



Department of Children and Youth Memo 25-059

TO: Early Intervention Service Coordination (EISC) Designated Agencies, Early Intervention (EI) Contract Managers, County Family and Children First (FCFC) Coordinators, and County Boards of Developmental Disabilities (CBDDs), Ohio Association of County Boards (OACB)

FROM: Diane Fox, Deputy Director, Training, TA, and Practice Advancement
Matthew Cunningham, Deputy Director, Contracts

DATE: August 12, 2025

SUBJECT: Early Intervention Service Coordination Grant Agreements Cyber Security

Background

The Department of Children and Youth (DCY) is the lead agency, as designated by the U.S. Department of Education, for the early intervention program, Part C of the Individuals with Disabilities Education Act, and oversees the delivery of service coordination activities throughout the state. Each year, the lead agency enters into grant agreements with designated agencies to provide early intervention services, including service coordination, evaluations, assessments, and local outreach. DCY sent the grant agreements to the designated service coordination agencies at the end of June and has received requests to clarify some items in the Early Intervention Service Coordination (EISC) grant agreement.

Purpose

The purpose of this memo is to provide clarification on the interpretation of Article V, Data and Information Control, specifically cyber security requirements.

Agreement on Interpretation of Cyber Security Requirements

The statute takes effect on September 30, 2025. Implementation will be on the Auditor of State (AOS) schedule and interpretation.

All EISC agreements must implement the cyber requirements as outlined in H.B. 96 and DCY will follow the Auditor of State guidance on both implementation and roll out. NIST is the best practice standard listed by DCY and AOS.



DCY will allow the Auditor of State to lead the implementation discussion as to the requirements of cyber security.

While the NIST language will stay, alternative forms such as HIPAA and CIS may be used and DCY will consider that these also meet the requirements of our agreement's cyber security standards.

Next Steps

No further action is needed as this memo will serve as supporting documentation of the agreed-upon interpretation of Article V, Data and Information section of the EI Service Coordination Grant Agreements.

If you have questions, please contact ei@childrenandyouth.ohio.gov.