2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program.	<b>65%</b>	52.9% $(d + e) / \text{TOTAL}$ $(4 + 5) / 17 = 52.9\%$
<b>Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>		
1 Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program	<b>55%</b>	64.7% $(c + d) / (a + b + c + d)$ $(5 + 6) / (0 + 6 + 5 + 6)$ <b>11/17 = 64.7%</b>
2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	<b>33%</b>	35.3% $(d + e) / \text{TOTAL}$ $(0 + 6) / 17 = 35.3\%$
<b>Outcome C: Use of appropriate behaviors to meet their needs</b>		
1 Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they exited the program	<b>82%</b>	72.7% $(c + d) / (a + b + c + d)$ $(5 + 3) / (0 + 3 + 5 + 3)$ <b>8/11 = 72.7%</b>
2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program	<b>77%</b>	52.9% $(d + e) / \text{TOTAL}$ $(3 + 6) / 17 = 52.9\%$

## Progress Data for Part C Children FFY 2010

<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	0	<b>0%</b>
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	5	$(5/17) = 29.41\%$
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	3	$(3/17) = 17.65\%$
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	4	$(4/17) = 23.53\%$
e. Percent of children who maintained functioning at a level comparable to same-aged peers	5	$(5/17) = 29.41\%$
Total	N = 17	100%
<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	0	<b>0%</b>
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	6	$(6/17) = 35.3\%$

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c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	5	(5/17) = 29.4%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	6	(6/17) = 35.3%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	0	0%
Total	N = 17	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	0	0%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	3	(3/17) = 17.65%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	5	(5/17) = 29.4%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	3	(3/17) = 17.65%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	6	(6/17) = 35.3%
Total	N = 17	100%

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:****Outcome A: Positive Social-Emotional Skills**

- **Summary Statement 1:**
  - CNMI's performance was at **58.3%**. The CNMI did not meet its target of 77% of the children substantially increased in their rate of growth by the time they exited the program.
- **Summary Statement 2**
  - **52.9%** of the children were functioning within age expectation by the time they exited the program. The CNMI did not meet the target of 65%.

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

- **Summary Statement 1:**
  - CNMI performance was **64.7%**. The CNMI exceeded its target of 55% of the children substantially increased their rate of growth by the time they exited the program.
- **Summary Statement 2:**
  - **35.3%** of the children were functioning within age expectation. The CNMI exceeded the target of 33% for this year.

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

- **Summary Statement 1:**
  - CNMI performance was **72.7%**. The CNMI did not meet its target of 82% of the children who substantially increased their rate of growth by the time they exited the program.
- **Summary Statement 2:**
  - **52.9%** of the children were functioning within age expectation by the time they exited the program. CNMI did not meet its target of 77%.

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



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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 continues 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 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 seventeen (17) children with IFSPs who met the criteria for Measurement 2 documenting entry and exit COSF for this reporting period.

New activities for 2011-2012 will include a revision to the Outcome Measurement report form. Currently the form has sections that are redundant or missing space to add comments and descriptors.

**Figure 1: Outcome A: Positive Social Emotional Trend Data**

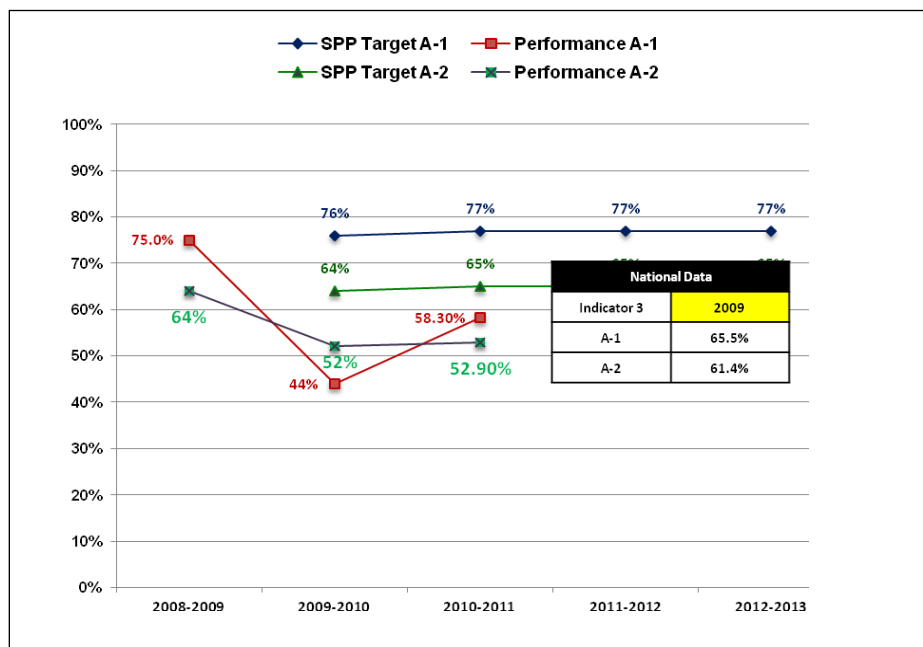
**Summary Statement A-1:** CNMI performance in 2008 was 75%, in 2009 was 44% and 2010 was 58.3%.

**Summary Statement A-2:** CNMI Performance in 2008 was 64%, in 2009 was 52% and 2010 was 53%.

The slippage from 2008 performance may be due to an increased understanding, knowledge and skills of providers on rating young children and understanding the overall early childhood outcome process.

In comparison with National Data taken from NCRRC-WRRC Cross-Regional Summit Presentation, November 2011, the Early Intervention program **Summary Statement 1 and Summary Statement 2** are below the National percent for Outcome A.

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



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National Data taken from NCRRC-WRRC Cross-Regional Summit Presentation, November 2011

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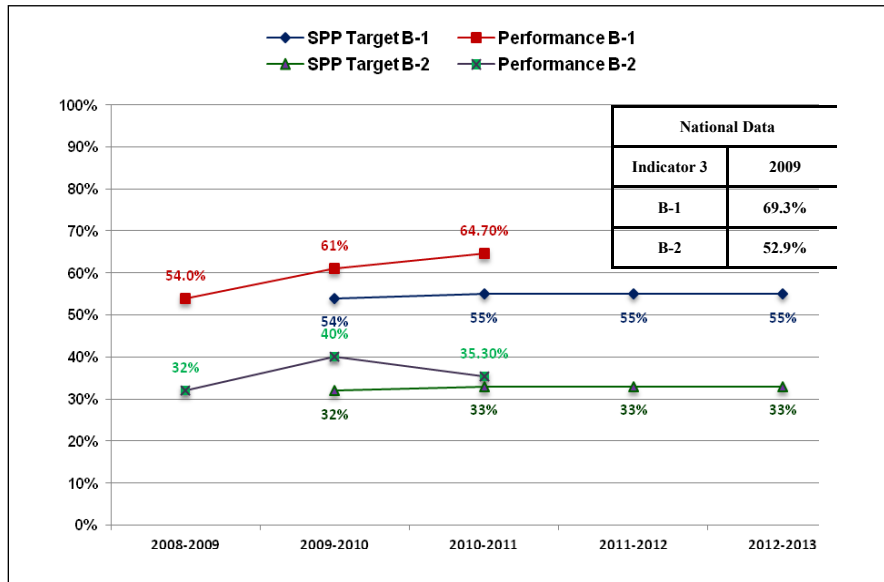
**Figure 2:** Outcome B: *Acquisition of Knowledge and Skills Trend Data*

**Summary Statement B-1:** CNMI performance in 2008 was 54%, in 2009 was 61% and 2010 was 65%

**Summary Statement B-2:** CNMI performance in 2008 was 32%, in 2009 was 40% and 2010 was 35%

In comparison to National Data taken from the NCRRC-WRRC Cross-Regional Summit held in November 2011, CNMI performing below the National average for Outcome B.

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



National Data taken from NCRRC-WRRC Cross-Regional Summit Presentation, November 2011

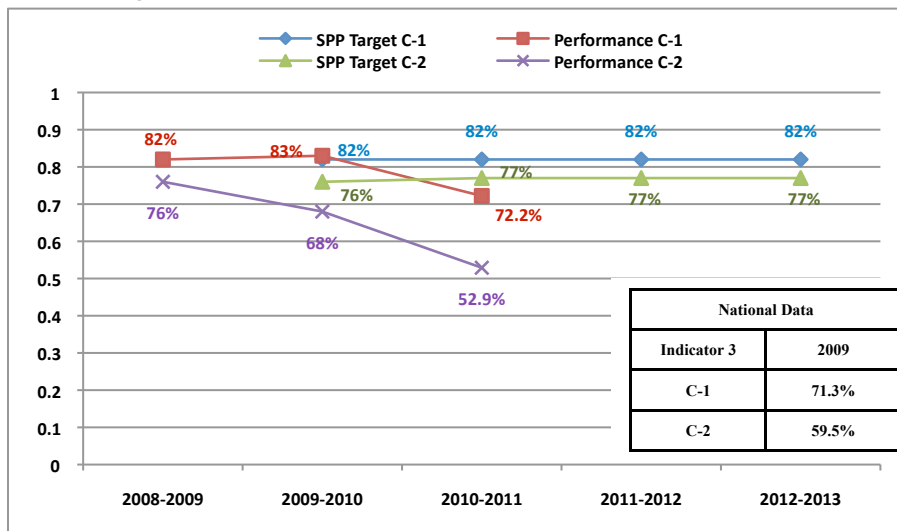
**Figure 3:** Outcome C: *Use Appropriate Behaviors Trend Data*

**Summary Statement C-1:** CNMI performance in 2008 was 82%, in 2009 was 83% and 2010 was 72%

**Summary Statement C-2:** CNMI Performance in 2008 was 76%, in 2009 was 68% and 2010 was 53%

In comparison to National Data, the CNMI exceeded the national percentage of 71.3% for this reporting for Outcome C Summary Statement A 72.7%. For Summary Statement 2, CNMI is in the fifth percentile in comparison to the National Data taken from the NCRRC-WRRC Regional Summit held in November 2011.

**Figure 3: Comparison of Outcome C for 2008, 2009, and 2010**



National Data taken from NCRRC-WRRC Cross-Regional Summit Presentation, November 2011

**CNMI Part C Annual Performance Report (APR) for FFY 2010****OSEP Response Table June 2011:**

OSEP appreciates CNMI's efforts to improve performance and looks forward to CNMI's data demonstrating improvement in performance in FFY 2010 APR due February 1, 2012.

**Revisions, with Justification, to Proposed Targets/Improvement Activities/ Timelines/Resources for 2011.** CNMI did not revise the targets.

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

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

**2011-2012 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	Part C Coordinator and Data Manager	<u>Continuing Activity</u> <u>2011 - 2012</u>
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 2010-2011 year.	As necessary	Part C Coordinator and Data Manager  Resource: Guam CEDDERS	<u>Continuing Activity</u> <u>2011 - 2012</u>
	Revise and condense the outcome measurement reporting "form" to include the descriptor statements and remove redundancy.	Fall 2011	RP: Part C Coordinator EI Staff  Resources: Guam CEDDERS, EI Program, ECO	<u>New Activity</u> <u>2011-2012</u>

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Training and Professional Development	Participate in the ECO annual Outcome Conference.	Fall 2011	RP: EI Providers  Resources: EI Program, ECO	<u>New Activity</u> <u>2011-2012</u>
	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	Part C Coordinator	<u>Continuing Activity</u> <u>2011 - 2012</u>
	Conduct training for parents, ICC members, and EI staff on the revised policies and procedures that align with the new Part C regulations as of September 2011.	March 2012 and Annually Thereafter	RP: Part C Coordinator  Resource: Guam CEDDERS, ECO, NECTAC, WRRC	<u>New Activity</u> <u>2011-2012</u>
Collaboration and Coordination	Collaborate and cross train with EC SPED to ensure consistency in measurements and strategies to increase knowledge and skills in strategies that promote growth and development in the area of social/emotional, early literacy (early language and communication), and self- help skills.	Fall 2007 Fall 2009 Fall 2010 Fall 2011	Part C Coordinator	<u>Continuing Activity</u> <u>2012-2012</u>

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

**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
(2010-2011)	(A) Maintain 91% Know their rights (B) Maintain 91% Effectively communicate their children's needs (C) Maintain 90% Help their children learn and grow

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

**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:

- A. Know their rights;
- B. Effectively communicate their need; and

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## 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 56 surveys distributed, 33 or 59% (33/56) were completed and submitted by June 2011. The percentage of returns increased by 25% for FFY 2010 over 34% return rate for 2009. The increase in 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 in the past.

Of the 33 surveys returned, 12 were from "New" families, 9 were from "Ongoing" families, and 12 were from "Exiting" families. Table 2, provides the summary data of the families or "respondent groups" that completed the 2010 - 2011 Part C Family Survey:

**Table 2. Percent of Families who Report that Early Intervention Services has Helped their Family in Measurement A, B, and C for FFY 2010**

	A. Know Your Rights	B. Effectively Communicate their children's needs	C. Help their Children Develop and Learn
<b>New</b>	60 responses indicated "Agree" out of 60 possible responses. <b>60/60 = 100%</b>	72 responses indicated "Agree" out of 72 possible responses. <b>72/72 = 100%</b>	48 responses indicated "Agree" out of 48 possible responses. <b>48/48 = 100%</b>
<b>Ongoing</b>	41 responses indicated "Agree" out of 45 possible responses. <b>41/45 = 91%</b>	33 responses indicated "Agree" out of 36 possible responses. <b>33/36 = 92%</b>	33 responses indicated "Agree" out of 36 possible responses. <b>33/36 = 92%</b>
<b>Exit</b>	18 of the 18 possible responses indicated "Agree." <b>29/36 = 81%</b>	28 of the 35 (*) possible responses indicated "Agree." <b>28/35 = 80%</b>	77 of the 84 possible responses indicated "Agree." <b>77/84 = 92%</b>
<b>Overall % Agreement of Respondents</b>	130 overall responses that indicate "agree" of the 141 possible responses. <b>130/141 = 92%</b>	133 overall responses that indicate "agree" of the 143 possible responses. <b>133/143 = 93%</b>	113 overall responses that indicate "agree" of the 118 possible responses. <b>158/168 = 94%</b>

(\*) Indicate that there was 1 survey item that was left blank and was not included in the denominator.



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“New” families consistently rated all three measurements areas with 100% agreement. “Ongoing” and “Exiting families rated “Know Their Rights” lowest at 91% and 81% respectively. For overall percentages, “Know Their Rights” was rated the lowest of the three areas surveyed. As of the survey results, CNMI will include a new improvement activity for parent training on procedural safeguards that will align with the new Part C IDEA requirements of 2011.

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, 2010

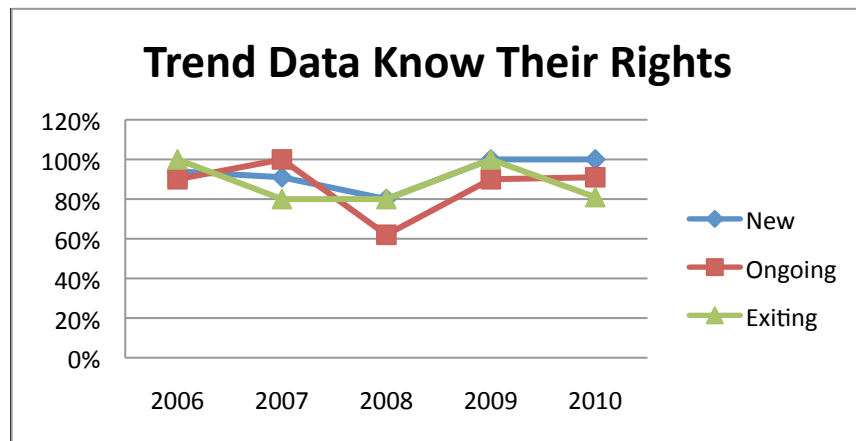
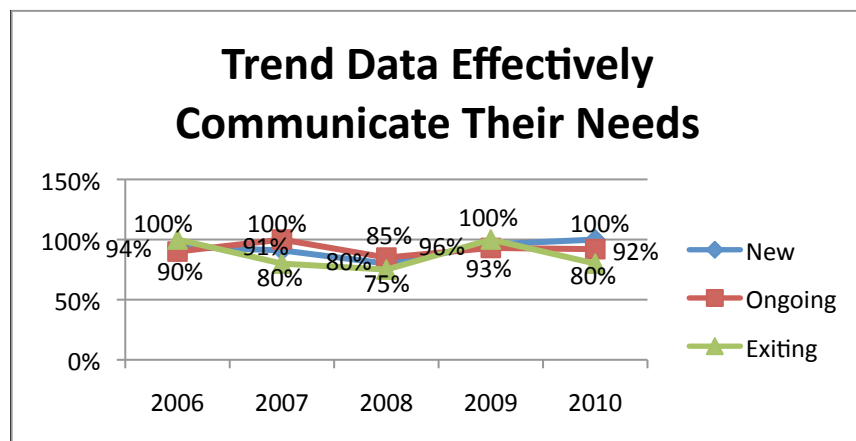


Figure 2: Percent of Part C Families Who Responded that Part C Services ‘Effectively Communicate Their Children’s Needs’ – FFY’s 2006, 2007, 2008, 2009, 2010



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Figure 3: Percent of Part C Families Who Responded that Part C Services ‘Helps Their Children Develop and Learn’ – FFYs 2006, 2007, 2008, 2009, 2010

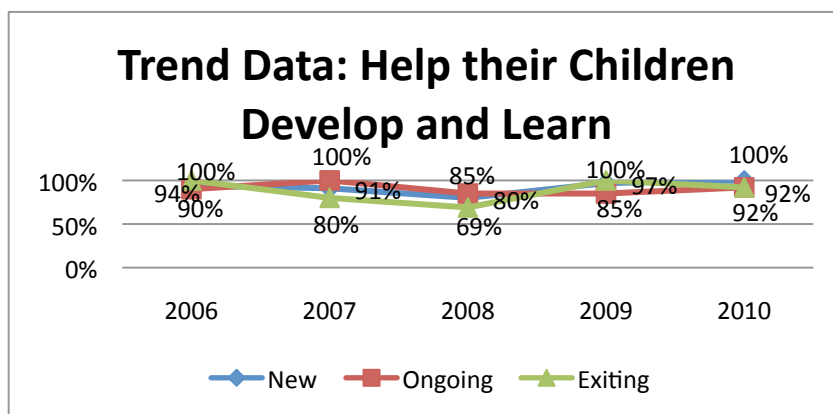
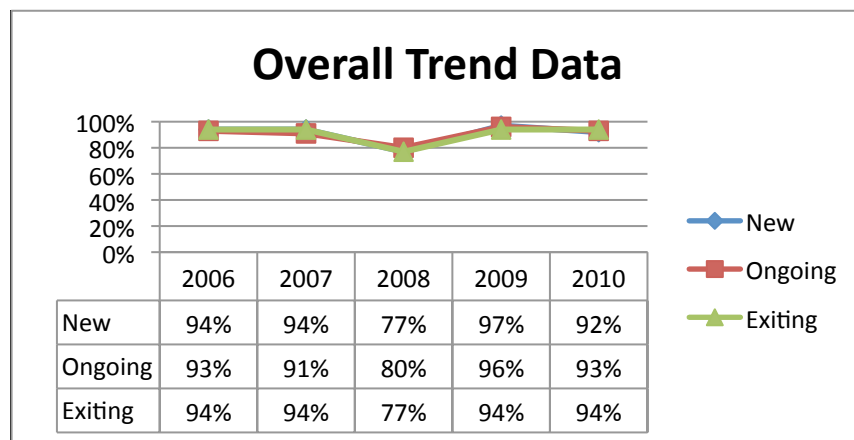


Figure 4: Overall Percent of Part C Families Who Responded Per Category Question (A, B, & C) – FFYs 2006, 2007, 2008, and 2009



**OSEP Response Table June 2011:**

OSEP appreciates CNMI's efforts to improve performance.

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

For the 2010 - 2011 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 there rights 130/141 or 92% exceeded the target by 1%. B) Effectively communicate their children’s needs 133/143 or 93% exceeding the overall target by 2%; and C) Help their children

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developed and learn was at the performance of 158/168 or 94% exceeding the target by 4% for this reporting period.

Reviewing the overall survey results as group is a valuable experience for the EI providers, particularly the comment section. From the comments, the providers are able to self-evaluate their performance and rapport with families, where they do well and areas to target for improvement. With so much emphasis on “compliance” (timelines, forms, documentation, data etc.) the EI providers appreciate constructive feedback from families to keep them focused on the “things” that are important to families as well as requirements.

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)?

- The Teacher is very nice to my boys and hope that she will come back for work.
- For me it’s good experience with C\*DAC because I really did meet the goal, more knowledge to learn, thank you so much
- There was a sense of camaraderie and importance between our family and C\*DAC staff.
- They were very helpful and understanding with my child’s needs
- They always provided suggestions/feedback for my child.
- Good feeling when they come and visit at home for my child. I really appreciate that.
- I really like how each teacher acts and talks to \_\_\_\_\_ as if he was their own.
- I’m so happy with the service because I know my child is trying to learn and she is trying to understand what the teacher said.
- Positive experiences was, showed us the level of where our child is. Help us understand what our child is behind with and makes us more interested in making her learn new things.
- I was able to learn how to communicate with my child especially at the start of the program.
- You guys come and help for \_\_\_\_\_. \_\_\_\_\_ can say out the words in the picture.
- All teachers are supporting and encouraging our mind to take better care of our child. They work with patience and with love, which influenced us a lot. Never give up.
- Staff is willing to share experience as “parent,” which is very helpful for family with first baby.
- Not only do things helpful for baby’s development, but also do other social things for baby’s family.
- My son developed his motor skills.
- Less Fear
- We tried flash cards naming them and making the sounds of each picture, saying words in melody.
- Eating by mouth, walking, talking, learning, laughing, and doing things on her own independently.
- My husband and I saying it’s a big help and pleasure to us that they have like this program, because in the first place ourselves are not prepared for this kind of problem, but because you have this program it’s kind a big help to prepare step by step how and what we gonna do us a team to developed my son.

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:

- Provide a list of services that are offered by their program.
- Include more activities that we can always use at home or more ideas for even making our own activities.
- I guess continuing for home visit.

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- Open an office here in Tinian
- Keep doing their best and help parents meet other parents for support and to share their unique experience.
- Need to communicate with CHC or other clinic if there are children that needs attention, sometimes parents doesn't know about this program.
- It will be better if there are more special equipment or tools available for baby's special needs. And they will be available in time.
- It will be good for some of the parents to borrow some magazines for those families with development problems if CDAC can subscribe.
- More physical activities.
- More teams for children's needs.
- Helping family with family needs.

The Part C Coordinator and EI providers use the comments shared by parents to develop and or incorporate improvement activities to address their concerns. The "trends" in the comments focus on a several areas:

- More effective or efficient public awareness and child find effort as some families, in spite of the coordinated child find effort with the health center, are not informed of the early intervention program or services available to them. The EI providers have re-energized the public awareness and child find efforts to include Saturdays at the shopping centers with flyers, developmental checklists, and appointment cards for evaluations at the Children's Developmental Assistance Center. For Rota and Tinian, a Saturday in the village center. The EI team will also participate in the Head Start Year of the Child/Family Fun day on all three islands. (These New Activities are reflected in the improvement activities of indicator 5 and 6).
- Access to resources and networking with other families. Although many families have access to internet, the EI providers have not consistently provided families with the information or skills to navigate websites that are beneficial to them. During IFSP meetings or service visits, EI providers will assist parents to access these resources.
- Consistent service provision to the Island of Rota and Tinian. The majority of the comments regarding consistent services or more services are from families on the Island of Rota and Tinian. It is increasingly more difficult to provide consistent services to these Islands due to the constant cancelation of flights or reduction of the seat capacity of the flights. In an effort to address the issues, the EI providers and parents have suggested splitting up the EI team which would mean fewer members per each visit however, there will be more visits.

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2011:** The CNMI did not revise targets at this time.

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:

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

**2011-2012 IMPROVEMENT ACTIVITY TABLE**

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

<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. The survey results will be tallied and reported once per year. Families sign a "receipt slip" as they receive the survey. A record of the receipt slip is used to determine the number of surveys that were disseminated. Surveys will continue to be provided with envelopes that can be mailed back, dropped off or picked up by providers. Continue to conduct Parent Forums as another means to 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. The information gathered at forums is not be used in the percentage calculations of the surveys however, it is used to verify and validate survey results.</p>	July 2007, 2008, 2009, 2010, 2011, 2012	Part C Coordinator Service Coordinators	<u>Continuing Activity 2011 - 2012</u>
Collaboration and Coordination	Continue to Conduct Forums in conjunction with the DD Council Public Awareness activities and Protection and Advocacy.	March 2007, 2009, 2011, 2012	Part C Coordinator EI Providers  Guam CEDDERS	<u>Continuing Activity 2011-2012</u>
Technical Assistance	Share survey results with CEDDERS Guam to assist with the analysis of the results. Use the results for program improvement. Continue to review survey results with EI providers and drill down the results and comments to target areas for improvement	September 2009 2010 2011 2012	CEDDERS Guam NECTAC	<u>Continuing Activity 2011 - 2012</u>
	Conduct training for parents, ICC members, and EI staff on the revised procedural safeguards (Parent Rights) that align with the new Part C regulations as of September 2011.	March 2012 and Annually Thereafter	RP: Part C Coordinator  Resource: Guam CEDDERS, NECTAC	<u>New Activity 2011-2012</u>
Collaboration and Coordination	Share results with Health Care providers, specifically results that indicate need for better awareness	September 2009 2010	Part C Coordinator	<u>Continuing Activity 2011 - 2012</u>

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<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
Collaboration and Coordination	of early intervention program for new parents.	2011 2012	Part C Coordinator	<u>Continuing Activity</u> <u>2011 - 2012</u>
Improve Service Provisions	During IFSP meetings and service visits, assist families to access and navigate information and resources on the internet.	August 2011	RP: EI Providers  Resources: CDAC, EI Program	<u>New Activity</u> <u>2011-2012</u>

**CNMI Part C Annual Performance Report (APR) for FFY 2010****Overview of the Annual Performance Report Development:**

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

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

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

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

Measurement:

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

FFY	Measurable and Rigorous Target
(2010-2011)	On December 1, 2010, the CNMI will serve .91% of children under age one.

**Actual Target Data for FFY 2010 (2010 - 2011):****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 .91% for Reporting Year
2010	16	1297	1.2 (16/1297 x 100)	1.03	1.2%

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, 2011.

The CNMI's target for this past year was to serve at least .91% of infants below age one. The CNMI performance indicated that 1.2% of infants below age one were served. The CNMI met and exceeded its target and the National baseline of 1.03% as reported in Table C-13 last updated in August 3, 2011.

**OSEP Response Table June 2011:**

OSEP looks forward to CNMI's data demonstrating improvement in performance in the FFY 2010 APR, due February 1, 2012.

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

Although it is difficult to pinpoint the exact variables that lead to the increase in the overall number and percentage of children served, specifically under age one, some events and activities that may have attributed was the coordinated child find efforts of the EI providers, 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, radio and TV advisements, with particular information on the signs of Autism and the newborn hearing screening program, EHDl.



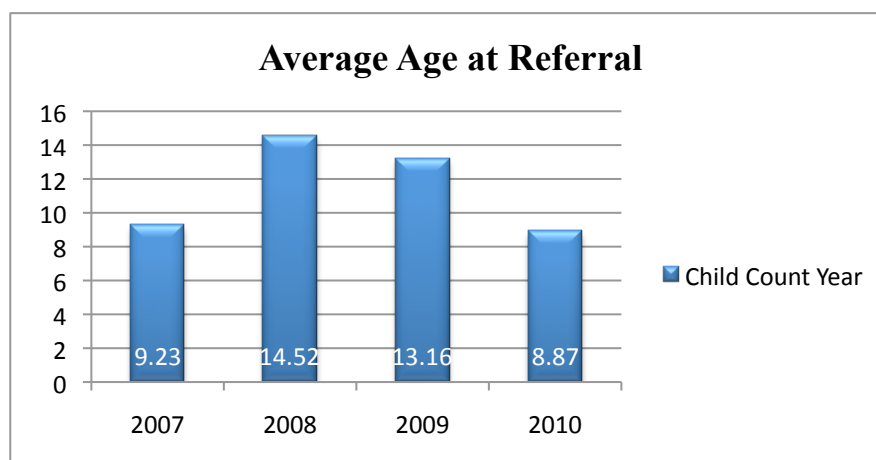
## CNMI Part C Annual Performance Report (APR) for FFY 2010

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, and where to go for assistance.

In collaboration with the Maternal Child Health, Early Childhood Comprehensive System Project - *"Big Steps for Little Feet"* and the CNMI EHDI program, 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 and hearing screening results.

In the last few years, CNMI has also focused on reducing the age at referral. Of the number and percentage of the infants and toddlers with an IFSP on December 1, 2010, the average age at referral was 8.5 months, a decrease of about 5 months over the last two years. Although the average age at referral is not typically reported in the APR, this is an indicator the Early Intervention Program has been monitoring for several years. When this data was first reviewed 6 years ago, the average age children were referred was 18 months old.

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



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

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

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

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

In spite of the coordinated public awareness and child find efforts, some families have reported in survey results that they were not informed of EI services available to them when they left the hospital. This concern was brought to the attention of the EI providers for their suggestions. The EI providers have re-energized the public awareness and child find efforts to include Saturdays at the shopping centers with flyers, developmental checklists, and appointment cards for evaluations at the Children's Developmental Assistance Center. For Rota and Tinian, a Saturday in the village center. The EI team will also participate in the Head Start Year of the Child/Family Fun day on all three islands.

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2011:** The CNMI has not revised its targets at this time.

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

**2011-2012 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.  Continue to distribute the Welcome New Baby packets for parents.	Daily through 2012	Social Worker	<u>Continuing Activity 2011 - 2012</u>  The Social Worker continues the NICU and PEDS daily visit.
Training and Professional Development	Conduct training and orientation to hospital staff (NICU staff, doctors, well baby clinic nurses and doctors and private clinic doctors) on the referral procedures and timelines. Referral procedures will include information specific to parents with premature infants or infants with other physical risk factors associated with learning or developmental complications and the benefits of early intervention for premature infants.	Annually in January of the year through 2012	Part C Coordinator with Clinic Representatives Private Clinics	<u>Continuing Activity 2011 - 2012</u>  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.

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/Resources</b>	<b>Status</b>
Collaboration and Coordination	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	<u>Continuing Activity 2011-2012</u>
	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 and procedures.	Spring 2011 Spring 2012	RP: Part C Coordinator	<u>Continuing Activity 2011 - 2012</u>
	Continue to 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.	Annually in coordination with the DD Council Advocacy Month through 2012	RP: Part C Coordinator with Agency Reps	<u>Continuing Activity 2011 - 2012</u>
	Continue collaboration with the MCH Early Childhood Comprehensive System (ECCS) " <i>Big Steps for Little Feet</i> ". <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	<u>Continuing Activity 2011 - 2012</u>
	The EI program will select and implement a screening tool specific for Autism	May 2011	Part C Coordinator and EI providers	<u>Completed 2010 - 2011</u>
Revise Policies and Procedures	Revise the Referral policies and procedures to align with the new Part C regulations.	June 2012	RP: Part C ICC EI Providers Head Start Partners DD Council Partners  Resources: CNMI EI Program and Head Start	<u>New Activities 2011-2011</u>
	Revise and update <i>the Public Awareness and Child Find Outreach Plan</i> with agency representatives and EI providers.	December 2011		
	Plan events specific to the Island of Rota and Tinian which will include an evening with parents of young children. Include Head Start Centers and Schools as point of contact for parents to make referrals and to make contact with EI Service providers.	March 2012		
	Participate in the Head Start	April 2012		

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/Resources	Status
	<p>Year of the Young Child event to include mass screenings of children.</p> <p>Develop and disseminate personal "<u><i>My Growing Baby</i></u>" a family guide for birth up to 36 months. Include in the welcome baby packets and for general distribution during the March Developmental Disabilities Month Activities and April Activities.</p>	February 2012		
Training and Professional Development	Conduct training for parents, ICC members, and EI staff on the revised policies and procedures that align with the new Part C regulations as of September 2011.	March 2012 and Annually Thereafter	RP: Part C Coordinator  Resource: Guam CEDDERS, NECTAC	<u>New Activity 2011-2012</u>

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

**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
(2010-2011)	On December 1, 2010, the CNMI will serve 2% of children birth to 3 years old.

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

**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 2% for Reporting Year
<b>2010</b>	<b>56</b>	<b>3600</b>	<b>1.6</b> <b>(56/3600 x 100)</b>	<b>2.67</b>	<b>1.6</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.

Although the number and percentage of children served birth to three years old increased as of the December 1, 2010 child count, the CNMI did not meet its target of 2% for overall children served and is under the National Average as reported on Table C-13 last updated on August 3, 2010.

**OSEP Response Table June 2011:**

OSEP looks forward to CNMI's data demonstrating improvement in performance in the FFY 2010 APR, due February 1, 2012.

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

The Early Intervention Program, in collaboration with the Department of Public Health and other agencies, the ICC and EI Providers are continuously looking at different ways to address child find activities to ensure all eligible infants and toddlers are identified, located and served. Since the child find and public awareness activities cover children 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 FFY 2011:** The targets were not revised at this time. 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 2010****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
(2010-2011)	<b>100%</b> of infants and toddlers with IFSPs will have an evaluation and assessment and an initial IFSP meeting conducted within Part C's 45-day timeline.

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

Report Period:	a.	b.	c.	d.	e.
July 2010 to June 2011	# of Evals Assessments and Initial IFSP meetings required to be conducted	# Completed Timely (within 45-day timeline)	# Completed Untimely for <b>valid</b> reasons	# completed but untimely for Invalid Reason (to be accounted for)	# and % Required (Timely Eval Plus untimely for valid reasons) % = (b + c/a x 100)
Evaluation and Assessment and Initial IFSP meetings	<b>43</b>	<b>41</b>	<b>2</b>	<b>0</b>	41+ 2/43 x 100 <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 43 evaluations, assessments and Initial IFSP meetings required to be held within the 45-day timeline, 41 were conducted within the timeline and 2 were not due to exceptional family circumstances documented on a *Reason for Delay Form* and filed in the child's IFSP folder. CNMI includes exceptional family circumstances to both the numerator and denominator in the calculations for this indicator. The data for this indicator are taken from the database of all children at the end of the report period, June 30, 2011.

**Reasons for Delay:**

- Due to significant medical needs of the child and mother, the family requested to delay the initial evaluation and IFSP meeting until such time mom was feeling up to it. The evaluation and initial IFSP meeting was conducted 1 day over the 45 day timeline, on day 46.

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

- One family was relocating to the Island of Tinian and requested a delay in the evaluation and initial IFSP meeting until they were settled in on Tinian. The evaluation and Initial IFSP meeting was conducted 19 days over the 45 day timeline on day 64.

**OSEP Response Table June 2011:**

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

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

The CNMI continues to demonstrate compliance in this indicator. Several years ago, the CNMI implemented a Standard Operating Procedure to ensure initial 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.

In order to ensure EI Providers are informed as to best practice, EI are given opportunities to attain continuing education units both on and off-island, to 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, NECTAC, ECO, and WRRC. In addition to continuing education units or in service training specific to their field of work, PSS encourages providers to cross train and attend PSS state wide professional development that focus on the overall strategic



**CNMI Part C Annual Performance Report (APR) for FFY 2010**

priorities of the Public School System. Indicator 2 lists the professional development opportunities provided to EI providers in 2010-2011. The PD opportunities included *Developing Measurable Family and Child Goals and Outcomes, Listening and Spoken Language for Early Interventionists, and Routines Based Interviews*. Previous PD opportunities included; *Using the 4 Step Process to Develop Child and Family Outcome, Improving Outcomes and Supports Systems for Young Children, The Pacific CIMAP Regional Low Vision Training, The Vision Screening Process for Young Babies and 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 FFY 2011:** This is a compliance indicator; therefore, the targets will not be adjusted.

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

**2011-2012 IMPROVEMENT ACTIVITY TABLE**

Improvement Category	Improvement Activity	Timeline	Responsible Person (RP)/ Resources	Status
Improve Administration and Monitoring	<p>Continue to conduct internal reviews to ensure timeliness of evaluations and initial IFSP meetings.</p> <p>The Data Manager continues to monitor the referral dates and evaluation and IFSP meeting dates. Heads up notices are provided to service coordinators to prevent time lags</p>	Random/Monthly through 2012	Part C Coordinator Data Manager	<u>Continuing Activity 2011 - 2012</u>

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
Training and Professional Development	<p>Provide training with EI Providers and Service Coordinators to ensure all EI Providers and Services Coordinators understand and implement the revised policies and procedures as per the new Part C regulations.</p> <p>Professional Development continues to be a priority for the CNMI EI Program. In order for staff and families to stay abreast of best practice and to keep updated on new requirements, PSS Policies and procedures, all PSS staff are required to attend at least 10 Staff Development events throughout the year.</p> <p>The EI providers will provide the opportunity to attend the Measuring Family and Child Outcomes conference</p>	<p>April 2012</p> <p>August 2011</p> <p>10 Professional Development days are scheduled every school year through 2012</p>	<p>PSS PD Requirements</p> <p>EI Providers HR Office</p>	<u>Continuing Activity 2011 - 2012</u>
	<p>Conduct training for parents, ICC members, and EI staff on the revised policies and procedures that align with the new Part C regulations as of September 2011.</p>	<p>October 2012 and Annually Thereafter</p>	<p>RP: Part C Coordinator</p> <p>Resource: Guam CEDDERS, NECTAC</p>	<u>New Activity 2011-2012</u>
Revision to Policies and Procedures	<p>Review and revise initial evaluation, initial assessment and initial IFSP policies and procedures to align with the new Part C regulations.</p>	<p>June 2012</p>	<p>RP: EI Coordinator</p> <p>Resources: PSS BOE Legal Counsel ICC Guam CEDDERS</p>	<u>New Activity 2011 - 2012</u>

**CNMI Part C Annual Performance Report (APR) for FFY 2010****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
(2010-2011)	<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 FFY 2010 (2010 - 2011):****Measurement A: Steps and Services**

(a) Total Exits	(b) IFSP with Steps and Services Required	(c) Total # IFSP with Steps and Service Included	(d) Exits for Other Reasons Steps and Services Not Required	(e) Total % (b/c) x100
37	25	25	12	(25/25) x 100= 100%

**Column (a):** There were a total of 37 children who exited from Early Intervention this report year.

**Column (b):** Of the 37 who exited, 25 required Transition Steps and Services, 12 did not.

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

**Column (d):** 12 exited for other reasons and steps and services were not required, (1 death, 4 moved off island and 7 withdrawn).

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

**CNMI Part C Annual Performance Report (APR) for FFY 2010****Measurement B: LEA Notification for Potentially Eligible Part B Children**

(a) Total # Potentially Eligible for Part B and Required LEA Notification	(b) Total # LEA Notifications	(c) Total % (b/c) x100
24	24	$(24/24) \times 100 = 100\%$

**Column (a):** 24 children were potentially eligible for Part B and required LEA notification

**Column (b):** 24 LEA notifications were sent and received by Part B

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

Twenty four (24) children were **potentially eligible** for special education services. Notifications for all 24 children were provided to the Special Education Program (the LEA). Data for this indicator was verified through a review of the LEA notifications sent to the Special Education Program.

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

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

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

(a) Total # Transition Conferences Required	(b) Total # Timely Transition Conference Held	(c) Untimely Transition Conference with Valid Reason	(d) Transition Conference Not required >90 Days before 3 birthday	(e) Total % (b/c+d) x100
20	18	2	4	$(20/18 + 2) \times 100 = 100\%$

**Column (a):** 20 Transition Conferences were required

**Column (b):** 18 Transition Conferences were held in a timely manner

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

**Column (d):** 4 children were referred to Part C fewer than 90 days before their third birthday

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

18 of the 20 required Transition Conferences were conducted in a timely manner, 2 were not due to exceptional family circumstances. One family was off island for medical treatment and returned two months before the child's third birthday and one family rescheduled the conference several times with no given reason. The Transition Conferences, although late, did occur no later than 2 months before the third birthdays. Four (4) children were referred less than 90 days before their third birthday. The 2 untimely Transition Conferences were added to the denominator. Data for this indicator was verified through a file review of the IFSP's of children who exited and required a Transition Conference.

**CNMI Part C Annual Performance Report (APR) for FFY 2010****OSEP Response Table June 2011:**

OSEP looks forward to CNMI's data demonstrating improvement in performance in the FFY 2010 APR, due February 1, 2012.

**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. Currently, there are no timeline requirements in the database for LEA notification, 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).

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

CNMI reports compliance with all transition requirements for this reporting year. The two conferences that were not conducted within timeline were due to valid reasons; one child and family were off-island and one family requested to reschedule the conference several times.

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 to Part C, combined evaluations for late referrals, and the CNMI's definition of potentially eligible for Part B. Based on the compliance of this indicator, the CNMI is correctly implementing the regulatory requirements for Indicator 8 based on the previous part C regulations. In 2011-2012, the CNMI will revise the transition policies and procedures to align with the Part C regulations as amended in September 2011. The revisions will include adding new fields and formulas to the data base.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011:** This is a compliance indicator; therefore, the targets will not be adjusted.

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

**CNMI Part C Annual Performance Report (APR) for FFY 2010****2011-2012 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	Data Clerk	<u>Continuing Activity 2011 - 2012</u>
Improve Data Collection and Reporting	<p>New data elements will be added to the data base to align with the new Part C Regulations:</p> <ul style="list-style-type: none"> <li>• 90 requirements for LEA Notification</li> <li>• 90 day requirements for Transition Plan (steps and services)</li> </ul> <p>Any other timeline requirements as per the new Part C Regulations.</p>	June 2012	<p>RP: Part C Coordinator EI Data Manager</p> <p>Resources: EI Program Guam CEDDERS NECTAC</p>	<u>New Activity 2011 - 2012.</u>
Revise Policies and Procedures	Revise the Transition Policies and Procedures to align with New part C Regulations.	June 2012	<p>RP: Part C Coordinator EI Data Manager</p> <p>Resources: EI Program, Guam CEDDERS</p>	<u>New Activity 2010 - 2012</u>
Training and Professional Development	<p>Conduct training on the revised Transition policies and procedures.</p> <p>Review IFSP forms to ensure transition requirements are included in the IFSP forms.</p>	April 2012	<p>RP: Part C Coordinator EI Data Manager</p> <p>Resources: Guam CEDDRERS NECTAC</p>	<u>New activity 2011 - 2012</u>
	Conduct training for parents, ICC members, and EI staff on the revised policies and procedures that align with the new Part C regulation as of September 2011.	March 2012 and Annually Thereafter	<p>RP: Part C Coordinator</p> <p>Resources: Guam CEDDRERS NECTAC</p>	<u>New Activity 2011-2011</u>

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

**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
(2010 - 2011)	The CNMI identifies and corrects <b>100%</b> of non-compliance as soon as possible but in no case later than one year from identification.

**Actual Target Data for FFY 2010 (2010 - 2011: 100%)**

**Indicator C-9 Worksheet**

Indicator/Indicator Clusters	General Supervision System Components	# of System Issued Findings in FFY 2009 (7/1/09 to 6/30/10)	(a) # of Findings of non-compliance identified in FFY 2009 (7/1/09 to 6/30/10)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
1. Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.	Monitoring Activities: APR Data Review, Individual File Review	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
2. Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings.	Monitoring Activities: APR Data Review, Individual File Review	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

Indicator/Indicator Clusters	General Supervision System Components	# of System Issued Findings in FFY 2009 (7/1/09 to 6/30/10)	(a) # of Findings of non-compliance identified in FFY 2009 (7/1/09 to 6/30/10)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
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
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:	Monitoring Activities: APR Data Review, Individual File Review	0	0	0
A. IFSPs with transition steps and services;	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	Monitoring Activities: APR Data Review, Individual File Review	0	0	0



**CNMI Part C Annual Performance Report (APR) for FFY 2010**

Indicator/Indicator Clusters	General Supervision System Components	# of System Issued Findings in FFY 2009 (7/1/09 to 6/30/10)	(a) # of Findings of non-compliance identified in FFY 2009 (7/1/09 to 6/30/10)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
appropriate community services by their third birthday including: B. Notification to LEA, if child potentially eligible for Part B	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
<b>OTHER AREAS OF NONCOMPLIANCE:</b> • IFSP 6 month reviews (§303.342(b)) and annual IFSP (§303.342(c)).	Monitoring Activities: APR Data Review, Individual File Review	<b>2</b> (Service Coordinators)	<b>3</b>	<b>3</b>
	Dispute Resolution: Complaints, Hearings	0	0	0
<b>Sum the numbers down Column a and Column b</b>			<b>3</b>	<b>3</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) x 100 = %</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. All files of children with an IFSP are selected for the comprehensive file review. The "files" are reviewed according to the designation of Service Coordinators.

During FFY 2009, the monitoring activity conducted was the annual database drawdown for APR compliance indicators and related requirements for other procedural and timeline requirements. The data drawdown reviewed data for all children with an IFSP within that reporting period. There were no complaints or due process requests in FFY 2009.

**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010 (2010-2011):**

The CNMI reports 100% (3/3) compliance with Indicator 9 for timely correction of findings of noncompliance identified in FFY 2009, which represents continued compliance with verification of timely correction of findings of noncompliance reported in previous years. Further, the previous year's finding of

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

noncompliance identified in FFY 2008 was verified timely corrected in FFY 2009 and reported in the FFY 2009 APR. There were no outstanding findings of noncompliance from previous years.

The following breakdown is provided, with an explanation of the verification of timely correction of FFY 2009 findings of noncompliance:

**Correction of FFY 2009 Findings of Noncompliance Timely Corrected (corrected within one year from identification of the noncompliance):**

1. Number of findings of noncompliance CNMI made during FFY 2009 (the period from July 1, 2009 through June 30, 2010) (Sum of Column a on the Indicator B15 Worksheet)	<b>3</b>
2. Number of findings CNMI verified as timely corrected (corrected within one year from the date of notification to the school of the finding) (Sum of Column b on the Indicator C9 Worksheet)	<b>3</b>
3. Number of findings <u>not</u> verified as corrected within one year [(1) minus (2)]	<b>0</b>

**Correction of FFY 2009 Findings of Noncompliance Not Timely Corrected (corrected more than one year from identification of the noncompliance):**

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

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

Consistent with OSEP Memorandum 09-02, CNMI reports verifying timely correction of FFY 2009 findings of noncompliance through: (1) correction of all instances of noncompliance; and (2) verification that for the identified noncompliance, CNMI is correctly implementing the specific regulatory requirements demonstrated through a review of additional data. Explanation of the verified timely correction for the FFY 2009 findings of noncompliance as follows:

**Other Areas of Noncompliance: Related Requirements**

The FFY 2009 annual database drawdown resulted in the identification of three (3) individual instances of noncompliance: 2 for untimely IFSP 6 month reviews (§303.342(b)) and 1 for untimely annual IFSP (§303.342(c)). A *Written Notification of Findings* was issued to two Part C Program Service Coordinators. The notice included the required additional data to be reviewed related to the areas of noncompliance. In addition, the service coordinators were required to attend a one-hour session on the regulatory requirements for the 6 month review and annual IFSP and to develop an excel worksheet for tracking timeline requirements.

Consistent with OSEP Memo 09-02, CNMI verified correction through a database review of the individual correction and additional data for the IFSP 6 month review and annual IFSP timeline requirements. In April 2011, a *Written Notice of Timely Correction* was issued to the 2 Part C Program Service Coordinators after the additional data reviewed demonstrated 100% compliance with the requirement and evidence of the completion of the one-hour training session and development of the excel worksheet. The additional data reviewed for compliance included children with IFSP due for an IFSP 6 month review and annual IFSP through March 2011, as indicated in the corrective action plan specific to the findings issued for each of the Part C Program Service Coordinator.

**CNMI Part C Annual Performance Report (APR) for FFY 2010****PSS Integrated Monitoring System Components**

The CNMI Public School System (PSS) Early Intervention Monitoring Procedures were revised in August 2010. The updated procedures 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, internal and external monitoring procedures, the self-assessment process, database drawdown 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 August 2010 revised Monitoring Procedures were presented to OSEP prior to the OSEP monitoring/verification review in November 2010.

Based on OSEP’s November 2010 review reported in OSEP’s February 8, 2011 Monitoring/Verification Review Letter, CNMI was required to provide clarification on CNMI’s process for identifying noncompliance. As required, CNMI submitted its revised Part C Monitoring Procedures, dated May 2011. The May 2011 revisions provide additional clarification to the August 2010 monitoring procedures regarding how CNMI PSS identifies and issues findings when data reviewed through its internal file reviews (self-assessment procedures) and external monitoring reflect noncompliance. As defined on page 3 of the revised procedures, a “*Finding*” of noncompliance is issued when noncompliance is identified through the PSS internal and external monitoring procedures when any noncompliance of the Part C requirements is identified under any of those processes.

OSEP’s June 20, 2011 Determination Letter for CNMI indicated that the May 2011 revisions to the Part C Monitoring Procedures were accepted with no further action required.

OSEP’s February 8, 2011 Monitoring/Verification Review Letter required CNMI to conduct training with all EI providers and monitors on the required content of the IFSP. On April 12, 2011, the Acting EI Coordinator conducted the training with all EI providers and monitors on the required content of IFSP’s under 34 CFR §303.344, including, but not limited to: 34 CFR §§303.344(a)(1); 303.344(d)(1) and (1)(i); and 34 CFR §303.344(f)(1). The completion of the training was reported to OSEP in May 2011. OSEP’s June 20, 2011 Determination Letter for CNMI indicated no further action was required.

For this reporting period, the self-assessment process was conducted in December 2010 for all children with an IFSP and the annual database drawdown was conducted in June 2011 for all children with an IFSP for the reporting period.

**OSEP Response Table, June 2011**

<b>Statement from the Response Table</b>	<b>State’s Response</b>
OSEP appreciates CNMI’s efforts in timely correcting findings of noncompliance identified in FFY 2008.	The CNMI appreciates OSEP’s recognition of CNMI’s efforts to timely correct noncompliance.
In reporting on correction of findings of noncompliance in the FFY 2010 APR, due February 1, 2012, CNMI must report that for each finding of noncompliance identified in FFY 2009, CNMI verified that is: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or the CNMI data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of CNMI, consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02). In the FFY 2010 APR, CNMI must describe the	CNMI assures implementation of OSEP Memorandum 09-02 for verification of timely correction, as reflected in the discussion section of this indicator.

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

Statement from the Response Table	State's Response
specific actions that were taken to verify the correction.	
In reporting on Indicator 9 in the FFY 2010 APR, CNMI must use the Indicator 9 Worksheet.	The CNMI used Indicator 9 Worksheet to complete this indicator.

Action Required from Response Table for OSEP's 2010 Verification Visit	State's Response
<p><b>GS.1: Identification of Noncompliance:</b></p> <p><u>No further action is required</u> regarding revisions to CNMI's monitoring procedures.</p> <p><u>Further action required:</u> CNMI must include the results of its latest internal file review and external monitoring under relevant SPP/APR compliance indicators and Indicator 9 in the FFY 2010 APR, due February 1, 2012.</p>	<p>Based on the August 2010 and May 2011 revisions to the monitoring procedures, including the updated <i>Child Record Review Checklist</i>, the latest internal file review (self-assessment) and external monitoring resulted in:</p> <ul style="list-style-type: none"> <li>• <u>December 2010:</u> The self-assessment process, an internal monitoring, was conducted for 54 IFSP files of eligible infants and toddlers with current IFSPs using the updated <i>Child Record Review Checklist</i>. This process resulted in findings of noncompliance issued to service coordinators. Findings of noncompliance issued were related requirements for initial evaluations and IFSP required content and timely 6-month and annual reviews. Verification of correction of these findings will be reported in the FFY 2011 APR. There were no findings of noncompliance issued that affected CNMI's performance on the SPP compliance indicator measures for this reporting period.</li> <li>• <u>June 2011:</u> The annual drawdown from the database, an internal monitoring, assesses compliance with the SPP compliance indicators and IDEA related requirements for other procedural and timeline requirements. For this reporting period, the annual database drawdown was conducted in June 2011 for all children with IFSP for the reporting period. The results of the annual drawdown were consistent with the findings issued for the December 2010 self-assessment process. No new findings of noncompliance were issued.</li> <li>• <u>October 2011:</u> External monitoring conducted for 5 monitoring priorities: 45-day evaluation, assessment and initial IFSP, 6 month IFSP reviews, annual IFSP reviews, timely services, and 90-day transition conferences. The results of the external monitoring were consistent with the findings issued for the December 2010 self-assessment process. No new findings of noncompliance were issued.</li> </ul>

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for 2011-2012:** This is a compliance indicator; therefore targets will not be adjusted.

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

**2011-2012 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>Conduct quality assurance activities (child record reviews, self-assessments, and peer reviews), to catch an issue before it becomes a non-compliance.</p> <p>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.</p> <p>Revise the monitoring policies and procedures to align with the new Part C IDEA 2011 regulations.</p>	Internal file reviews December of the Year through 2012	RP: Part C Coordinator and Data Manager	<p><u>Continuing Activity 2011 - 2012</u></p> <p>May 2011 updates to monitoring procedures include the internal monitoring procedures.</p>
	Conduct external monitoring in accordance with the revised monitoring procedures, every other year.	October 2011 October 2013	External Monitor	<p><u>Continuing Activity 2011-2012</u></p> <p>With the May 2011 updates to the monitoring procedures, the external monitoring was scheduled for October 2011.</p>
Training and Professional Development	Training on the EISS Monitoring procedures will be provided to early intervention providers, parents, Interagency Coordinating Council members, and Board of Education members.	Annually November 2010 March 2011 March 2012	Part C Coordinator	<p><u>Continuing Activity 2011 - 2012</u></p> <p>Completed and will continue as new procedures are established or put in place.</p>

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

<b>Improvement Category</b>	<b>Improvement Activity</b>	<b>Timeline</b>	<b>Responsible Person (RP)/ Resources</b>	<b>Status</b>
	Conduct training for parents, ICC members, and EI staff on the revised policies and procedures that align with the new Part C regulations as of September 2011.	March 2012 and Annually Thereafter	RP: Part C Coordinator  Resource: Guam CEDDERS	<u>New Activity 2011-2012</u>
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	<u>Continuing Activity 2011 - 2012</u>  To be consistent with the May 2011 updates to the Monitoring Procedures.
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; FFY 2011	Data Manger and Part C Coordinator	<u>Continuing Activity 2011 - 2012</u>  Need to updated, if needed, with the Part C Regulations

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

**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 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

FFY	Measurable and Rigorous Target
(2010-2011)	<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 FFY 2010 (2010 - 2011):**

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

**OSEP Response Table June 2011:**

OSEP looks forward to reviewing CNMI's data in the FFY 2010 APR, due February 1, 2012.

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

The CNMI will analyze complaint findings, hearing officer directives, and mediation agreements to address and correct systemic issues once a baseline is established.

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for FFY 2011:** This is a compliance target, therefore will not be revised.

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

**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
(2010-2011)	<b>100%</b> of due process hearing requests are fully adjudicated within the applicable timeline.

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

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

**OSEP Response Table June 2011:**

OSEP looks forward to reviewing CNMI's data in the FFY 2010 APR, due February 1, 2012.

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

**Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for 2011:** This is a compliance indicator; therefore, the targets will not be adjusted.



**CNMI Part C Annual Performance Report (APR) for FFY 2010**

**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
(2010-2011)	Targets will be set once baseline data is established with in 10 or more resolution sessions.

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

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 2011:**

OSEP looks forward to reviewing CNMI's data in the FFY 2010 APR, due February 1, 2012.

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

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

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

**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
(2010-2011)	Targets will be set once baseline data is established with 10 or more mediations.

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

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

**OSEP Response Table June 2011;**

OSEP looks forward to reviewing CNMI's data in the FFY 2010 APR, due February 1, 2012.

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

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

**CNMI Part C Annual Performance Report (APR) for FFY 2010****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).

FFY	Measurable and Rigorous Target
(2010-2011)	<b>100%</b> of required data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.

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

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**

APR Indicator	Valid and reliable	Correct calculation	Total
1	1	1	2
2	1	1	2
3	1	1	2
4	1	1	2
5	1	1	2
6	1	1	2
7	1	1	2
8A	1	1	2
8B	1	1	2
8C	1	1	2
9	1	1	2
10	1	1	2
11	1	1	2
12	1	1	2
13	1	1	2
		<b>Subtotal</b>	30
<b>APR Score Calculation</b>	<b>Timely Submission Points</b> - If the FFY 2010 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 2010**

Indicator 14 - 618 Data					
Table	Timely	Complete Data	Passed Edit Check	Responded to Date Note Requests	Total
Table 1 – Child Count Due Date: 2/2/11	1	1	1	1	4
Table 2 – Program Settings Due Date: 2/2/11	1	1	1	1	4
Table 3 – Exiting Due Date: 11/2/11	1	1	1	NA	3
Table 4 – Dispute Resolution Due Date: 11/2/11	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 2011:**

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 2010 APR due February 1, 2012, CNMI must use the Indicator 14 Data Rubric.

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

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 2011, 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.

Last year, the CNMI Early Intervention Program developed 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 is updated as needed, to include additions or revisions to the data collection and report process. The *Data Collection and Reporting Guide* were presented to stakeholders for comments. The stakeholders included the Early Intervention providers, the ICC, the Commissioner of Education, the 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.

**CNMI Part C Annual Performance Report (APR) for FFY 2010**

In November 2010, OSEP conducted a verification visit which included a review of the CNMI data system to determine:

- If the CNMI has a data system that is reasonably designed to collect and report valid and reliable data and information to the Department and the public in a timely manner. OSEP concluded that based on the review of documents and interviews with CNMI personnel, the CNMI has a data system that is reasonably designed to collect valid and reliable data and information, to report the data and information to the Department and the public in a timely manner and no action was required.
- The CNMI has procedures that are reasonably designed to verify that the data collected and reported reflect actual practice and performance. Based on the review of documents and interviews with CNMI personnel, OSEP concluded that CNMI has procedures that are reasonably designed to verify that the data collected and reported reflect actual practice and performance and not action was required.
- If the CNMI compiles and integrates data across systems and use the data to inform and focus its improvement activities. OSEP concluded that based on the review of documents and interviews with CNMI personnel, the CNMI compiles and integrates data across systems and uses the data to inform and focus its improvement activities and not action was required.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2011:** This is a compliance indicator therefore targets will not be adjusted.

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

**2011-2012 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 through 2012)	RP: Part C Coordinator and Web master	<u>Continuing Activity 2011 - 2012</u>
	New data elements will be added to the data base to align with the new Part C Regulations: <ul style="list-style-type: none"> <li>• 90 requirements for LEA Notification</li> <li>• 90 day requirements for Transition Plan (steps and services)</li> </ul> Any other timeline requirements as per the new Part C Regulations.	June 2012	Data Manager	<u>New Activity 2011 - 2012</u>
Improve Administration and Monitoring	The CNMI will continue to collect, verify and report all required data in a timely manner.	By Required Timelines through 2012	RP: Data Manager	<u>Continuing Activity 2011 - 2012</u>

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	<p>Complete and Disseminate Data Collection and Reporting manual to all EI providers, COE, BOE and ICC members.</p> <p>Continue to review and revise the <i>Data Collection and Reporting Guide</i> as needed to incorporate any new requirements or processes</p>	<p>Review and Revise as needed through 2012</p>	<p>Data manager Part C Coordinator</p>	<p><u>Continuing Activity</u> <u>2011 - 2012</u></p>
<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><u>Continuing Activity</u> <u>2011 - 2012</u></p>