Cluster Area CI: General Supervision (GS)

Question: **Is effective general supervision of the implementation of the Individuals with Disabilities Education Act (IDEA) ensured through the Lead Agency's (LA) utilization of mechanisms that result in all eligible infants and toddlers and their families having an opportunity to receive early intervention services in natural environments (EIS in NE)?**

Probes:

GS.I Do the general supervision instruments and procedures (including monitoring, complaint and hearing resolution, etc.), used by the LA, identify and correct IDEA noncompliance in a timely manner?

GS.II Are systemic issues identified and remediated through the analysis of findings from information and data collected from all available sources, including monitoring, complaint investigations and hearing resolutions?

GS.III Are complaint investigations, mediations and due process hearings and reviews completed in a timely manner?

GS.IV Are there sufficient numbers of administrators, service coordinators, teachers, service providers, paraprofessionals and other providers to meet the identified early intervention needs of all eligible infants and toddlers and their families?

GS.V Do State procedures and practices ensure collection and reporting of accurate and timely data?

State Goal (for reporting period July 1, 2003 through June 30, 2004):

- Effective general supervision of the implementation of the IDEA is ensured through the Lead Agency's utilization of mechanisms that result in all eligible infants and toddlers and their families having an opportunity to receive early intervention services in natural environments.

Performance Indicators (for reporting period July 1, 2003 through June 30, 2004):

GS.I The general supervision instruments and procedures (including monitoring, complaint and hearing resolution, etc.), used by the LA, identify and correct IDEA noncompliance in a timely manner.

GS.II Systemic issues are identified and remediated through the analysis of findings from information and data collected from all available sources, including monitoring, complaint investigations and hearing resolutions.

GS.III Complaint investigations, mediations and due process hearings and reviews are completed in a timely manner.

GS.IV There are sufficient numbers of administrators, service coordinators, teachers, service providers, paraprofessionals and other providers to meet the identified early intervention needs of all eligible infants and toddlers and their families.

GS.V State procedures and practices ensure collection and reporting of accurate and timely data.

GS.I The general supervision instruments and procedures (including monitoring, complaint and hearing resolution, etc.), used by the lead agency, identify and correct IDEA noncompliance in a timely manner.

1. Baseline/Trend Data and Analysis (for reporting period July 1, 2003 through June 30, 2004):

GENERAL SUPERVISION COMPONENTS

General Supervision Components in place during 2003-04

- SPOE and intake coordinator monitoring for referral process, intake, evaluation, eligibility determination and initial IFSP development
- Contracts and provider agreements for SPOEs and providers
- Interagency agreements for service provision and child find
- Central Finance Office (CFO), claims and billing system, Explanation of Benefits (EOB) to families
- Family survey
- Complaint system for child complaints, provider complaints and service complaints arising from EOB statements
- Investigation of questionable billing/authorizations for services including potential fraudulent billing
- Enrollment, training and credentialing requirements for providers
- SPOE child data system
- State Interagency Coordinating Council (SICC) is a venue for gathering information from stakeholders on a regular basis

Additional General Supervision Components put in place during 2004-05

- Informal provider issues database
- Additional provider and ongoing service coordinator monitoring activities
- Family exit survey
- Provider survey
- Regular general supervision data reviews
- IFSP Quality Indicators Rating Scale
- New SPOE contract for Phase 1 SPOEs
- First Steps regional consultant contracts filled

Additional Components to be put in place during Spring/Summer 2005

- New webSPOE software
- LEA surveys

Additional Components Pending Legislative Action

- New SPOE contract statewide
- Possible changes in provider structure within the system to improve provider oversight

These components are the building blocks of Missouri's system of general supervision. The table below shows how the components work together to address each of the Clusters and Probes of this Annual Performance Report. Additional information and/or data are located under each applicable cluster/probe. Each of the headings in the following table represent sources of data within the system of general supervision:

- Complaint System – Includes the existing formal Child Complaint and Due Process systems
- Informal Issue System – Will be comprised of a database for gathering provider or system issues brought to DESE's attention outside of the formal complaint system
- Data Systems – Includes data and reports available through the current SPOE software and the future web-based system
- Surveys – Includes existing parent surveys as well as future surveys for Providers and Local Education Agencies (LEA)
- Quality Indicators – Refers to the Quality Indicators Rating Scale and the data to be gathered from the future application of the rating scale
- SPOE/Service Coordinator Monitoring – Includes current and future data on SPOEs and service coordinators gathered through various sources of the general supervision system, including contracts, monitoring reviews, data reviews, consultants, etc.
- Provider Monitoring/Oversight – Includes current and future data on service providers gathered through various sources of the general supervision system, including contracts, enrollment requirements, data reviews, monitoring reviews, surveys, interviews, etc.
- Interagency Work – Includes interagency agreements and memoranda of understanding, primarily in regards to child find and service coordination
- Other – Includes current and future sources of information utilized in the system of general supervision

Current and Proposed Components of Missouri's System of General Supervision

Indicator/Probe	Complaint System	Informal Issues System	Data Systems	Surveys	Quality Indicators	SPOE/SC Monitoring	Provider Monitoring/ Oversight	Interagency Work	Other
GS.I Identification and correction of noncompliance	Yes	Yes	SPOE webSPOE Various reports	Parent Provider LEA		Yes	Yes	Correction of any identified noncompliance	
GS.II Systemic issues identified and remediated	Yes	Yes	SPOE webSPOE Various reports	Parent Provider LEA		Yes	Yes	Correction of any identified noncompliance	
GS.III Timely completion of complaints, due process	Yes								
GS.IV Sufficient number of trained providers	Yes	Yes	SPOE webSPOE	Parent Provider		Yes	Yes	DMH Service Coordinators	Provider database – enrollment and training
GS.V Collection and reporting of accurate and timely data			SPOE webSPOE Various reports			Yes	Yes		
CC.I, CC.II Comprehensive child find system	Yes	Yes	SPOE webSPOE	Parent Provider LEA		Yes		DHSS, DMH, Early Head Start, PAT	RICC
CF Family centered services		Yes	webSPOE	Parent Provider	Yes				

Indicator/Probe	Complaint System	Informal Issues System	Data Systems	Surveys	Quality Indicators	SPOE/SC Monitoring	Provider Monitoring/ Oversight	Interagency Work	Other
CE.I Access to service coordinator	Yes	Yes	webSPOE	Parent		Yes		DMH Service Coordinators	
CE.II Timely eval/assess – 45 day timelines	Yes	Yes	SPOE webSPOE	Parent Provider		Yes	Yes		
CE.III IFSPs include all services necessary and all identified services are provided	Yes	Yes	webSPOE	Parent	Yes	Yes	Yes		
CE.IV Services in NE and non-NE justification	Yes		webSPOE		Yes	Yes	Yes		
CE.V Improved and sustained functional abilities			webSPOE	Parent	Yes				School Entry Profile
CBT Early childhood transition	Yes	Yes	webSPOE	Parent Provider LEA	Yes	Yes			

In order to maximize the integration of all of the above data throughout a comprehensive General Supervision System for Missouri Part C, DESE has enlisted the assistance of Dr. Alan Coulter with National Center for Special Education Accountability Monitoring (NCSEAM). Division of Special Education (DSE) staff met with Dr. Coulter on July 22-23, 2004, and August 11-13, 2004, to begin the development of a focused monitoring system for Part C. The outcome of this meeting was to form an internal DSE workgroup with staff from each of the DSE sections (Funds Management, Compliance, Effective Practices and Data Coordination) to outline the major components of the Part C General Supervision requirements, activities, and responsibilities incorporating the data sources from the child data system. This framework is being compiled into a General Supervision Manual which is available online in draft form at http://dese.mo.gov/divspeced/FirstSteps/pdfs/GenSupManualDRAFT.pdf. This manual provides a format for outlining detailed procedures for general supervision responsibilities in each chapter area as listed below.

Chapters of the General Supervision Manual include:

1. Monitoring
2. Public Awareness
3. Comprehensive System of Professional Development
4. Complaint System
5. Data Collection
6. Financial Management
7. Interagency Agreements

The General Supervision Manual will be finalized prior to DESE's June 6, 2005, final report to OSEP regarding identification and correction of all noncompliance.

A stakeholder meeting was held January 27, 2005, to review and seek input on Missouri's current and proposed system of general supervision and provide information on focused monitoring. Specific input was solicited on strategies for provider monitoring/oversight. It is anticipated that Missouri will continue to work with NCSEAM on focusing its monitoring efforts.

COMPLIANCE MONITORING ACTIVITIES

Current SPOE Monitoring Activities
The chart below outlines the dates that initial and follow-up on-site monitoring visits were conducted with every SPOE in the First Steps system. DSE will continue to follow-up on all non-compliance through corrective action plans (CAPs), and beginning in June 2005 follow-up monitoring will address not only SPOE responsibilities, but also compliance requirements for ongoing service coordinators and providers.

Corrective Action Plans
As shown in the chart, the first CAPs received from SPOEs were not approved because they did not provide DESE the adequate assurances that the SPOEs understood the compliance requirements and had put in place effective strategies to achieve and maintain compliance within one year. Therefore, the First Steps Regional Consultants were trained and deployed to provide technical assistance to all SPOEs to refine their CAPs in January and February 2005. These revised CAPs are now being received and reviewed.

Future Monitoring Plans
In February and March 2005, DESE, with the assistance of First Steps Regional Consultants, conducted initial on-site monitoring of the Phase I re-bid SPOE Regions 2 and 4. This monitoring addresses not only SPOE responsibilities, but also compliance expectations for all on-going service coordinators (SPOE and DMH). Where non-compliance was found, corrective actions are being required (see below for compliance indicators related to ongoing service coordination). CAPs are required for systemic non-compliance and data to verify compliance with specific issues are required by the Final Report Letters. In addition, all non-compliance identified in specific children's files is required to be corrected as directed by DESE. Technical assistance will be provided by Consultants and DESE staff as needed to help ensure correction of non-compliance within one year, and a follow-up review will be conducted (by desk review, if possible) within nine months of the date of the Final Report Letter.

In June and July 2005, DESE will conduct follow-up reviews of all Phase II SPOEs as well as Region 1. All areas of non-compliance from previous reviews will be monitored for each region. In conjunction with the SPOE reviews, all indicators related to ongoing service coordination and early intervention providers will be monitored. Additional detail on service coordination and service provider responsibilities is included in sections CE.I and GS.IV, respectively.

Compliance indicators related to ongoing service coordinators:
- Parental consent for exchange of personally identifiable information
- Prior written notice and consent
- Written notification of IFSP meetings
- IFSP content
- Transition planning
- Timely IFSP meetings

Compliance indicators related to service providers:
- Implements services in accordance with the IFSP
- Completes and submits evaluation reports in a timely manner
- Submits complete and timely monthly progress reports to the SPOE

All compliance indicators regarding federal compliance required by OSEP have been outlined and categorized according to who will be monitored for each, what data will be used, and how often a review of the item will take place (monthly or quarterly data review, cyclical review, random data system check etc).

Monitoring strategies will include:

- File reviews including children served by DMH and independent ongoing service coordinators. Files will be selected randomly with certain characteristics identified to target areas of non-compliance from the previous review. Files will be selected to verify data submitted on reasons for exceeding 45 day timelines. Files will also be selected to address specific service coordinators or providers identified through the formal complaint system, informal issues data base, data on high amounts of services, as well as preliminary phone or Consultant-conducted interviews of SPOE staff. These interviews will be conducted prior to the monitoring visit to help identify issues with providers or ongoing service coordinators (failure to submit evaluation reports on time, failure to conduct timely meetings, informal complaints received by the SPOE etc.)
- Interviews will be held with a sample of SPOE staff from each region. Interviews will also be scheduled with a sample of DMH and independent service coordinators and providers. These may be randomly selected, but if specific issues have been identified as potential problems, specific individuals will be identified for interview. Parents will also be interviewed or surveyed where issues are identified related to provision of services from specific providers or service coordinators.
- The new webSPOE data system will help ensure compliance in a number of areas by creating reminders for service coordinators and preventing them from moving forward in the system until specific actions such as notices or meeting notifications are provided.

To further ensure compliance, beginning when new contracts are in place statewide, all SPOES will be placed on a three year cycle for verification review. This review process will address compliance for all intake and ongoing service coordinators, SPOE administration, and service providers in the region and will:

- Verify compliance by reviewing a sampling of source documents not available in the child data system (e.g. notices and evaluation reports)
- If deemed necessary and useful, provide a comprehensive review of all compliance indicators through a self assessment process conducted by each SPOE and verification of compliance calls by DESE staff with assistance from First Steps Regional Consultants
- Specifically target any areas of concerns identified through the systematic data review process.

Off-schedule reviews to target specific issues will also be conducted as needed based on areas identified through the systematic data review process and/or spot checks of data that will be possible through the webSPOE child data system. These will be conducted by desk review, if practical, based on the areas being reviewed, and if not practical, an on-site review will be conducted.

Final report letters will be provided to SPOEs within six weeks of the review. A Corrective Action Plan will be required for all systemic non-compliance identified. In addition, all non-compliance identified in specific children's files will be corrected as directed by DESE. Technical assistance will be provided by Consultants and DESE staff as needed to help ensure correction of non-compliance within one year, and a follow-up review will be conducted (by desk review, if possible) within nine months of the date of the Final Report Letter to verify the implementation of the corrective action and correction of the non-compliance.

Ongoing service coordinators (DMH and independent) and providers will also receive reports if non-compliance is identified, requiring corrective actions.

Sanctions

Intensive technical assistance will be provided when any of the above entities has been unable to correct non-compliance within one year. Sanctions will be imposed, as needed, and include the following:

- Submit frequent progress reports to DESE
- Implement specific procedures as defined by DESE
- Removal from the First Steps Matrix such that services can not be provided through First Steps
- Issues with DMH will be addressed through administrative strategies between DESE and DMH central office if correction is not accomplished

- Persistent non-compliance from SPOEs will ultimately affect their opportunity to continue to receive a contract through First Steps. Contract renewal was denied in one SPOE area during 2003-04.
- Liquidated damages for failure to meet performance requirements can be assessed as outlined in the new Phase I contracts
- Recovery of funds when improper billing is identified

Future Compliance Monitoring within the Context of Missouri's General Supervision Procedures
Missouri DESE recognizes that general supervision responsibilities encompass more than compliance monitoring and the complaint system. Procedures have been developed and are continuing to be refined for using the comprehensive data system available in Missouri to assist with oversight of all areas of general supervision: Monitoring, Public Awareness, CSPD, Complaint System, Data Collection, Financial Management, and Interagency Agreements.

These separate pieces overlap in many ways, and these areas are being integrated by:

- Developing a manual of procedures for each area
- Developing a systematic data review process that covers areas of compliance and additional areas targeted in the APR that can appropriately be addressed by data review. Data reviews began January 2005. First Steps team members and Consultants participate to help ensure an integrated approach. The process also allows for review of issues that have come in through the Informal Issues process.
- Charting all APR indicators and displaying the strategies used to analyze and address each area to ensure all available means to identify and address each area are being employed.

Missouri is continuing to work with NCSEAM and identified stakeholders in refining the state's General Supervision system and moving forward with focused monitoring to systematically address performance outcomes.

Monitoring Data
Results from SPOE monitoring visits are discussed under the applicable cluster/probe.

Missouri Part C Monitoring and Corrective Action Plan (CAP) Dates as of 2/22/05

Original Phase I (contracts were re-bid in 2004)

Region	Initial Review	Report Sent	Follow-Up 1	Follow-Up Report Sent	CAP Due	CAP Rec'd	Doc. Due	Doc. Rec'd	Follow-Up 2
Child Day Care Association St Charles (1)	10/11/2002	4/16/2003	5/25/2004	10/29/2004	11/29/2004	11/29/2004	12/14/2004	1/5/2005	03/05 (See note 7)
United Cerebral Palsy of Greater St. Louis St Louis (2)	10/10/2002	4/16/2003	11/11/2003	4/5/2004	5/5/2004	7/1/2004 (see note 6)	5/26/2004	NA	NA
Community Services of Northwest Missouri Atchison (4)	11/19/2002	4/16/2003	5/17/2004	10/29/2004	See notes 3,4,5	NA		NA	NA
Young Women's Christian Association St. Joseph (5)	11/11/2002	4/16/2003	1/19/2004	10/29/2004	See notes 3,4,5	NA		NA	NA
Sunshine Center Clay,Platte,Ray (6)	11/11/2002	4/16/2003	5/14/2004	10/29/2004	See notes 3,4,5	NA		NA	NA

Phase I Re-Bid SPOEs (contracts awarded July 2004)

Region	Letter Assigning CAP	CAP Due	CAP Received	SPOE Specific Documentation Due	SPOE Specific Documentation Received	On-site
Child Day Care Association Greater St. Louis (1)	8/13/2004	9/28/2004	10/24/2004	11/15/2004	11/12/2004	Summer '05
Special School District of St. Louis County St. Louis Co. (2)	8/13/2004	9/27/2004	9/27/2004	11/13/2004	12/15/2004	02/05 (see note 5)
The Daulton Group, Inc Northwest (4)	10/29/2004	12/13/2004	11/18/2004	1/28/2005	1/21/2005	02/05 (see note 5)

Notes: Phase 1 SPOEs re-bid effective July 1, 2004
Note 1: Region 1 – Area was expanded to include St. Louis City
Note 2: Region 2 – Geographical area was divided with St. Louis City going to Region 1 and St. Louis County awarded to a new contractor
Note 3: Regions 4, 5, 6 – Were combined and awarded to a new contractor
Note 4: Corrective action plans from previous SPOEs were sent to new SPOEs to correct
Note 5: Regions 2, 4 – Phase 1 re-bid SPOEs will have initial on-site monitoring in February/March 2005, to include verification of corrective actions from previous SPOEs
Note 6: Region 1 – St. Louis SPOE's CAP was not acceptable, however the responsibility was transferred to the new SPOEs for Regions 1 and 2
Note 7: Follow-up will include verification of corrective action from previous SPOE

Missouri Part C Monitoring and Corrective Action Plan (CAP) Dates as of 3/14/05
Phase II

Region	Initial Review	Report Sent	CAP Due	CAP Rec'd	Consultant CAP Training	Revised CAP Rec'd	CAP Approved*	Doc Due	Doc Rec'd	Doc Approved*	Follow-up Due
SEMO											
Jefferson County (3)	11/13/03	10/13/04	11/15/04	11/23/04	1/31/05	2/7/05		11/30/04	2/18/05		06/05
Farmington (7)	11/13/03	9/30/04	11/1/04	11/4/04	1/31/05	2/7/05		11/15/04	2/18/05		06/05
Poplar Bluff (21)	11/13/03	9/30/04	11/1/04	11/4/04	1/31/05	2/7/05		11/15/04	2/18/05		06/05
Bootheel (23)	11/13/03	9/30/04	11/1/04	11/4/04	1/31/05	2/7/05		11/15/04	2/18/05		06/05
ChildCare Connection											
Columbia (11)	6/17/04	9/28/04	10/28/04	11/5/04	2/1/05	3/13/05		11/11/04	3/1/05		06/05
Jefferson City (16)	6/14/04	10/7/04	11/8/04	11/23/04	1/16/05	3/3/05		11/24/04	3/24/05		07/05
First Steps of Southwest Missouri											
Joplin (12)	5/11/04	10/22/04	11/23/04	11/23/04	3/1/05	3/7/05		12/8/04	12/9/04		07/05
South Kansas City (14)	5/11/04	10/22/04	11/23/04	11/23/04	3/1/05	3/7/05		12/8/04	12/9/04		07/05
Bolivar (15)	5/11/04	10/22/04	11/23/04	11/23/04	3/1/05	3/7/05		12/8/04	12/9/04		07/05
First Steps - A program of Child Care Resource and Referral											
Springfield (13)	5/13/04	10/22/04	11/23/04	11/18/04	2/7/05	3/7/05		12/8/04	12/27/04		07/05
South Central MO (18)	5/11/04	10/22/04	11/23/04	11/18/04	2/7/05	3/7/05		12/8/04	12/27/04		07/05
West Plains (22)	5/11/04	10/22/04	11/23/04	11/18/04	2/7/05	3/7/05		12/8/04	12/27/04		07/05
Evergreen Behavioral Services											
Kirksville (8)	5/21/04	10/21/04	11/22/04	11/19/04	2/3/05	3/3/05		12/7/04	12/7/04		07/05
Union (19)	11/6/03	10/21/04	11/22/04	11/19/04	2/3/05	3/3/05		12/7/04	12/7/04		07/05
North Central Mo (24)	5/19/04	10/21/04	11/22/04	11/19/04	2/3/05	3/3/05		12/7/04	12/7/04		07/05
Hannibal (25)	11/16/03	10/21/04	11/22/04	11/19/04	2/3/05	3/3/05		12/7/04	12/7/04		07/05
Montgomery City (26)	11/16/03	10/21/04	11/22/04	11/19/04	2/3/05	3/3/05		12/7/04	12/7/04		07/05
The Children's Place											
Kansas City (9)	5/5/04	10/8/04	11/8/04	2/16/05	2/24/05	2/16/05		11/22/04	2/16/05		07/05
Children's Therapy Center											
Sedalia (10)	4/27/04	10/13/04	11/13/04	11/11/04	2/14/05	3/9/05		11/29/04	11/29/04		07/05
First Steps for Families											
Camdenton/Rolla (17)	4/9/04	10/22/04	11/23/04	1/9/05	2/14/05	3/17/05		12/8/04	1/21/05		07/05
Bringing Families Together											
Cuba (20)	4/5/04	10/22/04	11/22/04	12/1/04	2/25/05	3/24/05		12/7/04	12/1/04		07/05

* DESE staff are currently reviewing and approving corrective action plans and documentation. Reviews are scheduled to be completed by April 1, 2005.

2. Targets (for reporting period July 1, 2003 through June 30, 2004):

- Any areas of noncompliance identified and corrected in a timely manner
- All Phase 1 SPOE follow-ups conducted in 2003-04
- All Phase 2 SPOEs will be monitored during 2003-04

3. Explanation of Progress or Slippage (for reporting period July 1, 2003 through June 30, 2004):

Information under the Baseline/Trend Data section describe the progress made in developing Missouri's compliance monitoring and general supervision systems. In summary, much progress has been made in defining Missouri's system of general supervision, including the integration of all data available, and identifying where additional data/systems are needed. Beginning in February and March of 2005, ongoing service coordinators are being monitored and service provider monitoring will begin within the next few months.

4. Projected Targets:

- All follow-ups conducted show correction of non-compliance
- Any areas of noncompliance are identified and corrected in a timely manner
- Complete system of general supervision developed by June 2005
- Continue monitoring activities using complete system of general supervision during 2005-06

5. & 6. Future Activities to Achieve Projected Targets/Results and Projected Timelines and Resources:

See also CE.I, CE.II, CBT

New Cluster/ Probe	Future Activities to Achieve Projected Targets (5)	Projected Targets/ Evidence of Change (4)	Projected Timelines (6)	Resources (6)
GS.I GS.II	Monitoring of SPOEs	Ongoing monitoring, correction of past deficiencies, enforcement actions implemented if needed	Ongoing	Comp, Consultants
GS.I GS.II CE.I CE.II CBT	Monitoring of ongoing service coordinators	Ongoing monitoring, correction of past deficiencies, enforcement actions implemented if needed	2/2005 Ongoing	Comp, Consultants
GS.I GS.II GS.IV	Monitoring of providers	Ongoing monitoring, correction of past deficiencies, enforcement actions implemented if needed	6/2005 Ongoing	Comp, Consultants
GS.I GS.II	Identify standards to be monitored	Standards identified	2004-05	Comp
GS.I GS.II	Develop written monitoring procedures	Procedures developed	2004-05	Comp
GS.I GS.II	Establish data review process	Systemic issues identified and corrected	Ongoing	DSE Staff, Consultants

GS.II Systemic issues are identified and remediated through the analysis of findings from information and data collected from all available sources, including monitoring, complaint investigations and hearing resolutions.

1. Baseline/Trend Data and Analysis (for reporting period July 1, 2003 through June 30, 2004):

Systemic non-compliance across SPOEs
Based on general supervision data reviews, SPOE monitoring and child complaint data, systemic issues for SPOEs include:

- 45 day timelines for initial evaluation/assessment
- Transition out of First Steps
- Application of eligibility criteria
- Notice and consent

Any noncompliance identified during the SPOE reviews are being addressed through technical assistance and follow-up monitoring reviews. Additional information can be found under the applicable clusters/indicators.

Two additional issues identified by stakeholders include:

- Provider availability, especially in very rural areas of the state
- Individualizing services through the IFSP

SPOE directors and State Interagency Coordinating Council (SICC) members, among others, have indicated that there are provider shortages in various areas of the state, especially in the very rural areas. Efforts to gather and analyze data and target provider recruitment are addressed under GS.IV.

Also from various stakeholders, there is a perception that services on IFSPs are not always individualized for infants and toddlers with disabilities. In response to this concern, the DESE has engaged in the following activities:

- Review child and financial data to determine possible service, frequency or delivery trends across SPOEs, Service Coordinators or providers/provider agencies
- Investigate data trends that raise questions at the local and regional levels by the First Steps Consultants
- Address instances where First Steps Consultants find discrepancies of practice, process, or philosophic understanding through whole-site technical assistance, meaning that all parties (administrators, practitioners, etc.) attend the technical assistance training
- Submit reports detailing discrepancies found and the remediation applied to DESE Compliance and Effective Practices sections

2. Targets (for reporting period July 1, 2003 through June 30, 2004):
Systemic issues are identified and remediated.

3. Explanation of Progress or Slippage (for reporting period July 1, 2003 through June 30, 2004):
The new RFP for Phase 1 SPOEs addresses the oversight and monitoring of service coordinators and providers and proposed legislative changes may improve provider and system oversight by making the SPOEs even more responsible for service provision. First Steps consultants are providing consistent technical assistance and training to SPOEs, service coordinators and providers and are assisting with provider recruitment and retention.

4. Projected Targets:

- Systemic issues are identified and remediated.
- Additional projected targets are in the Future Activities tables.

5 & 6. Future Activities to Achieve Projected Targets/Results and Projected Timelines and Resources:

See also GS.I, CE.I and CE.II

New Cluster/ Probe	Future Activities to Achieve Projected Targets (5)	Projected Targets/ Evidence of Change (4)	Projected Timelines (6)	Resources (6)
GS.II	Develop web-based compliance monitoring system for First Steps to compile monitoring results, timelines and status	Web-based compliance monitoring system developed for First Steps	2005-06	Comp, Data
GS.II	Develop webSPOE which will aid in identifying and ensuring correction of systemic issues	webSPOE data is used to identify and remediate non-compliance	2004-05	Comp, Data

GS.III Complaint investigations, mediations and due process hearings and reviews are completed in a timely manner.

1. Baseline/Trend Data and Analysis (for reporting period July 1, 2003 through June 30, 2004):

	2001-2002		2002-2003		2003-2004	
	Child Complaints	Due Process	Child Complaints	Due Process	Child Complaints	Due Process
Total filed	3	1	16	1	11	0
Completed within timelines	2	0	13	0	9	0
Withdrawn	1	1	3	1	2	0
Completed outside of extended timelines	0	0	0	0	0	0

From April 2004 First Steps Family Survey

Q9: I received information and explanations about our family's legal rights (such as due process, procedural safeguards).

	#	%	
Strongly Agree	610	47.51%	93.15%
Agree	586	45.64%	
Disagree	70	5.45%	6.85%
Strongly Disagree	18	1.40%	
Total	1284		

The family survey was sent out in April 2004 to 3328 families, and 1401 were returned for a response rate of 42.1%. Results displayed here do not include the responses “I Do Not Know,” “Does Not Apply,” or non-responses.

Data show that all child complaints and due process hearings have been completed within original or properly extended timelines. Over 90% of families indicate that they received information about their legal rights.

2. Targets (for reporting period July 1, 2003 through June 30, 2004):

- All complaint investigations, mediations and due process hearing and reviews are completed in a timely manner.

3. Explanation of Progress or Slippage (for reporting period July 1, 2003 through June 30, 2004):

The child complaint database provides a regular report of child complaints that are nearing the end of timelines. This ensures that all investigations are either completed within timelines or that appropriate extensions are made.

4. Projected Targets:

- All complaint investigations, mediations and due process hearing and reviews are completed in a timely manner.

5 & 6. Future Activities to Achieve Projected Targets/Results and Projected Timelines and Resources:

This is a maintenance area for Missouri.

GS.IV There are sufficient numbers of administrators, service coordinators, teachers, service providers, paraprofessionals and other providers to meet the identified early intervention needs of all eligible infants and toddlers and their families.

1. Baseline/Trend Data and Analysis (for reporting period July 1, 2003 through June 30, 2004):

Provision of Services

- Intake Service Coordination is provided through contracts with the Lead Agency. Through contracts of System Points of Entry (SPOEs), intake service coordinators accept referrals and coordinate the evaluation process to determine eligibility for the Part C system.
- The Department of Mental Health (DMH), through an interagency agreement, funds ongoing service coordination for an agreed upon number/percent of infants and toddlers. Service coordination for all other eligible infants and toddlers is provided via independent service coordinators who have contractual agreements with the lead agency or via service coordinators employed by Phase 1 SPOEs.
- Personnel meeting state qualifications who are under contract with DESE provide all other early intervention services required by Part C. These providers bill the Central Finance Office (CFO). The CFO in turn, bills Department of Social Services (Medicaid) who reimburses the CFO per the interagency agreement between DMS and DESE.
- Payments to providers in Missouri's Part C system are based on the state's Medicaid reimbursement rate. This rate includes a natural environments incentive for services provided in those settings. As a result, the state's Medicaid office will not approve any added payment for travel expenses incurred by providers when serving children in the natural environment. Missouri is primarily a rural state and attracting providers to the Part C system is challenging when the pay rate is so low and providers must drive long distances to serve children with no reimbursement for the time on the road or the costs associated with the travel.

Missouri's system for ongoing service coordination follows two models across the state. The original model is based on independent and DMH service coordinators with very limited oversight. The revised model which is operating in three regions of the state (serving approximately half of the First Steps child count) makes SPOEs responsible for ongoing service coordination, either though coordinators employed by the SPOE or through DMH coordinators. The revised system allows for extensive oversight of service coordination activities. Data and information regarding service coordination is primarily included in the Early Intervention Services in Natural Environments cluster. See CE.I and CE.II for more information.

The model for other service providers (regardless of region) is currently an independent system where providers contract with DESE and enroll with the CFO. Providers are then chosen by the family from a service matrix. One change being discussed by the proposed legislation is SPOE contract responsibility for the provision of services as well as service coordination. This could be done through SPOEs employing or contracting with providers. Any changes made to the program may result in changes to the systems for provider recruitment, retention, training and monitoring.

That being said, the following tables present data regarding the numbers and types of providers and training data from 2003-04.

Providers of Early Intervention Services by Service Type

	6/30/2004				6/30/2003
	A Number of Children Receiving Services	B Number of Enrolled Providers	C Number of Providers Providing Services	D Percent of Providers Providing Services	E Percent of Providers Providing Services
ABA	72	174	88	50.6%	57.8%
Assistive Technology Providers	329	92	61	66.3%	56.2%
Audiologists	92	18	14	77.8%	50.0%
Interpreters (Bilingual and Sign)	66	33	21	63.6%	55.2%
Nurses	112	20	16	80.0%	27.3%
Nutritionists/Dieticians	283	16	16	100.0%	90.0%
Occupational Therapists	2,038	490	337	68.8%	68.4%
Orientation and Mobility Specialists	0	2	0	0.0%	37.5%
Physical Therapists	1,900	452	321	71.0%	71.0%
Physicians and Pediatricians	6	1	1	100.0%	50.0%
Psychologists	5	5	4	80.0%	75.0%
Service Coordination	3,454	278	175	62.9%	75.9%
Social Workers	64	18	16	88.9%	53.8%
Special Instruction	1,472	293	237	80.9%	82.8%
Speech and Language Pathologists	2,449	644	444	68.9%	72.4%
Total	12,342	2,536	1,751	69.0%	69.5%

Notes:

A - Number of children receiving services on June 30, 2004

B - Number of providers enrolled with the CFO as of June 30, 2004

C - Number of enrolled providers who were providing services to the children in Column A

D - Percent of Enrolled Providers Providing Service = Column C / Column B

E - Percent of Enrolled Providers Providing Service figure from 2002-03, as reported in 2002-03 APR

Provider Module Training during 2003-04

	2003-04		2002-03	
Module Title	Sessions	Attendees	Sessions	Attendees
Module I: FS Orientation**	19	378	21	430
Module II: FS Evaluation and Assessment	18	299	12	248
Module III: IFSP Outcomes in Natural Environments	23	370	7	138
Module IV: FS Transition	24	498	4	96
Specialty Module: Service Coordination	7	79	6	57
Total *	91	1,624	50	969

* Total attendees may be duplicated if providers attended multiple trainings.

** The orientation module was converted to an online training in December 2003. In 2004-05, Modules II, III and IV are being placed online as well.

From April 2004 First Steps Family Survey

Q14: We receive all the services listed in our Individualized Family Services Plan (IFSP)

	#	%	
Strongly Agree	677	51.68%	96.11%
Agree	582	44.43%	
Disagree	43	3.28%	3.89%
Strongly Disagree	8	0.61%	
Total	1310		

Q15: The people who work with my child know a lot about my child's disability and how to work with him/her.

	#	%	
Strongly Agree	767	56.15%	96.19%
Agree	547	40.04%	
Disagree	46	3.37%	3.81%
Strongly Disagree	6	0.44%	
Total	1366		

Q17: I receive information and explanations about the services my child needs and believe the services my child and family receive are appropriate.

	#	%	
Strongly Agree	708	51.34%	95.65%
Agree	611	44.31%	
Disagree	52	3.77%	4.35%
Strongly Disagree	8	0.58%	
Total	1379		

Anecdotal as well as preliminary "No Provider Available" data indicate that while there are regions with an adequate provider base, there are other regions with provider shortages. Extreme rural areas are especially likely to have very limited availability of providers. Many more providers attended training during 2003-04 than the previous year, largely as a result of the state enforcing training requirements. Family survey data suggest that over 95 percent of families are receiving all services on the IFSP, and feel that providers are knowledgeable and capable, and that services received are appropriate.

Future Plans for Data Collection

- No Provider Available (NPA) data collection through SPOE software. Preliminary data is now being collected outside the SPOE software, but will be incorporated into the webSPOE software
- Informal issues database planned to be implemented in Spring 2005
- Provider surveys

2. Targets (for reporting period July 1, 2003 through June 30, 2004):

- All services identified in IFSPs will be provided
- No child will go without a needed service because of lack of providers

3. Explanation of Progress or Slippage (for reporting period July 1, 2003 through June 30, 2004):

Due to delay in completion of the new webSPOE data system, the "No Provider Available" (NPA) option was not available until a change was made to the current system to allow entry of NPA authorizations. Data collection on NPA began in 2004-05 and initial data indicates that SPOEs and service coordinators are beginning to report where providers are not available for a service, however the reporting has not reached a level that suggests that the NPA option is being used consistently across the state. In reporting a service for which no provider is available, the IFSP service is identified in the child data system, but rather than entering an authorization for a particular provider, "No Provider Available" is designated. Guidance has been distributed in regards to when and how to use the NPA authorizations and what is required of service coordinators in the event that no providers are available. Requirements include continuing to look for providers and offering compensatory services when a provider is located. Significant public awareness efforts are being made to ensure service coordinators know about the NPA option and are using it. Monthly maps are being posted indicating where the NPA data shows provider need. These maps will encourage service coordinators and SPOEs to better and more completely use the NPA option. Additionally, the data is being shared with the SICC and First Steps Regional Consultants who are working with SPOEs and RICCs/LICCs to conduct targeted provider recruiting efforts based on the NPA data.

In defining Missouri's system of general supervision, the following service provision requirements, indicators and mechanisms for monitoring were outlined:

Federal and State Regulations describe the general role of service providers:

- Consulting with parents, other service providers, and representatives of appropriate community agencies to ensure the effective provision of services in that area
- Training parents and others regarding the provision of these services
- Participating in the multidisciplinary team's assessment of a child and the child's family and in the development of integrated goals and outcomes for the IFSP

Compliance Indicators:

- Provides services in accordance with the IFSP
- Submits evaluations in a timely fashion
- Submits progress reports in a timely fashion

Mechanisms in place for Service Provider monitoring/oversight:

- In place during 2003-04
  - Child complaint and due process system
  - Credential requirements for enrollment
  - Parent Surveys
  - Provider agreements require adherence to state and federal statute and regulations, was recently revised to strengthen the agreement
  - EOB statements sent to families provide for check between provision of services and billing for the services
- Implemented during 2004-05
  - Informal issues system – including billing complaints
  - Regularly scheduled reviews of pertinent data reports including provider availability
  - Pilot IFSP Quality Indicators Rating Scale
  - Providers removed from sight on the Matrix such that no new authorizations could be entered – for lack of training, lack of updating matrix information or extremely questionable billing practices
  - Consultant use of questionnaire for group services providers
  - Consultant review of service provision data
- To be implemented during 2005-06
  - New webSPOE software will keep service providers aware of upcoming timelines and meeting dates, as well as progress notes reminders
  - Monitor service providers in conjunction with SPOE reviews. Corrective actions for non-compliance will be required.
  - Full implementation of IFSP Quality Indicators Rating Scale

Provider training/credentialing system

The provider credentialing system in currently being reviewed and the Comprehensive System of Personnel Development (CSPD) committee has been reconvened to review the provider credentialing system and to recommend changes if any are needed. All First Steps training modules are being converted to web-based trainings so that providers have easier access to the trainings and are not required to spend time away from their work to attend.

4. Projected Targets:

- All services identified in IFSPs will be provided.
- No child will go without a needed service because of lack of providers.
- 100% of providers trained in all modules within six months of enrollment
- Additional projected targets are in the Future Activities tables

5. & 6. Future Activities to Achieve Projected Targets/Results and Projected Timelines and Resources:

See also GS.I and CE.IV

New Cluster/ Probe	Future Activities to Achieve Projected Targets (5)	Projected Targets/ Evidence of Change (4)	Projected Timelines (6)	Resources (6)
GS.IV GS.V	Monitor various reports & evaluate SPOE rebid/RICC work in regards to provider availability	Providers are qualified, timely evaluation/assessment	Ongoing	EP
GS.IV CE.III	Collect NPA, track trends and target recruitment	Instances of NPA reduce	Ongoing	EP
GS.IV	Develop and implement process and procedures for provider recruitment	Provider shortage decreases, recruitment activities implemented	Ongoing	EP, Consultants, SPOEs

GS.V State procedures and practices ensure collection and reporting of accurate and timely data.

1. Baseline/Trend Data and Analysis (for reporting period July 1, 2003 through June 30, 2004):
Various efforts have been made to ensure the accuracy of data entered by the SPOEs into the data system:

- Each SPOE is the electronic record-keeper for the children served in their area. System requirements demand accurate and timely data entry at the child level in order for the children to have valid authorizations for services. These data are maintained at the SPOE and are batched to the CFO on a regular basis.
- Twice a month the CFO sends to DESE an up-to-date superSPOE database that contains child and family data including demographics and eligibility, IFSP information and service authorization data, among other items. This database is used to aggregate and disaggregate data through Access queries for federal reporting purposes, and data is monitored for irregularities through various query results. Questions and clarifications are asked of the SPOEs as appropriate. Examples of data clean-up required based on the database include children whose electronic record may need to be inactivated, children incorrectly marked as duplicates, children in referral over 45 days, etc.
- Various data reports are compiled from the superSPOE and posted on the web monthly. These reports contain referral, timelines, IFSP and inactivation data by SPOE, among others. Posting this report has encouraged more accurate data entry.
- Technical assistance from the CFO Help Desk supports more accurate data entry.
- Data is being used for monitoring for
    - Determining which SPOEs to monitor on-site
    - File selection and data verification on-site
    - Desk reviews for SPOE monitoring as well as regular data reviews
    - Referring consultants to work with SPOEs, service coordinators and providers on specific issues
    - Fiscal data reviews and investigations

2. Targets (for reporting period July 1, 2003 through June 30, 2004):

- Data collection and reporting is accurate and timely.

3. Explanation of Progress or Slippage (for reporting period July 1, 2003 through June 30, 2004):
A large amount of time has been devoted to the development of the webSPOE data system. The new web-based system will greatly enhance Missouri's Part C program and will provide data for program evaluation and monitoring purposes. The new system is expected to be implemented in the Summer of 2005.

4. Projected Targets:

- Data collection and reporting is accurate and timely.
- Additional projected targets are in the Future Activities tables.

5. & 6. Future Activities to Achieve Projected Targets/Results and Projected Timelines and Resources:

See also GS.I and GS.IV

New Cluster/ Probe	Future Activities to Achieve Projected Targets (5)	Projected Targets/ Evidence of Change (4)	Projected Timelines (6)	Resources (6)
GS.V	Final development, testing and implementation of the webSPOE software	webSPOE in place statewide	Ongoing	DSE Staff