



# Ohio Early Intervention Annual Performance Report (APR)

FFY 2021 (July 1, 2021– June 30, 2022)

***DODD is pleased to share the FFY21/SFY22 Annual Performance Report with Ohio's Early Intervention stakeholders. We welcome any public comment. This report will remain posted through January 31, 2023, and we will accept public comment through December 31, 2022. Please e-mail any public comment to [EI@dodd.ohio.gov](mailto:EI@dodd.ohio.gov).***

## Introduction

### Executive Summary

DODD has continued its focus on the delivery of high-quality technical assistance and professional development opportunities to Early Intervention (EI) service providers to support the effective and appropriate implementation of the Individuals with Disabilities Education Act (IDEA) Part C regulations and evidence-based EI practices. Throughout this reporting period, considerations related to the COVID-19 pandemic and staffing challenges involved significant resources at both the lead agency and local levels. Lead agency staff were actively engaged in providing technical assistance and other supports to local programs, including supporting local programs in new American Rescue Plan Act (ARPA) initiatives. During 2023, DODD will be focused on its five-year administrative rule review process. Lead agency staff have been planning this process throughout 2022 and begun initial engagement with Ohio's State Interagency Coordinating Council (SICC). DODD is planning for and, looks forward to engaging with, an extensive group of diverse stakeholders.

### Additional Information Related to Data Collection and Reporting

DODD has no relevant additional information to report related to data collection and reporting.

### General Supervision System

***The systems that are in place to ensure that IDEA Part C requirements are met, e.g., monitoring systems, dispute resolution systems.***

In Ohio, the requirements for EI providers are outlined in Ohio Administrative Code at 5123-10-01 (Early Intervention Services - Procedural Safeguards); 5123-10-02, Appendix A, Appendix B, and Appendix C (Early Intervention Eligibility and Services); 5123-10-03 (Early Intervention Services - System of Payments); and 5123-10-04 (Credentials for EI Service Coordinators and EI Service Coordination Supervisors). These rules apply to any EI service provider or other entity responsible for carrying out a requirement of Part C EI in Ohio, and DODD is directly responsible for overseeing the implementation of these rules.

In addition to these rules, Ohio utilizes its website, guidance documents, memos, conference calls, and newsletters to provide technical assistance around the requirements of Part C of IDEA. EI program consultants also reiterate the rules through various communication methodologies including individual calls, e-mails, conference calls, webinars, on-site trainings, and on-site focused technical assistance about the requirements. Topic-specific guidance on rules is also offered via web-based training modules. The lead agency monitors all EI programs annually on a rotating schedule through three compliance indicators: 45-Day timeline; Timely Receipt of Services; and Transition, including Transition Planning Conference and Transition Steps and Services. Local Education Agency (LEA) notification is monitored for every program annually. Any EI program with less than 100% compliance on any of these indicators is issued a finding and provided with targeted technical assistance, as needed. Data for the program are monitored monthly until compliance is verified at 100%. Members of the data and monitoring team examine trends in data related to compliance indicators, IDEA requirements, and evidence-based EI practices. They lead monitoring site visits, conduct record reviews, and provide support to local EI programs in implementing the requirements of IDEA. Finally, every local EI program has a technical assistance and training plan that addresses these priorities.

## Technical Assistance System

***The mechanisms that the State has in place to ensure the timely delivery of high quality, evidenced based technical assistance and support to early intervention service (EIS) programs.***

Four regional EI program consultants and technical assistance team lead work at DODD and provide timely, high quality technical assistance to all 88 Ohio county EI programs. The program consultants work closely with the data and monitoring team to ensure that technical assistance is targeted to local program needs. Program consultants, in collaboration with other lead agency staff members, make site visits and virtual visits, engage in conference calls, and complete record reviews and other activities to support local programs' implementation of state and federal Part C regulations and best EI practices. All local programs have an active technical assistance and training plan drafted in concert with the assigned program consultant. This plan reflects local needs and strengths and serves as a roadmap for implementation of IDEA and evidence-based EI practices. During this reporting period, the EI program consultants have been focused heavily on supporting many local programs facing significant staffing challenges. Relatedly, many local programs also needed support as they grappled with a disproportionate number of new staff. To that end, in early 2022, DODD embarked on a multi-year process to reinforce the EI eligibility process. This work has been informed by data DODD obtained via data analyses, record reviews, and a skills assessment of all EI service coordinators and their supervisors at the end of 2021 and beginning of 2022.

DODD continues to communicate via a formal update memo on a bi-weekly basis with the EI field and stakeholders to provide important updates and explanations about program requirements, due dates, and training opportunities. The memo is geared to local EI program leadership, but any interested person can sign up to receive the communication. Approximately 6000 individuals are on the distribution list. The communications are also archived on the EI program's website.

## Professional Development System

***The mechanisms the State has in place to ensure that service providers are effectively providing services that improve results for infants and toddlers with disabilities and their families.***

In this reporting period, Ohio continued to provide a significant number of trainings to Ohio's EI field. DODD also encouraged local EI programs to leverage ARPA funding opportunities to support professional development around evidence-based EI practices. During this rating period, in collaboration with stakeholders, DODD approached finalization of an extensive professional development plan. This plan will be shared statewide in December 2022. During this reporting period, DODD also began implementation of an evidence-based coaching requirement for individuals who hold a one-year developmental specialist certification.

Many of Ohio's EI trainings are available in an electronic format so they can be accessed remotely and at convenient times for participants, and stakeholder input is sought throughout development of all DODD-created trainings.

## Broad Stakeholder Input

***The mechanisms for soliciting broad stakeholder input on the State's targets in the SPP/APR and any subsequent revisions that the State has made to those targets, and the development and implementation of Indicator 11, the State's Systemic Improvement Plan (SSIP).***

Active, meaningful stakeholder involvement in all aspects of Ohio's Early Intervention program is a strong priority of the Department of Developmental Disabilities (DODD). For this reason, several years ago, Ohio formally augmented its SICC meetings with a number of additional, non-voting members. These non-voting members participate in ICC meetings, work groups, discussion, planning, and more while providing additional insight and feedback to DODD staff and

appointed SICC members. These additional members provided invaluable feedback over the past several years as DODD staff routinely discussed SPP/APR targets and baseline and other data related to the targets, as well as the development and implementation of Ohio's SSIP. In addition to the 18 appointed SICC members, Ohio includes approximately 25 additional members. These additional members include representatives from early childhood and disability advocacy groups in the state, Ohio's Parent Training and Information (PTI) Center, an organization representing the largest providers of EI services in the state, local EI program leadership, and the Ohio Chapter of the American Academy of Pediatrics.

Stakeholders in Ohio are engaged in numerous ways, including calls, public postings inviting input and feedback, quarterly State Interagency Coordinating Council (SICC) meetings, and requests for feedback before any significant program change is made. Additionally, DODD leverages its annual family questionnaire to learn more about family's experiences in EI. In late 2022, DODD also conducted a survey of EI providers in the state to learn more about their strengths and challenges. In both surveys, DODD also asked respondents if they would be willing to participate in future solicitations for feedback about other topics.

The lead agency invites public comment on the APR, annual application for Part C IDEA funds, and any rule or form changes. The public is invited to provide comment for a minimum of thirty calendar days for any document submitted to the USDOE/OSEP. All documents are posted on the program website (<https://ohioearlyintervention.org/>) for a minimum of sixty calendar days. Solicitations for feedback are made via the biweekly communication to the EI field and stakeholders, which has approximately 6000 recipients.

Targets for the state performance plan (SPP) were a topic of much discussion over an extended period of time with the SICC and broader EI stakeholder group in order to allow members sufficient time to review data, request additional data, and ask questions. Members discussed the targets at the March 2019, May 2019, and August 2019 SICC meetings before settling on targets. In this time period, DODD presented data, offered recommendations, sought feedback, and supported the SICC in finalizing targets. After the clarification period for the FFY18 APR and feedback from OSEP in spring 2020, DODD again discussed targets with the SICC. At its May 2020 meeting, the SICC also discussed whether it would be appropriate to update the state's baseline data for Indicators #2, 3, 4, 5, and 6 given significant program changes over the past ten years.

EI program leadership meets frequently with EI stakeholder organizations and committees. EI program leadership attends regularly scheduled meetings of stakeholder groups related to county boards of developmental disabilities; the Developmental Disabilities Council; the Universal Newborn Hearing Sub-Committee; Ohio's Infant Mortality Commission; the Ohio Home Visiting Consortium; and Family and Children First Council, which is responsible for overseeing the work of EI service coordination at the local level in Ohio. In addition, EI program leadership takes part in numerous state cross-agency initiatives. At these meetings, EI program leadership provides updates relevant to the stakeholder group being addressed and seeks stakeholder input about the EI program.

Announcements and solicitations for feedback are distributed widely via the program's bi-weekly communication and EI website to EI providers, parents, stakeholders, grantees, service providers, and county boards of developmental disabilities. In addition to these electronic communication strategies, DODD engages numerous workgroups, including the SICC and a larger, more diverse EI Stakeholder group, at quarterly in-person meetings to discuss any business in Early Intervention that needs input, feedback, or assistance.

## Number of Parent Members

4

## Parent Members Engagement

***Describe how the parent members of the Interagency Coordinating Council, parent center staff, parents from local and statewide advocacy and advisory committees, and individual parents were engaged in setting targets, analyzing data, developing improvement strategies, and evaluating progress.***

The four parent members of the SICC were actively involved over an extended period of time in analyzing data, considering improvement strategies and evaluating progress, and ultimately finalizing targets in the SPP/APR. In addition to these four appointed members of the SICC, DODD actively involved other parents of children with disabilities and representatives from organizations advocating for and representing parents of children with disabilities. As stated above in the "Broad Stakeholder Input" section, Ohio has formally augmented its SICC with approximately 25 additional members. These members include parents of children with disabilities, a representative from the state's Parent Training and Information Center (who also acts as multicultural information specialist), and other advocacy groups for early childhood and disability initiatives. The stakeholder group also includes representation from an Ohio initiative dedicated to engaging, empowering, and supporting families and leadership.

After working with this diverse group of stakeholders to create a draft proposal of targets, DODD sought broader feedback. The proposal, that included relevant historical data and descriptions of targets, was posted on the Ohio EI website and DODD actively publicized this website posting through the biweekly EI newsletter. Approximately 6000 people are subscribed to this EI newsletter and recipients include families of children with disabilities, advocates, and local EI partners. Feedback was shared with the broad stakeholder group, additional data were discussed, and targets were finalized at the November 2021 meeting.

How best to evaluate progress has been discussed extensively at these broad stakeholder meetings especially in the context of improving data quality related to child outcomes and the effects of the COVID-19 pandemic on child counts. In addition, the group is actively involved in considering improvement strategies for the EI program. Child find and public awareness for EI are discussed regularly. These stakeholders are actively involved in identifying improvement strategies as part of Ohio's SSIP and data to inform future discussions. Finally, Ohio has prioritized hearing directly from families as part of the annual family questionnaire. Comments and data from the questionnaire are used to inform improvement strategies and to evaluate progress on existing initiatives. DODD, in collaboration with stakeholders, did not make any changes to targets for FY21.

## Activities to Improve Outcomes for Children with Disabilities

***Describe the activities conducted to increase the capacity of diverse groups of parents to support the development of implementation activities designed to improve outcomes for infants and toddlers with disabilities and their families.***

DODD values the feedback from families when implementing activities to improve outcomes for children with disabilities and their families. Several years ago, DODD added questions to its annual family questionnaire to capture data that can inform statewide activities to improve outcomes. During this reporting period, DODD included questions related to Ohio's new social-emotional-focused SiMR in its 2022 family questionnaire to gain insights directly from families. DODD has also taken steps in recent years to increase both the overall response rate and the representativeness of the respondents of the family questionnaire. In FY20, the representativeness of Black and African American respondents increased significantly. DODD was able to maintain this level of representativeness in FY21. Finally, DODD uses its SICC and stakeholder group to ensure that the diverse feedback is shared with the department. This group has been instrumental in evaluating the state's Early Intervention infrastructure and identifying activities to improve child outcomes.

## Soliciting Public Input

***The mechanisms and timelines for soliciting public input for setting targets, analyzing data, developing improvement strategies, and evaluating progress.***

As lead agency, DODD actively seeks stakeholder input. DODD uses three primary mechanisms for communicating with the public: the standalone Early Intervention website, a biweekly newsletter about Early Intervention, and the augmented EI SICC and stakeholder group. As stated earlier in this introduction, DODD used an extended period of time with a robust group of stakeholders to analyze data and create a set of proposed targets. By spreading this process out over a two-year period, there were multiple occasions for stakeholders to review data, ask questions, and inform the process of target setting. The draft proposal agreed upon by Ohio's SICC and stakeholder group was then posted for the general public on the EI website for 30 days. Feedback was shared with SICC and stakeholder group at their November 2021 meeting. DODD used its biweekly newsletter to publicize the draft proposal and seek feedback. The biweekly newsletter was sent to approximately 6000 recipients. Stakeholders are also very involved in developing improvement strategies and evaluating progress. DODD uses its website to provide a robust, well-organized archive of data submitted to OSEP, including APRs and SSIPs dating to FFY13. In addition to this, DODD also uses the website to post other data that is not required to be federally posted (e.g., monthly referral and child counts broken out by local EI program). Families are asked annually as part of the EI family questionnaire a series of questions about their EI services beyond those required in Indicator 4 of the APR. DODD uses this information to develop new strategies to improve child outcomes and evaluate progress. Finally, DODD has worked to build a culture that actively and transparently engages with the public about the EI program. The concluding line of the introduction of every biweekly EI newsletter actively encourages readers to provide any feedback they have to the Part C Coordinator and includes his contact information. Because of this, he has received feedback from local EI leaders, early childhood stakeholders, EI providers, and families. The EI newsletters are also archived on the EI website.

## Making Results Available to the Public

***The mechanisms and timelines for making the results of the target setting, data analysis, development of the improvement strategies, and evaluation available to the public.***

DODD has used the EI website to post all federally required documents, and DODD has also maintained a historical archive of many materials. Although this is not required, DODD believes it is important to make these materials freely available to members of the public so they can be active partners in shaping the state's EI program. Thus, copies of the state's APR and SSIP submissions through FFY13 are easily accessible on the website. Child count and settings, exiting, and dispute resolution data for the past three years are also maintained on the website. DODD has also provided a two to three page summary version of each year's SSIP submission for readers who may not wish to review the complete submission. Multiple years of data related to Indicator 4 are also posted on the EI website. When DODD shared the SICC and stakeholder group's proposal for the APR targets with the broader public in the autumn of 2021, historical data were included in addition to the proposed targets themselves. Public input was sought for 30 days. When this APR is submitted, DODD will post this APR to the EI website along with the finalized targets. DODD and SICC and stakeholder group members discussed the importance of routinely reviewing targets, data, improvement strategies, and evaluation at the November 2021 meeting. Improving data quality related to child outcome ratings, the continued effects of the COVID-19 pandemic, and increasing response rates for the family questionnaire were discussed as having potential effects on different APR indicators.

## Reporting to the Public:

***How and where the State reported to the public on the FFY 2019 performance of each EIS Program located in the State on the targets in the SPP/APR as soon as practicable, but no later than 120 days following the State's submission of its FFY 2019 APR, as required by 34 CFR §303.702(b)(1)(i)(A); and a description of where, on its website, a complete copy***

***of the State's SPP/APR, including any revision if the State has revised the targets that it submitted with its FFY 2019 APR in 2021, is available.***

DODD provides the public with a report on each EIS program's performance on the APR indicators, as well as each program's determination category by posting the 88 EI program reports on the program website (<https://ohioearlyintervention.org/>) by June 1 of each calendar year. The FFY21 reports were sent to all local EIS programs and posted to the EI website in March 2022. The FFY21 reports will be sent to local programs and added to the EI website by June 2023.

DRAFT



## Indicator 1: Timely Provision of Services

Monitoring Priority: Early Intervention Services In Natural Environments

**Compliance indicator: 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)**

### Data and Targets

FFY	2020	2021	2022	2023	2024	2025
Target	100%	100%	100%	100%	100%	100%
Data	99.68%	99.77%				

### FFY 2021 Data

Number of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	Total number of infants and toddlers with IFSPs	FFY 2021 Data
1,305	1,308	99.77%

***Describe your State's criteria for "timely" receipt of early intervention services (i.e., the time period from parent consent to when IFSP services are actually initiated).***

Ohio defines timely receipt of early intervention services as services that are delivered for the first time within 30 days of the signed IFSP to which they are added.

**What is the source of the data provided for this indicator?**

**State monitoring**

***Describe the method used to select EIS programs for monitoring.***

For compliance analyses, EIS programs were selected for Indicator 1, Indicator 7, or Indicators 8A and C. Ohio has implemented a monitoring cycle that ensures an even and representative selection of EIS programs each fiscal year for one of the aforementioned compliance indicators. All local programs have data analyzed for all of these compliance indicators within a three-year period. DODD completes activities related to each of these one at a time on a rotating schedule throughout each year. As part of this process, findings are issued as soon as possible after noncompliance is identified (within less than three months of discovery), as specified in #7 of the FREQUENTLY ASKED QUESTIONS REGARDING IDENTIFICATION AND CORRECTION OF NONCOMPLIANCE AND REPORTING ON CORRECTION IN THE STATE PERFORMANCE PLAN (SPP)/ANNUAL PERFORMANCE REPORT (APR).

Thirty EIS programs were scheduled to have their data for this indicator monitored for FFY 2021. All children among the 30 selected EIS programs who had services due to start between January 1, 2022 and March 31, 2022 were included in Ohio's FFY21 TRS analysis (with the exception of one EIS program that had no applicable data for the time period, for which a representative sample of children with TRS due dates between October 1, 2021 and December 31, 2021 was examined). Ohio used monitoring data from its data system as well as from the review and verification of a selection of records to determine the percent compliant for this indicator. No findings were issued to EIS programs upon completion of the baseline analysis. A total of three noncompliant records were identified across two local programs during the FFY21 baseline analysis, but DODD looked at more recent data as part of the analysis, and the local programs subsequently corrected the noncompliance and therefore were not issued a finding. DODD ensured that each EIS program (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.

The 1,305 child records counted as being compliant include 204 that were non-timely due to documented exceptional family circumstances. These 1,305 child records are included in the numerator and denominator. See below for a breakdown of reasons for untimely receipt of services:

- Exceptional family circumstances: 204
- Staff error: 3

Two TRS findings were due for correction in FFY21. These findings were reported in Ohio's FFY20 APR, based on FFY20 data, and **identified and issued in FFY20**. These findings were corrected in a timely manner and verified in accordance with OSEP Memorandum 09-02. DODD ensured that the EIS program (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. Additionally, Ohio reported less than 100% compliance in its FFY19 APR for this indicator.

## Correction of Previous Findings of Noncompliance

### *Correction of Findings of Noncompliance Identified in FFY 2020*

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
2	2	0	0

### *FFY 2020 Findings of Noncompliance Verified as Corrected*

#### ***Describe how the State verified that each local program with noncompliance is correctly implementing the regulatory requirements***

Two findings for this indicator were due for correction in FFY21, which were corrected in a timely manner. Correction of each finding was verified in accordance with OSEP Memorandum 09-02. DODD ensured that the EIS program (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.

The EIS programs found to be noncompliant with TRS were issued a finding of noncompliance via a written memorandum that included the noncompliant status and informed the local programs that the noncompliance must be corrected as soon as possible, but in no case more than one year from identification. These memos were issued as soon as possible after noncompliance was identified.

To ensure local programs are correctly implementing each regulatory requirement, Ohio requests records for verification of correction as follows:

- DODD examines data on a monthly basis to determine county compliance. Data are pulled on or just after the first of each month and counties receive missing data inquiries, as necessary.
- In order to correct any findings, counties must first have two consecutive months of data at 100% face value, at which point DODD requests a representative sample of records for verification.

- If a county does not correct within six monthly data analyses, the county will go on 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. A month with no applicable records, however, will not impact two consecutive months that occur immediately prior to and following the null month.

Using the above approach, the state verified a randomly selected, representative sample of child records from the local programs to ensure that for each child, all new services began within thirty days of the signed IFSP or that any delays in this timeline were due to family reasons. The state continued to examine data and request records to verify until all TRS requirements were found to be met for all children as determined by requested child records. In all cases, the needed sample size was calculated using an online sample size calculator with a 95% confidence level and 15% confidence interval. Specifically, verification to indicate correction occurred in the local programs as follows:

- **Crawford:** 5 records reviewed; timelines ending February and March 2021
- **Fulton:** 10 records reviewed; timelines ending February and March 2021

***Describe how the State verified that each local program corrected each individual case of noncompliance***

Ohio ensured the local programs corrected each individual case of noncompliance through the state's baseline analyses. An explanation of noncompliance (referred to as a noncompliance reason or "NCR" in Ohio) is required upon late completion of all required components. Thus, in the bulk of cases of late completion, the state automatically ensures required actions have been completed when determining baseline compliance percentages. In addition, the state, as part of its baseline analyses, determined if any child for whom a required component was late had exited or moved from the EIS program's jurisdiction. For this indicator, Ohio ensured that all services due to start within the examined timeline were delivered, albeit late, or that the child was subsequently exited from EI.

## Indicator 2: Services in Natural Environments

Monitoring Priority: Early Intervention Services In Natural Environments

**Results indicator: 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)**

### Data and Targets

FFY	2020	2021	2022	2023	2024	2025
Target	98.00%	98.00%	98.00%	99.00%	99.00%	99.00%
Data	98.52%	98.96%				

### Targets: Description of Stakeholder Input

Ohio utilized an extended period of time to ensure meaningful involvement of diverse Early Intervention stakeholders in the target setting process. In addition to appointed SICC members, Ohio's SICC meetings also formally include other important stakeholders from organizations representing providers (including the largest provider of EI services in Ohio), families (including the state's parent and training center), and other key stakeholders (e.g., the Ohio Family and Children First Council). At the state's March 2019 SICC and larger EI stakeholder group meeting, DODD provided an overview of the APR indicators, along with a summary of the state's targets and results for the FFY13 through FFY18 APR cycle, indicating that the group would have a discussion at the following meeting to set targets for the next APR cycle. At the May 2019 meeting, the group had an in-depth discussion about SPP/APR targets and determined the starting target for the next SPP/APR cycle for all indicators should be the FFY17 percentage (rounded down) and the state's targets should gradually increase by the end of the SPP/APR cycle. By the state's August 2019 meeting, DODD had become aware that the current SPP/APR cycle would be extended for one year, and informed the SICC and larger EI stakeholder group of this. The group reviewed the targets discussed at the previous meeting, and agreed to keep the FFY19 targets the same as what had been discussed, but adjusted targets as needed so they were greater than the baseline percentage. As Ohio received additional guidance from OSEP, the SICC and larger stakeholder group continued to discuss targets and baseline data. At the August 2020 and August 2021 meetings of the SICC and larger stakeholder group, members discussed targets and baseline data.

At the August 2021 meeting, it was decided to share the targets proposal settled on the prior August with an even broader group of stakeholders for any input prior to finalization. DODD posted a document reflecting the August 2020 consensus approach for FFY20-25 targets on the Ohio Early Intervention website on October 7, 2021. The document explained the targets, provided proposed targets, and invited comment and input from the public that would be shared with SICC and larger stakeholder group at their November meeting. DODD also publicized the solicitation for feedback in its biweekly newsletter about EI. This communication is sent to more than 5700 recipients and includes providers, advocacy groups, parents, and other EI stakeholders. Three biweekly newsletters included information about seeking feedback. DODD accepted comment for 30 days and shared results with the SICC and stakeholder group at its November meeting.

### FFY 2021 Data

Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	Total number of infants and toddlers with IFSPs	FFY 2021 Data
11,746	11,870	98.96%

## Indicator 3: Early Childhood Outcomes

*Monitoring Priority: Early Intervention Services In Natural Environments*

**Results indicator: 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)**

### Data and Targets

FFY	2020	2021	2022	2023	2024	2025
<b>A1 Target</b>	52.00%	52.00%	53.00%	53.00%	54.00%	55.00%
<b>A1 Data</b>	52.18%	54.34%				
<b>A2 Target</b>	54.00%	54.00%	55.00%	55.00%	56.00%	57.00%
<b>A2 Data</b>	54.75%	54.30%				
<b>B1 Target</b>	59.00%	59.00%	60.00%	60.00%	61.00%	62.00%
<b>B1 Data</b>	59.21%	60.37%				
<b>B2 Target</b>	45.00%	45.00%	46.00%	46.00%	47.00%	48.00%
<b>B2 Data</b>	45.35%	44.67%				
<b>C1 Target</b>	62.00%	62.00%	63.00%	63.00%	64.00%	65.00%
<b>C1 Data</b>	62.28%	61.16%				
<b>C2 Target</b>	48.00%	48.00%	49.00%	49.00%	50.00%	51.00%
<b>C2 Data</b>	48.51%	48.51%				

### Targets: Description of Stakeholder Input

Ohio utilized an extended period of time to ensure meaningful involvement of diverse Early Intervention stakeholders in the target setting process. In addition to appointed SICC members, Ohio's SICC meetings also formally include other important stakeholders from organizations representing providers (including the largest provider of EI services in Ohio), families (including the state's parent and training center), and other key stakeholders (e.g., the Ohio Family and Children First Council). At the state's March 2019 SICC and larger EI stakeholder group meeting, DODD provided an overview of the APR indicators, along with a summary of the state's targets and results for the FFY13 through FFY18 APR cycle, indicating that the group would have a discussion at the following meeting to set targets for the next APR cycle. At the May 2019 meeting, the group had an in-depth discussion about SPP/APR targets and determined the starting target for the next SPP/APR cycle for all indicators should be the FFY17 percentage (rounded down) and the state's targets should gradually increase by the end of the SPP/APR cycle. By the state's August 2019 meeting, DODD had become aware that the current SPP/APR cycle would be extended for one year, and informed the SICC and larger EI stakeholder group of this. The group reviewed the targets discussed at the previous meeting, and agreed to keep the FFY19 targets the same as what had been discussed, but adjusted targets as needed so they were greater than the baseline percentage. As Ohio received additional guidance from OSEP, the SICC and larger stakeholder group continued to discuss targets and baseline data. At the August 2020 and August 2021 meetings of the SICC and larger stakeholder group, members discussed targets and baseline data.

At the August 2021 meeting, it was decided to share the targets proposal settled on the prior August with an even broader group of stakeholders for any input prior to finalization. DODD posted a document reflecting the August 2020 consensus approach for FFY20-25 targets on the Ohio Early Intervention website on October 7, 2021. The document

explained the targets, provided proposed targets, and invited comment and input from the public that would be shared with SICC and larger stakeholder group at their November meeting. DODD also publicized the solicitation for feedback in its biweekly newsletter about EI. This communication is sent to more than 5700 recipients and includes providers, advocacy groups, parents, and other EI stakeholders. Three biweekly newsletters included information about seeking feedback. DODD accepted comment for 30 days and shared results with the SICC and stakeholder group at its November meeting.

After completing analyses for FFY19 and FFY20, DODD revisited targets again for the COS indicators as the state continued to see declines in these percentages due likely to increased data quality. DODD's new proposal was to start with the FFY20 data as the initial target as opposed to FFY17 in order to ensure the targets were as meaningful as possible. At the November 2021 meeting of the SICC and larger stakeholder group, members discussed targets and finalized the targets contained in this APR for FFY20-25.

## FFY 2021 Data

### *Outcome A: Positive social-emotional skills (including social relationships)*

	Number of children	Percentage of Total
a. Infants and toddlers who did not improve functioning	21	0.25%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	2,614	31.40%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	1,169	14.04%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	1,967	23.63%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	2,553	30.67%

	Numerator	Denominator	FFY 2021 Data
A1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	3,136	5,771	54.34%
A2. 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	4,520	8,324	54.30%

**Outcome B: Acquisition and use of knowledge and skills (including early language/communication)**

	Number of Children	Percentage of Total
a. Infants and toddlers who did not improve functioning	40	0.48%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	2,754	33.09%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	1,812	21.77%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	2,445	29.37%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	1,273	15.29%

	Numerator	Denominator	FFY 2021 Data
B1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	4,257	7,051	60.37%
B2. 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	3,718	8,324	44.67%

**Outcome C: Use of appropriate behaviors to meet their needs**

	Number of Children	Percentage of Total
a. Infants and toddlers who did not improve functioning	33	0.40%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	2,721	32.69%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	1,532	18.40%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	2,804	33.69%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	1,234	14.82%

	Numerator	Denominator	FFY 2021 Data
C1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	4,336	7,090	61.16%
C2. 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	4,038	8,324	48.51%

**The number of infants and toddlers who did not receive early intervention services for at least six months before exiting the Part C program.**

Measure	Number
The number of infants and toddlers who exited the Part C program during the reporting period, as reported in the State's part C exiting 618 data	12,000
The number of those infants and toddlers who did not receive early intervention services for at least six months before exiting the Part C program.	3,847

**List the instruments and procedures used to gather data for this indicator.**

Beginning in January 2015, the Child Outcomes Summary process was integrated into the child and family assessment and overall IFSP process. At that time, Ohio began to collect the following Child Outcomes Summary statements (adopted from Maryland), using its data system, for each of the three outcome areas:

- Relative to same age peers, child's functioning might be described as like that of a much younger child. He shows early skills, but not yet immediate foundational or age expected skills in this outcome area
- Relative to same age peers, child is showing some emerging or immediate foundational skills, which will help him to work toward age appropriate skills in the area of (outcome).
- Relative to same age peers, child is not yet using skills expected of his age. He does however use many important and immediate foundational skills to build upon in the area of this outcome
- Relative to same age peers, child shows occasional use of some age expected skills, but more of his skills are not yet age expected in the area of this outcome
- Relative to same age peers, child shows many age expected skills, but continues to show some functioning that might be described like that of a slightly younger child in the area of this outcome
- Relative to same age peers, child has the skills that we would expect of his age in regard to this outcome; however, there are concerns
- Relative to same age peers, child has all of the skills that we would expect of a child his age in the area of this outcome

The COS is required as part of the initial assessment process, as well as annually, so entry COS are completed as part of the IFSP process and documented on Ohio's IFSP form, as well as in the state data system. Local programs still use the decision tree, along with all the information discussed in the child and family assessments to help them choose which statement above best describes the child's development comparable to same-age peers. Each statement above corresponds to a score of 1 through 7, respectively.



Exit COS are also required for all children who have been served in Early Intervention in Ohio who are exiting for a reason other than being deceased or loss of contact with the family. The Exit COS is not a part of any other particular process, but, like the entry and annual COS, is completed by the IFSP team, including the family.

DRAFT

## Indicator 4: Family Involvement

*Monitoring Priority: Early Intervention Services In Natural Environments*

**Results indicator: 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)

### Data and Targets

FFY	2020	2021	2022	2023	2024	2025
A Target	96.00%	96.00%	96.00%	97.00%	97.00%	97.00%
A Data	92.13%	92.25%				
B Target	96.00%	96.00%	96.00%	97.00%	97.00%	97.00%
B Data	95.01%	94.96%				
C Target	96.00%	96.00%	96.00%	97.00%	97.00%	97.00%
C Data	93.64%	93.68%				

#### ***Targets: Description of Stakeholder Input***

Ohio utilized an extended period of time to ensure meaningful involvement of diverse Early Intervention stakeholders in the target setting process. In addition to appointed SICC members, Ohio's SICC meetings also formally include other important stakeholders from organizations representing providers (including the largest provider of EI services in Ohio), families (including the state's parent and training center), and other key stakeholders (e.g., the Ohio Family and Children First Council). At the state's March 2019 SICC and larger EI stakeholder group meeting, DODD provided an overview of the APR indicators, along with a summary of the state's targets and results for the FFY13 through FFY18 APR cycle, indicating that the group would have a discussion at the following meeting to set targets for the next APR cycle. At the May 2019 meeting, the group had an in-depth discussion about SPP/APR targets and determined the starting target for the next SPP/APR cycle for all indicators should be the FFY17 percentage (rounded down) and the state's targets should gradually increase by the end of the SPP/APR cycle. By the state's August 2019 meeting, DODD had become aware that the current SPP/APR cycle would be extended for one year, and informed the SICC and larger EI stakeholder group of this. The group reviewed the targets discussed at the previous meeting, and agreed to keep the FFY19 targets the same as what had been discussed, but adjusted targets as needed so they were greater than the baseline percentage. As Ohio received additional guidance from OSEP, the SICC and larger stakeholder group continued to discuss targets and baseline data. At the August 2020 and August 2021 meetings of the SICC and larger stakeholder group, members discussed targets and baseline data.

At the August 2021 meeting, it was decided to share the targets proposal settled on the prior August with an even broader group of stakeholders for any input prior to finalization. DODD posted a document reflecting the August 2020 consensus approach for FFY20-25 targets on the Ohio Early Intervention website on October 7, 2021. The document explained the targets, provided proposed targets, and invited comment and input from the public that would be shared with SICC and larger stakeholder group at their November meeting. DODD also publicized the solicitation for feedback in its biweekly newsletter about EI. This communication is sent to more than 5700 recipients and includes providers,

advocacy groups, parents, and other EI stakeholders. Three biweekly newsletters included information about seeking feedback. DODD accepted comment for 30 days and shared results with the SICC and stakeholder group at its November meeting.

## FFY 2021 Data

Number of respondent families participating in Part C who report that early intervention services have helped the family:	# of Positive Responses	Total Respondents	Percent
4A. Know their rights	2,524	2,736	92.95%
4B. Effectively communicate their children's needs	2,602	2,740	94.96%
4C. Help their children develop and learn	2,566	2,739	93.68%

### Overview

The Ohio Department of Developmental Disabilities used a modified version of the Early Childhood Outcomes Center's (ECO) 2010 Family Outcomes Questionnaire. These items from the ECO Family Questionnaire were adapted for Ohio and used on a survey distributed to families in order to gather data for this indicator:

1. Early Intervention has helped me to know my rights in the program.
2. Early Intervention has helped me to communicate my child's needs.
3. Early Intervention has helped me to help my child learn and develop.

Each question had a five-point scale with the following anchors:

- Strongly Disagree
- Disagree
- Neither Agree nor Disagree
- Agree
- Strongly Agree

Ohio added total responses of 'Agree' and 'Strongly Agree' for each question to determine what percentage of families were helped by EI in the three areas of this indicator.

The following modifications to the ECO survey were made:

- Early Intervention was substituted for Part C throughout the questionnaire as that is how families "know" Part C in Ohio.
- The verbiage of the survey was adjusted to be at a 5<sup>th</sup> grade reading level.
- The adapted OSEP items (Early Intervention has helped me to know my rights in the program; Early Intervention has helped me to communicate my child's needs; and Early Intervention has helped me to help my child learn and develop) were the first questions on the questionnaire rather than dispersed throughout the survey as they are on the 2010 OSEP version of the questionnaire.
- DODD added additional open-ended questions to obtain input from families regarding their experiences receiving EI services virtually during the COVID pandemic, for use in Ohio's State Systemic Improvement Plan, and to conduct a more in-depth qualitative analysis of the survey data.

### Administration of the Questionnaire

Families served in Early Intervention on June 1, 2022 were identified as potential recipients. For all primary caregivers identified as recipients who did not have an email address listed in EIDS, the questionnaire and a one page information

sheet about the questionnaire were mailed to the family. This information was also sent via mail if the email address was identified as invalid by Survey Monkey or the caregiver had opted out of receiving surveys via Survey Monkey. Finally, DODD translated the questionnaire into additional languages this year (any language that was identified as the primary language for at least five caregivers on the Family Questionnaire recipient list) and questionnaires in the family's language were mailed to these families, with the option to complete the English version of the questionnaire online. All other families were emailed a Survey Monkey link to the questionnaire, with the same information that was included in the one page sheet mailed to families in the body of the email.

Questionnaires and links were distributed in mid-August and accepted through early October in order to be included in analyses. In an effort to maximize the number of survey respondents, Ohio implemented the following strategies in its administration of the family questionnaire:

- Questionnaire recipients were emailed information or mailed an information sheet explaining why DODD distributes the questionnaire and how data are used, as well as questionnaire links and the child's unique identifier to be used in completing the questionnaire.
- Recipients who received the questionnaire via email were sent several reminder emails if they had not yet completed the questionnaire
- DODD provided local programs a list of questionnaire recipients and the questionnaire links so they could encourage families to respond.
- DODD included all families served at a point in time close to the questionnaire distribution in the population receiving the questionnaire.
- The questionnaire was translated into Amharic, Arabic, Chinese, French, Gujarati, Hindi, Nepali, Pennsylvania Dutch (Amish), Portuguese, Russian, Somali, Spanish, and Tamil and the pertinent questionnaire was distributed to families whose primary caregiver was identified as primarily speaking each language in Ohio's Early Intervention Data System (EIDS).
- The questionnaire was highlighted in several editions of the Part C Coordinator's bi-weekly communication to Ohio's EI field.

***Describe strategies that will be implemented which are expected to increase the response rate year over year, particularly for those groups that are underrepresented.***

Last reporting year, DODD began to require collection of caregiver email addresses in the state's Early Intervention Data System (EIDS) and started emailing information about and links to the Family Questionnaire directly to the majority of families. This has proven to be effective in increasing the state's response rate to the questionnaire compared to the past several years. As such, DODD will continue to work with local programs to ensure as many caregiver email addresses as possible are collected in EIDS and will continue to email families directly regarding the questionnaire. A substantial number of invalid email addresses have been identified, so the state will also continue to work with local programs to ensure that the email addresses entered into the data system are accurate and up to date. Additionally, the state will continue to encourage local programs to discuss the Family Questionnaire with their families, including distributing information sheets and links to complete the questionnaire so families are receiving this information in multiple different ways. Finally, DODD will specifically work with local programs that have a high percentage of groups who are underrepresented in questionnaire responses to get closer to representativeness across the board.

***Describe the analysis of the response rate including any nonresponse bias that was identified, and the steps taken to reduce any identified bias and promote response from a broad cross section of families that received Part C services.***

## **Questionnaire Responses**

Of the 12,497 families who were identified as having children being served on June 1, 2022, a total of 12,464 received questionnaires (with those not receiving questionnaires being due to a deceased child or not having up-to-date contact information for the family in the data system). DODD received completed questionnaires from 2,743 families, which is a

response rate of 22.01% (which is an increase from the 20.8% response rate in FFY20). Eighty-seven of Ohio's eighty-eight counties were represented in the responses to the Family Questionnaire. The following table outlines the methods families used to respond to the questionnaire.

**Table 1: Distribution of Questionnaire Respondents' Response Type**

Response Method	Number	Percent
Email	2	0.07%
Mail	101	3.68%
Online	2,640	96.24%
<b>Total</b>	<b>2,743</b>	<b>100.00%</b>

*Describe the metric used to determine representativeness (e.g., +/- 3% discrepancy, age of the infant or toddler, and geographic location in the proportion of responders compared to target group).*

DODD examined the response rate by race/ethnicity categories, child age ranges, and gender. Categories where the response rate deviated 3% or less from the overall response rate were considered to be representative. Those that deviated more than 3% included American Indian or Alaska Native, Asian, and Black or African American respondents. It should be noted, though, that the total number of American Indian or Alaska Native families is too small to draw meaningful conclusions about the percentage of respondents.

*Include the State's analysis of the extent to which the demographics of the families responding are representative of the demographics of infants, toddlers, and families enrolled in the Part C program.*

The following tables provide a comparison of the race/ethnicity categories, age ranges, and gender between the respondents and non-respondents of the questionnaire, as well as the totals for all children served in EI in Ohio on June 1, 2022 whose families received the questionnaire.

**Table 2: Race and Ethnicity Comparison**

Race/Ethnicity	Non-Respondents #	Non-Respondents %	Respondents #	Respondents %	Total #	Total %	Response Rate
Hispanic	797	8.20%	202	7.36%	999	8.02%	20.22%
American Indian or Alaska Native	10	0.10%	2	0.07%	12	0.10%	16.67%
Asian	289	2.97%	51	1.86%	340	2.73%	15.00%
Black or African American	1,481	15.24%	239	8.71%	1,720	13.80%	13.90%
Native Hawaiian or Other Pacific Islander	7	0.07%	2	0.07%	9	0.07%	22.22%
White	6,550	67.38%	2,109	76.89%	8,659	69.47%	24.36%
Two or More Races	587	6.04%	138	5.03%	725	5.82%	19.03%
<b>Total</b>	<b>9,721</b>	<b>100.00%</b>	<b>2,743</b>	<b>100.00%</b>	<b>12,464</b>	<b>100.00%</b>	<b>22.01%</b>

**Table 3: Child Age Range**

Age Range	Non-Respondents #	Non-Respondents %	Respondents #	Respondents %	Total #	Total %	Response Rate
0 to 1	1,010	10.39%	308	11.23%	1,318	10.57%	23.37%
1 to 2	2,878	29.61%	834	30.40%	3,712	29.78%	22.47%
2 to 3	5,833	60.00%	1,601	58.37%	7,434	59.64%	21.54%
<b>Total</b>	<b>9,721</b>	<b>100.00%</b>	<b>2,743</b>	<b>100.00%</b>	<b>12,464</b>	<b>100.00%</b>	<b>22.01%</b>

**Table 4: Gender**

Gender	Non-Respondents #	Non-Respondents %	Respondents #	Respondents %	Total #	Total %	Response Rate
Female	3,553	36.55%	1,030	37.55%	4,583	36.77%	22.47%
Male	6,168	63.45%	1,713	62.45%	7,881	63.23%	21.74%
<b>Total</b>	<b>9,721</b>	<b>100.00%</b>	<b>2,743</b>	<b>100.00%</b>	<b>12,464</b>	<b>100.00%</b>	<b>22.01%</b>

Age categories and gender of children in respondent families were comparable to non-respondents and all children served on June 1, 2021 whose families received questionnaires. Black or African American families were underrepresented among respondents; however, representativeness of Black families the past two years improved from previous years (nearly 9% of respondents to the FFY21 and FFY20 questionnaires had children who were Black or African American compared to approximately 6% in FFY19 and FFY18 and while still far below the total response rate, the response rate for Black or African American families was again closer to the overall response rate than in previous years). Asian families were also underrepresented among respondents in a similar manner to previous years. Other race and ethnicity group respondents were similar to the overall group receiving the questionnaire. Ohio will continue to make efforts to further increase representativeness of Black respondents with future questionnaires.

***If respondents were not representative of the demographics of infants, toddlers, and families enrolled in the Part C program, describe the strategies that the State will use to ensure that in the future the response data are representative of those demographics.***

DODD convened a work group in early 2019 to discuss ways to improve the response rate for the 2019 EI family questionnaire and the representativeness of respondents. As a result of this work group, DODD prepared a visually appealing one page flyer that provided an overview and explained the purpose of the family questionnaire, including how the data would be used. DODD again distributed informational flyers to recipient families prior to collecting questionnaire responses in 2020, 2021, and 2022 and included information and reminders about the questionnaire in several of its bi-weekly communications to the EI field and stakeholders. EI service coordinators were encouraged to use personalized text messages or e-mails to families with links to the online versions of the questionnaire. DODD monitored and provided updates to local programs regarding the response rates throughout the data collection period. EI Program consultants also had conversations with local programs regarding response rates and representativeness of respondents.

Despite these new efforts in 2019 and 2020, Ohio's response rate and representativeness remained similar to past years. After the data collection period was over, DODD also surveyed service coordinators about their involvement in the family questionnaire to understand what they view as barriers to increasing response rates and to obtain input regarding how the process could be improved. Prior to the distribution of the 2021 questionnaire, DODD worked with software developers for the statewide EI data system and local EI program staff to improve collection of parent e-mail addresses in order to provide parents directly with links to the annual family questionnaire. The representativeness of

Black and African American families did improve significantly in 2021 and 2022, although they remain underrepresented. DODD also required all local EI programs to respond to a solicitation for information about how local programs are engaging families and encouraging them to respond to the questionnaire, which will be useful information as the state continues to make efforts to improve representativeness going forward.

DRAFT



## Indicator 5: Child Find (Birth to One)

Monitoring Priority: Effective General Supervision Part C / Child Find

**Results indicator: Percent of infants and toddlers birth to 1 with IFSPs compared to national data. (20 U.S.C. 1416(a)(3)(B) and 1442)**

### Data and Targets

FFY	2020	2021	2022	2023	2024	2025
Target	0.90%	0.90%	1.00%	1.00%	1.10%	1.10%
Data	0.82%	*				

\*DODD is awaiting final population numbers from the US Census in order to calculate the percentage.

### Targets: Description of Stakeholder Input

Ohio utilized an extended period of time to ensure meaningful involvement of diverse Early Intervention stakeholders in the target setting process. In addition to appointed SICC members, Ohio's SICC meetings also formally include other important stakeholders from organizations representing providers (including the largest provider of EI services in Ohio), families (including the state's parent and training center), and other key stakeholders (e.g., the Ohio Family and Children First Council). At the state's March 2019 SICC and larger EI stakeholder group meeting, DODD provided an overview of the APR indicators, along with a summary of the state's targets and results for the FFY13 through FFY18 APR cycle, indicating that the group would have a discussion at the following meeting to set targets for the next APR cycle. At the May 2019 meeting, the group had an in-depth discussion about SPP/APR targets and determined the starting target for the next SPP/APR cycle for all indicators should be the FFY17 percentage (rounded down) and the state's targets should gradually increase by the end of the SPP/APR cycle. By the state's August 2019 meeting, DODD had become aware that the current SPP/APR cycle would be extended for one year, and informed the SICC and larger EI stakeholder group of this. The group reviewed the targets discussed at the previous meeting, and agreed to keep the FFY19 targets the same as what had been discussed, but adjusted targets as needed so they were greater than the baseline percentage. As Ohio received additional guidance from OSEP, the SICC and larger stakeholder group continued to discuss targets and baseline data. At the August 2020 and August 2021 meetings of the SICC and larger stakeholder group, members discussed targets and baseline data.

At the August 2021 meeting, it was decided to share the targets proposal settled on the prior August with an even broader group of stakeholders for any input prior to finalization. DODD posted a document reflecting the August 2020 consensus approach for FFY20-25 targets on the Ohio Early Intervention website on October 7, 2021. The document explained the targets, provided proposed targets, and invited comment and input from the public that would be shared with SICC and larger stakeholder group at their November meeting. DODD also publicized the solicitation for feedback in its biweekly newsletter about EI. This communication is sent to more than 5700 recipients and includes providers, advocacy groups, parents, and other EI stakeholders. Three biweekly newsletters included information about seeking feedback. DODD accepted comment for 30 days and shared results with the SICC and stakeholder group at its November meeting.

### FFY 2021 Data

Number of infants and toddlers birth to 1 with IFSPs	Population of infants and toddlers birth to 1	FFY 2021 Data
1,243	*	

\*DODD is awaiting final population numbers from the US Census in order to calculate the percentage.

## Indicator 6: Child Find (Birth to Three)

Monitoring Priority: Effective General Supervision Part C / Child Find

**Results indicator: Percent of infants and toddlers birth to 3 with IFSPs compared to national data. (20 U.S.C. 1416(a)(3)(B) and 1442)**

### Data and Targets

FFY	2020	2021	2022	2023	2024	2025
Target	2.70%	2.70%	2.80%	2.80%	2.90%	2.90%
Data	2.57%	*				

\*DODD is awaiting final population numbers from the US Census in order to calculate the percentage.

### Targets: Description of Stakeholder Input

Ohio utilized an extended period of time to ensure meaningful involvement of diverse Early Intervention stakeholders in the target setting process. In addition to appointed SICC members, Ohio's SICC meetings also formally include other important stakeholders from organizations representing providers (including the largest provider of EI services in Ohio), families (including the state's parent and training center), and other key stakeholders (e.g., the Ohio Family and Children First Council). At the state's March 2019 SICC and larger EI stakeholder group meeting, DODD provided an overview of the APR indicators, along with a summary of the state's targets and results for the FFY13 through FFY18 APR cycle, indicating that the group would have a discussion at the following meeting to set targets for the next APR cycle. At the May 2019 meeting, the group had an in-depth discussion about SPP/APR targets and determined the starting target for the next SPP/APR cycle for all indicators should be the FFY17 percentage (rounded down) and the state's targets should gradually increase by the end of the SPP/APR cycle. By the state's August 2019 meeting, DODD had become aware that the current SPP/APR cycle would be extended for one year, and informed the SICC and larger EI stakeholder group of this. The group reviewed the targets discussed at the previous meeting, and agreed to keep the FFY19 targets the same as what had been discussed, but adjusted targets as needed so they were greater than the baseline percentage. As Ohio received additional guidance from OSEP, the SICC and larger stakeholder group continued to discuss targets and baseline data. At the August 2020 and August 2021 meetings of the SICC and larger stakeholder group, members discussed targets and baseline data.

At the August 2021 meeting, it was decided to share the targets proposal settled on the prior August with an even broader group of stakeholders for any input prior to finalization. DODD posted a document reflecting the August 2020 consensus approach for FFY20-25 targets on the Ohio Early Intervention website on October 7, 2021. The document explained the targets, provided proposed targets, and invited comment and input from the public that would be shared with SICC and larger stakeholder group at their November meeting. DODD also publicized the solicitation for feedback in its biweekly newsletter about EI. This communication is sent to more than 5700 recipients and includes providers, advocacy groups, parents, and other EI stakeholders. Three biweekly newsletters included information about seeking feedback. DODD accepted comment for 30 days and shared results with the SICC and stakeholder group at its November meeting.

### FFY 2021 Data

Number of infants and toddlers birth to 3 with IFSPs	Population of infants and toddlers birth to 3	FFY 2021 Data
11,870	*	

\*DODD is awaiting final population numbers from the US Census in order to calculate the percentage.

## Indicator 7: 45-day timeline

Monitoring Priority: Effective General Supervision Part C / Child Find

**Compliance indicator:** Percent of eligible infants and toddlers with IFSPs for whom an initial evaluation and initial 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)

### Data and Targets

FFY	2020	2021	2022	2023	2024	2025
Target	100%	100%	100%	100%	100%	100%
Data	99.40%	98.84%				

### FFY 2021 Data

Number of eligible infants and toddlers with IFSPs for whom an initial evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline	Number of eligible infants and toddlers evaluated and assessed for whom an initial IFSP meeting was required to be conducted	FFY 2021 Data
1,022	1,034	98.84%

**What is the source of the data provided for this indicator?**

**State monitoring**

***Describe the method used to select EIS programs for monitoring.***

For compliance analyses, EIS programs were selected for Indicator 1, Indicator 7, or Indicators 8A and C. Ohio has implemented a monitoring cycle that ensures an even and representative selection of EIS programs each fiscal year for one of the aforementioned compliance indicators. All local programs have data analyzed for all of these compliance indicators within a three-year period. DODD completes activities related to each of these one at a time on a rotating schedule throughout each year. As part of this process, findings are issued as soon as possible after noncompliance is identified (within less than three months of discovery), as specified in #7 of the FREQUENTLY ASKED QUESTIONS REGARDING IDENTIFICATION AND CORRECTION OF NONCOMPLIANCE AND REPORTING ON CORRECTION IN THE STATE PERFORMANCE PLAN (SPP)/ANNUAL PERFORMANCE REPORT (APR).

Thirty EIS programs were scheduled to have their data for this indicator monitored for FFY21. Ohio used monitoring data from its data system as well as from the review and verification of a selection of records to determine the percent compliant for this indicator. All children among the 30 selected EIS programs who had 45-Day timelines ending between July 1, 2021 and September 30, 2021 were included in Ohio's FFY21 45-Day analysis. Of the 1,034 child records examined, 1,022 (98.84 percent) were compliant. A total of three findings were issued to three EIS programs upon completion of the baseline analysis. These findings were **identified and issued in FFY21** and therefore due for correction in FFY22 and the status of correction will be reported in the FFY22 APR.

The 1,022 child records counted as being compliant include 434 that were non-timely due to documented exceptional family circumstances. These 434 child records are included in the numerator and denominator. See below for a breakdown of reasons for all missed 45-Day timelines:

- Exceptional family circumstances: 434 children

- Staff error/System reason: 12 children

Four findings for this indicator were due for correction in FFY21. These findings were reported in the FFY20 APR, based on FFY20 data, and **identified and issued in FFY20**. All four findings were corrected in a timely manner and verified in accordance with OSEP Memorandum 09-02. DODD ensured that the EIS program (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.

## Correction of Previous Findings of Noncompliance

### *Correction of Findings of Noncompliance Identified in FFY 2020*

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
4	4	0	0

### *FFY 2020 Findings of Noncompliance Verified as Corrected*

**Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements**

Four findings for this indicator were due for correction in FFY21. These findings were reported in the FFY20 APR, based on FFY20 data, and **identified and issued in FFY20**. All four findings were corrected in a timely manner and verified in accordance with OSEP Memorandum 09-02. DODD ensured that the EIS program (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.

The EIS programs found to be noncompliant with 45-Day Timelines were issued a finding of noncompliance via a written memorandum that included the noncompliant status and informed the local program that the noncompliance must be corrected as soon as possible, but in no case more than one year from identification. The memos were issued as soon as possible after noncompliance was identified (within three months of discovery).

To ensure local programs are correctly implementing each regulatory requirement, Ohio requests records for verification of correction as follows:

- DODD examines data on a monthly basis to determine local program compliance. Data are pulled on or just after the first of each month and local programs receive missing data inquiries, as necessary.
- In order to correct any findings, local programs must first have two consecutive months of data at 100% face value, at which point DODD requests a representative sample of records for verification.
- If a local program does not correct within six monthly data analyses, the local program will go on a Corrective Action Plan (CAP).
- If a local program has no applicable records during one of the first six months of analyses, the month will still count towards the six months. A month with no applicable records, however, will not impact two consecutive months that occur immediately prior to and following the null month.

The state verified a randomly selected, representative sample of child records from the local programs to ensure that for each child, the required components were completed within 45 days or that any delays in this timeline were due to family reasons. The state continued to examine data and request records to verify until all 45-Day requirements were

found to be met for all children as determined by requested child records. In all cases, the needed sample size was calculated using an online sample size calculator with a 95% confidence level and 15% confidence interval. Specifically, verification to indicate correction occurred in the local program as follows:

- **Fayette:** 7 records reviewed; timelines ending April and May 2021
- **Morrow:** 5 records reviewed; timelines ending April and May 2021
- **Pickaway:** 10 records reviewed; timelines ending April and May 2021
- **Wyandot:** 2 records reviewed; timelines ending December 2021 and January 2022

**Describe how the State verified that each *individual case of noncompliance* was corrected**

Ohio ensured each local program corrected the individual case of noncompliance through the state's baseline analyses. An explanation of noncompliance (referred to as a noncompliance reason or "NCR" in Ohio) is required upon late completion of all required components. Thus, in the bulk of cases of late completion, the state automatically ensures required actions have been completed when determining baseline compliance percentages. In addition, the state, as part of its baseline analyses, determined if any child for whom a required component was late had exited or moved from the EIS program's jurisdiction. For this indicator, Ohio ensured that components of the 45-Day timeline were completed for all children, albeit late, or that the child was subsequently exited from EI.

## Indicator 8: Early Childhood Transition

Monitoring Priority: Effective General Supervision Part C / Child Find

**Compliance indicator:** The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:

- A. Developed an IFSP with transition steps and services at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler's third birthday;
- B. Notified (consistent with any opt-out policy adopted by the State) the SEA and the LEA where the toddler resides at least 90 days prior to the toddler's third birthday for toddlers potentially eligible for Part B preschool services; and
- C. Conducted the transition conference held with the approval of the family at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler's third birthday for toddlers potentially eligible for Part B preschool services.

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

### 8A Data and Targets

FFY	2020	2021	2022	2023	2024	2025
Target	100%	100%	100%	100%	100%	100%
Data	98.27%	99.72%				

### 8A FFY 2021 Data

Number of children exiting Part C who have an IFSP with transition steps and services	Number of toddlers with disabilities exiting Part C	FFY 2021 Data
705	707	99.72%

**What is the source of the data provided for this indicator?**

**State monitoring**

***Describe the method used to select EIS programs for monitoring.***

For compliance analyses, EIS programs were selected for Indicator 1, Indicator 7, or Indicators 8A and C. Ohio has implemented a monitoring cycle that ensures an even and representative selection of EIS programs each fiscal year for one of the aforementioned compliance indicators. All local programs have data analyzed for all of these compliance indicators within a three-year period. DODD completes activities related to each of these one at a time on a rotating schedule throughout each year. As part of this process, findings are issued as soon as possible after noncompliance is identified (within less than three months of discovery), as specified in #7 of the FREQUENTLY ASKED QUESTIONS REGARDING IDENTIFICATION AND CORRECTION OF NONCOMPLIANCE AND REPORTING ON CORRECTION IN THE STATE PERFORMANCE PLAN (SPP)/ANNUAL PERFORMANCE REPORT (APR).

Twenty-eight EIS programs were scheduled to have their data for this indicator monitored for FFY21. Ohio used monitoring data from its data system as well as from the review and verification of a selection of records to determine the percent compliant for this indicator. All children among the 28 selected EIS programs who had IFSPs with Transition Steps and Services due between October 1, 2021 through December 31, 2021 were included in Ohio's FFY21 Transition Steps and Services analysis. Of the 707 child records examined, 705 (99.72 percent) were compliant. A total of one finding was issued to one EIS program upon completion of the baseline analysis; this finding was **identified and issued in FFY21** and therefore the status of correction will be reported in the FFY22 APR.



The 705 child records counted as being compliant include 76 that were non-timely due to documented exceptional family circumstances . These 76 child records are included in the numerator and denominator. See below for a breakdown of reasons for missed Transition Steps and Services timelines:

- Exceptional family circumstances: 76 children
- Staff error: 2 children

Seven Steps and Services findings were due for correction in FFY21. Two findings were reported in the FFY19 APR and **based on FFY19 data**, but **not identified and issued until FFY20**. Five were reported in the FFY20 APR, **based on FFY20 data**, and **identified and issued in FFY20**. All seven findings were corrected in a timely manner and verified in accordance with OSEP Memorandum 09-02. DODD ensured that the EIS program (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.

## 8A Correction of Previous Findings of Noncompliance

### *Correction of Findings of Noncompliance Identified in FFY 2020*

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
7	7	0	0

### *FFY 2020 Findings of Noncompliance Verified as Corrected*

**Describe how the State verified that the source of noncompliance is correctly implementing the *regulatory requirements***

Seven Steps and Services findings were due for correction in FFY21. Two findings were reported in the FFY19 APR and **based on FFY19 data**, but **not identified and issued until FFY20**. Five were reported in the FFY20 APR, **based on FFY20 data**, and **identified and issued in FFY20**. All seven findings were corrected in a timely manner and verified in accordance with OSEP Memorandum 09-02. DODD ensured that the EIS program (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.

The EIS programs found to be noncompliant with Transition Steps and Services were issued a finding of noncompliance via a written memorandum that included the noncompliant status and informed the local program that the noncompliance must be corrected as soon as possible, but in no case more than one year from identification. The memos were issued as soon as possible after noncompliance was identified (within three months of discovery).

To ensure local programs are correctly implementing each regulatory requirement, Ohio requests records for verification of correction as follows:

- DODD examines data on a monthly basis to determine local program compliance. Data are pulled on or just after the first of each month and local programs receive missing data inquiries, as necessary.
- In order to correct any findings, local programs must first have two consecutive months of data at 100% face value, at which point DODD requests a representative sample of records for verification.
- If a local program does not correct within six monthly data analyses, the local program will go on a Corrective Action Plan (CAP).



- If a local program has no applicable records during one of the first six months of analyses, the month will still count towards the six months. A month with no applicable records, however, will not impact two consecutive months that occur immediately prior to and following the null month.

The state verified a randomly selected, representative sample of child records from the local programs to ensure that for each child, an IFSP within the required timeframe included Transition Steps and Services or that any delays in this timeline were due to family reasons. The state continued to examine data and request records to verify until all Transition Steps and Services were found to be met for all children as determined by requested child records. In all cases, the needed sample size was calculated using an online sample size calculator with a 95% confidence level and 15% confidence interval. Specifically, verification to indicate correction occurred in the local program as follows:

- **Champaign:** 4 records reviewed; timelines ending in September and October 2020
- **Williams:** 5 records reviewed; timelines ending in August and September 2020
- **Lawrence:** 6 records reviewed; timelines ending June and July 2021
- **Lucas:** 23 records reviewed; timelines ending June and July 2021
- **Monroe:** 2 records reviewed; timelines ending May and June 2021
- **Ottawa:** 3 records reviewed; timelines ending June and July 2021
- **Vinton:** 2 records reviewed; timelines ending June and September 2021

#### Describe how the State verified that each *individual case of noncompliance* was corrected

Ohio ensured each local program corrected the individual case of noncompliance through the state's baseline analyses. An explanation of noncompliance (referred to as a noncompliance reason or "NCR" in Ohio) is required upon late completion of all required components. Thus, in the bulk of cases of late completion, the state automatically ensures required actions have been completed when determining baseline compliance percentages. In addition, the state, as part of its baseline analyses, determined if any child for whom a required component was late had exited or moved from the EIS program's jurisdiction. For this indicator, Ohio ensured that for all children potentially eligible for Part B, an IFSP contained Transition Steps and Services, albeit late, or that the child was subsequently exited from EI.

### 8B Data and Targets

FFY	2020	2021	2022	2023	2024	2025
Target	100%	100%	100%	100%	100%	100%
Data	100%	100%				

### 8B FFY 2021 Data

Number of toddlers with disabilities exiting Part C where notification to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services	Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B	FFY 2021 Data
5,877	5,877	100%

#### Describe the method used to collect these data

Ohio EIS programs are required to send quarterly reports to the LEA by February 1st; May 1st; August 1st; and November 1st each year that include all children who will be turning three within a year from the report due date, as long as the family does not opt out of sharing information. Although the report due dates do not correspond to a state or federal fiscal year, because each report includes all children who will be turning three within a year of the report due date, the state ensures that, over the course of the four report submissions, LEAs are notified of children potentially eligible for Part B at least 90 days prior to any child's third birthday. The state requires EIS programs to submit proof to DODD that they submitted the February 1 report to the relevant LEAs, which, for the past several years, has been used to determine compliance for this indicator. As part of this process, findings are issued as soon as possible after noncompliance is identified (within less than three months of discovery), as specified in #7 of the FREQUENTLY ASKED QUESTIONS REGARDING IDENTIFICATION AND CORRECTION OF NONCOMPLIANCE AND REPORTING ON CORRECTION IN THE STATE PERFORMANCE PLAN (SPP)/ANNUAL PERFORMANCE REPORT (APR).

Ohio created a data set from reports distributed to LEAs from EIS programs. Reports due February 1, 2022 were generated using Ohio's statewide data system of all children turning three between February 1, 2022 and January 31, 2023 who were potentially eligible for Part B, excluding toddlers whose families opted out from notification (762 families opted out, which are not included in the numerator or denominator). The LEAs were informed in a timely manner for all 5,877 (100%) toddlers turning three in the referenced timeframe and whose families did not opt out of notification. DODD also ensured the SEA was notified of all 5,877 children for the February 1, 2022 reporting date in a timely manner, as well as for each quarterly reporting date throughout the fiscal year. As the requirements for the indicators are always the same, a sample of the data from one of the required quarterly reports within the fiscal year is presumed to represent the state and counties' compliance for the entire fiscal year. No LEA/SEA findings were issued based on FFY21 data.

There were no LEA/SEA findings due for correction in FFY21.

#### **What is the source of the data provided for this indicator?**

##### **State monitoring**

##### ***Describe the method used to select EIS programs for monitoring.***

Ohio created a data set from reports distributed to LEAs from local EI programs. Reports due February 1, 2022 were generated using Ohio's statewide data system of all children turning three between February 1, 2022 and January 31, 2023 potentially eligible for Part B, excluding toddlers whose families opted out of notification (1,379 families opted out, which are not included in the numerator or denominator). Currently, counties are required to send quarterly reports to the LEA (due February 1st, May 1st, August 1st, and November 1st each year) that include all children who will be turning three within a year from the report due date, as long as the family provides consent to share information. Counties are then required to submit proof of doing so to DODD for the February 1 report, which is used for the APR compliance analysis. The LEAs were informed in a timely manner for all 5,877 (100%) toddlers turning three in the referenced time frame and whose families did not opt out of notification. DODD ensured the SEA was notified of all 5,877 children for the February 1, 2022 reporting date in a timely manner, as well as for each quarterly reporting date throughout the fiscal year. As the requirements for the indicators are always the same, a sample of the data from one of the required quarterly reports within the fiscal year is presumed to represent the counties' compliance for the entire fiscal year.

## 8B Correction of Previous Findings of Noncompliance

### Correction of Findings of Noncompliance Identified in FFY 2020

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
0	0	0	0

## 8C Data and Targets

FFY	2020	2021	2022	2023	2024	2025
Target	100%	100%	100%	100%	100%	100%
Data	97.65%	99.55%				

## 8C FFY 2021 Data

Number of toddlers with disabilities exiting Part C where the transition conference occurred at least 90 days, and at the discretion of all parties at least nine months prior to the toddler's third birthday for toddlers potentially eligible for Part B	Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B	FFY 2021 Data
664	668	99.40%

What is the source of the data provided for this indicator?

### State monitoring

#### *Describe the method used to select EIS programs for monitoring.*

For compliance analyses, EIS programs were selected for Indicator 1, Indicator 7, or Indicators 8A and C. Ohio has implemented a monitoring cycle that ensures an even and representative selection of EIS programs each fiscal year for one of the aforementioned compliance indicators. All local programs have data analyzed for all of these compliance indicators within a three-year period. DODD completes activities related to each of these one at a time on a rotating schedule throughout each year. As part of this process, findings are issued as soon as possible after noncompliance is identified (within less than three months of discovery), as specified in #7 of the FREQUENTLY ASKED QUESTIONS REGARDING IDENTIFICATION AND CORRECTION OF NONCOMPLIANCE AND REPORTING ON CORRECTION IN THE STATE PERFORMANCE PLAN (SPP)/ANNUAL PERFORMANCE REPORT (APR).

Twenty-eight EIS programs were scheduled to have their data for this indicator monitored for FFY21. Ohio used monitoring data from its data system as well as from the review and verification of a selection of records to determine the percent compliant for this indicator. All children among the 28 selected EIS programs who had Transition Planning Conferences due between October 1, 2021 and December 31, 2021 were included in Ohio's FFY21 Transition Planning Conference analysis. Of the 668 child records examined, 664 (99.40 percent) were compliant. Three findings were issued to three EIS programs upon completion of the baseline analysis; these findings were **identified and issued in FFY21** and therefore the status of their correction will be reported in the FFY22 APR.

The 664 child records counted as being compliant include 93 that were non-timely due to documented exceptional family circumstances. These 93 child records are included in the numerator and denominator. See below for a breakdown of reasons for missed TPC timelines:

- Exceptional family circumstances: 93
- Staff error: 4

There were six TPC findings due for correction in FFY21. These findings were included in the FFY20 APR, **based on FFY20 data, and identified and issued in FFY20**. All of these findings were corrected in a timely manner and verified in accordance with OSEP Memorandum 09-02. DODD ensured that the EIS program (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.

## 8C Correction of Previous Findings of Noncompliance

### *Correction of Findings of Noncompliance Identified in FFY 2020*

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
6	6	0	0

### *FFY 2020 Findings of Noncompliance Verified as Corrected*

**Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements**

There were six TPC findings due for correction in FFY21. These findings were included in the FFY20 APR, **based on FFY20 data, and identified and issued in FFY20**. All of these findings were corrected in a timely manner and verified in accordance with OSEP Memorandum 09-02. DODD ensured that the EIS program (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.

The EIS programs found to be noncompliant with Timely Transition Planning Conferences were issued a finding of noncompliance via a written memorandum that included the noncompliant status and informed the local programs that the noncompliance must be corrected as soon as possible, but in no case more than one year from identification. The memos were issued as soon as possible after noncompliance was identified (within three months of discovery).

To ensure local programs are correctly implementing each regulatory requirement, Ohio requests records for verification of correction as follows:

- DODD examines data on a monthly basis to determine local program compliance. Data are pulled on or just after the first of each month and local programs receive missing data inquiries, as necessary.
- In order to correct any findings, local programs must first have two consecutive months of data at 100% face value, at which point DODD requests a representative sample of records for verification.
- If a local program does not correct within six monthly data analyses, the local program will go on a Corrective Action Plan (CAP).
- If a local program has no applicable records during one of the first six months of analyses, the month will still count towards the six months. A month with no applicable records, however, will not impact two consecutive months that occur immediately prior to and following the null month.

The state verified a randomly selected, representative sample of child records from the local programs to ensure that Timely Transition Planning Conferences occurred for each child. The state continued to examine data and request records to verify until all TPC requirements were found to be met for all children as determined by requested child records. In all cases, the needed sample size was calculated using an online sample size calculator with a 95% confidence level and 15% confidence interval. Specifically, verification to indicate correction occurred in the local program as follows:

- **Lawrence:** 6 records reviewed; timelines ending June and July 2021
- **Lorain:** 23 records reviewed; timelines ending May and June 2021
- **Lucas:** 21 records reviewed; timelines ending May and June 2021
- **Monroe:** 2 records reviewed; timelines ending May and June 2021
- **Ottawa:** 3 records reviewed; timelines ending June and July 2021
- **Vinton:** 1 record reviewed; timeline ending in September 2021

**Describe how the State verified that each *individual case of noncompliance* was corrected**

Ohio ensured each local program corrected the individual case of noncompliance through the state's baseline analyses. An explanation of noncompliance (referred to as a noncompliance reason or "NCR" in Ohio) is required upon late completion of all required components. Thus, in the bulk of cases of late completion, the state automatically ensures required actions have been completed when determining baseline compliance percentages. In addition, the state, as part of its baseline analyses, determined if any child for whom a required component was late had exited or moved from the EIS program's jurisdiction. For this indicator, Ohio ensured that TPCs were held for all children potentially eligible for Part B, albeit late, or that the child was subsequently exited from EI.

## Indicator 9: Resolution Sessions

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

**Results indicator: 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)**

### Data and Targets

FFY	2020	2021	2022	2023	2024	2025
Target	N/A	N/A	N/A	N/A	N/A	N/A
Data	N/A	N/A				

**Targets: Description of Stakeholder Input**

N/A

### FFY 2021 Data

3.1(a) Number resolutions sessions resolved through settlement agreements	3.1 Number of resolutions sessions	FFY 2021 Data
0	0	N/A

## Indicator 10: Mediation

Monitoring Priority: Effective General Supervision Part C / General Supervision

Results indicator: Percent of mediations held that resulted in mediation agreements. (20 U.S.C. 1416(a)(3)(B) and 1442)

### Data and Targets

FFY	2020	2021	2022	2023	2024	2025
Target	N/A	N/A	N/A	N/A	N/A	N/A
Data	N/A	N/A				

**Targets: Description of Stakeholder Input**

N/A

### FFY 2021 Data

2.1.a.i Mediation agreements related to due process complaints	2.1.b.i Mediation agreements not related to due process complaints	2.1 Number of mediations held	FFY 2021 Data
0	0	0	N/A