



ANNUAL PERFORMANCE REPORT MISSOURI PART C 2009-2010



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Office of Special Education

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Part C State Annual Performance Report (APR) for 2009-10**Introduction to the Annual Performance Report:**

This Annual Performance Report (APR) covers federal fiscal year 2009 which is the state fiscal year 2010 (July 1, 2009 through June 30, 2010). The time period covered by this report is referred to as “2009-2010” to eliminate confusion due to the differing state and federal fiscal year terminology.

Missouri’s early intervention program, First Steps (FS), is operated through contractual agreements in ten (10) regions across the state and a contracted Central Finance Office (CFO). The ten regional offices are known as System Points of Entry (SPOE) and they provide service coordination, evaluation and eligibility determination, as well as all local administrative activities for the program. The Department of Elementary and Secondary Education, herein and after referred to as The Department, is the lead state agency for the program. The state contracts with a single entity in each region to fulfill the SPOE function. Independent providers enroll with the CFO and provide direct services to children and families as directed by the Individualized Family Service Plan (IFSP).

Overview of the Annual Performance Report Development:

This APR was developed with review and input from the State Interagency Coordinating Council (SICC) and the SPOEs, as was the State Performance Plan (SPP). On December 29, 2010, the SPOE contractors and the SICC received a draft of the SPP/APR documents. These groups were asked to provide feedback to the Department so that recommendations could be considered and incorporated into the final document prior to the scheduled review of the final draft at the January 14, 2011, SICC meeting. At this meeting the SICC approved the report and accepted it as their annual report. The SICC Certification of the APR is available at <http://dese.mo.gov/divspeced/SPPpage/html>.

Public Dissemination and Reporting: Missouri’s SPP and APR are available for public viewing on the Department website at <http://dese.mo.gov/divspeced/SPPpage.html>. This webpage also provides a link to the public reporting by SPOE. These forms of reporting allow the public to review the state’s SPP targets and be aware of any progress/slippage at the state and local levels.

In addition to the annual reporting of the APR, the Office of Special Education reports annually to the regional SPOE offices and the SICC on progress/slippage made across the state during the previous year on meeting the state’s targets as addressed in the State Performance Plan (SPP). During these discussions indicators are examined and evaluated related to the improvement activities described in the SPP. Data are tracked and reviewed periodically during the year to identify current trends that may require immediate technical assistance to individual regions within the state. The SICC certifies this APR report as their annual report to the Governor and the Secretary of the U.S. Department of Education.

Monitoring Procedures: The ten SPOEs are divided into two sets of five for monitoring purposes. Each set of five SPOEs is representative of the state as a whole, since urban and rural areas are included in each cohort and the child count is similar. Each set of SPOEs receives an onsite compliance review every other year.

Prior to 2009-10, APR data for compliance indicators 1, 7, and 8C were obtained from the early intervention database for every child in the five SPOE regions being monitored; and results for other compliance indicators, including 8A and 8B, were based on a review of the files of 15 children from each of the five SPOE regions during onsite monitoring.

In 2009-10, compliance indicators 1, 7, and 8A, 8B and 8C were monitored through a review of two files which were randomly selected from every Service Coordinator in each of the five SPOE regions scheduled for review. A reason for the change in monitoring procedures from reviewing 15 initial IFSPs and 15 transition IFSPs per SPOE region was that service coordination numbers in smaller SPOE regions resulted in multiple files being reviewed for some service coordinators in the state, and Service Coordinators in other areas of the state having only one file, or in some cases, no files reviewed during the monitoring cycle.

In 2009-10 there were seven service coordinators in the smallest rural SPOE and 27 service coordinators in the largest urban SPOE. It was determined that reviewing one initial and one transition IFSP for each Service Coordinator provided a more accurate view of each SPOE.

For this APR, both timeline and compliance monitoring data are obtained from a review of two files from each Service Coordinator in the five SPOE regions being reviewed. SPOEs are monitored for SPP compliance indicators as well as additional state standards and indicators. All identified noncompliance must be corrected at 100% within twelve months of notification. Any SPOE agency not willing or able to correct noncompliance within twelve months of receiving notification (timely correction) would be considered out of compliance and would be subject to the enforcement actions discussed in the SPP.

Per OSEP instructions, the State ensures that each SPOE agency with noncompliance identified from any source: (1) is correctly implementing the specific regulatory requirements (i.e., achieve 100% compliance) based on a review of updated data; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the SPOE, consistent with OSEP Memo 09-02.

Corrective Action Plans are required for all identified noncompliance and all noncompliance must be corrected within 12 months of the SPOE agency's notification of the findings. State staff request additional data as part of the follow-up review. This data must indicate 100% correction of noncompliance and SPOEs may only receive a report of correction of noncompliance when all correction is verified.

All findings of individual child noncompliance must be corrected at 100% within 60 days of the report of findings, unless the child is no longer under the jurisdiction of the program. State staff request documentation showing that the individual noncompliance has been corrected and any other required actions (such as compensatory services, evaluations completed) have been put in place.

Timely correction of noncompliance is ensured through the use of the web based monitoring system (IMACS) and frequent contact with the SPOEs by Area Directors and other State staff. SPOEs are informed through various communications about enforcement actions that may be taken for failure to correct noncompliance within 12 months.

Evaluation of SPP Improvement Activities: The Office of Special Education began work with the North Central Regional Resource Center (NCRRC) in November of 2007 to develop a plan for evaluating the implementation and impact of all SPP Improvement Activities. The NCRRC trained Department staff in a model for evaluating improvement activities. Using this model, Office of Special Education staff has worked to review and revise some existing improvement activities, align those activities with relevant contractual activities, and develop action plans with implementation and impact measures for those activities. Revisions to the improvement activities are reflected in the SPP/APR. The detailed action plans and evaluation measures may be found at the following website:
<http://www.dese.mo.gov/divspeced/SPPpage.html>

Regional Technical Assistance: The Department employs five Area Directors to work as a program unit within the field. Each Area Director provides direction, training and problem solving for two contiguous SPOE regions. They also function as the statewide technical assistance resource for the program which enables the lead agency to provide a consistent message to the early intervention community. The Area Directors are supervised by the coordinator of the First Steps Program, who is employed by the Department.

Transdisciplinary Teams: The Area Directors are an integral part of the movement toward Early Intervention Teams, Missouri's service delivery model that involves transdisciplinary teams and a primary provider model. In 2008-09, approximately 20 teams implemented this practice. In 2009-10, the number of teams increased to approximately 25. For 2010-11, SPOEs are contractually required to implement the team model for at least 25 percent of new families. The Area Directors provide initial guidance and instruction to regional SPOE offices and providers and will provide continued mentoring to teams as Missouri achieves statewide implementation.

Part C State Annual Performance Report (APR) for 2009-10

Monitoring Priority: Early Intervention Services In Natural Environments

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

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

Measurement:

Percent = [(# of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner) divided by the (total # of infants and toddlers with IFSPs)] times 100.

Account for untimely receipt of services including the reasons for delays.

FFY	Measurable and Rigorous Target
2009-10	100% of infants and toddlers with IFSPs will receive the early intervention services on their IFSPs in a timely manner

Actual Target Data for 2009-10:

At 87.5% Missouri did not meet the 100% target for this indicator.

Infants and Toddlers with IFSPs who receive Early Intervention Services in a Timely Manner: (includes data for initial services from the entire fiscal year)

	2006-07	2007-08	2008-09	2009-10
Number of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner (within 30 days of parent consent)	N/A	1,383	1,321	46
Infants and Toddlers Receiving All IFSP Services with Acceptable Reasons for Delay in Initiation of Services*	N/A	266	424	17
Subtotal - Number of infants and toddlers receiving all IFSP Services within 30 Days or with Acceptable Reasons*	2,416	1,649	1,745	63
Total number of infants and toddlers with IFSPs	2,964	1,834	1,931	72
Percent of infants and toddler with IFSPs who receive the early intervention services on their IFSPs in a timely manner*	81.5%	89.9%	90.4%	87.5%

* Both the infants and toddlers receiving all services within 30 days (numerator) and the total infants and toddlers receiving IFSP services (denominator) include children whose delays in initiation of services were due to exceptional family circumstances.

Data reported for 2006-07 included all children in the state.

Data reported for 2007-08 and 2008-09 included all children in five of the ten SPOEs in the state.

Data reported for 2009-10 are based on a review of selected files from five of the ten SPOEs in the state. (See Overview under “Monitoring Procedures” for selection procedures).

“Children Receiving All IFSP Services within 30 Days” is determined by comparing the first date of service for each service type to the date of parental consent for the service. The date of parental consent is assumed to be equivalent to the IFSP meeting date. If one or more services on the child’s IFSP were started more than 30 days after the meeting date without an acceptable reason or if the child received a ‘No Provider Available’ (NPA) authorization for a service that was not then provided within the 30 days, the child is not counted as receiving all IFSP services within 30 days.

The web system prompts Service Coordinators to enter reasons when a child’s initial service was initiated more than 30 days after the date of parental consent. Initial service refers to the initial authorization of any early intervention service. The reasons include: 1) Parent/Child Delay; 2) Team Decision; 3) Service Coordinator Delay; 4) Provider Delay; and 5) Authorization/Billing Issue. Acceptable reasons include: Parent/Child Delay; Team Decision; and Authorization/Billing Issue. Team Decisions which indicate the IFSP Team decided the initiation of services should not commence within the first 30 days after the team meeting are considered acceptable reasons. Authorization/Billing issues indicate that the service actually did begin within 30 days; however, an issue with the entry of an authorization or the provider’s billing for the service made it appear as though the service did not start within 30 days. The table below, which shows the distribution of reasons for untimely services, indicates that 10 out of 27 delays were not acceptable.

Unacceptable Reasons for Untimely Services	
Provider delay	5
Service Coordinator delay	4
No Provider Available	1
Total	10
Acceptable Reasons for Untimely Services	
Authorization/Billing issue (no actual delay in provision of services)	4
Parent/Child delay (Exceptional Family Circumstances)	9
Team decision	4
Total	17

Compliance staff examined the data by region and service type to account for the children who did and did not receive timely services. Seventy-two children were included in this analysis and represent a total of 189 initial services delivered during 2009-10.

In reference to the 189 initial services, 179 (94.7%) were provided in a timely manner or there were allowable reasons for initiating the services beyond 30 days. An analysis by service type showed that Speech Language Pathology accounted for six incidents of untimely implementation, with three delays attributed to the provider, one delay due to no provider available, and two delays attributed to the service coordinator. Special Instruction accounted for three delayed services, with two of the delays attributed to the provider, and one delay attributed to the service coordinator. Physical Therapy accounted for one delay attributed to the service coordinator.

Actual delays in initiation of services ranged from one to 59 days beyond the 30-day threshold. Eight of the ten delayed services, or 80%, were less than 30 days beyond the 30-day threshold. The longest delays of 59 and 52 days were due, respectively, to either the service coordinator failing to give the provider correct contact information or no provider was available. Other delays were due to scheduling difficulties where either the family could not be contacted despite ongoing efforts or there were significant scheduling issues between providers and families.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

The state did not meet the target of 100% compliance, and slippage from the previous year is reported. After an analysis of data for this indicator, it was determined that slippage is due to the variation in the availability of service providers. While the State is moving toward a transdisciplinary team approach to service delivery with dedicated teams of providers to serve designated geographical regions, much of 2009-10 was spent developing and finalizing regional plans to implement teams with implementation of the teams scheduled to begin in 2010-11. Implementation of dedicated teams should improve the availability of providers, thus improving the State's performance on delivery of services in a timely manner.

Improvement activities for 2009-10 include the following:

- Develop and implement Transdisciplinary Service Training for Service Coordinators and providers
- Review/revise training materials for providers to address their decisions related to initiation of services after initial IFSP decisions to authorize specific services.

Discussion of these improvement activities follows:

Transdisciplinary Service Training: Missouri is moving toward a unified transdisciplinary model of service delivery, Early Intervention Teams (EIT), which consists of conducting the Routines-Based Interview™ and a primary provider approach to service delivery. Much of fiscal year 2010 was spent developing implementation plans as a “path” to successful teaming.

As indicated in the SPOE contracts awarded in fiscal year 2009 and implemented July 1, 2009, SPOE agencies were required to identify their individual EIT implementation plan by June 30, 2010. All SPOE agencies successfully completed this process and began to implement teams in each SPOE region as of July 1, 2010. With the assistance of National Early Childhood Technical Assistance Center (NECTAC) and Dr. Robin McWilliam, the state is in the process of developing five levels of training for providers who participate on teams. Two of the five trainings were disseminated in fiscal year 2010 and the remaining three will be disseminated in fiscal year 2011. The First Steps Area Directors continue to support the development and training of teams across the state.

Review/revise training materials: The First Steps web based system provides a systematic way to capture whether delays in the initiation of service were timely. Reasons available for selection include 1) parent/child reason, 2) Service Coordinator reason, 3) team decision, 4) provider delay and 5) authorization/billing issue. The First Steps Area Directors developed written guidance on Timely Services that outlined the definitions of the five reasons and how Service Coordinators would enter reasons for untimely services. The First Steps Area Directors continue to provide technical assistance regarding the provision of services in a timely manner.

In July 2009 a Provider Service Request Form was developed for statewide use to help Service Coordinators and providers keep track of evaluation and service deadlines. Additionally, the lead agency develops Provider Newsletters to provide additional technical assistance, updates and reminders regarding service provision. The spring 2010 edition of the newsletter featured the article: *Providing Timely Services to Missouri's Children and Families*.

Correction of previous noncompliance

Correction of FFY 2008 Findings of Noncompliance: No findings of noncompliance were issued for this indicator in 2008-09. Monitoring reports issued in 2008-09 were based on data from 2007-08. The 2007-08 data showed that 185 children (1834 children less 1649 with timely services) did not receive all initial services in a timely manner. No findings were issued, because prior to issuance of findings, state staff confirmed, based upon a review of updated data, that all 185 children for whom services were delayed were receiving the services authorized by the IFSP; therefore, all noncompliance had been corrected prior to issuing final reports.

The State did not review updated data, other than the data for children for whom services were delayed, to determine if each EIS program with noncompliance was correctly implementing the

specific regulatory requirements because, at this time, the noncompliance did not rise to the State's definition of systemic noncompliance. Therefore, no findings of systemic noncompliance were issued, and no additional files were reviewed.

Compliance staff is now aware that *all* findings of noncompliance must be followed up with a verification review of new data. We have changed our procedures to include a review of new data to verify that all findings of noncompliance are corrected at 100%, in addition to verifying that each finding of individual child noncompliance is also corrected.

Correction of Remaining FFY2007 Findings of Noncompliance (if applicable): No findings of noncompliance were issued for this indicator in 2007-08. Monitoring reports issued in 2007-08 were based on data from 2006-07. The 2006-07 data showed that 548 children (2964 children less 2416 with timely services) did not receive all initial services in a timely manner. No findings were issued, because prior to issuance of findings, state staff confirmed that all children for whom services were delayed were receiving the services authorized by the IFSP; therefore, all noncompliance had been corrected prior to issuing final reports.

The State did not review updated data, other than the data for children for whom services were delayed, to determine if each EIS program with noncompliance was correctly implementing the specific regulatory requirements because, at this time, the noncompliance did not rise to the State's definition of systemic noncompliance. Therefore, no findings of systemic noncompliance were issued, and no additional files were reviewed.

Compliance staff is now aware that *all* findings of noncompliance must be followed up with a verification review of new data. We have changed our procedures to include a review of new data to verify that all findings of noncompliance are corrected at 100%, in addition to verifying that each finding of individual child noncompliance is also corrected.

Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable): N/A. There were no remaining findings of noncompliance from FFY 2006 or earlier.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009--10:

Per OSEP instructions, SPP targets and Improvement Activities have been extended for an additional two years (2011-12 and 2012-13).

Improvement Activities have been revised in the SPP. Revisions to improvement activities were made as a result of an evaluation process to ensure alignment with all Office and Department activities and to ensure that the activities were measurable. These changes were presented to and approved by the SICC in January 2011.

MO FFY 2008 (2008-09) Response Table:

OSEP Analysis/Next Steps: The State must demonstrate, in the FFY 2009 APR due February 1, 2011, that the State is in compliance with the timely service provision requirements in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1). Because the State reported less than 100% compliance for FFY 2008, the State must report on the status of correction of noncompliance reflected in the data the State reported for this indicator.

When reporting the correction of noncompliance, the State must report, in its FFY 2009 APR, that it has verified that each EIS program with noncompliance reflected in the data the State reported for this indicator: (1) is correctly implementing 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) (i.e., achieved 100% compliance) based on updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has initiated services, although late, for any child whose services were not initiated in a timely manner, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02).

In the FFY 2009 APR, the State must describe the specific actions that were taken to verify the correction.

If the State does not report 100% compliance in the FFY 2009 APR, the State must review its improvement activities and revise them, if necessary.

The State must also report, in the FFY 2009 APR, how many findings of individual noncompliance related to this indicator were issued in FFY 2007, how many findings were issued in FFY 2008 based on the State's FFY 2007 data, and whether those findings were corrected.

When reporting the correction of noncompliance, the State must report, in its FFY 2009 APR, that it has verified that each EIS program with noncompliance identified in FFY 2007, and identified in FFY 2008 based on FFY 2007 data: (1) is correctly implementing 34 CFR §§303.340(c), 303.342(e) and 303.344(f)(1) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has initiated services, although late, for any child whose services were not initiated in a timely manner, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02. In the FFY 2009 APR, the State must describe the specific actions that were taken to verify the correction.

Department Response: The state has described the verification of the correction of noncompliance in the section above entitled "Correction of Previous Noncompliance." The state was able to verify that all EIS programs with identified noncompliance (1) were correctly implementing 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) (i.e., achieved 100% compliance) based on updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) initiated services, although late, for any child whose services were not initiated in a timely manner, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02).

Also in the "Correction of Previous Noncompliance" section, the state reported on the number of children who did not receive timely services from previous years, and explained why there were no findings of noncompliance issued for FFY 2007 and FFY 2008.

The Department reviewed and revised the SPP Improvement Activities as part of an overall evaluation process. The state believes the revised Improvement Activities will lead to improvement on this indicator.

Part C State Annual Performance Report (APR) for 2009-10

Monitoring Priority: Early Intervention Services In Natural Environments

Indicator 2: Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings.

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

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

FFY	Measurable and Rigorous Target
2009-10	95.0% of infants and toddlers with IFSPs will primarily receive early intervention services in the home or programs for typically developing children

Actual Target Data for 2009-10:

Missouri exceeded the 2009-10 target for this indicator with 98.2% of children served in the home or programs for typically developing children.

Primary Setting for children under 3 years of age with active IFSPs	12/1/2007	%	12/1/2008	%	12/1/2009	%
Home	3,173	92.0%	3,506	92.7%	3,923	93.4%
Community-based Setting	204	5.9%	204	5.4%	200	4.8%
Total	3,377	97.9%	3,710	98.0%	4,123	98.2%
Program Designed for Children with Developmental Delay or Disabilities	53	1.5%	49	1.3%	64	1.5%
Service Provider Location	4	0.1%	9	0.2%	3	0.1%
Hospital (Inpatient)	9	0.3%	8	0.2%	4	0.1%
Other Setting	6	0.2%	5	0.1%	5	0.1%
Residential Facility	1	0.0%	3	0.1%	1	0.0%
Total Other	73	2.1%	74	2.0%	77	1.8%
Total	3,450	100.0%	3,784	100.0%	4,200	100.0%

*Data based on 618 Table 2

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

Primary setting data in Missouri continues to show a very high percentage of children served in their natural environment. The data are supported by results of monitoring reviews which confirm that the decision-making process regarding service settings is appropriate and in compliance with regulatory requirements.

Improvement activities for 2009-10 included the following:

- Implement regular data reviews and analyze service location data by region, demographic variables and service types in order to target specific areas, groups, services or provider agencies
- During the data review process, assign Area Directors to investigate specific agencies where there is a high level of services in a special purpose center (e.g., hospital, service provider location, etc.) and assist in development and implementation of improvement plans or corrective actions where necessary

Discussion of these improvement activities follows:

Data reviews: Data on service settings continue to be reviewed by the Office of Special Education. Providing services in the natural environment is a priority in the First Steps system, and its importance is understood by all staff working within the program. Monthly data reports are posted on the Department's website and include information on the primary setting for services. The data were reviewed throughout 2009-10 with the vast majority of services being provided in the natural environments. In specific areas where services were identified to be provided by hospital or special purpose center due to agency preference, the Area Director for that SPOE region provided technical assistance and further discussion on natural environments.

Data investigations: While these data continue to show a very high percentage of children served in the natural environment, Office of Special Education and SPOE staff continue to review these data on an ongoing basis. Should the data indicate a need for investigation, the First Steps Area Directors would be directed to look into the situations. In order to ensure that IFSP teams are making individualized decisions regarding the settings in which infants and toddlers receive early intervention services, the Area Directors conduct a Quality Indicator Rating Scale (QIRS) scoring process that includes the review of justification statements in the event that services are provided outside of the natural environment.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-10:

Per OSEP instructions, SPP targets and Improvement Activities have been extended for an additional two years (2011-12 and 2012-13).

Improvement Activities have been revised in the SPP. Revisions to improvement activities were made as a result of an evaluation process to ensure alignment with all Office and Department activities and to ensure that the activities were measurable. These changes were presented to and approved by the SICC in January 2011.

MO FFY 2008 (2008-09) Response Table:

OSEP did not require a state response on this indicator.

Part C State Annual Performance Report (APR) for 2009-10

Monitoring Priority: Early Intervention Services In Natural Environments

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 IFSPs 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 IFSPs 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 IFSPs 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 IFSPs 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 IFSPs assessed)] times 100.

Summary Statements for Each of the Three Outcomes:

Summary Statement 1: Of those infants and toddlers who entered or exited early intervention below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program.

Measurement for Summary Statement 1: Percent = # of infants and toddlers reported in progress category (c) plus # of infants and toddlers reported in category (d) divided by [# of infants and toddlers reported in progress category (a) plus # of infants and toddlers reported in progress category (b) plus # of infants and toddlers reported in progress category (c) plus # of infants and toddlers reported in progress category (d)] times 100.

Summary Statement 2: The percent of infants and toddlers who were functioning within age expectations in each Outcome by the time they turned 3 years of age or exited the program.

Measurement for Summary Statement 2: Percent = # of infants and toddlers reported in progress category (d) plus [# of infants and toddlers reported in progress category (e) divided by the total # of infants and toddlers reported in progress categories (a) + (b) + (c) + (d) + (e)] times 100.

FFY	Measurable and Rigorous Targets		
		Summary Statement 1	Summary Statement 2
2009-2010	A: Social Emotional	68.4%	53.5%
	B: Knowledge and Skills	67.3%	51.4%
	C: Behaviors	72.0%	41.7%

Actual Target Data for 2009-10:

	A: Positive social-emotional skills		B: Acquisition and use of knowledge and skills		C: Use of appropriate behaviors to meet their needs	
	# children	% children	# children	% children	# children	% children
a. Did not improve functioning	36	2.7%	43	3.3%	42	3.2%
b. Improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	271	20.6%	265	20.2%	264	20.1%
c. Improved functioning to a level nearer to same-aged peers	384	29.2%	408	31.1%	533	40.6%
d. Improved functioning to reach a level comparable to same-aged peers	304	23.1%	322	24.5%	293	22.3%
e. Maintained functioning at a level comparable to same-aged peers	319	24.3%	276	21.0%	182	13.9%
Total	1,314	100.0%	1,314	100.0%	1,314	100.0%

Summary Statements

	A: Positive social-emotional skills	B: Acquisition and use of knowledge and skills	C: Use of appropriate behaviors to meet their needs
	% children	% children	% children
1. Of those children who entered the program below age expectations in Outcome, the percent that substantially increased their rate of growth in the Outcome by the time they exited	69.1%	70.3%	73.0%
2. Percent of children who were functioning within age expectations in Outcome by the time they exited.	47.4%	45.5%	36.1%

Definition of “comparable to same-aged peers”: Based on the ratings determined at entry and exit by the First Steps personnel, “comparable to same-aged peers” is defined as a rating of “5” on a scale of 1-5, meaning “completely (all of the time/typical)” in response to the question “To what extent does this child show age-appropriate functioning, across a variety of settings and situations?” A rating of “5” roughly translates to a 0-10% delay.

Instruments and Procedures for Assessment and Data Reporting of Early Childhood Outcomes (ECO):

- First Steps and ECSE should use multiple sources of information rather than a single approved assessment instrument. A decision was made to allow the First Steps personnel to determine the appropriate assessment tools to use to collect data for this indicator. No approved list of instruments has been or will be compiled. While First Steps personnel are not required to use a specific instrument or to choose from an approved list of instruments when evaluating early childhood outcomes, the state does provide an Early Childhood Outcomes Tool designed specifically to address information relevant to Indicator 3 on the Part C APR. This tool is currently used by all local programs and can be viewed at <http://www.dese.mo.gov/divspeced/ECOtraining.html>.
- The Missouri Outcomes Summary Sheet (MOSS) was designed to synthesize the information into a comprehensive summary. The MOSS is located online at <http://www.dese.mo.gov/divspeced/ECOtraining.html>
- The MOSS would be used to provide standard documentation statewide for reporting to the Department
- Each eligible child entering First Steps or ECSE beginning October 2006 must have an ECO rating if the child will be in the program at least six months
- No sampling will be used. All children with potential of being in the program for six months or more will be assessed
- Entry and exit data is to be recorded on the MOSS within 30 days of eligibility determination and exit from the program, respectively
- A rating between 1-5 will be determined for each of the three outcome indicators with 1 meaning “Not Yet” and 5 meaning “Completely”
- All entry and exit data collected during a given year will be submitted electronically to the Department at the end of that year
- The outcome status for each child will be determined by comparing the entry and exit ratings

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

Missouri met the targets for Summary Statement 1 for each of the three outcome areas. The state did not meet the targets for Summary Statement 2 for any of the three outcome areas. Missouri has narrow eligibility criteria of half-age delay and does not serve at risk children. An analysis of the data for this indicator is demonstrative of the State’s eligibility criteria, since the children who are entering the First Steps program show increased growth, yet they are not exiting at age expectations. Also, due to the population being served in First Steps, most children continue to be eligible and receive services in Part B, Early Childhood Special Education (ECSE). Data from the Part B program show that children receiving services in ECSE continue to grow and make progress on these outcomes. (See Part B APR, Indicator 7).

Improvement activities for 2009-10 included the following:

- Provide Early Childhood Outcomes (ECO) training through periodic face to face and online trainings to improve administration of the ECO assessment and data collection and reporting for Early Childhood Outcomes
- Evaluate First Steps and ECSE ECO data through the use of common identification numbers (MOSIS) on an annual basis to ensure the reliability and validity of the data
- Provide targeted technical assistance to agencies identified as not meeting or in danger of not meeting state targets based on evaluation of data provided by the Department in order to improve performance on this indicator.
- Provide information on evidence based practices and strategies for improving performance on this indicator

Discussion of these improvement activities follows:

Provide Early Childhood Outcomes (ECO) training: In November of 2009, the Department held a statewide training on administration and reporting of data for the Early Childhood Outcomes (ECO) Assessment. This training was attended by approximately 300 Early Childhood Special Education (ECSE) personnel and Part C (First Steps) System Point of Entry (SPOE) staff. Subsequent to that training, all training materials and a video of the presentation were posted on the Office of Special Education website at <http://dese.mo.gov/divspeced/ECOtraining.html>. ECSE program and SPOE administrators receive regular reminders through their Listservs regarding the availability of the materials and the importance of training for staff who will be administering the assessment and the timely and accurate reporting of the data.

Evaluate First Steps and ECSE ECO Data: Cross checks were performed to analyze whether improvements were made in agencies using FS exit ratings for ECSE entry ratings. The amount of agencies utilizing the FS exit ratings for ECSE entry ratings has nearly doubled from 2008-09. Telephone calls and emails were placed/sent to school districts that reported child count numbers for the December 1 cycle but had not reported entry/exit ratings for those children to ensure the entry of necessary/correct data. Telephone calls and emails were also placed/sent to those districts who reported entry/exit dates but with no ratings to ensure the entry of necessary data.

Provide targeted technical assistance: The Area Directors provide technical assistance on early childhood outcomes by attending staff meetings, fielding questions, and conducting regional trainings, as needed. An example of targeted technical assistance in 2009-10 occurred when two SPOE regions were identified as having data that was inconsistent with the other eight regions. The Area Directors responsible for those regions were sent to investigate the SPOEs process for collecting data and determining ratings for early childhood outcomes. The Area Directors found that both of the regions were incorrectly implementing the state procedures for rating determinations and provided additional training to these regions to clarify the state procedures.

Provide information on evidence based practices and strategies: Missouri's ECO website was updated in 2009 to include training materials for best practice related to assessing young children. The materials were developed using information provided by the National ECO Center so that Missouri accurately measures the performance of infants, toddlers and preschoolers with disabilities. For example, the data collection process was modified to include at least three sources of information (i.e., professional input, parent report and assessment results) regardless of the instrument used.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-10:

Per OSEP instructions, SPP targets and Improvement Activities have been extended for an additional two years (2011-12 and 2012-13).

Per OSEP requirements from the June 2010 Response Table, the 2010-11 targets for Indicator 3 have been revised to show improvement over the baseline and are included in the revised SPP dated January 28, 2011.

MO FFY 2008 (2008-09) Response Table:

OSEP Analysis/Next Steps: The State must report progress data and actual target data for FFY 2009 with the FFY 2009 APR. The State must revise its FFY 2010 targets to show improvement over the baseline.

Department Response: Targets for Indicator 3 have been revised to show improvement over the baseline and are included in the SPP revised January 2011.

Part C State Annual Performance Report (APR) for 2009-10

Monitoring Priority: Early Intervention Services In Natural Environments

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 children's needs; and
- C. Help their children develop and learn.

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

Measurement:

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

FFY	Measurable and Rigorous Target
2009-10	4A, 4B, 4C: 95% of parents will agree or strongly agree with the survey items

Actual Target Data for 2009-10:

The state met the 2009-10 targets for indicators 4A, 4B and 4C, with family survey data indicating 96.1%, 97.6% and 98.5% agreement, respectively, with increases over the prior year in all areas.

Survey Instrument: The complete parent survey can be found at <http://www.dese.mo.gov/divspeced/FirstSteps/documents/CombinedSurvey2010.pdf>

For the administration of the survey, surveys were sent to all families with an IFSP receiving First Steps services (census methodology). The response rate for 2009-10 was 26.8% with 122 more responses received this year than last. The response rate for 2008-09 was 26.8%. The response rate for 2007-08 was 30.2%. The survey response rate for 2006-07 was 34.2%. Survey results follow:

Family Survey Data

A. Percent of families participating in Part C who report that early intervention services have helped the family know their rights

Q10. I received information and explanations about our family's rights to file a child complaint.

	Family Survey 2008	Family Survey 2009	Family Survey 2010		
Strongly Agree	91.2%	92.4%	623	56.0%	94.1%*
Agree			424	38.1%	
Disagree	8.8%	7.6%	57	5.1%	5.9%
Strongly Disagree			9	0.8%	

Q11. I received information and explanations about our family's parental rights¹.

	Family Survey 2008	Family Survey 2009	Family Survey 2010		
Strongly Agree	94.2%	96.9%	673	58.9%	98.1%*
Agree			447	39.2%	
Disagree	5.8%	3.1%	17	1.5%	1.9%
Strongly Disagree			4	0.4%	

***Average affirmative response for questions related to Indicator 4A: Average of 94.1% and 98.1% = 96.1%**

Note 1: Previously, “parental rights” was “procedural safeguards”. The wording change was made upon request of the SICC to make the wording consistent with the document the families receive.

B. Percent of families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs

Q24. Since being part of First Steps, I can work with professionals.

	Family Survey 2008	Family Survey 2009	Family Survey 2010		
Strongly Agree	96.9%	96.8%	591	57.5%	98.1%*
Agree			417	40.6%	
Disagree	3.1%	3.2%	16	1.5%	1.9%
Strongly Disagree			4	0.4%	

Q25. Since being part of First Steps, I know how to advocate for what my child needs.

	Family Survey 2008	Family Survey 2009	Family Survey 2010		
Strongly Agree	94.9%	94.4%	626	56.9%	97.2%*
Agree			443	40.3%	
Disagree	5.1%	5.6%	27	2.4%	2.8%
Strongly Disagree			4	0.4%	

***Average affirmative response for questions related to Indicator 4B: Average of 98.1% and 97.2% = 97.6%**

C. Percent of families participating in Part C who report that early intervention services have helped the family help their children develop and learn

Q19. First Steps services give my family the tools to directly improve my child's development.

	Family Survey 2008	Family Survey 2009	Family Survey 2010		
Strongly Agree	96.6%	97.4%	766	66.09%	98.5%*
Agree			375	32.36%	
Disagree	3.4%	2.6%	10	0.86%	1.5%
Strongly Disagree			8	0.69%	

***Affirmative response for question related to Indicator 4C: 98.5%**

OSEDA Survey and Analysis: As noted in the previous two (2) Annual Performance Reports, The Department worked with the University of Missouri Office of Social and Economic Data Analysis (OSEDA) to evaluate the representativeness and reliability of the First Steps Family Survey. As a result of this collaboration, changes to the 2007 survey included the addition of new items designed to meet the reporting requirements for this APR and to enhance subsequent analysis of survey data. In addition, a split survey methodology was used in 2007 to explore the use of sampling versus a census approach to gathering yearly data.

Several conclusions were drawn from analyzing the 2007 data from the split survey design:

- The two methods resulted in very similar rates of agreement
- No non-response bias was evident by using the census methodology
- Response rates by SPOE region did not differ between the two methodologies
- Survey results were representative of the state as a whole
- Either method (census or sample) is appropriate and produces valid and reliable data that adequately represent the population of the First Steps program.

For 2009-10, the census methodology was utilized and surveys were mailed to all families receiving First Steps services. An analysis of responses by SPOE indicates that response rates are comparable across the state. For response rates from prior years, refer to the following link:

<http://dese.mo.gov/divspeced/FirstSteps/data.html#OtherReports>.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

The state met the 2009-10 targets for indicators 4A, 4B and 4C, with family survey data indicating 96.1%, 97.6% and 98.5% agreement, respectively, with increases over the prior year in all areas. This may be attributed to increased focus on technical assistance and training of service coordinators regarding the provision and explanation of the Parental Rights Statement to First Steps families.

Improvement activities for 2009-10 included the following:

- Use results of parent surveys to target parent training opportunities
- Develop a consumer report from survey responses focusing on a small number of key questions
- Develop a parent newsletter with the goal of quarterly distribution
- Develop parent training opportunities, including face-to-face trainings, handbooks, DVDs
- Consider the development of a family mentor system within First Steps
- Use results of parent surveys to target service coordinator trainings

Discussion of these improvement activities follows:

Parent survey results: Through a contract with Missouri's Parent Training Information Center, Missouri Parents Act (MPACT), Transition from C to B training was conducted for parents and agency personnel (consisting of First Steps, Head Start, LEA and MPACT staff) in St. Joseph, Kansas City, Springfield and St. Louis during 2009-10. Additionally, MPACT developed a three-part parent involvement curriculum during 2009-10. The "Steps for Success" curriculum addresses effective communication, the First Steps process, and understanding parental rights. Trainings will be a collaborative effort between representatives of the parent training and information center as well as lead agency staff. The intent of the training is to provide information to families on how to work effectively with teams, understand the early intervention process and understand their rights. The development of the curriculum was based on MPACT's analysis of the parent survey responses.

Consumer report from parent survey responses: As an additional part of the 2009-10 contract, MPACT analyzed family survey data focusing on a small number of key questions to develop topics for parent training opportunities as reported above. The data will be included in parent newsletters as a consumer report during 2010-11.

Parent newsletter: Quarterly parent newsletters were included in the 2009-10 contract with MPACT. Each year four editions of parent newsletters are published with topics determined by an

analysis of the family survey data, a review of program data and related content selected by the local programs and lead agency. Topics in 2009-10 included parental rights, autism awareness, and the importance of reading to young children.

Parent training opportunities: During 2009-10, the local programs disseminated packets on Part C to Part B transition to families as the Service Coordinator and family began discussions about the transition from First Steps. This packet includes a video depicting a transition meeting with participation by early childhood programs at the local school district and community programs such as Head Start. The packet also includes a parent handbook, developed in collaboration between MPACT and the lead agency, which covers basic information on the transition process. The transition packets were disseminated at all MPACT transition trainings in 2009-10. Additionally, the packets were disseminated to families whose children would be transitioning from Part C to Part B during Early Childhood resource fairs and one-on-one parent assistance.

Family Mentor System: This activity was not included in the current MPACT contract but may be considered in future years.

Service Coordinator Trainings: Service Coordinator trainings conducted by the lead agency in 2009-10 consisted of the following topics: transition C to B, early childhood outcomes, parental rights, eligibility determination, and early intervention teams. SPOE Director trainings conducted by the lead agency in 2009-10 consisted of the following topics: child complaint system, initial contacts, evaluation/assessment, early childhood outcomes, and early intervention teams. In addition to the lead agency trainings, monthly staff meetings between SPOE Directors and Service Coordinators occur in most regions and consist of reminders and updates to policies and procedures.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-10:

Per OSEP instructions, SPP targets and Improvement Activities have been extended for an additional two years (2011-12 and 2012-13).

Improvement Activities have been revised and one was discontinued in the SPP. Revisions to Improvement Activities were made as a result of an evaluation process to ensure alignment with all Office and Department activities and to ensure that the activities were measurable. These changes were presented to and approved by the SICC in January 2011.

MO FFY 2008 (2008-09) Response Table:

OSEP did not require a state response on this indicator.

Part C State Annual Performance Report (APR) for 2009-10

Monitoring Priority: Effective General Supervision Part C / Child Find

Indicator 5: Percent of infants and toddlers birth to 1 with IFSPs compared to national data.

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

Measurement:

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

FFY	Measurable and Rigorous Target
2009-10	0.82% of infants and toddlers birth to 1 will have IFSPs

Actual Target Data for 2009-10:

With 0.84% of children birth to age 1 served by Missouri’s First Steps program, the state met the 2009-10 target.

Percent of Children Birth to Age 1 with IFSPs

	Dec-05	Dec-06	Dec-07	Dec-08	Dec-09
Child Count	547	500	617	616	676
Estimated Population*	77,970	78,424	80,673	82,359	80,605
Missouri %	0.71%	0.64%	0.76%	0.75%	0.84%
National %			1.01%	1.04%	1.03%

* Estimated Population from US Bureau of Census

Source: Data from 618, Table 1 at http://mcdc.missouri.edu/websas/estimates_by_age.shtml

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

While the estimated population decreased by 2.2%, the number of children birth to age 1 increased by 9.8% and Missouri met the target for 2009-10.

Improvement activities for 2009-10 included the following:

- Analyze data to target referral sources with high percentage of inappropriate referrals, promote referrals from underserved populations and educate primary referral sources (NICU, PAT, pediatricians, CAPTA, Newborn Hearing Screening)
- Analyze RICC Child Find plans to determine impact of actions on locating additional eligible children
- Work with Early Head Start/Head Start to increase identification of and inclusion of children with disabilities in those programs
- Continue to support PAT National Center training of parent educators on appropriate FS referrals and serving families and children with special needs
- Investigate the possible ways that RICC child find efforts could be assisted by the state

Discussion of these improvement activities follows:

Referral Sources: First Steps SPOE Directors participated in various state and local conferences related to early childhood intervention and education to share referral information. Conference attendees received information regarding the First Steps program, eligibility requirements and referral procedures. Current data indicate the number of referrals has increased overall with the largest relative increases in Social Services Agency (including Division of Family Services) referrals. However, a continuing area of concern for the state is that approximately half of all referrals do not result in an IFSP, due to ineligibility, parent withdrawal prior to IFSP development or the inability to contact the family after the initial referral is made. Missouri's narrow criteria may be part of the reason for this high percentage of ineligible children. There continues to be a need to educate primary referral sources about the program's criteria.

Over the past year, the largest increase in eligibility rates came from the Department of Health and Senior Services. Other slight increases were seen in the eligibility rates for some of the less prevalent referral sources such as Child Abuse Prevention and Treatment Act (CAPTA), other health care and LEA provider, and social service agencies. Eligibility rates from referrals made by parents and Parents as Teachers (PAT) showed a very slight decrease.

RICC Child Find: For the 2009-10 reporting period, each Regional Interagency Coordinating Council (RICC) reported collaboration with Head Start offices, Parents as Teachers (PAT), local community hospitals and physician's offices, the Department of Mental Health and local early childhood programs. Specific activities included the improvement and distribution of printed materials, developing community resource lists and attending early childhood and health fairs.

Early Head Start/Head Start: In January 2009, the Department of Elementary and Secondary Education, in partnership with the Missouri Head Start Collaboration Office and the Missouri Department of Social Services completed a Memorandum of Understanding (MOU). The purpose of this MOU is to support local efforts in providing collaborative high quality services to families of children with disabilities birth to five years in the areas of identification, evaluation, IFSP/IEP development, training, transition and inclusion. Lead agency staff also participates in the Missouri Head Start advisory council and Missouri's SpecialQuest Birth-5 Initiative.

PAT National Center Training: Parents as Teachers (PAT) is a program offered in every school district in Missouri with voluntary participation of families of children between the ages of birth and five (5) years. First Steps Area Directors and SPOE Directors assist the PAT National Center, located in St. Louis, Missouri, with facilitating a First Steps presentation at their annual special needs training for PAT educators as well as ongoing in-services for professional development. At these presentations, they share information regarding the First Steps program, including IDEA, eligibility criteria, facilitating appropriate referrals and referral procedures.

RICC Child Find Assistance: Missouri law at 160.932 RSMo (Revised Statutes of Missouri) established a Child Find Coordinator pilot program in one region of the state, which started July 1, 2008 and is expected to be in place for three years. The RICC in this region is in charge of the position and assists the Child Find Coordinator with activities and materials. An annual report was provided in June 2010 for activities conducted in fiscal year 2009-10 and concluded the region experienced an increase in the number of referrals and subsequent eligible children with the largest growth in NICU, physician and Social Service agency referrals. At the end of the three year pilot project, any successful activities identified through the pilot will be considered for replication statewide.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-10:

Per OSEP instructions, SPP targets and Improvement Activities have been extended for an additional two years (2011-12 and 2012-13).

Improvement Activities have been revised in the SPP. Revisions to Improvement Activities were made as a result of an evaluation process to ensure alignment with all Office and Department activities and to

ensure that the activities were measurable. These changes were presented to and approved by the SICC in January 2011.

MO FFY 2008 (2008-09) Response Table:

OSEP did not require a state response on this indicator.

Part C State Annual Performance Report (APR) for 2009-10

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 toddlers birth to 3 with IFSPs) divided by the (population of infants and toddlers birth to 3)] times 100 compared to national data.

FFY	Measurable and Rigorous Target
2009-10	1.64% of infants and toddlers birth to 3 will have IFSPs

Actual Target Data for 2009-10:

At 1.72% of children birth to age 3 served by Missouri’s First Steps program, the state met the 2009-10 target.

Percent of Children Birth to Age 3 with IFSPs

	Dec-05	Dec-06	Dec-07	Dec-08	Dec-09
Child Count	3,376	3,216	3,450	3,784	4,200
Estimated Population*	228,675	234,751	238,086	243,847	244,769
Missouri %	1.48%	1.37%	1.45%	1.55%	1.72%
National %			2.48%	2.66%	2.67%

* Estimated Population from US Bureau of Census

Source: Data from 618, Table 1 at http://mcdc.missouri.edu/websas/estimates_by_age.shtml

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

A significant increase was seen in the last year, both in the number and percentage of children served. Missouri exceeded the 2009-10 target for this indicator.

See the discussion for Indicator 5 for information about both the birth to 1 and birth to 3 groups.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-10:

Per OSEP instructions, SPP targets and Improvement Activities have been extended for an additional two years (2011-12 and 2012-13).

See Indicator 5 for revisions to Improvement Activities.

MO FFY 2008 (2008-09) Response Table:

OSEP did not require a state response on this indicator.

Part C State Annual Performance Report (APR) for 2009-10

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

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

FFY	Measurable and Rigorous Target
2009-10	100.0% of eligible infants and toddlers with IFSPs will have an evaluation and assessment and an initial IFSP meeting conducted within Part C’s 45-day timelines

Actual Target Data for 2009-10:

The State met the target of 100% compliance with the 45-day timeline requirement.

45-Day Timeline Data (includes initial IFSPs developed throughout the entire fiscal year)

Initial IFSPs	2006-07	2007-08	2008-09	2009-10
# IFSPs with acceptable timelines‡	2,388	1,478	1,336	47
Total IFSPs	2,510	1,551	1,406	47
% with acceptable timelines	95.1%	95.3%	95.0%	100.0%

‡“Acceptable timelines” includes those evaluations and initial IFSP meetings completed within the 45-day timeline as well as those that went over 45 days due to parent or child reasons. Both the IFSPs with acceptable timelines (numerator) and the total IFSPs (denominator) include children whose delays were due to exceptional family circumstances. See explanation below for more information.

Data reported for 2006-07 included all children in the state.

Data reported for 2007-08 and 2008-09 included all children in five of the ten SPOEs in the state.

Data reported for 2009-10 are based on a review of selected files from five of the ten SPOEs in the state. (See Overview under “Monitoring Procedures” for selection procedures).

The following table provides detail on the reasons for exceeding the 45-day timeline. These reasons are required to be entered by Service Coordinators in the web system if a referral exceeds 45 days.

45-Day Timeline Calculation Details	Number
Initial IFSPs	47
Initial IFSPs under 45 days	43
Initial IFSPs over 45 days with acceptable reasons	4
Initial IFSPs over 45 days with unacceptable reasons	0
Total under 45 days or with acceptable reasons	47
Percent under 45 days or with acceptable reasons	100.0%

For the children listed above whose 45-day timelines were not met, the delays ranged from eight to 20 days and reasons for the delays included family holiday/vacation, the inability to contact the family, and child illness/hospitalization.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

Missouri improved performance from 95% in 2008-09 to 100% compliance with this indicator in 2009-10.

Improvement activities for 2009-10 included the following:

- Identify barriers within each SPOE region to meeting 45-day timelines and target technical assistance toward those barriers
- Implement consistent screening, evaluation and assessment procedures across the state in order to meet 45-day timelines

Discussion of these improvement activities follows:

Identify barriers and target technical assistance: The lead agency conducts quarterly meetings with all ten SPOE Directors, lead Service Coordinators, as designated by the SPOE, and Area Directors in attendance. During these meetings the SPOE staff share challenges related to SPOE operations and ask questions regarding Department policies and procedures. In 2009-10, monthly targeted technical assistance was provided to the SPOEs related to formal and informal assessment procedures, informed clinical opinion, eligibility determination, and transdisciplinary service delivery. In July 2009, following a SPOE Director meeting, a Provider Service Request Form was developed for statewide use to help Service Coordinators and providers keep track of evaluation and service deadlines.

Implement consistent procedures: Previously the Department staff identified a need to distinguish between screening, evaluation and assessment procedures to achieve statewide consistency. As a result, the Developmental Assessment of Young Children (DAYC) was identified as a uniform instrument to determine eligibility. Since the initiation of the utilization of the DAYC, the First Steps Area Directors have trained more than 600 providers on the use of the DAYC to assist with eligibility determination.

In order to improve consistent practices between the ten SPOE regions, the lead agency updated the Service Coordinator Practice Manual that was previously posted on the Department’s website. The lead agency also conducted a two-day training regarding referral and intake procedures with representation from each of the ten SPOE regions in attendance. Ongoing technical assistance was provided, as needed, by the Area Directors throughout 2009-10.

Correction of previous noncompliance

Correction of FFY 2008 Findings of Noncompliance: No findings of noncompliance were issued for this indicator in 2008-09. Monitoring reports issued in 2008-09 were based on data from 2007-08. The 2007-08 data showed that 73 children (1551 children less 1478 within 45-day timelines) did not

have initial IFSP meetings held within the 45-day timeline. No findings were issued, because prior to issuance of findings, state staff confirmed that all 73 children had had an initial IFSP meeting, although late. Therefore, all noncompliance had been corrected prior to issuing final reports.

The State did not review updated data, other than the data for children who did not receive an initial evaluation, assessment, and IFSP meeting within the 45-day timeline, to determine if each EIS program with noncompliance was correctly implementing the specific regulatory requirements because, at this time, the noncompliance did not rise to the State’s definition of systemic noncompliance. Therefore, no findings of systemic noncompliance were issued, and no additional files were reviewed.

Compliance staff is now aware that all findings of noncompliance must be followed up with a verification review of new data. We have changed our procedures to include a review of new data to verify that all findings of noncompliance are corrected at 100%, in addition to verifying that each finding of individual child noncompliance is also corrected.

Correction of Remaining FFY2007 Findings of Noncompliance (if applicable): No findings of noncompliance were issued for this indicator in 2007-08. Monitoring reports issued in 2007-08 were based on data from 2006-07. The 2006-07 data showed that 122 children (2510 children less 2388 within 45-day timelines) did not have initial IFSP meetings held within the 45-day timeline. No findings were issued, because prior to issuance of findings, state staff confirmed that all 122 children had had an initial IFSP meeting, although late. Therefore, all noncompliance had been corrected prior to issuing final reports.

The State did not review updated data, other than the data for children who did not receive an initial evaluation, assessment, and IFSP meeting within the 45-day timeline, to determine if each EIS program with noncompliance was correctly implementing the specific regulatory requirements because, at this time, the noncompliance did not rise to the State’s definition of systemic noncompliance. Therefore, no findings of systemic noncompliance were issued, and no additional files were reviewed.

Compliance staff is now aware that all findings of noncompliance must be followed up with a verification review of new data. We have changed our procedures to include a review of new data to verify that all findings of noncompliance are corrected at 100%, in addition to verifying that each finding of individual child noncompliance is also corrected.

Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable): N/A. There were no remaining findings of noncompliance from FFY 2006 or earlier.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-10:

Per OSEP instructions, SPP targets and Improvement Activities have been extended for an additional two years (2011-12 and 2012-13).

Improvement Activities have been revised in the SPP. Revisions to Improvement Activities were made as a result of an evaluation process to ensure alignment with all Office and Department activities and to ensure that the activities were measurable. These changes were presented to and approved by the SICC in January 2011.

MO FFY 2008 (2008-09) Response Table

OSEP Analysis/Next Steps: OSEP appreciates the State’s efforts and looks forward to reviewing in the FFY 2009 APR the State’s data demonstrating that it is in compliance with the 45-day timeline requirements in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a). Because the State reported less than 100% compliance, the State must report on the status of correction of noncompliance reflected in the data the State reported for this indicator.

When reporting the correction of noncompliance, the State must report, in its FFY 2009 APR, that it has verified that each EIS program with noncompliance reflected in the data the State reported for this indicator: (1) is correctly implementing 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has conducted the initial evaluation, assessment, and IFSP meeting, although late, for any child for whom the 45-day timeline was not met, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02. In the FFY 2009 APR, the State must describe the specific actions that were taken to verify the correction.

If the State does not report 100% compliance in the FFY 2009 APR, the State must review its improvement activities and revise them, if necessary.

The State must also report, in the FFY 2009 APR, how many findings of individual noncompliance related to this indicator were issued in FFY 2007, how many findings were issued in FFY 2008 based on the State's FFY 2007 data, and whether those findings were corrected.

When reporting the correction of noncompliance, the State must report, in its FFY 2009 APR, that it has verified that each EIS program with noncompliance identified in FFY 2007 and identified in FFY 2008 based on FFY 2007 data: (1) is correctly implementing 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has conducted the initial evaluation, assessment, and IFSP meeting, although late, for any child for whom the 45-day timeline was not met, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02. In the FFY 2009 APR, the State must describe the specific actions that were taken to verify the correction.

Department Response: The state has described the verification of the correction of noncompliance in the section above entitled "Correction of Previous Noncompliance." The state was able to verify that each EIS program with noncompliance reflected in the data the State reported for this indicator: (1) is correctly implementing 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has conducted the initial evaluation, assessment, and IFSP meeting, although late, for any child for whom the 45-day timeline was not met, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02.

Also in the "Correction of Previous Noncompliance" section, the state reported on the number of children who did not have an initial IFSP meeting within 45 days, and explained why there were no findings of noncompliance issued for FFY 2007 and FFY 2008.

The Department reviewed and revised the SPP Improvement Activities as part of an overall evaluation process. The state believes the revised Improvement Activities will lead to improvement on this indicator.

Part C State Annual Performance Report (APR) for 2009-10

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; and
- 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.

FFY	Measurable and Rigorous Target
2009-10	100% of all children exiting Part C will receive timely transition planning by their third birthday

Actual Target Data for 2009-10:

The percent of compliance is 100% for 8A.

Children Exiting Part C who Received Timely Transition Planning

A. Number of children exiting Part C who have an IFSP with transition steps and services	69
B. Number of children exiting Part C	69
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	100.0%

Trend data:

Year	2006-07	2007-08	2008-09	2009-10
Percent in compliance (8A)	92.7%	100.0%	100.0%	100.0%

The results for 8A were gathered by reviewing a randomly selected transition file for every service coordinator in each of the five SPOEs monitored. The number of files reviewed for each SPOE ranged in number from six files in the smallest rural SPOE to 26 files in the largest urban SPOE monitored.

The percent of compliance is 100.0% for 8B.

	Number of files reviewed	Number of parents who refused consent	Number of parents providing consent	Number of LEAs notified	Percent in compliance 2009-10
B: Notification to LEA, if child potentially eligible for Part B	69	0	69	69	100.0%

Trend data:

Year	2006-07	2007-08	2008-09	2009-10
Percent in compliance (8B)	90.9%	94.7%	98.6%	100.0%

The results for 8B were gathered from file reviews of the same children referred to in 8A, who exited the program during 2009-10, and reflects the number of children for whom the LEA was provided with directory information.

With OSEP approval, and after training all SPOE agencies, Missouri implemented an “opt out” policy in July 2009. A change in state regulations, accomplished June 30, 2010, brought Missouri into full compliance with federal requirements requiring notification of the LEA with directory information of First Steps children potentially eligible for Part B services unless a parent “opted out” of providing that information, in writing. http://dese.mo.gov/divspeced/stateplan/documents/PartC_State_Plan_2010.pdf Pages 11-12.

The percent of compliance is 91.2% for 8C.

	Number of children	Number of late referrals	Number in compliance	Number of delays due to exceptional family circumstances	Number out of compliance	Percent in compliance 2009-10
C: Transition conference, if child potentially eligible for Part B	69	1*	57	5	6	91.2%

*Child referred less than 90 days before third birthday and was excluded from the numerator and denominator of calculation.

The chart above shows the number of children (69) reviewed for 8C. The one late referral was excluded from the numerator and denominator of the calculation. Fifty-seven children were found to be in compliance with transition timelines. An additional five transition conferences, delayed due to exceptional family circumstances, were allowed as acceptable. Exceptional family circumstances included difficulty in contacting parents, and referrals received 39 days or less prior to the child turning 2 1/2. These exceptional family circumstances have been included in the numerator and denominator of the calculation for indicator 8C.

Six cases of child specific noncompliance were cited due to unacceptable delays.

Trend data:

Year	2006-07	2007-08	2008-09	2009-10
Percent in compliance (8C)	78.1%	94.2%	92.6%	91.2%

While not meeting the target of 100% for 8C, the state has maintained a high percentage of compliance (over 91%) with transition planning requirements.

Results for 8C were gathered through the review of files from the same five SPOEs as reviewed for 8A and 8B. These files were of children transitioning from Part C to Part B from July 1, 2009 to June 30, 2010.

Current state regulations require transition meetings must occur six months prior to the child’s third birthday; however, proposed changes to the Part C state regulations would change this to “at least six months (and at the discretion of all parties, not more than nine months) prior to the child’s third birth date...” The state anticipates this change will be finalized no later than June 30, 2011.

The chart indicates six unacceptable delays in transition timelines, all attributable to just one of the five SPOE agencies monitored. This agency was issued a Corrective Action Plan which requires provision of evidence of correction of noncompliance within twelve months. No individual child noncompliance was cited, as all six meetings, although late according to Missouri standards, were held 120 days or more prior to the child’s third birth date, giving the LEA ample time to evaluate and determine eligibility for Part B services, and all of the children had exited the First Steps program prior to the review.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

Indicator 8C did not meet the 100% target and slipped slightly from 92.6% in 2008-09 to 91.2% in 2009-10. As was indicated above, all of the noncompliance was attributed to one SPOE region. This SPOE region experienced a change of contractor during the summer of 2009 which created numerous personnel and organizational changes. It is believed that these changes had an impact on the ability of the SPOE to effectively manage transition timelines, accounting for the indicated slippage. This SPOE is working through a Corrective Action Plan and is receiving targeted technical assistance from the Lead Agency.

Improvement activities for 2009-10 included the following:

- Provide training and professional development to all SPOE agencies to improve collaboration and coordination with families and school districts in the area of C to B Transition timelines.
- Provide information on evidence based practices and strategies for improving performance on this indicator.

Discussion of these improvement activities follows:

Part C to B Transition Training: The lead agency maintains a webpage specifically for Transition C to B topics in order to organize all transition training materials and technical assistance documents in one place. This page can be viewed at: <http://www.dese.mo.gov/divspeced/FirstSteps/Transitionindexpg.htm> Additionally, statewide Transition C to B trainings are conducted in the spring of every other year. This schedule was initiated in the spring of 2006, repeated in 2008 and again in 2010. Individual SPOE regions and local school district early childhood special education staff attended each year. With technical assistance documents available online as well as an online training module, it was determined that biennial face-to-face trainings would be sufficient to ensure compliance with this indicator.

Transition C to B training materials, including PowerPoint presentation, timeline chart, and Q & A documents were updated as needed to clarify procedures. The updated documents were used in the statewide trainings in the spring of 2010.

In 2009-10, listserv messages on collaboration between Parts C and B were disseminated to the field throughout the year. In more than one urban area of the state, regional interagency meetings have included topics of discussion related to successful transition from Part C to Part B. Ongoing technical assistance by the Area Directors is available to SPOE Directors and Service Coordinators as needed.

During 2009-10, the lead agency prepared a family information packet on Part C to Part B transition. This packet includes a DVD depicting the transition meeting and participation by early childhood programs at the local school district and community programs such as Head Start. The packet also includes a parent handbook covering basic information on the transition process. These packets continue to be provided to families as the Service Coordinator and family begin discussions about the transition from First Steps.

Correction of Previous Noncompliance

Correction of FFY 2008 Findings of Noncompliance: 8A: No findings of noncompliance were issued for this indicator in 2008-09.

Correction of Remaining FFY2007 Findings of Noncompliance (if applicable): 8A: No findings of noncompliance were issued for this indicator in 2007-08.

Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable): 8A: N/A. There were no remaining findings of noncompliance from FFY 2006 or earlier.

Correction of FFY 2008 Findings of Noncompliance: 8B: No findings of noncompliance were issued for this indicator in 2008-09. Monitoring reports issued in 2008-09 were based on record reviews of children exiting First Steps in 2007-08. The 2007-08 reviews showed that notification of the LEA did not occur for four children (75 children less 71 in compliance). No findings were issued for any SPOE regions because the extent of noncompliance did not meet the state's former criteria for identification of systemic noncompliance and individual correction was not required because the children had already exited the Part C system.

Correction of Remaining FFY2007 Findings of Noncompliance (if applicable): 8B: No findings of noncompliance were issued for this indicator in 2007-08. Monitoring reports issued in 2007-08 were based on record reviews of children exiting First Steps in 2006-07. The 2006-07 reviews showed that notification of the LEA did not occur for 15 children (165 children less 150 in compliance). No findings were issued for any SPOE regions because the extent of noncompliance did not meet the state's former criteria for identification of systemic noncompliance and individual correction was not required because the children had already exited the Part C system.

Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable): 8B: N/A. There were no remaining findings of noncompliance from FFY 2006 or earlier.

Correction of FFY 2008 Findings of Noncompliance: 8C: No findings of noncompliance were issued for this indicator in 2008-09. Monitoring reports issued in 2008-09 were based on data for children exiting First Steps in 2007-08. The 2007-08 data showed that transition meeting timelines were not met for 32 children (550 children less 518 in compliance). No findings were issued for any SPOE regions because the extent of noncompliance did not meet the state's former criteria for identification of systemic noncompliance and individual correction was not required because all of the children had already exited the Part C system.

Correction of Remaining FFY2007 Findings of Noncompliance (if applicable): 8C: In 2007-08, the state issued eleven findings of noncompliance for this indicator. Monitoring reports issued in 2007-08 were based on data for children exiting First Steps in 2006-07. The 2006-07 data showed that transition meeting timelines were not met for 227 children (1038 children less 811 in compliance). The 227 children resulted in the eleven agencies receiving findings of noncompliance because the extent of noncompliance met the state's former criteria for identification of systemic noncompliance. The state verified through additional file reviews that all eleven findings were corrected within 12 months of

notification and that the agencies were correctly implementing 34 CFR §303.148(b)(1). Individual correction was not required because all of the children had already exited the Part C system.

Correction of Any Remaining Findings of Noncompliance from FFY 2006 or Earlier (if applicable): 8C: N/A. There were no remaining findings of noncompliance from FFY 2006 or earlier.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-10:

Per OSEP instructions, SPP targets and Improvement Activities have been extended for an additional two years (2011-12 and 2012-13).

Improvement Activities have been revised in the SPP. Revisions to Improvement Activities were made as a result of an evaluation process to ensure alignment with all Office and Department activities and to ensure that the activities were measurable. These changes were presented to and approved by the SICC in January 2011.

MO FFY 2008 (2008-09) Response Table

OSEP Analysis/Next Steps Indicator 8A:

OSEP did not require a state response on this indicator.

OSEP Analysis/Next Steps Indicator 8B: OSEP appreciates the State's efforts and looks forward to reviewing in the FFY 2009 APR the State's data demonstrating that it is in compliance with the LEA notification requirements in 34 CFR §303.148(b)(1). Because the State reported less than 100% compliance for FFY 2008, correction of noncompliance reflected in the data the State reported for this indicator.

When reporting the correction of noncompliance, the State must report, in its FFY 2009 APR, that it has verified that each EIS program with noncompliance reflected in the data the State reported for this indicator: (1) is correctly implementing 34 CFR §303.148(b)(1) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has provided notification to the LEA for each child, unless the child is no longer within the jurisdiction of the EIS program (i.e., the child has exited the State's Part C program due to age or other reasons), consistent with OSEP Memo 09-02. In the FFY 2009 APR, the State must describe the specific actions that were taken to verify the correction.

If the State does not report 100% compliance in the FFY 2009 APR, the State must review its improvement activities and revise them, if necessary.

The State must also report, in the FFY 2009 APR, how many findings of individual noncompliance related to this indicator were issued in FFY 2007, how many findings were issued in FFY 2008 based on the State's FFY 2007 data, and whether those findings were corrected.

When reporting the correction of noncompliance, the State must report, in its FFY 2009 APR, that it has verified that each EIS program with noncompliance identified in FFY 2007 and identified in FFY 2008 based on FFY 2007 data: (1) is correctly implementing 34 CFR §303.148(b)(1) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has provided notification to the LEA for each child, unless the child is no longer within the jurisdiction of the EIS program (i.e., the child has exited the State's Part C program due to age or other reasons), consistent with OSEP Memo 09-02. In the FFY 2009 APR, the State must describe the specific actions that were taken to verify the correction.

Department Response Indicator 8B: The state has described the verification of the correction of noncompliance in the section above entitled "Correction of Previous Noncompliance." The state was able to verify that each EIS program with noncompliance reflected in the data the State reported for this indicator: (1) is correctly implementing 34 CFR §303.148(b)(1) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has provided notification to the LEA for each child, unless the child is no longer within the jurisdiction of the EIS program (i.e., the child has exited the State's Part C program due to age or other reasons), consistent with OSEP Memo 09-02.

OSEP Analysis/Next Steps Indicator 8C: The State must demonstrate, in the FFY 2009 APR, that the State is in compliance with the timely transition conference requirements in 34 CFR §303.148(b)(2)(i)(as modified by IDEA section 637(a)(9)(A)(ii)(II)). Because the State reported less than 100% compliance for FFY 2008, the State must report on the status of correction of noncompliance reflected in the data the State reported for this indicator.

When reporting the correction of noncompliance, the State must report, in its FFY 2009 APR, that it has verified that each EIS program with noncompliance reflected in the data the State reported for this indicator: (1) is correctly implementing 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II))(i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has conducted a transition conference, although late, for any child potentially eligible for Part B whose transition conference was not timely, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02. In the FFY 2009 APR, the State must describe the specific actions that were taken to verify the correction.

If the State does not report 100% compliance in the FFY 2009 APR, the State must review its improvement activities and revise them, if necessary.

Department Response Indicator 8C: The state has described the verification of the correction of noncompliance in the section above entitled “Correction of Previous Noncompliance.” The state was able to verify that each EIS program with noncompliance reflected in the data the State reported for this indicator: (1) is correctly implementing 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has conducted a transition conference, although late, for any child potentially eligible for Part B whose transition conference was not timely, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02.

Part C State Annual Performance Report (APR) for 2009-10

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

- a. # of findings of noncompliance
- 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.

FFY	Measurable and Rigorous Target
2009-10	100% of noncompliance will be corrected as soon as possible but in no case later than one year from identification

Actual Target Data for 2009-10:

Missouri had 100% timely correction of noncompliance identified in 2008-09. Missouri requires 100% correction of identified noncompliance in all initial monitoring reviews, as well as in any follow-up files submitted for review. In conducting follow-up verification reviews for correction of identified noncompliance, the new files submitted for review must show 100% correction. If they do not, additional slices of data (i.e., additional file samples) are required until the agency is cleared of noncompliance at 100%. All findings of individual child noncompliance must be corrected at 100% within 60 days of the report of findings, unless the child is no longer under the jurisdiction of the program. Any SPOE agency not willing or able to correct any identified noncompliance within 12 months of the notification (timely correction) would be considered to be noncompliant and subject to the enforcement actions discussed in the SPP.

SPOEs are monitored for SPP compliance indicators as well as additional state standards and indicators. The correction of noncompliance from findings issued in 2008-09 is reported in the following table. The columns of the table are as follows:

- (a) # of Findings of noncompliance identified in 2008-09 – the total number of individual instances of noncompliance identified
- (b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification – the total number of findings of noncompliance corrected within one year from the date of the final reports

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2008 (7/1/08 through 6/30/09)	(a) # of Findings of noncompliance identified in FFY 2008 (7/1/08 through 6/30/09)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
1. Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	3	5	5
	Dispute Resolution: Complaints, Hearings	0	0	NA
2. Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	Monitoring Activities:	0	0	NA
	Dispute Resolution:	0	0	NA
3. Percent of infants and toddlers with IFSPs who demonstrate improved outcomes	Monitoring Activities:	0	0	NA
	Dispute Resolution:	0	0	NA
4. Percent of families participating in Part C who report that early intervention services have helped the family	Monitoring Activities:	0	0	NA
	Dispute Resolution:	0	0	NA
5. Percent of infants and toddlers birth to 1 with IFSPs	Monitoring Activities:	0	0	NA
6. Percent of infants and toddlers birth to 3 with IFSPs	Dispute Resolution:	0	0	NA
7. Percent of eligible infants and toddlers with IFSPs for whom an evaluation and	Monitoring Activities:	5	200	200

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2008 (7/1/08 through 6/30/09)	(a) # of Findings of noncompliance identified in FFY 2008 (7/1/08 through 6/30/09)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.	Dispute Resolution:	0	0	NA
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;	Monitoring Activities:	0	0	NA
	Dispute Resolution:	0	0	NA
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: B. Notification to LEA, if child potentially eligible for Part B; and	Monitoring Activities:	1	3	3
	Dispute Resolution:	0	0	NA
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: C. Transition conference, if child potentially eligible for Part B.	Monitoring Activities:	0	0	NA
	Dispute Resolution:	0	0	NA
Sum the numbers down Column a and Column b			208	208
Percent of noncompliance corrected within one year of identification = (column (b) sum divided by column (a) sum) times 100.			(b) / (a) X 100 =	100.0%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

The state met the target of 100% for this indicator.

Improvement activities for 2009-10 included the following:

- Provide targeted technical assistance by Area Directors to SPOEs/providers based on data reviews and other information
- Implement web-based system for monitoring and self-assessment purposes
- Fully implement IFSP Quality Indicators Rating Scale (QIRS) to assess IFSP quality

Discussion of these improvement activities follows:

Targeted technical assistance: The lead agency employs First Steps Area Directors to assist SPOEs and Early Intervention (EI) providers with specific issues identified through data and compliance monitoring reviews. Throughout 2009-10, Area Directors reviewed data reports regularly and provided technical assistance as needed, which helped to ensure that SPOE staff and providers were informed about and operating under compliant procedures.

Implement web-based monitoring system: The Lead Agency supports two systems which help to ensure identification and timely correction of noncompliance. IMACS - Improvement Monitoring, Accountability and Compliance System for Part C is a database that includes SPOE Program Planning, Quality Indicators Rating Scale (QIRS) scoring results, compliance file reviews and corrective action plans. Missouri's web-based child data and IFSP system (WebSPOE) was implemented September 1, 2005, and an enhancement is scheduled to be released in 2011. The system contains all elements of referral, evaluation, eligibility determination, and IFSP development and implementation. The system is compliance-driven and ensures compliance with regulations as well as best practice. Data regarding demographics, health information, outcomes, domains, and IFSP specifics are available online for children in the web system, which has become an integral part of Missouri's general supervision system.

IFSP Quality Indicators Rating Scale: The IFSP QIRS process was developed by lead agency staff, in conjunction with nationally recognized early childhood experts, to provide a "quality" evaluation instrument used to evaluate IFSPs. Throughout 2009-10, the First Steps Area Directors provided training and technical assistance to each SPOE region regarding the QIRS process and expectations.

The SPOE contracts require that the region receive an overall score on the QIRS review in the "acceptable" to "high quality" range or liquidated damages will be applied to the next year's contract. For the 2009-10, each of the SPOE regions reviewed received ratings at the acceptable level; therefore, no penalty was applied to the contract renewal for the 2009-10 fiscal year based on the QIRS review.

The Area Directors will review the QIRS results with each SPOE agency and hold training activities targeted to continue strengthening the quality of IFSP development. These efforts are intended to ensure that all children and families receive high quality intervention services through the First Steps program.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-10:

Per OSEP instructions, SPP targets and Improvement Activities have been extended for an additional two years (2011-12 and 2012-13).

Improvement Activities have been revised and one was discontinued in the SPP. Revisions to Improvement Activities were made as a result of an evaluation process to ensure alignment with all Office and Department activities and to ensure that the activities were measurable. These changes were presented to and approved by the SICC in January 2011.

MO FFY 2007 (2007-08) Response Table

OSEP Analysis/Next Steps: OSEP appreciates the State's efforts in timely correcting noncompliance identified in FFY 2007.

In its FFY 2009 APR, under Indicator 9, the State must report on the correction of all findings of noncompliance identified in FFY 2008, regardless of the specific level of noncompliance.

In reporting on correction of noncompliance in the FFY 2009 APR, the State must report that it verified that each EIS program with noncompliance identified in FFY 2008: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02. In the FFY 2009 APR, the State must describe the specific actions that were taken to verify the correction.

In responding to Indicators 1, 7, 8B, and 8C in the FFY 2009 APR, the State must report on correction of the noncompliance described in this table under those indicators.

In addition, in reporting on Indicator 9 in the FFY 2009 APR, the State must use the Indicator 9 Worksheet.

As stated in OSEP's February 18, 2010 verification visit letter, the State was required to submit an assurance that it will give prior written notice, including information about procedural safeguards and the State's procedures for reviewing the parents' ability to pay in the event of changed circumstances, to parents, as required under 34 CFR §303.403, when a suspension of Early Intervention Services occurs due to non-payment of fees. The State provided this assurance in its April 8, 2010 letter to OSEP.

Department Response: The state has described the verification of the correction of noncompliance above. The state was able to verify that each EIS program with noncompliance identified in FFY 2008: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02.

In Indicators 1, 7, 8B, and 8C in this APR, the State reported on correction of noncompliance for each of those indicators.

The state used the Indicator 9 Worksheet. The worksheet is replicated above.

Part C State Annual Performance Report (APR) for 2009-10

Monitoring Priority: Effective General Supervision Part C / General Supervision

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 a 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
2009-10	100% of signed written complaints with reports issued will be resolved within 60-day timeline or a timeline extended for exceptional circumstances

Actual Target Data for 2009-10:

During 2009-10, one child complaint was filed, and the report was issued within timelines, resulting in 100% compliance with this indicator.

	2005-06	2006-07	2007-08	2008-09	2009-10
Complaints with reports issued	19	3	6	0	1
Reports within timelines	14	3	6	0	1
Reports within extended timelines	5	0	0	0	0
Percent issued within 60 day or extended timelines	100.0%	100.0%	100.0%	NA	100.0%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

The State continues to maintain 100% compliance with this indicator.

Improvement activities for 2009-10 included the following:

- Maintain current procedures to ensure continued compliance

The Department continues to use a database to record and monitor the timelines for issuance of child complaints. Reports are monitored to ensure that reports are issued within 60 days or, if not possible due to the nature of the complaint, appropriate extensions are made.

In September 2007, the Office of Special Education staff completed a web-based video to assist parents, districts, advocates, and others on the procedures of the complaint system which includes a description of the timelines of the complaint system for child complaints. In spring 2010, the video was shown during a meeting between Department staff and staff of Missouri Protection and Advocacy. The training is reviewed annually to determine if there is a need for revision. The most recent review of the training indicated that there is no need for revision at this time.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-10:

Per OSEP instructions, SPP targets and Improvement Activities have been extended for an additional two years (2011-12 and 2012-13).

Improvement Activities have been revised in the SPP. Revisions to Improvement Activities were made as a result of an evaluation process to ensure alignment with all Office and Department activities and to ensure that the activities were measurable. These changes were presented to and approved by the SICC in January 2011.

MO FFY 2008 (2008-09) Response Table:

OSEP did not require a state response on this indicator.

Part C State Annual Performance Report (APR) for 2009-10

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

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

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

FFY	Measurable and Rigorous Target
2009-10	100% of fully adjudicated due process hearing requests will be fully adjudicated within the applicable timeline

Actual Target Data for 2009-10:

No due process hearing requests were filed during 2009-10.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

No explanation of progress/slippage can be made, as no due process hearing requests were filed during 2009-10.

Improvement activities for 2009-10 included the following:

- Maintain current procedures to ensure continued compliance

The Department continues to use a database to record and monitor the timelines for due process hearing requests. Missouri uses a 30-day timeline which does not provide for extensions.

In September 2007, the Office of Special Education staff completed a web-based video to assist parents, districts, advocates, and others on the procedures of the complaint system which includes a description of the timelines of the complaint system for child complaints. In spring 2010, the video was shown during a meeting between Department staff and staff of Missouri Protection and Advocacy. The training is reviewed annually to determine if there is a need for revision. The most recent review of the training indicated that there is no need for revision at this time.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-10:

Per OSEP instructions, SPP targets and Improvement Activities have been extended for an additional two years (2011-12 and 2012-13).

Improvement Activities have been revised in the SPP. Revisions to Improvement Activities were made as a result of an evaluation process to ensure alignment with all Office and Department activities and to ensure that the activities were measurable. These changes were presented to and approved by the SICC in January 2011.

MO FFY 2008 (2008-09) Response Table:

OSEP did not require a state response on this indicator.

Part C State Annual Performance Report (APR) for 2009-10

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 12: Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements (applicable if Part B due process procedures are adopted).

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

Measurement: Percent = (3.1(a) divided by 3.1) times 100.

FFY	Measurable and Rigorous Target
2009-10	Missouri did not adopt Part B due process procedures for Part C.

Actual Target Data for 2009-10:

Not applicable as Missouri did not adopt Part B due process procedures for Part C.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

Not applicable

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2008-09:

Not applicable

MO FFY 2008 (2008-09) Response Table:

OSEP did not require a state response on this indicator.

Part C State Annual Performance Report (APR) for 2009-10

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 13: Percent of mediations held that resulted in mediation agreements.

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

Measurement: Percent = [(2.1(a)(i) + 2.1(b)(i)) divided by 2.1] times 100.

FFY	Measurable and Rigorous Target
2009-10	Not set due to lack of baseline data

Actual Target Data for 2009-10:

There were no mediation requests during 2009-10.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

Not applicable

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-10:

No revisions were made in the State Performance Plan. Per OSEP, the state is not required to provide targets or improvement activities except in any fiscal year in which ten or more mediations were held.

MO FFY 2008 (2008-09) Response Table:

OSEP did not require a state response on this indicator.

Part C State Annual Performance Report (APR) for 2009-10

Monitoring Priority: Effective General Supervision Part C / General Supervision

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: State reported data, including 618 data, State performance plan, and annual performance reports, are:

- 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

FFY	Measurable and Rigorous Target
2009-10	100% of State reported data will be timely and accurate

Actual Target Data for 2009-10:

The state met the 100% target for this indicator.

Missouri utilizes a variety of data sources to compile data for the Annual Performance Report and the Section 618 data. Sources include the following:

- WebSPOE system - WebSPOE is a web-based system used to maintain child level data for the First Steps program. Child level information includes referral, evaluation, meeting, and IFSP data. These data are used for the Section 618 child count, primary setting and exit reporting. WebSPOE is also used for APR Indicators 2, 5, 6
- Monitoring – data gathered through monitoring reviews are utilized for Indicators 1, 7, 8 and 9
- Dispute Resolution Database – the database is used to record information on child complaints, due process hearing requests, mediations and resolution sessions. The database is used to monitor timelines throughout the year, and data are used for the Section 618 Dispute Resolution table and for APR Indicators 10-13
- Others – See Indicators 3 (SPP) and 4 (APR) for information about Early Childhood Outcomes and the First Steps Family Survey <http://dese.mo.gov/divspeced/SPPpage.html>

Missouri utilized OSEP’s scoring rubric to evaluate the accuracy and timeliness of data collected for 2009-10. The results follow:

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
		Subtotal	30
APR Score Calculation	Timely Submission Points – If the FFY 2009 APR was submitted on-time, place the number 5 in the cell on the right		5
	Grand Total		35

Indicator 14 - 618 Data					
Table	Timely	Complete Data	Passed Edit Check	Responded to Date Note Requests	Total
Table 1 – Child Count Due Date: 2/1/10	1	1	1	1	4
Table 2 – Settings Due Date: 2/1/10	1	1	1	1	4
Table 3 – Exiting Due Date: 11/1/10	1	1	1	NA	3
Table 4 – Dispute Resolution Due Date: 11/1/10	1	1	1	N/A	3
				Subtotal	14
			Grand Total (Subtotal X 2.5)		35

Indicator #14 Calculation	
A. APR Grand Total	35.00
B. 618 Grand Total	35.00
C. APR Grand Total (A) + 618 Grand Total (B) =	70.00
Total NA in APR	0
Total NA in 618	0
Base	70.00
D. Subtotal (C divided by Base) =	1.000

E. Indicator Score (Subtotal D x 100) =	100.0%
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Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2009-10:

Missouri continues to meet the target of 100% for timely and accurate state reported data. All 618 data and required reports have been submitted on or before the due dates. OSEP data reports, as well as data submitted in the SPP/APR are accurate as evidenced by the verification efforts described below.

Improvement activities for 2009-10 included the following:

- Continue data review process to target technical assistance and improve accountability for data entered in the child data system
- Continue to review and improve data verification process

Discussion of these improvement activities follows:

Data review process: Data reviews were conducted in 2009-10 for indicators as previously discussed throughout this document. Through these reviews, issues were identified at an early stage in order to address and correct them proactively. Data are used to target areas that SPOEs must address through program planning activities.

Data verification process: Missouri implemented the web-based child data system in the summer of 2005. This system captures data elements in the Part C system and contains information from referral, eligibility determination and IFSP development. The system is compliance-driven; it requires critical data items and conducts edit checks on data to help ensure accuracy. The system supplies data that can be reviewed at the SPOE and state levels for program evaluation and monitoring purposes. Much of the data for the SPP/APR comes from this system, and various data elements are verified as necessary.

Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for 2009-10:

Per OSEP instructions, SPP targets and Improvement Activities have been extended for an additional two years (2011-12 and 2012-13).

Improvement Activities have been revised in the SPP. Revisions to Improvement Activities were made as a result of an evaluation process to ensure alignment with all Office and Department activities and to ensure that the activities were measurable. These changes were presented to and approved by the SICC in January 2011.

MO FFY 2008 (2008-09) Response Table:

OSEP Analysis/Next Steps: In reporting on Indicator 14 in the FFY 2009 APR, the state must use the Indicator 14 Data Rubric.

Department Response: The state used the Indicator 14 Data Rubric to provide the data for this indicator. The rubric is replicated in this document.