

SC Part C

FFY2017 State Performance Plan / Annual Performance Report

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR) Introduction to the State Performance Plan (SPP)/Annual Performance Report (APR)

Executive Summary:

Introduction

Effective July 1, 2017, lead agency responsibilities for the South Carolina system of early intervention, known as "BabyNet," transitioned from South Carolina First Steps to School Readiness (SCFSSR) to the South Carolina Department of Health and Human Services (SCDHHS) pursuant to Executive Order 2016-20, issued by Governor Nikki R. Haley Sept. 14, 2016.

Since the program transfer, SCDHHS has begun to address programmatic concerns with aggressive actions related to personnel assignment, staff development, financial and systems process improvement, contracts with partnering agencies, and an unwavering commitment to treat programmatic failure as an unacceptable outcome among program leadership. BabyNet will not be fixed overnight, or even in a single year, and the agency cannot provide such an assurance. Rather, the agency commits to sustained improvement over one to three fiscal years, with specific targets designed to improve both overall performance and specific compliance ratings.

Leadership and Culture

BabyNet senior management has long suffered from a culture of failure acceptance and non-compliance that anchored the program to low expectations both internally and externally. To address these issues, SCDHHS hired a new IDEA Part C Program Manager, reassigned a health programs specialist operating the Early and Periodic Screening, Diagnostic and Treatment (EPSDT) program to assist the BabyNet team, hired a dedicated budget analyst for the BabyNet program and eliminated the Assistant Part C Coordinator position. The Part C Data Manager position will also be filled in 2019. SCDHHS will continue to realign personnel to match the various ongoing improvement processes.

Referral Intake and Case Assignment

The BabyNet program currently receives between 11,000 and 12,000 referrals annually. In the past, the process of all referrals coming into different System Point of Entry (SPOE) offices across the state, led to inconsistencies in eligibility determinations and inconsistent methods for case assignment across (SPOE) regions. In order to improve timely and accurate identification and eligibility determinations for children with developmental delays, SCDHHS has begun making numerous changes.

SCDHHS is moving forward with centralizing intake activities to include the following changes:

- Created a centralized, web-based referral form to allow improved electronic submission of referrals by both physicians and other referral sources.
- Hired a four-member central referral intake staff to process and IDEA Part C referrals.
- Implementing an electronic document management system to improve organization of and access to beneficiary records
- Piloted centralized scheduling in Horry County for evaluation of the process. Pilot in Richland County began Jan. 2, 2019.

Additional activities that will deploy in the coming months include:

- Full centralization of all statewide referrals via all intake channels.
- Statewide expansion of centralized scheduling, allowing program staff more insight into and better management of referral and eligibility workflows.
- Implementation of an electronic document management system, allowing BabyNet to engage in paperless storage of records.

System Point of Entry Staffing, Education and Performance Monitoring

SCDHHS is maintaining a strategy for SPOE staff that focuses on education and training of existing resources and externalizing high-volume referral work from the central referral team to SPOE eligibility staff or administrative specialists. The re-write of policies and procedures for SPOE staff are in process and, once federally approved, those documents will form the basis of a front-line focused training curricula and job-aids that are more intuitive and user-friendly. SPOE staff were also re-trained on the Batelle Developmental Inventory May 1 and Aug. 9, 2018. Currently, some SPOE staff engage in ongoing service coordination activities after initial eligibility decisions. The agency intends to put a stop to this practice as soon as the appropriate Medicaid policy manual changes and payment coding can be put into place.

Payment System Integration

Integration of the IDEA Part C case management system, BabyNet Reporting and Intervention Data Gathering Electronic System (BRIDGES), with the Medicaid Management Information System (MMIS) for the purpose of complying with federal coordination of benefits requirements is ongoing, with development underway.

With substantial progress made in 2017/18 with respect to program leadership, staff morale, training and systems development necessary to fully implement payment coordination in the upcoming years, BabyNet program staff will begin shifting focus away from information technology to additional initiatives designed to improve personnel processes and service quality. Many of those initiatives are outlined in this document.

Attachments

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No APR attachments found.		

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.

Overview

South Carolina's IDEA Part C program has a history of comprehensive and longstanding noncompliance with the federal Part C performance indicators, with 12 of the last 15 federal determinations indicating that the state needs some form of intervention. Last year, South Carolina did see a positive change in its determination level, but there is still much work that needs to be done.

FFY 2017 began another period of transition for the BabyNet program. After the transfer of the program from SCFSSR to SCDHHS some time was spent introducing and acquainting the BabyNet program to the other programs within the new lead agency. Once the new IDEA Part C Program Manager/Part C Coordinator started in February 2018, work began in earnest to begin addressing the longstanding noncompliance that has plagued the program.

While the BabyNet program does not currently have a robust system of general supervision, steps are being taken to move the program in this direction. The first step is development of a comprehensive, policy and procedure manual. The drafting of this manual began in late 2017 and will end in early 2019. Expectations will be clearly articulated across the Part C system to ensure accountability in all areas at all levels. The new policy and procedure

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manual will include training curricula and job aids that are more intuitive and user-friendly.

From a fiscal management perspective, the BabyNet program has begun to make significant changes to address ongoing fiscal concerns. Since the beginning of 2018, the BabyNet program:

- Ended the fiscal agency contract with Jasper Disabilities and Special Needs Board, bringing payment systems in-house.
- Completed the development of identifiers for IDEA Part C participants in the MMIS as well as funded logic to correctly coordinate benefits.
- Successfully created the programs necessary to transmit beneficiary information from the MMIS to BRIDGES (South Carolina's IDEA Part C data system), to ensure that beneficiary identities are consistent in each system. Testing is underway for the BRIDGES operator to receive and use this data.

Efforts are still underway to complete the systems development for the remainder of the functions necessary to integrate IDEA Part C and Medicaid payment environment. Once payment system redesign is complete, BabyNet providers will be able to bill SCDHHS a single time for payment, not twice—once for Medicaid and once for Part C—as is the current system. The payment logic programmed into the MMIS system is designed to satisfy federally-required payment coordination activities in the background, without active effort by service providers.

Dispute resolution was not a problem area for South Carolina in 2017/18. Changes are being made to the BabyNet Family Guide to make it more user-friendly and ensure that it is shared with families throughout the process, so as not to overwhelm them at any given point in time. This document discusses parent's rights and responsibilities for their child while they are receiving Part C services in South Carolina.

Prior to the transfer to SCDHHS, the previous lead agency had not implemented a system of general supervision of the provider network or the performance of individual providers. Providers are able to self-report reasons for delays in service provision in the BRIDGES case management system. These self-reported reasons are left largely unexamined and unchallenged, with no formal issuance of findings related to inappropriate outcomes or root cause analysis of the episodic or systemic issues leading to poor outcomes. As part of the corrective action plan negotiated with The US Department of Education, Office of Special Education Programs (OSEP) in 2018, SCDHHS will implement a system of general supervision and provider oversight to include reporting, desk audits, field reviews and technical assistance to improve the quality of the program's provider network and ultimately outcomes for children.

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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.

The initial focus of the state's technical assistance system will be on supporting staffing, education and performance monitoring of all BabyNet System personnel. In 2017/18, BabyNet employed 13 state staff and received additional assistance from a Budget Analyst employed at SCDHHS. Since that time, the Budget Analyst has joined state staff full-time, the Part C Coordinator Assistant position has been eliminated and repurposed to lead the general supervision and monitoring process and an Administrative Assistant has joined the team and will handle South Carolina Interagency Coordinating Council (SCICC) responsibilities. In addition to BabyNet state staff, four Central Referral Team (CRT) workers were hired with the plan to hire two additional CRT staff in the coming months. Currently SCDHHS employs 12 SPOE Supervisors, 14 Administrative Assistants and 40 BabyNet Intake Coordinators. The number of SPOE positions has increased significantly from 2017/18 and the system is now staffed at full capacity. SCDHHS continues to perform regional analysis of workloads to account for regional variations to ensure appropriate resource distribution.

To ensure the timely delivery of high quality, evidenced based technical assistance, the state utilizes a comprehensive, tiered, technical assistance system. With guidance from OSEP, national technical assistance calls and the SCDHHS Agency Director, the IDEA Part C Program Manager/Part C Coordinator is able to effectively communicate important changes and information to statewide BabyNet system personnel. BabyNet leadership participates in monthly OSEP calls with the state contact and national OSEP technical assistance calls. The IDEA Part C Program Manager/Part C Coordinator also meets regularly with the Agency Director to continue the work of integrating the BabyNet program with SCDHHS.

State office staff meetings are held monthly to review relevant federal updates and address issues that may have arisen at Local Early Intervention System (LEIS) meetings. This is an opportunity for state staff to ask questions and receive feedback that will help ensure a consistent message is communicated statewide. Discussion that occurs at these meetings often informs state staff of current training needs.

Monthly Program Manager meetings are held with representatives from partnering agencies including the Parent Training and Information Center, Family Connection of SC. This is an opportunity for BabyNet state staff to share information from the lead agency, gather feedback from agency partners on recent changes and identify training needs. The expectation is that each Program Manager take the information back and share it with management at their respective agencies. Program Managers are also expected to share this information via staff meetings or counterpart meetings to ensure local dissemination.

Regional Part C Coordinators plan and coordinate LEIS meetings each month. They encourage participation from all service provider and service coordination agencies and other invested stakeholders. A portion of each agenda is taken from the BabyNet state staff meetings, this is also a time for local providers to share provider-specific and community events, staffing changes and additional concerns. Questions that arise are brought back to the state office so that a consistent response can be developed and disseminated statewide.

In addition to face-to-face technical assistance, the state also staffs an online help desk that is available 24 hours a day, seven days a week. State office staff respond to help desk tickets in a timely manner and are immediately evaluated by the individual requesting assistance. All new BabyNet personnel are required to complete a 12-hour set of core curriculum modules designed to provide a foundation in early intervention and an introduction to the state's data system. The online learning management system also houses many additional topic-specific modules intended to assist early intervention staff in the provision of high-quality services.

The state believes that the use of a multi-faceted, tiered approach to technical assistance will improve communication, the dissemination of accurate information and ensure more consistent messaging. Now that the BabyNet program is staffed appropriately and communication at all levels is improved, we are confident that the technical assistance provided in the future will help to improve outcomes for children and families.

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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.

Prior to the lead agency change to SCDHHS, extensive cross-discipline stakeholder input identified a number of revisions and changes to the state's early intervention professional development system. Given that the state's policy and procedure manual is being re-written, rollout of the comprehensive system of personnel development

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(CSPD) changes will occur in tandem with the implementation of revised policies and procedures, and corresponding staffing, education and performance monitoring.

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Stakeholder Involvement: apply this to all Part C results indicators

The mechanism for soliciting broad stakeholder input on targets in the SPP, including revisions to targets.

The South Carolina Interagency Coordinating Council (SCICC) for the BabyNet early intervention system had 15 appointed members in 2017. While keeping the SCICC fully seated has been challenging, the state has continued to work collaboratively with the Governor's office to recommend appointments. In addition to appointed members, the SCICC meetings are typically attended by family members, Service Coordinators, Service Providers, participating State Agency Program Managers, the Parent Training and Information Center and Early Head Start/Head Start. The SCICC and other interested members of the public provided input on targets for the Annual Performance Report for FFY 2017 in meetings of January 2018.

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Reporting to the Public:

How and where the State reported to the public on the FFY 2016 performance of each EIS Program or Provider 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 2016 APR, as required by 34 CFR §303.702(b)(1)(i)(A); and a description of where, on its Web site, a complete copy of the State's SPP, including any revision if the State has revised the SPP that it submitted with its FFY 2016 APR in 2018, is available.

All publicly reported information is located on the website for the lead agency, South Carolina Department of Health and Human Services at:

<https://msp.scdhhs.gov/babynet/site-page/babynet-state-and-federal-reporting>

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No APR attachments found.		

Actions required in FFY 2016 response

OSEP Response

The State has not publicly reported on the FFY 2016 (July 1, 2016-June 30, 2017), FFY 2015 (July 1, 2015-June 30, 2016), and FFY 2014 (July 1, 2014 to June 30, 2015) performance of each EIS program or provider located in the State on the targets in the State's performance plan as required by section 616(b)(2)(C)(ii)(I) of IDEA.

The State's determinations for both 2017 and 2018 were Needs Assistance. Pursuant to section 616(e)(1) of the IDEA and 34 C.F.R. § 300.604(a), OSEP's June 26, 2018 determination letter informed the State that it must report with its FFY 2017 SPP/APR submission, due February 1, 2019, on: (1) the technical assistance sources from which the State received assistance; and (2) the actions the State took as a result of that technical assistance. The State did not provide the required information.

States were instructed to submit Phase III Year Three of the State Systemic Improvement Plan (SSIP) by April 1, 2019. Although the State provided the required FFY 2017 data and a narrative report, the State did not report in the SPP/APR progress in implementing the State-identified coherent improvement strategies, including infrastructure improvement strategies, or implementation of evidence-based practices with fidelity.

Required Actions

The State has not publicly reported on the FFY 2016 (July 1, 2016-June 30, 2017) performance of each EIS program or provider located in the State on the targets in the State's performance plan as required by section 616(b)(2)(C)(ii)(I) of IDEA. With its FFY 2018 SPP/APR, the State must provide a Web link demonstrating that the State reported to the public on the performance of each early intervention service program or provider located in the State on the targets in the SPP/APR for FFY 2016. In addition, the State must report with its FFY 2018 SPP/APR, how and where the State reported to the public on the FFY 2017 performance of each early intervention service program or provider located in the State on the targets in the SPP/APR.

The State's IDEA Part C determination for both 2018 and 2019 is Needs Assistance. In the State's 2019 determination letter, the Department advised the State of available sources of technical assistance, including OSEP-funded technical assistance centers, and required the State to work with appropriate entities. The Department directed the State to determine the results elements and/or compliance indicators, and improvement strategies, on which it will focus its use of available technical assistance, in order to improve its performance. The State must report, with its FFY 2018 SPP/APR submission, due February 3, 2020, on: (1) the technical assistance sources from which the State received assistance; and (2) the actions the State took as a result of that technical assistance.

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In the FFY 2018 SPP/APR due in February 2020, the State must report FFY 2018 data for the State-identified Measurable Result (SiMR). Additionally, the State must, consistent with its evaluation plan described in Phase II, assess and report on its progress in implementing the SSIP. Specifically, the State must provide: (1) a narrative or graphic representation of the principal activities implemented in Phase III, Year 4; (2) measures and outcomes that were implemented and achieved since the State's last SSIP submission (i.e., April 1, 2019); (3) a summary of the SSIP's coherent improvement strategies, including infrastructure improvement strategies, and evidence-based practices that were implemented by the State and progress toward short- and long-term outcomes that are intended to impact the SiMR; and (4) any supporting data that demonstrates that implementation of these activities are impacting the State's capacity to improve its SiMR data. If, in its FFY 2018 SPP/APR, the State is not able demonstrate progress in implementing its coherent improvement strategies, including progress in the areas of infrastructure improvement strategies or the implementation of evidence-based practices with fidelity, the State must provide its root cause analysis for each of these challenges.

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
Indicator 1: Timely provision of services

Monitoring Priority: Early Intervention Services In Natural Environments

Compliance indicator: Percent of infants and toddlers with Individual Family Service Plans (IFSPs) who receive the early intervention services on their IFSPs in a timely manner.

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

Historical Data

Baseline Data: 2005

FFY	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Target			100%	100%	100%	100%	100%	100%	100%	100%	100%
Data		95.00%	92.00%	76.00%	74.50%	85.00%	73.00%	83.00%	87.00%	85.32%	NVR

FFY	2015	2016
Target	100%	100%
Data	32.20%	40.63%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2017 - FFY 2018 Targets

FFY	2017	2018
Target	100%	100%

FFY 2017 SPP/APR 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 2016 Data	FFY 2017 Target	FFY 2017 Data
2356	6602	40.63%	100%	40.25%

<p>Number of documented delays attributable to exceptional family circumstances <i>This number will be added to the "Number of infants and toddlers with IFSPs who receive their early intervention services on their IFSPs in a timely manner" field above to calculate the numerator for this indicator.</i></p>	301
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Include 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). The South Carolina early intervention system defines timely receipt as initiation of all new IFSP services within thirty calendar days of parent signature on the plan.

In FFY 2016, two new features were added to the state's early intervention data system (BRIDGES: *BabyNet Reporting and Intervention Data Gathering Electronic System*) for this indicator: four sets of late reasons (parent, service provider, service coordinator, and system), and assignment of documentation of late reasons to the primary service coordinator in keeping with 34 CFR 303.34(b)(6) – 34 CFR 303.34(b)(7). The service provider must enter a service log in the child's record documenting the first date of service delivery. If the service log date is more than 30 days from the date of the IFSP to which the service was newly added, the primary service coordinator is alerted of a late service through a Manage Service Delay Report. This report requires the service coordinator to contact the provider to determine the late reason, then input the appropriate late reason into the data system. BabyNet state staff can then access this data to identify sources of non-compliance with both data reporting and timeliness of services, local and regional trends in provider availability, and target resources and technical assistance as necessary.

While the addition of these late reasons was helpful, it only assisted the state in analyzing data when data is entered into the system properly. When service logs are entered into the BRIDGES system, we are able to identify timely services versus untimely services that were related to familial reasons. Due to ongoing concerns related to the capturing of Indicator 1 data, training on each of the Part C Indicators was conducted at local early intervention system (LEIS) meetings. During each monthly meeting, the Regional Part C Coordinators trained on a specific indicator until all were covered. The goal of this training was to reiterate the importance of timely and accurate data entry into the BRIDGES system especially as it relates to Indicator 1. Despite these efforts, the calculations for Indicator 1 are incomplete with regard to both the number and percentage of timely services, and reasons for late services.

With the transition of the program to SCDHHS, various efforts are underway to begin addressing South Carolina's missing data for Indicator 1. This work will be accomplished through the efforts of Bridges Integration, the creation of a system of General Supervision, the hiring of a IDEA Part C Data Manager and the streamlining of the documentation options available to Service Providers and Service Coordinators; which will provide the lead agency the ability to provide reimbursement only once proper documentation is submitted. It will take the coordination of all of these systemic changes to make significant progress with this Indicator.

State leadership has identified a number of potential causes for failure of system personnel to enter documentation regarding timely provision of early intervention services. In the majority of instances of missing data, two key variables have been identified: first, that providers and service coordinators enter service documentation in multiple systems, and second, that providers and service coordinators are paid regardless of whether their data is entered into the BRIDGES. The use of multiple methods by which providers remit invoices for services on IFSPs has supported provider practices of billing for Part C services paid by Medicaid in a manner that bypasses BabyNet and the state's early intervention data system. The BRIDGES integration work that is currently underway will prevent this behavior from continuing and should ensure that the data for Indicator 1 improves over time.

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

- State monitoring
- State database

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Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).

The reporting period for this indicator was July 1, 2017 - June 30, 2018.

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

The data for timely services have been validated based on submission of service logs by BabyNet Service Providers, and includes only those children for whom a service initiation date was reported. While a significant proportion of data remains missing as of this report, current and planned efforts within SCDHHS to integrate BabyNet and Medicaid payment systems, intensification of oversight activities regarding timely provision of services and data reporting responsibilities of Service Coordinators and Service Providers, and the ability to conduct deeper analysis of late reasons and missing data now positions SCDHHS to show progress with this indicator over the next year.

Actions required in FFY 2016 response

The State did not provide valid and reliable data for FFY 2016. The State must provide valid and reliable data for FFY 2017 in the FFY 2017 SPP/APR and submit in a timely manner all items required under the CAP.

Note: Any actions required in last year's response table that are related to correction of findings should be responded to on the "Correction of Previous Findings of Noncompliance" page of this indicator. If your State's only actions required in last year's response are related to findings of noncompliance, a text field will not be displayed on this page.

Responses to actions required in FFY 2016 response, **not including correction of findings**

In the past, South Carolina has had numerous issues with identifying noncompliance, notifying providers when it occurs and following up to ensure correction when concerns are identified. The state has not had a coordinated system of general supervision that has been communicated at all levels within the program or to our stakeholders. Requirements have not been clearly articulated in policies and procedures and there has been an inability to ensure valid and reliable data in numerous areas. As a result of these concerns, the new lead agency voluntarily entered into a Corrective Action Plan (CAP) on June 1, 2018 to address these issues. Steady progress is being made in all areas of the CAP which has resulted in a complete overhaul of the entire BabyNet system.

Ongoing progress with the CAP has been communicated with OSEP, the SCICC, and other interested stakeholders, including pediatricians. While some targets have been extended via memorandum to OSEP on Dec. 5, 2018, and later approved on Jan. 31, 2019 many of the requirements spelled out in the CAP have already been completed. SCDHHS has committed an unprecedented amount of resources to the BabyNet program and it is in the best position it's ever been in to address the longstanding noncompliance that has plagued the program.

Correction of Findings of Noncompliance Identified in FFY 2016

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

OSEP Response

The State did not provide valid and reliable data for this indicator. These data are not valid and reliable because the State reported that its FFY 2017 calculations for Indicator 1 are incomplete. Specifically, the State reported that the calculations for Indicator 1 are incomplete "with regard to both the number and percentage of timely services, and reasons for late services," because system personnel failed to enter documentation. Therefore, OSEP could not determine whether the State met its target.

The State did not demonstrate that the EIS program or provider corrected the remaining 13 findings of noncompliance identified in FFY 2014 reported as uncorrected in the State's FFY 2015 APR and the 56 findings of noncompliance identified in FFY 2015 reported as uncorrected in the State's FFY 2016 APR, because the lead agency did not have the necessary data and information to correct the noncompliance which was identified by the previous lead agency. As the State reported, "due to past issues with identifying noncompliance, notifying providers when it occurs and following up to ensure correction when concerns are identified,... the new lead agency voluntarily entered into a Corrective Action Plan (CAP) to address these issues."

OSEP's December 2017 monitoring letter identified noncompliance with the State's ability to submit valid and reliable data (including for this indicator) and required the State to submit a corrective action plan (CAP) to ensure compliance. The State submitted, and OSEP approved on June 1, 2018, the CAP submitted in response to OSEP's December 2017 monitoring letter. The State submitted in a timely manner all items required under the CAP. The State's CAP is part of SC's FFY 2018 IDEA Part C grant award.

In a memo dated January 31, 2019, OSEP responded to the State's December 2018 revised CAP and granted an extension of time to June 30, 2019 for the State to demonstrate its State-level general supervision responsibility for monitoring compliance with IDEA Part C requirements, including identifying and issuing findings of noncompliance and ensuring correction of identified noncompliance. OSEP continues to provide technical assistance to the State.

Required Actions

The State did not provide valid and reliable data for FFY 2017. The State must provide valid and reliable data for FFY 2018 in the FFY 2018 SPP/APR.

**FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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)

Historical Data

Baseline Data: 2005

FFY	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Target ≥			96.00%	96.00%	96.00%	96.00%	96.00%	96.00%	99.00%	99.00%	99.00%
Data		86.00%	86.00%	82.00%	84.00%	99.00%	99.00%	99.00%	99.00%	99.40%	NVR

FFY	2015	2016
Target ≥	97.64%	97.64%
Data	97.64%	97.33%

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2017 - FFY 2018 Targets

FFY	2017	2018
Target ≥	97.64%	98.00%

Key:

Explanation of Changes

The South Carolina Interagency Coordinating Council and interested members of the public met in January 2019 to review state performance and set targets for all results indicators. During that meeting, the decision was made to update the target for Indicator 2 for 2018. This decision was made after a discussion that focused on provider shortages in South Carolina and concerns about how this impacts service delivery options for families. SCICC members asked the lead agency to investigate how other states' Part C programs may use telehealth to solve provider shortages and begin discussions within the lead agency about this option, if feasible.

Targets: Description of Stakeholder Input

The South Carolina Interagency Coordinating Council and interested members of the public met in January 2019 to review state performance and set targets for all results indicators. Following review and revision of the targets for Indicator 2 with the FFY 2017 Annual Performance Report, the recommendation of the ICC was to change the target for services in natural environments to 98% for 2018, which is 2 percentage points lower than the original target, but still represents an increase from South Carolina's 2017 result of 97.82%.

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2017-18 Child Count/Educational Environment Data Groups	7/11/2018	Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	4,844	
SY 2017-18 Child Count/Educational Environment Data Groups	7/11/2018	Total number of infants and toddlers with IFSPs	4,952	

FFY 2017 SPP/APR 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 2016 Data	FFY 2017 Target	FFY 2017 Data
4,844	4,952	97.33%	97.64%	97.82%

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Actions required in FFY 2016 response

none

OSEP Response

The State revised its targets for FFY 2018 for this indicator, and OSEP accepts those targets.

Required Actions

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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)

Does your State's Part C eligibility criteria include infants and toddlers who are at risk of having substantial developmental delays (or "at-risk infants and toddlers") under IDEA section 632(5)(B)(i)? No

Historical Data

	Baseline Year	FFY	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
A1	2008	Target ≥						80.00%	80.00%	85.00%		80.00%	80.00%
		Data					80.00%	80.00%	85.00%	81.00%	82.00%	79.56%	79.86%
A2	2013	Target ≥						67.00%	65.00%	66.00%		59.00%	59.00%
		Data					67.00%	65.00%	66.00%	63.00%	59.00%	59.25%	53.46%
B1	2008	Target ≥						82.00%	81.00%	85.00%		82.00%	82.00%
		Data					82.00%	81.00%	85.00%	82.00%	82.00%	80.53%	81.90%
B2	2013	Target ≥						64.00%	63.00%	63.00%		54.00%	54.00%
		Data					64.00%	63.00%	63.00%	60.00%	56.00%	54.54%	49.94%
C1	2008	Target ≥						82.00%	81.00%	86.00%		82.00%	82.00%
		Data					82.00%	81.00%	86.00%	82.00%	82.00%	82.01%	81.90%
C2	2013	Target ≥						69.00%	66.00%	66.00%		57.00%	57.00%
		Data					69.00%	66.00%	66.00%	65.00%	59.00%	57.71%	53.63%

	FFY	2015	2016
A1	Target ≥	78.00%	78.00%
	Data	78.40%	78.17%
A2	Target ≥	54.00%	54.00%
	Data	53.99%	50.70%
B1	Target ≥	81.00%	81.00%
	Data	80.99%	81.68%
B2	Target ≥	50.00%	50.00%
	Data	49.94%	47.54%
C1	Target ≥	82.00%	82.00%
	Data	81.51%	80.28%
C2	Target ≥	51.00%	51.00%
	Data	51.74%	49.43%

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2017 - FFY 2018 Targets

FFY	2017	2018
Target A1 ≥	78.00%	80.10%
Target A2 ≥	54.00%	60.00%
Target B1 ≥	81.00%	55.00%
Target B2 ≥	50.00%	55.00%
Target C1 ≥	82.00%	82.10%
Target C2 ≥	51.00%	58.00%

Key:

Explanation of Changes

During the January 2019 meeting of the SC Interagency Coordinating Council the 2018 and 2019 targets were discussed at length. The decision to modify targets for 2018 was based upon the state's slowed progress or lack of progress in summary statements. The state has also planned training on the Early Childhood Outcomes Process in Spring 2019 to address inconsistencies in teams' rating practices. This indicator is further impacted by missing or inaccurate data by Service Coordinators. Data system errors include certain "rules" that the state was told were put in place that would not allow Service Coordinators to move to another screen without child outcome summary data being entered. It was determined with this year's APR that these rules do not currently exist in our data system. This has been addressed with the data system vendor and changes will be deployed as soon as possible. It is anticipated that once these changes are made, we will see improvements in the data in the future years.

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

Targets: Description of Stakeholder Input

The South Carolina Interagency Coordinating Council and interested members of the public met in January 2019 to review state performance and set targets for all results indicators. Following review and revision of the targets to Indicator 3 with the FFY 2017 Annual Performance Report, the recommendation of the ICC was to modify the targets as outlined above for FFY 2018. As previously mentioned, the SCICC was informed of the "rules" that the state was told were in place that would prevent Service Coordinators from moving to additional screens in the system without child outcome summary data being entered. Program staff are now discussing this issue with the BRIDGES system development staff to determine when such rules can be deployed.

FFY 2017 SPP/APR Data

Number of infants and toddlers with IFSPs assessed	2704.00
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Outcome A: Positive social-emotional skills (including social relationships)

	Number of Children	Percentage of Children
a. Infants and toddlers who did not improve functioning	54	2.00%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	469	17.33%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	775	28.64%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	983	36.33%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	425	15.71%

	Numerator	Denominator	FFY 2016 Data	FFY 2017 Target	FFY 2017 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 $(c+d)/(a+b+c+d)$.	1758.00	2281.00	78.17%	78.00%	77.07%
A2. The percent of infants and toddlers who were functioning within age expectations in Outcome A by the time they turned 3 years of age or exited the program $(d+e)/(a+b+c+d+e)$.	1408.00	2706.00	50.70%	54.00%	52.03%

Reasons for A1 Slippage

Slippage in the performance for A1 of this Indicator is attributed in part to an ongoing concern regarding the Outcome Summary Process. As reported by the child's Service Coordinator at the time of exit, oftentimes the rating scores are obtained without full participation of the IFSP team. An additional factor that may have contributed to the slippage in this indicator is that lack of a IDEA Part C Data Manager. When South Carolina had a full-time Data Manager, a role that this person performed was to email staff across the state to encourage the entry of early childhood outcome data. They also sent out reminder emails to staff at agency partners. This person was also responsible for statewide training on the Child Outcome Summary process and the development of guidance materials.

As previously mentioned, there are also concerns about "rules" that were to have been placed in the BRIDGES data system that would require child outcome information be captured in the data system. SC discovered that these rules were not added to the data system, thus allowing Service Coordinators to move on within the system without Child Outcome Summary information being entered into the system. This has been addressed with the data system vendor and changes will be deployed as soon as possible.

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

	Number of Children	Percentage of Children
a. Infants and toddlers who did not improve functioning	44	1.63%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	459	16.96%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	901	33.28%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	1,047	38.68%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	256	9.46%

	Numerator	Denominator	FFY 2016 Data	FFY 2017 Target	FFY 2017 Data
B1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program $(c+d)/(a+b+c+d)$.	1948.00	2451.00	81.68%	81.00%	79.48%
B2. The percent of infants and toddlers who were functioning within age expectations in Outcome B by the time they turned 3 years of age or exited the program $(d+e)/(a+b+c+d+e)$.	1303.00	2707.00	47.54%	50.00%	48.13%

Reasons for B1 Slippage

Slippage in the performance for this B1 Indicator is attributed in part to an ongoing concern regarding the Outcome Summary Process. As reported by the child's service coordinator at the time of exit, oftentimes the rating scores are obtained without full participation of the IFSP team. This is an area of focus for South Carolina in our SSIP work and will include additional training for all system personnel. An additional factor that may have contributed to the slippage in this indicator is that lack of a IDEA Part C Data Manager. When SC had a full-time Data Manager, one job duty for this person was to email staff across the state to encourage the entry of this data. They also sent out reminder emails to staff at agency partners.

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

As previously mentioned, there are also concerns about "rules" that were to have been placed in the BRIDGES data system that would require child outcome information be captured in the data system. SC discovered that these rules were not added to the data system, thus allowing Service Coordinators to move on within the system without this information being entered. This has been addressed with the data system vendor and changes will be deployed as soon as possible.

Outcome C: Use of appropriate behaviors to meet their needs

	Number of Children	Percentage of Children
a. Infants and toddlers who did not improve functioning	46	1.70%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	473	17.51%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	831	30.77%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	1,013	37.50%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	338	12.51%

	Numerator	Denominator	FFY 2016 Data	FFY 2017 Target	FFY 2017 Data
C1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program (c+d)/(a+b+c+d).	1844.00	2363.00	80.28%	82.00%	78.04%
C2. The percent of infants and toddlers who were functioning within age expectations in Outcome C by the time they turned 3 years of age or exited the program (d+e)/(a+b+c+d+e).	1351.00	2701.00	49.43%	51.00%	50.02%

Reasons for C1 Slippage

Slippage in the performance for this C1 Indicator is attributed in part to an ongoing concern regarding the Outcome Summary Process. As reported by the child's service coordinator at the time of exit, oftentimes the rating scores are obtained without full participation of the IFSP team. This is an area of focus for South Carolina in our SSIP work and will include additional training for all system personnel. An additional factor that may have contributed to the slippage in this indicator is that lack of a IDEA Part C Data Manager. When SC had a full-time Data Manager, one job duty for this person was to email staff across the state to encourage the entry of this data. They also sent out reminder emails to staff at agency partners.

As previously mentioned, there are also concerns about "rules" that were to have been placed in the BRIDGES data system that would require child outcome information be captured in the data system. SC discovered that these rules were not added to the data system, thus allowing Service Coordinators to move on within the system without this information being entered. This has been addressed with the data system vendor and changes will be deployed as soon as possible.

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

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	4285
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.	1032

Please note that this data about the number of infants and toddlers who did not receive early intervention services for at least six months before exiting the Part C program is optional in this FFY16 submission. It will be required in the FFY17 submission.

Was sampling used? No

Did you use the Early Childhood Outcomes Center (ECO) Child Outcomes Summary (COS) process? Yes

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

Using the Child Outcome Summary process, service coordinators reported the following sources of information were used to gather data for each of the early childhood outcomes.

- Batelle Developmental Inventory (BDI-2)
- The Carolina Curriculum for Infants and Toddlers with Special Needs (CCITSN), Third Edition (birth to 24 months) or
- The Carolina Curriculum for Preschoolers with Special Needs (CCPSN), Second Edition (24-60 months)
- Service Provider documentation of evaluation, assessment and service delivery

Provide additional information about this indicator (optional)

For the reporting period of July 1, 2017-June 30, 2018, measurement of the Early Childhood Outcomes occurred at entry and exit from BabyNet for all children with an IFSP who were thirty months of age or younger at entry. The child's primary Service Coordinator assigned after the child's BabyNet eligibility has been determined is responsible for ensuring the family and other members of the IFSP team contribute to the entry and exit ratings for the child using the Child Outcomes Summary Process and forms.

To ensure completeness of the data, Service Coordinators had been notified monthly if any Child Outcome data is missing for children on their caseload, by matching the Early Childhood Outcomes data with reports of children who entered BabyNet at 30 months or age or younger and all children who have exited with at least six months of services. Due to the fact that the state has not had a Data Manager, these reminders have been far less frequent. Filling that position is a requirement of South Carolina's Corrective Action Plan and the position will be filled no later than February 2019.

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

Actions required in FFY 2016 response

none

OSEP Response

The State revised its targets for FFY 2018 this indicator, and OSEP accepts the targets for Outcomes A1, C1, and C2, but OSEP cannot accept the target for Outcome B1 because the State's end target for FFY 2018 does not reflect improvement over the baseline data. The State must revise its FFY 2018 target for Outcome B1 to reflect improvement.

Required Actions

**FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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)

Historical Data

	Baseline Year	FFY	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
A	2012	Target ≥					87.00%	91.00%	76.00%	79.00%	82.00%	86.00%	86.00%
		Data			76.00%	69.00%	73.00%	76.00%	79.00%	81.00%	86.00%	91.67%	85.91%
B	2012	Target ≥					82.00%	86.00%	71.00%	77.00%	80.00%	86.00%	86.00%
		Data			69.00%	64.00%	67.00%	71.00%	77.00%	81.00%	86.00%	90.91%	81.82%
C	2017	Target ≥					95.00%	95.00%	86.00%	89.00%	92.00%	86.00%	86.00%
		Data			85.00%	82.00%	84.00%	86.00%	89.00%	82.00%	86.00%	92.36%	87.73%

	FFY	2015	2016
A	Target ≥	74.00%	74.00%
	Data	74.06%	63.21%
B	Target ≥	72.00%	72.00%
	Data	72.18%	61.02%
C	Target ≥	75.00%	75.00%
	Data	75.94%	64.63%

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2017 - FFY 2018 Targets

FFY	2017	2018
Target A ≥	74.00%	74.00%
Target B ≥	72.00%	72.00%
Target C ≥	75.00%	75.10%

Key:

Explanation of Changes

The South Carolina Interagency Coordinating Council and interested members of the public met January 2019 to review state performance and set targets for all results indicators. The ICC decided to modify the state's targets for Family Outcomes in 2018 and 2019 to make the targets more attainable, while still moving the state's progress forward. This indicator is one that the state is focusing on with Phase II of our State Systemic Improvement Plan. We will begin training staff in Region 4 (Chesterfield, Darlington, Marlboro, Marion, Dillon, Florence, Lee, Sumter, Clarendon, Georgetown, Williamsburg and Horry counties) while continuing to scale up to other regions in the state.

Targets: Description of Stakeholder Input

The South Carolina Interagency Coordinating Council and interested members of the public met January 2019 to review state performance and set targets for all results indicators. Recommendations based on stakeholder input were to modify the targets as outlined above.

BabyNet state management staff explained that helping families help their child develop and learn is the focus of South Carolina's State Systemic Improvement Plan (SSIP). The focus on improving family involvement and the procedures with which we gather child and family outcome data should have a direct impact on the state's ability to meet our future targets.

FFY 2017 SPP/APR Data

Number of families to whom surveys were distributed		3,253
Number of respondent families participating in Part C	7.16%	233

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

A1. Number of respondent families participating in Part C who report that early intervention services have helped the family know their rights	149
A2. Number of responses to the question of whether early intervention services have helped the family know their rights	229
B1. Number of respondent families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs	134
B2. Number of responses to the question of whether early intervention services have helped the family effectively communicate their children's needs	221
C1. Number of respondent families participating in Part C who report that early intervention services have helped the family help their children develop and learn	160
C2. Number of responses to the question of whether early intervention services have helped the family help their children develop and learn	228

	FFY 2016 Data	FFY 2017 Target	FFY 2017 Data
A. Percent of families participating in Part C who report that early intervention services have helped the family know their rights	63.21%	74.00%	65.07%
B. Percent of families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs	61.02%	72.00%	60.63%
C. Percent of families participating in Part C who report that early intervention services have helped the family help their children develop and learn	64.63%	75.00%	70.18%

Was sampling used? No

Was a collection tool used? Yes

Is it a new or revised collection tool? No

The demographics of the families responding are representative of the demographics of infants, toddlers, and families enrolled in the Part C program.
Yes

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.

South Carolina uses the "Impact of Early Intervention Services on the Family" survey, developed by the National Center on Special Education Accountability Monitoring (NCSEAM), with Rasch analysis for measurement of the Family Outcomes. For the reporting period of July 1, 2017 – June 30, 2018, the distribution of families above the cut score for the survey items were as follows:

Number and percent of families who strongly agreed or very strongly agreed that early intervention services have helped the family:

Family Outcome Indicator	Number of Respondents	Percentage of Respondents	Impact of Early Intervention Services
Indicator 4A	149 of 229	65.07%	Know their rights
Indicator 4B	134 of 221	60.06%	Effectively communicate their children's needs
Indicator 4C	160 of 228	70.18%	Help their child develop and learn

When responses were analyzed to include families at or above the cut score the survey items, the results were:

Number and percent of families who agreed, strongly agreed, or very strongly agreed that early intervention services have helped the family:

Family Outcome Indicator	Number of Respondents	Percentage of Respondents	Impact of Early Intervention Services
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FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

Indicator 4A	218 of 229	95.20%	Know their rights
Indicator 4B	209 of 221	94.58%	Effectively communicate their children's needs
Indicator 4C	220 of 228	96.49%	Help their child develop and learn

The survey is mailed to all families whose child has received at least six months of early intervention services, during the month of the child's exit from the system; i.e., the family receives the survey only once during the child's Part C eligibility period. Surveys are available with Spanish translation, and both versions of the survey are available online. For the reporting period July 1, 2017 – June 30, 2018, 2505 surveys were disseminated to 3253 families, and 233 were received for a response rate of 7.16%. 100% of respondents answered the race/ethnicity questions with the distribution of responses is as follows:

Race/Ethnicity	# Survey Respondents	Percent Survey Respondents	Percent All Enrolled in SC IDEA/Part C*
American Indian or Alaskan Native	2	00.88%	0.08%
Asian	8	3.54%	1.31%
Black or African-American	44	19.47%	3.86%
Native Hawaiian or Other Pacific Islander	0	00.00%	0.30%
White	155	68.58%	53.09%
Hispanic	22	9.73%	9.69%

*Per SC Part C Child Count FFY 2017-2018, EDFACTS Metadata and Process System

The collected data is representative of SC IDEA Part C eligible population in FFY 2017-2018, with a 95% confidence level with a +/-4.49% confidence interval based on the population of 4952 children and families. One of the coherent improvement strategies developed to address South Carolina's SIMR, is to focus on the Family Outcomes Measurement System. This strategy includes dissemination practices and improving response rates.

The largest percentage of children were enrolled in early intervention services for 0-6 months (41.0%, n=93), with the next largest percentage enrolled for 6-12 months (19.0%, n=43) The survey further revealed that a limited number of these families (34%, n=77) received additional family support services from our Parent Training and Information Center or other parent supports, which may have had an impact on survey responses.

Actions required in FFY 2016 response

none

OSEP Response

The State indicated on the Historical Data and Targets page that it revised baseline for this indicator using data from FFY 2017. However, OSEP cannot accept that revision because the State did not provide an explanation for that revision.

The State revised its targets for FFY 2018 for this indicator, but OSEP cannot accept those targets because the State's end targets for FFY 2018 do not reflect improvement over the baseline data. The State must revise its FFY 2018 targets to reflect improvement.

The State reported that the data for this indicator were collected from a response group that was representative of the population. However, in its narrative, the State reported, "There is slight underrepresentation of children identified as Native Hawaiian/Other Pacific Islander, and more significant underrepresentation of children identified as Black/African American." In addition, in its data table the State reported that 19.47% of respondents were

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

Black/African American. However, only 3.86% of the infants, toddlers, and families enrolled in the Part C program identified as Black/African American.

Required Actions

In the FFY 2018 SPP/APR, the State must report whether its FFY 2018 response data are representative of the demographics of infants, toddlers, and families enrolled in the Part C program , and, if not, the actions the State is taking to address this issue. The State must also include its analysis of the extent to which the demographics of the families responding are representative of the population.

**FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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)

Historical Data

Baseline Data: 2005

FFY	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Target ≥			0.90%	1.00%	1.04%	1.03%	1.03%	1.03%	1.06%	0.84%	0.89%
Data		0.92%	0.82%	0.97%	0.97%	0.80%	0.57%	0.43%	0.81%	0.79%	0.66%

FFY	2015	2016
Target ≥	0.74%	0.95%
Data	0.74%	0.95%

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2017 - FFY 2018 Targets

FFY	2017	2018
Target ≥	0.98%	0.92%

Key:

Explanation of Changes

The South Carolina Interagency Coordinating Council and interested members of the public met January 2019 to review state performance and set targets for all results indicators. The ICC decided to modify the target for FFY 2018 to better align with the state's growth. South Carolina continues to make slow, incremental progress on this indicator and it was the feeling of the ICC members that we would continue to see that growth with the current child find efforts of the new lead agency.

Targets: Description of Stakeholder Input

The South Carolina Interagency Coordinating Council and interested members of the public met January 2019 to review state performance and set targets for all results indicators. Recommendations based on stakeholder input were to change the targets for this indicator as follows:

	2015	2016	2017	2018
Target ≥	0.74%	0.95%	0.98%	0.90%

The decision to lower the 2018 target came after a discussion about the state's slowed growth overall. BabyNet state leadership shared information on outreach efforts that had already occurred as well as future events designed to promote the program and share information statewide.

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2017-18 Child Count/Educational Environment Data Groups	7/11/2018	Number of infants and toddlers birth to 1 with IFSPs	514	null
U.S. Census Annual State Resident Population Estimates April 1, 2010 to July 1, 2017	6/12/2018	Population of infants and toddlers birth to 1	57,601	null

FFY 2017 SPP/APR Data

Number of infants and toddlers birth to 1 with IFSPs	Population of infants and toddlers birth to 1	FFY 2016 Data	FFY 2017 Target	FFY 2017 Data
514	57,601	0.95%	0.98%	0.89%

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

The national average of children ages birth to twelve months served by Part C= 1.25%.

Actions required in FFY 2016 response

none

OSEP Response

The State revised its targets for FFY 2018 for this indicator, but OSEP cannot accept those targets because the State's end target for FFY 2018 does not reflect improvement over the baseline data. The State must revise its FFY 2018 target to reflect improvement.

Required Actions

**FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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)

Historical Data

Baseline Data: 2005

FFY	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Target ≥			2.00%	2.00%	2.66%	2.67%	2.82%	2.79%	2.77%	2.24%	2.13%
Data		2.07%	1.98%	2.21%	2.38%	2.44%	2.57%	2.46%	2.17%	2.13%	2.12%

FFY	2015	2016
Target ≥	2.30%	2.49%
Data	2.30%	2.49%

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2017 - FFY 2018 Targets

FFY	2017	2018
Target ≥	2.49%	2.50%

Key:

Targets: Description of Stakeholder Input

The South Carolina Interagency Coordinating Council and interested members of the public met January 2019 to review state performance and set targets for all results indicators. Recommendations based on stakeholder input were to leave the targets at the rates previously set.

	2015	2016	2017	2018
Target ≥	2.30%	2.49%	2.49%	2.50%

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2017-18 Child Count/Educational Environment Data Groups	7/11/2018	Number of infants and toddlers birth to 3 with IFSPs	4,952	
U.S. Census Annual State Resident Population Estimates April 1, 2010 to July 1, 2017	6/12/2018	Population of infants and toddlers birth to 3	175,671	

FFY 2017 SPP/APR Data

Number of infants and toddlers birth to 3 with IFSPs	Population of infants and toddlers birth to 3	FFY 2016 Data	FFY 2017 Target	FFY 2017 Data
4,952	175,671	2.49%	2.49%	2.82%

Compare your results to the national data

National average of children ages birth to 36 months served by Part C=3.26%

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

Actions required in FFY 2016 response

none

OSEP Response

Required Actions

**FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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)

Historical Data

Baseline Data: 2005

FFY	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Target			100%	100%	100%	100%	100%	100%	100%	100%	100%
Data		97.90%	82.00%	95.28%	95.00%	93.00%	13.00%	22.00%	88.00%	81.85%	65.16%

FFY	2015	2016
Target	100%	100%
Data	72.40%	83.46%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2017 - FFY 2018 Targets

FFY	2017	2018
Target	100%	100%

FFY 2017 SPP/APR 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 2016 Data	FFY 2017 Target	FFY 2017 Data
2,601	3,988	83.46%	100%	83.25%
Number of documented delays attributable to exceptional family circumstances <i>This number will be added to the "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" field above to calculate the numerator for this indicator.</i>				719

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

- State monitoring
- State database

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).

The data collection period for Indicator 7 was July 1, 2017 - June 30, 2018.

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Throughout the reporting period, data validation activities included checks for missing and/or invalid data (e.g., incorrect dates). Data quality issues continue to be to be addressed with ongoing training and technical assistance, and monthly reminders of missing/invalid data. South Carolina has been without a Part C Data Manager for more than a year now, and there is no doubt that this has impacted the state's ability to monitor data on a monthly basis. As a requirement of the state's Corrective Action Plan (CAP) a Data Manager will be hired by February 2019.

To better pinpoint breakdowns in the 45-day process and isolate sources of delay, the state data system was revised for FFY 2017 to calculate the number of days between:

1. referral and intake,
2. intake and transfer to primary service coordination,
3. transfer to primary service coordination and when the primary service coordinator was added to Planned Services in *BRIDGES*, and
4. referral and parental signature on and consent to the IFSP.

Another area of focus in the CAP is to overhaul the 45 day process in South Carolina. Most, if not all of these systemic changes are well underway and will continue to roll out over the next six months. These changes will ensure more

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

consistency and bring the state into compliance through a number of initiatives. One main areas of focus includes ensuring that eligible infants and toddlers receive an initial evaluation, assessment and IFSP within 45 days.

Actions required in FFY 2016 response

The State must submit in a timely manner all items required under the CAP.

Note: Any actions required in last year's response table that are related to correction of findings should be responded to on the "Correction of Previous Findings of Noncompliance" page of this indicator. If your State's only actions required in last year's response are related to findings of noncompliance, a text field will not be displayed on this page.

Responses to actions required in FFY 2016 response, not including correction of findings

In the past, South Carolina has had numerous issues with identifying noncompliance, notifying providers when it occurs and following up to ensure correction when concerns are identified. The state has not had a coordinated system of general supervision that has been communicated at all levels within the program or to our stakeholders. Requirements have not been clearly articulated in policies and procedures and there has been an inability to ensure valid and reliable data in numerous areas. As a result of these concerns, the new lead agency voluntarily entered into a Corrective Action Plan (CAP) to address these issues. Steady progress is being made in all areas of the CAP which has resulted in a complete overhaul of the entire BabyNet system.

Ongoing progress with the CAP has been communicated with OSEP, the SCICC, and other interested stakeholders, including pediatricians. While the state requested to extend some targets via memorandum submitted Dec. 5, 2018, and later approved by OSEP on Jan. 31, 2019, many requirements spelled out in the CAP have already been completed. SCDHHS has committed an unprecedented level of resources to the BabyNet program which has put it in the best possible position to address the longstanding noncompliance that has plagued the program.

Correction of Findings of Noncompliance Identified in FFY 2016

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

Please explain why no findings of noncompliance were identified when you reported a failure to be in compliance in your last APR.

In the past, South Carolina has had numerous issues with identifying noncompliance, notifying providers when it occurred and following up to ensure correction when concerns are identified. Under the previous lead agency the state did not have a coordinated system of general supervision that was developed, implemented and communicated at all levels within the program or with interested stakeholders. Since the transfer of the BabyNet program to SCDHHS, steps have been taken to ensure that a coordinated system of general supervision is developed as a condition of the Corrective Action Plan. The due date for the General Supervision plan is April 2019.

For the reasons listed above, the state cannot provide an explanation or follow-up on instances of noncompliance for Indicator 7 or account for the lack of findings for this Indicator in 2016. The state must develop policies and procedures that clearly document expectations, develop a general supervision plan that outlines how all providers will be held accountable and implement that plan to ensure accurate and timely data for this Indicator. Once the CAP requirements are completed, the state can then address Indicator 7 findings of noncompliance in a coordinated and consistent manner.

FFY 2015 Findings Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

In the past, South Carolina has had numerous issues with identifying noncompliance, notifying providers when it occurred and following up to ensure correction when concerns are identified. Under the previous lead agency the state did not have a coordinated system of general supervision that was developed, implemented and communicated at all levels within the program or stakeholders. Since the transfer of the BabyNet program to SCDHHS, steps have been taken to ensure that a coordinated system of general supervision is developed as a condition of the Corrective Action Plan. The due date for the plan is April 2019.

For the reasons listed above, the state cannot provide an explanation or follow-up on the 35 instances of noncompliance for Indicator 7 that were identified in FFY 2015 which were also not addressed in 2016. The state must develop policies and procedures that clearly document expectations, develop a general supervision plan that outlines how all providers will be held accountable and implement that plan to ensure accurate and timely data for this Indicator. Once the CAP requirements are completed, the state can then address Indicator 7 findings of noncompliance in a coordinated and consistent manner.

OSEP Response

The State did not demonstrate that the EIS program or provider corrected the findings of noncompliance identified in FFY 2016 and the remaining 35 findings of noncompliance identified in FFY 2015, because the lead agency did not have the necessary data and information to correct the noncompliance which was identified by the previous lead agency. As the State reported, "due to past issues with identifying noncompliance, notifying providers when it occurs and following up to ensure correction when concerns are identified,... the new lead agency voluntarily entered into a Corrective Action Plan (CAP) to address these issues."

OSEP's December 2017 monitoring letter identified noncompliance with the State's monitoring system and required the State to submit a corrective action plan (CAP) to ensure compliance. The State submitted, and OSEP approved on June 1, 2018, the CAP submitted in response to OSEP's December 2017 monitoring letter. The State's CAP is part of SC's FFY 2018 IDEA Part C grant award.

In a January 31, 2019 memo, OSEP responded to the State's December 2018 revised CAP and granted an extension of time to June 30, 2019 for the State to demonstrate its State-level general supervision responsibility for monitoring compliance with IDEA Part C requirements, including identifying and issuing findings of noncompliance and ensuring correction of identified noncompliance. OSEP continues to provide technical assistance to the State.

Required Actions

**FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
Indicator 8A: Early Childhood Transition**

Monitoring Priority: Effective General Supervision Part C / Effective Transition

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 State educational agency (SEA) and the local educational agency (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)

Historical Data

Baseline Data: 2005

FFY	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Target			100%	100%	100%	100%	100%	100%	100%	100%	100%
Data			88.00%	100%	100%	100%	60.00%	60.00%	72.00%	70.94%	100%

FFY	2015	2016
Target	100%	100%
Data	100%	100%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2017 - FFY 2018 Targets

FFY	2017	2018
Target	100%	100%

FFY 2017 SPP/APR Data

Data include only those toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has 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.

Yes

No

Number of children exiting Part C who have an IFSP with transition steps and services	Number of toddlers with disabilities exiting Part C	FFY 2016 Data	FFY 2017 Target	FFY 2017 Data
3,203	3,203	100%	100%	100%

Number of documented delays attributable to exceptional family circumstances <i>This number will be added to the "Number of children exiting Part C who have an IFSP with transition steps and services" field to calculate the numerator for this indicator.</i>	0
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What is the source of the data provided for this indicator?

State monitoring

State database

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).

Data for this indicator were collected from the full reporting period of July 1, 2017 through June 30, 2018.

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

The BRIDGES system, requires transition planning with the initial and each subsequent 6-month review or evaluation of the IFSP. Service coordinators cannot save the IFSP in the data system without a completed transition plan.

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

Actions required in FFY 2016 response

none

Note: Any actions required in last year's response table that are related to correction of findings should be responded to on the "Correction of Previous Findings of Noncompliance" page of this indicator. If your State's only actions required in last year's response are related to findings of noncompliance, a text field will not be displayed on this page.

Correction of Findings of Noncompliance Identified in FFY 2016

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

OSEP Response

Required Actions

**FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
Indicator 8B: Early Childhood Transition**

Monitoring Priority: Effective General Supervision Part C / Effective Transition

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 State educational agency (SEA) and the local educational agency (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)

Historical Data

Baseline Data: 2005

FFY	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Target			100%	100%	100%	100%	100%	100%	100%	100%	100%
Data		100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

FFY	2015	2016
Target	100%	100%
Data	100%	100%

Key: Gray – Data Prior to Baseline Yellow – Baseline

FFY 2017 - FFY 2018 Targets

FFY	2017	2018
Target	100%	100%

FFY 2017 SPP/APR Data

Data include notification to both the SEA and LEA

- Yes
- No

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 2016 Data	FFY 2017 Target	FFY 2017 Data
3,203	3,203	100%	100%	100%

Number of parents who opted out This number will be subtracted from the "Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B" field to calculate the denominator for this indicator.	0
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Describe the method used to collect these data

Using data from the BRIDGES data system, the staff at the Team for Early Childhood Solutions (TECS) sends data reports on a monthly basis to the SEA and each of the state's LEAs as follows:

1. "24 Month Report" from BRIDGES of children who turned 24 months (2 years) of age in the previous month and for whom an initial IFSP was developed.
2. "Over 24 Report" from BRIDGES of children who were 24 months (2 years) of age during the previous month and for whom an initial IFSP was developed.
3. "30 Month Report" from BRIDGES of children who turned 30 months (2.5 years) of age or and for whom an initial IFSP was developed at age 30 months (2.5 years) during the previous month

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

4. "Over 33 Month Report" from BRIDGES of children with an initial IFSP developed between age 33 months (2 years 9months) and 34.5 months (2 year, 10.5 months); and e) "Over 34.5 Month Report" from BRIDGES of children referred to BabyNet over 34.5 months of age in the assigned geographic area.

Each report includes directory information (child's name, date of birth, address, and telephone number) for children in the assigned geographic area for the LEA. If no children in a school district qualify for notification, a "Zero Report" is made which notifies the SCDE and LEA that there are no children to report in the specific month range.

Do you have a written opt-out policy? No

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

- State monitoring
- State database

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).

Data for this indicator were collected from the full reporting period of July 1, 2017 - June 30, 2018.

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Because the notification to the State Education Agency (SEA) and each Local Education Agency (LEA) is completed electronically as described above, the state has ensured 100% compliance with Indicator 8b.

Actions required in FFY 2016 response

none

Note: Any actions required in last year's response table that are related to correction of findings should be responded to on the "Correction of Previous Findings of Noncompliance" page of this indicator. If your State's only actions required in last year's response are related to findings of noncompliance, a text field will not be displayed on this page.

Correction of Findings of Noncompliance Identified in FFY 2016

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

OSEP Response

Required Actions

**FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
Indicator 8C: Early Childhood Transition**

Monitoring Priority: Effective General Supervision Part C / Effective Transition

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 State educational agency (SEA) and the local educational agency (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)

Historical Data

Baseline Data: 2005

FFY	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Target			100%	100%	100%	100%	100%	100%	100%	100%	100%
Data		93.00%	68.00%	64.89%	83.00%	84.00%	87.00%	75.00%	91.00%	88.06%	84.72%

FFY	2015	2016
Target	100%	100%
Data	96.47%	85.97%

Key:  Gray – Data Prior to Baseline  Yellow – Baseline

FFY 2017 - FFY 2018 Targets

FFY	2017	2018
Target	100%	100%

FFY 2017 SPP/APR Data

Data reflect only those toddlers for whom the Lead Agency has 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

- Yes
- No

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 2016 Data	FFY 2017 Target	FFY 2017 Data
2,150	3,203	85.97%	100%	90.50%

Number of toddlers for whom the parent did not provide approval for the transition conference <i>This number will be subtracted from the "Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B" field to calculate the denominator for this indicator.</i>	487
Number of documented delays attributable to exceptional family circumstances <i>This number will be added to the "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" field to calculate the numerator for this indicator.</i>	308

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

- State monitoring
- State database

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).

Data for this indicator were collected for the full reporting period of July 1, 2017 - June 30, 2018.

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

With the monthly data reminders for missing and/or invalid data, service coordinators have been particularly responsive to requests to enter both transition and exit data in BRIDGES, including instances when parents decline the transition conference process and when the conference was delayed due to parent reasons. Part B and Part C have collaborated on a Transition Guide for families and have plans for additional collaborations in the coming year.

Actions required in FFY 2016 response

none

Note: Any actions required in last year's response table that are related to correction of findings should be responded to on the "Correction of Previous Findings of Noncompliance" page of this indicator. If your State's only actions required in last year's response are related to findings of noncompliance, a text field will not be displayed on this page.

Correction of Findings of Noncompliance Identified in FFY 2016

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

OSEP Response

The State did not demonstrate that the EIS program or provider corrected the findings of noncompliance identified in FFYs 2015 and 2014 because it did not report that it verified correction of those findings, consistent with the requirements in OSEP Memo 09-02. Specifically, the State did not report that it verified that each EIS program or provider with noncompliance identified in FFYs 2015 and 2014 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.

The State did not report that it identified any findings of noncompliance in FFY 2016, although its FFY 2016 data reflect less than 100% compliance. In the FFY 2018 SPP/APR, the State must provide an explanation of why it did not identify any findings of noncompliance in FFY 2016.

The State must demonstrate, in the FFY 2018 SPP/APR, that the remaining findings identified in FFYs 2015 and 2014 were corrected. When reporting on the correction of noncompliance, the State must report, in the FFY 2018 SPP/APR, that it has verified that each EIS program or provider with remaining noncompliance identified in FFYs 2015 and 2014: (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 or provider, consistent with OSEP Memo 09-02. In the FFY 2018 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

Required Actions

**FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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 under section 615 of the IDEA are adopted).

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

Historical Data

Baseline Data:

FFY	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Target ≥											
Data											

FFY	2015	2016
Target ≥		
Data		

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2017 - FFY 2018 Targets

FFY	2017	2018
Target ≥		

Key:

Targets: Description of Stakeholder Input

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2017-18 EMAPS IDEA Part C Dispute Resolution Survey; Section C: Due Process Complaints	11/8/2018	3.1(a) Number resolution sessions resolved through settlement agreements	n	n
SY 2017-18 EMAPS IDEA Part C Dispute Resolution Survey; Section C: Due Process Complaints	11/8/2018	3.1 Number of resolution sessions	n	n

Explanation of Alternate Data

FFY 2017 SPP/APR Data

3.1(a) Number resolution sessions resolved through settlement agreements	3.1 Number of resolution sessions	FFY 2016 Data	FFY 2017 Target	FFY 2017 Data
0	0			0%

Provide additional information about this indicator (optional)

South Carolina reported a total of 3 complaints in FFY 2017. One complaint was withdrawn or dismissed; two complaints were investigated, and reports issued within required timelines. Neither rose to the level of a resolution session or settlement agreement. All complaints involved issues about access to or timeliness of services.

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

Actions required in FFY 2016 response

none

OSEP Response

This indicator is not applicable to the State.

Required Actions

**FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
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)

Historical Data

Baseline Data: 2005

FFY	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Target ≥									100%		
Data											

FFY	2015	2016
Target ≥		
Data		

Key: Gray – Data Prior to Baseline Yellow – Baseline Blue – Data Update

FFY 2017 - FFY 2018 Targets

FFY	2017	2018
Target ≥		

Key:

Targets: Description of Stakeholder Input

Prepopulated Data

Source	Date	Description	Data	Overwrite Data
SY 2017-18 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/8/2018	2.1.a.i Mediations agreements related to due process complaints	n	null
SY 2017-18 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/8/2018	2.1.b.i Mediations agreements not related to due process complaints	n	null
SY 2017-18 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/8/2018	2.1 Mediations held	n	null

FFY 2017 SPP/APR Data

2.1.a.i Mediations agreements related to due process complaints	2.1.b.i Mediations agreements not related to due process complaints	2.1 Mediations held	FFY 2016 Data	FFY 2017 Target	FFY 2017 Data
0	0	0			

Provide additional information about this indicator (optional)

See KKM's language re: data submitted in November

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

Actions required in FFY 2016 response

none

OSEP Response

The State reported fewer than ten mediations held in FFY 2017. The State is not required to provide targets until any fiscal year in which ten or more mediations were held.

Required Actions

**FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)
Indicator 11: State Systemic Improvement Plan**

Monitoring Priority: General Supervision

Results indicator: The State's SPP/APR includes a State Systemic Improvement Plan (SSIP) that meets the requirements set forth for this indicator.

Reported Data

Baseline Data: 2017

FFY	2013	2014	2015	2016	2017
Target					75.00%
Data					70.18%

Key: Gray – Data Prior to Baseline Yellow – Baseline
Blue – Data Update

FFY 2018 Target

FFY	2018
Target	75.10%

Key:

Description of Measure

Targets: Description of Stakeholder Input

Overview

Data Analysis

A description of how the State identified and analyzed key data, including data from SPP/APR indicators, 618 data collections, and other available data as applicable, to: (1) select the State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and their Families, and (2) identify root causes contributing to low performance. The description must include information about how the data were disaggregated by multiple variables (e.g., EIS program and/or EIS provider, geographic region, race/ethnicity, socioeconomic status, gender, etc.) As part of its data analysis, the State should also consider compliance data and whether those data present potential barriers to improvement. In addition, if the State identifies any concerns about the quality of the data, the description must include how the State will address these concerns. Finally, if additional data are needed, the description should include the methods and timelines to collect and analyze the additional data.

Analysis of State Infrastructure to Support Improvement and Build Capacity

A description of how the State analyzed the capacity of its current infrastructure to support improvement and build capacity in EIS programs and/or EIS providers to implement, scale up, and sustain the use of evidence-based practices to improve results for infants and toddlers with disabilities and their families. State systems that make up its infrastructure include, at a minimum: governance, fiscal, quality standards, professional development, data, technical assistance, and accountability/monitoring. The description must include current strengths of the systems, the extent the systems are coordinated, and areas for improvement of functioning within and across the systems. The State must also identify current State-level improvement plans and other early learning initiatives, such as Race to the Top-Early Learning Challenge and the Home Visiting program and describe the extent that these new initiatives are aligned, and how they are, or could be, integrated with, the SSIP. Finally, the State should identify representatives (e.g., offices, agencies, positions, individuals, and other stakeholders) that were involved in developing Phase I of the SSIP and that will be involved in developing and implementing Phase II of the SSIP.

State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and Their Families

A statement of the result(s) the State intends to achieve through the implementation of the SSIP. The State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and their Families must be aligned to an SPP/APR indicator or a component of an SPP/APR indicator. The State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and their Families must be clearly based on the Data and State Infrastructure

FFY 2017 Part C State Performance Plan (SPP)/Annual Performance Report (APR)

Analyses and must be a child- or family-level outcome in contrast to a process outcome. The State may select a single result (e.g., increase the rate of growth in infants and toddlers demonstrating positive social-emotional skills) or a cluster of related results (e.g., increase the percentage reported under child outcome B under Indicator 3 of the SPP/APR (knowledge and skills) and increase the percentage trend reported for families under Indicator 4 (helping their child develop and learn)).

Statement

Description

Selection of Coherent Improvement Strategies

An explanation of how the improvement strategies were selected, and why they are sound, logical and aligned, and will lead to a measurable improvement in the State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and their Families. The improvement strategies should include the strategies, identified through the Data and State Infrastructure Analyses, that are needed to improve the State infrastructure and to support EIS program and/or EIS provider implementation of evidence-based practices to improve the State-identified result(s) for infants and toddlers with disabilities and their families. The State must describe how implementation of the improvement strategies will address identified root causes for low performance and ultimately build EIS program and/or EIS provider capacity to achieve the State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and their Families.

Theory of Action

A graphic illustration that shows the rationale of how implementing the coherent set of improvement strategies selected will increase the State's capacity to lead meaningful change in EIS programs and/or EIS providers, and achieve improvement in the State-identified Measurable Result(s) for Infants and Toddlers with Disabilities and their Families.

Submitted Theory of Action: No Theory of Action Submitted



Provide a description of the provided graphic illustration (optional)

Infrastructure Development

- Specify improvements that will be made to the State infrastructure to better support EIS programs and providers to implement and scale up EBPs to improve results for infants and toddlers with disabilities and their families.
- Identify the steps the State will take to further align and leverage current improvement plans and other early learning initiatives and programs in the State, including Race to the Top-Early Learning Challenge, Home Visiting Program, Early Head Start and others which impact infants and toddlers with disabilities and their families.
- Identify who will be in charge of implementing the changes to infrastructure, resources needed, expected outcomes, and timelines for completing improvement efforts.
- Specify how the State will involve multiple offices within the State Lead Agency, as well as other State agencies and stakeholders in the improvement of its infrastructure.

See attached plan

Support for EIS programs and providers Implementation of Evidence-Based Practices

- Specify how the State will support EIS providers in implementing the evidence-based practices that will result in changes in Lead Agency, EIS program, and EIS provider practices to achieve the SIMR(s) for infants and toddlers with disabilities and their families.
- Identify steps and specific activities needed to implement the coherent improvement strategies, including communication strategies and stakeholder involvement; how identified barriers will be addressed; who will be in charge of implementing; how the activities will be implemented with fidelity; the resources that will be used to implement them; and timelines for completion.
- Specify how the State will involve multiple offices within the Lead Agency (and other State agencies such as the SEA) to support EIS providers in scaling up and sustaining the implementation of the evidence-based practices once they have been implemented with fidelity.

See attached plan

Evaluation

- Specify how the evaluation is aligned to the theory of action and other components of the SSIP and the extent to which it includes short-term and long-term objectives to measure implementation of the SSIP and its impact on achieving measurable improvement in SIMR(s) for infants and toddlers with disabilities and their families.
- Specify how the evaluation includes stakeholders and how information from the evaluation will be disseminated to stakeholders.
- Specify the methods that the State will use to collect and analyze data to evaluate implementation and outcomes of the SSIP and the progress toward achieving intended improvements in the SIMR(s).
- Specify how the State will use the evaluation data to examine the effectiveness of the implementation; assess the State's progress toward achieving intended improvements; and to make modifications to the SSIP as necessary.

see attached plan

Technical Assistance and Support

Describe the support the State needs to develop and implement an effective SSIP. Areas to consider include: Infrastructure development; Support for EIS programs and providers implementation of EBP; Evaluation; and Stakeholder involvement in Phase II.

see attached plan

Phase III submissions should include:

- Data-based justifications for any changes in implementation activities.
- Data to support that the State is on the right path, if no adjustments are being proposed.
- Descriptions of how stakeholders have been involved, including in decision-making.

A. Summary of Phase 3

1. Theory of action or logic model for the SSIP, including the SiMR.
2. The coherent improvement strategies or principle activities employed during the year, including infrastructure improvement strategies.
3. The specific evidence-based practices that have been implemented to date.
4. Brief overview of the year's evaluation activities, measures, and outcomes.
5. Highlights of changes to implementation and improvement strategies.

South Carolina has not submitted its SSIP as of the start of clarification.

B. Progress in Implementing the SSIP

1. Description of the State's SSIP implementation progress: (a) Description of extent to which the State has carried out its planned activities with fidelity—what has been accomplished, what milestones have been met, and whether the intended timeline has been followed and (b) Intended outputs that have been accomplished as a result of the implementation activities.
2. Stakeholder involvement in SSIP implementation: (a) How stakeholders have been informed of the ongoing implementation of the SSIP and (b) How stakeholders have had a voice and been involved in decision-making regarding the ongoing implementation of the SSIP.

C. Data on Implementation and Outcomes

1. How the State monitored and measured outputs to assess the effectiveness of the implementation plan: (a) How evaluation measures align with the theory of action, (b) Data sources for each key measure, (c) Description of baseline data for key measures, (d) Data collection procedures and associated timelines, (e) [If applicable] Sampling procedures, (f) [If appropriate] Planned data comparisons, and (g) How data management and data analysis procedures allow for assessment of progress toward achieving intended improvements
2. How the State has demonstrated progress and made modifications to the SSIP as necessary: (a) How the State has reviewed key data that provide evidence regarding progress toward achieving intended improvements to infrastructure and the SiMR, (b) Evidence of change to baseline data for key measures, (c) How data support changes that have been made to implementation and improvement strategies, (d) How data are informing next steps in the SSIP implementation, and (e) How data support planned modifications to intended outcomes (including the SiMR)—rationale or justification for the changes or how data support that the SSIP is on the right path
3. Stakeholder involvement in the SSIP evaluation: (a) How stakeholders have been informed of the ongoing evaluation of the SSIP and (b) How stakeholders have had a voice and been involved in decision-making regarding the ongoing evaluation of the SSIP

D. Data Quality Issues: Data limitations that affected reports of progress in implementing the SSIP and achieving the SiMR

1. Concern or limitations related to the quality or quantity of the data used to report progress or results
2. Implications for assessing progress or results
3. Plans for improving data quality

E. Progress Toward Achieving Intended Improvements

1. Infrastructure changes that support SSIP initiatives, including how system changes support achievement of the SiMR, sustainability, and scale-up
2. Evidence that SSIP's evidence-based practices are being carried out with fidelity and having the desired effects
3. Outcomes regarding progress toward short-term and long-term objectives that are necessary steps toward achieving the SiMR
4. Measurable improvements in the SiMR in relation to targets

F. Plans for Next Year

1. Additional activities to be implemented next year, with timeline
2. Planned evaluation activities including data collection, measures, and expected outcomes
3. Anticipated barriers and steps to address those barriers
4. The State describes any needs for additional support and/or technical assistance

OSEP Response

This indicator is not applicable.