

Ohio Baseline Compliance Analysis Process

Compliance Monitoring

Each year, Ohio monitors counties on the required compliance indicators: 45-Day Timeline; Timely Receipt of Services (TRS); and Transition, including Transition Steps and Services, Notification to the Local Educational Agency (LEA), and Timely Transition Planning Conferences (TPC). Results from each of these analyses are included in Ohio's Annual Performance Report (APR) due to the U.S. Department of Education's Office of Special Education Programs (OSEP) at the beginning of February each year.

Cyclical Monitoring Process

Ohio has implemented a rotating annual monitoring schedule in which county programs are included in the 45-Day, TRS, or Transition (including Transition Steps and Services and TPC) analysis each year and all counties have data analyzed for each of these compliance indicators within a three-year period. Notification to the LEA is monitored for every county annually.

Baseline Analysis Schedule

The entire process, from initial notification of inclusion to disseminating final results memos, is completed in approximately three to five months, and includes the following:

- Initial communications are sent:
 - Counties included in the baseline indicator analysis receive a schedule of baseline activities and a handout regarding the process for reviewing and cleaning data.
 - Counties not included in the analysis receive information about which indicator they were or will be monitored on for the baseline year.
- A data cleaning period is initiated:
 - Counties have about two weeks to review and clean data that will be included in the baseline analysis, including asking questions and requesting any needed deletions in the Early Intervention Data System (EIDS).
 - All deletion requests are processed by EIDS staff within approximately five working days.
 - Any applicable data re-entry following deletions needs to be completed by counties within approximately five working days.
- Relevant data are extracted from EIDS and analyzed after the data cleaning period is complete:
 - DCY staff perform initial data analyses and prepare any needed county inquiries within approximately a week and a half.
 - County inquiries, including missing data and verification requests, as applicable, are sent to counties, who are then required to respond within approximately 10 working days. Data may be missing for a number of reasons, such as delays due to family reasons, late timelines due to staff error, and data entry errors. County staff are asked to indicate why any components are missing from the data system.
 - DCY staff verify applicable records (i.e., confirm that hard copies support what is entered in EIDS), send clarification requests to those counties with incomplete verification documentation, review/reconcile any needed data, and finalize results.
- Results memos are sent to each county included in the analysis

Baseline Results

Results of the baseline analyses are determined using percent compliant, as follows:

- **100%:** If the analysis indicates 100% compliance, the county is considered compliant.
- **95 – 99.9%:** If the analysis shows a compliance percentage that falls in this range, DCY looks at one month of the most recent data. If the data appear to be 100% compliant in the data system (after any necessary missing data requests have been resolved), no finding is issued; however, the original percentage is utilized for Annual Performance Report (APR) reporting purposes. If the more recent data are not 100% compliant in the data system, a finding is issued reflecting the original compliance percentage.
- **<95% with only one noncompliant record AND no evidence of systemic noncompliance:** If the analysis indicates a compliance percentage less than 95%, but with only one noncompliant record for the data set, DCY looks at the circumstances to determine if the record reflects an isolated event or potential systemic noncompliance. In the absence of evidence of systemic noncompliance, DCY looks at one month of the most recent data. If the more recent data appear to be 100% compliant in the data system (after any necessary missing data requests have been resolved), no finding is issued; however, the original percentage is utilized for Annual Performance Report (APR) reporting purposes. If the more recent data are not 100% compliant in the data system, a finding is issued reflecting the original compliance percentage.
- **< 95% with more than one noncompliant record OR evidence of systemic noncompliance:** If the analysis shows the compliance percentage to be below 95% with more than one noncompliant record or evidence of systemic noncompliance, no further data are reviewed and a finding is issued.

Correction of Findings

Once issued a finding, counties must correct the finding as soon as possible, but no more than one year from issuance of the finding. Counties must also demonstrate that they have corrected each individual case of child-specific noncompliance, unless the child is no longer within the jurisdiction of the county. DCY examines data on a monthly basis to determine county compliance. In order to correct any findings, counties must first have one month of data at 100% compliance as entered in EIDS (i.e., before verification), at which point DCY will request a representative sample of records for verification. If all records are found to be compliant, a correction memo is issued. If any records are found to be noncompliant, DCY continues to examine monthly data. The following are some additional requirements of and details about what happens while a county is working to correct a finding:

- Counties must access technical assistance while on a finding.
- Data will be pulled on or just after the first of each month and counties will receive missing data inquiries, as applicable.
- Counties must run and review reports in EIDS at least monthly in order to stay up-to-date on their data.
- If a county does not correct within six monthly data analyses, the county will be required to complete a Corrective Action Plan (CAP).
- If a county has no applicable records during one of the first six months of analyses, the month will still count towards the six months. In situations where an extremely small program does not have sufficient, updated data to demonstrate systemic compliance, alternative methods of verification of correction may be considered, taking into consideration factors such as county

size, number of children served, extenuating circumstances, etc. Alternative methods to verify correction may include, but are not limited to, documentation of new policies and procedures, successful completion of professional development, and evidence of applicable system changes (e.g., changes in key personnel).

- If additional, related noncompliance is identified for the local program via the correction process or other means, DCY may not issue a correction memo until the additional noncompliance is also resolved.

Questions

Additional data and monitoring resources are available on the EI website at <https://ohioearlyintervention.org/>. EI Program Consultants and Data & Monitoring staff are also available to answer any questions about compliance.