

Part C State Annual Performance Report (APR) for 2010

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Public Reporting

SC FFY 2010 APR was submitted to MidSouth RRC for feedback, reviewed with the SCICC and other interested members of the public on December 7, 2011 and January 12, 2012, and posted on the SC First Steps website (<http://www.scfirststeps.org/babynet.html>) February 1, 2012.

Overview of the Annual Performance Report Development:

Part C SPP/APR Part C SPP/APR Indicator/Measurement Table (OMB NO: 1820-0578 / Expiration Date: 08/31/2014) was used for all indicators with the exception of Indicator 8a-8c. The FFY 2010 APR has been prepared by staff of SC First Steps with the assistance of the Part C Data Manager with the Team for Early Childhood Solutions at the University of South Carolina, School of Medicine. Activities initiated, in progress or completed under SC First Steps leadership July 1, 2010 through June 30, 2011 (FFY 2010) are included in this APR.

Monitoring Priority: Early Intervention Services In Natural Environments

Indicator 1: Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner. (20 U.S.C. 1416(a)(3)(A) and 1442)

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

FFY	Measurable and Rigorous Target
2010	100%

Actual Target Data for 2010: 73%; Target unmet.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2010:

Data are from South Carolina early intervention system database, using data for the entire reporting year (July 1, 2010 – June 30, 2011). Both numerator and denominator include data for children whose delays were attributed to exceptional family circumstances.

Numerator: 4233 (# Children with IFSP with any new service added to plan between July 1, 2010 and June 30, 2011 whose start date for all IFSP services is within 30 days of IFSP completion date, *including* children with documented exceptional family circumstances.)

Denominator: 5798 (# Children with IFSP with any new service added to plan between July 1, 2010 and June 30, 2011, *including* children with documented exceptional family circumstances.)

Additional information related to timely initiation of IFSP services:

# Children with IFSP to which a new service was added, July 1, 2010 – June 30, 2011.	5798
# Children with <i>any</i> service initiated more than 30 days after IFSP completion.	1565
# Children with <i>any</i> service initiated more than 30 days after IFSP completion where exceptional family circumstances resulted in delay in initiation of IFSP services. This includes instances where the reason for a late initiation of services entered in BabyTrac is “parent request” (e.g. child ill, parent ill, etc.) or “unable to contact” are counted as “documented exceptional family circumstances” which are beyond the control of BabyNet staff. (Three contact attempts over at least three days are required before entering “unable to contact” in BabyTrac.)	430
# Children with <i>any</i> service initiated more than 30 days after IFSP completion where delay in initiation of IFSP services due to BabyNet system.	1135

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Infants and Toddlers with IFSPs who receive Early Intervention Services in a Timely Manner:

a. Number of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	4233
b. Total number of infants and toddlers with IFSPs	5798
Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner (Percent = [(a) divided by (b)] times 100)	73%

Comparison to FFY 2009:

FFY 2009: 76%*

***Note:** South Carolina previously reported performance of 85% for this Indicator for FFY 2009. In preparing the FFY 2010 APR, it was discovered that the data system report included a duplicated count of children. The accurate count for FFY 2009 is as follows:

Corrected data are from South Carolina early intervention system database, using data for the entire reporting year (July 1, 2009 – June 30, 2010). Both numerator and denominator include data for children whose delays were attributed to exceptional family circumstances.

Numerator: 4163 (# Children with IFSP with any new service added to plan between July 1, 2009 and June 30, 2010 whose start date for all IFSP services is within 30 days of IFSP completion date, *including* children with documented exceptional family circumstances.)
 Denominator: 5512 (# Children with IFSP with any new service added to plan between July 1, 2009 and June 30, 2010, *including* children with documented exceptional family circumstances.)

Additional information related to timely initiation of IFSP services:

# Children with IFSP to which a new service was added, July 1, 2009 – June 30, 2010.	5512
# Children with <i>any</i> service initiated more than 30 days after IFSP completion.	1349
# Children with <i>any</i> service initiated more than 30 days after IFSP completion where exceptional family circumstances resulted in delay in initiation of IFSP services. This includes instances where the reason for a late initiation of services entered in BabyTrac is “parent request” (e.g. child ill, parent ill, etc.) or “unable to contact” are counted as “documented exceptional family circumstances” which are beyond the control of BabyNet staff. (Three contact attempts over at least three days are required before entering “unable to contact” in BabyTrac.)	325
# Children with <i>any</i> service initiated more than 30 days after IFSP completion where delay in initiation of IFSP services due to BabyNet system.	1024

This error in calculation for Indicator 1 for FFY 2009 is noted in Indicators 9 and 14 for this APR.

Instances of Non-Compliance for Indicator 1:

South Carolina did not make findings of non-compliance in FFY 2009. The slippage reported above is nonetheless documented by SC First Steps as an increase in the number of instances of non-compliance for Indicator 1.

Following extension review and revision of the State's system of General Supervision in concert with OSEP, South Carolina issued findings of non-compliance as defined by OSEP Memorandum 09-02 in FFY 2011 for FFY 2010. Findings were issued to service coordination vendors (i.e., the lowest level of supervision accountable for correction of non-compliance). In the event the service coordination vendor served more than one county, *and* non-compliance existed in multiple counties served by the vendor, a finding was issued to the vendor for each county in which non-compliance has been documented.

<u>YEAR</u>	<u>2009</u>	<u>2010</u>
INSTANCES OF NON-COMPLIANCE	2124 instances	Findings as defined by OSEP Memorandum 09-02 for FFY 2010 were issued in October, 2011. Verification of correction of Prong One and Prong 2 is in progress, and will be reported in the APR submitted in February 2013.
% INSTANCES CORRECTED < 1 YEAR	42% (892)	
% INSTANCES CORRECTED > 1 YEAR	40% (850)	
% INSTANCES NOT YET VERIFIED AS CORRECTED	18% (382)	

(1) OSEP has requested that SCFS determine a) if BabyNet system personnel correctly implementing 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) (i.e., achieved 100% compliance) based on updated data such as data subsequently collected through on-site monitoring or a State data system; b) that services were initiated although late, for any child whose services were not initiated in a timely manner, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02); and c):

- a. SCFS cannot currently verify 100% compliance for this indicator. On February 3, 2011, a request for submission of Indicator 1 missing data from FFY 2007 through FFY 2010, was sent to program managers of BabyNet participating state agencies providing service coordination. This effort has increased the percentage of instances reported as corrected after 12 months from 32% to 40%, and reduced the percentage of missing data for indicator 1 for FFY 2009 from 26% as originally reported in this APR to 18%. In subsequent review of the data system elements with DAC later in February 2012, it was determined the data system lacks specificity in reporting late reasons for this indicator; consequently, it appears that in some instances of missing data for this indicator, service coordinators have been omitting data rather than selecting an inaccurate late reason. This has limited the ability of SCFS to reasonably determine in instances of missing data if services were provided, were justifiably late, or were not provided; all data queries for verification of compliance with this indicator for subsequent children, therefore, are invalid. A second request has been sent to program managers for BabyNet participating state agencies for documentation samples from early intervention records of children with continued missing data, as well as children served subsequent to identified instances of non-compliance so that we can verify compliance, with a submission deadline of May 1, 2012. Simultaneously SCFS, together with the Part C data manager and the data system vendor, are revising the late reason reporting options to meet requirements for valid and reliable data for FFY 2012.
- b. Also requested for submission by May 1, 2012, was documentation from early intervention records for each child with late services to verify that although late, services were in fact initiated for each identified instance of non-compliance. SCFS is therefore at this time unable to demonstrate or report correction of non-compliance reflected in FFY 2009 date for Indicator 1.

- c. Verification of provision of late services as well as compliance with Indicator 1 and related requirements for subsequent children for FFY 2007-2010 will be reported in the FFY 2011 Grant Award Special Conditions Progress Report of May 7, 2012.

Improvement Activities

Activities initiated, completed or in process July 1, 2010 – June 30, 2011 to improve performance and/or correct noncompliance identified in FFY 2010 and/or noncompliance identified in previous years that was not corrected within one year:

Activity	Lead Person/Agency	Completion Date	Notes (including resources needed)
Ongoing TA with the Data Accountability Center, MidSouth Regional Resource Center, and National Early Childhood Technical Assistance Center.	SC First Steps	On-going	Includes state data system vendor as appropriate
As part of General Supervision functions, provide training to all current and future BabyNet System Personnel possess demonstrable knowledge regarding the related requirements, policies and procedures for timely delivery of services and 45-day process.	SC First Steps	Initiated February 2011; ongoing	Collaborate with Team for Early Childhood Solutions (TECS) regarding technology for delivery of training, and CSPD content
Provide access to an updated online searchable database of contracted service providers by zip code.	SC First Steps	April 2011; ongoing	Robin Morris, Debra McCoy
Through correction of findings of non-compliance, develop and implement mechanism to verify that when alternate providers are available within the state definition of timely, the service coordinator documents that the family has been offered a choice in order to facilitate	SC First Steps	April 2011; ongoing	BabyNet State Office Associates Program Managers of collaborating agencies providing service coordination
Target provider recruitment for urban centers and rural areas as APR data (including formal and informal complaints) indicates	SC First Steps	On-going	SCICC Robin Morris, Debra McCoy State professional associations
Investigate, develop and implement use of a primary service provider model as one means to address provider shortages	SC First Steps	Initiate April 2011; implement beginning July 2012	TECS, NECTAC
Initiate discussions with state Medicaid agency regarding Part C requirements	SC First Steps	Immediately and ongoing	SCICC, SC Department of Health and Human Services
Review and revise provider contracts, Part C service fund reimbursement rates, and other guidance as needed to ensure sustainable fiscal stewardship	SC First Steps	Immediately and ongoing	BabyNet State Office Staff, Provider focus groups

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/ Resources for 2011: Due to slippage in proposed targets and an increase in the number of findings of non-compliance, Improvement Activities have been refocused on system-level issues and general supervision activities as noted below. Additionally, data is now available to allow county-level drill down for availability of providers and trends in non-compliance, which will in turn facilitate better measurement and evaluation of the revised Improvement Activities. These revisions to proposed Improvement Activities are included in South Carolina's amended State Performance Plan.

Activity	Lead Person/ Agency	Completed	Notes (including resources needed)
RECRUITMENT AND RETENTION: Active recruitment through state professional associations in 35 counties where service coordinators reported no provider available for occupational therapy, physical therapy and speech- language pathology.	First Steps	Ongoing	Staff of First Steps, ICC Committees, State Professional Associations
TECHNICAL ASSISTANCE: Provider training/TA to include information on the 30-day timeline requirement and methods for meeting this timeline. Prompt response to contracted service providers' training; consultation and/or technical assistance based on provider requests or identified needs in order to maximize availability of services to children eligible for IDEA Part C. Provide TA related to exploration of new service delivery model for the state, corresponding training, and revisions to provider contracts.	First Steps	Ongoing	Staff of First Steps, TECS
TECHNICAL ASSISTANCE: Training, consultation and technical assistance to service coordinators (representing three agencies) to encourage prompt and accurate data entry.	First Steps, Participating State Agencies, TECS	Ongoing	Staff of First Steps, TECS
TECHNICAL ASSISTANCE: Posting of available providers both on the BabyNet website and in the Part C Central Directory.	First Steps	Ongoing	Staff of First Steps, Family Connection of South Carolina
POLICY/PROCEDURES Revision of policy regarding service coordination responsibilities to use BabyNet Central Directory to seek alternate providers where waiting lists are reported, unless parent requests to delay initiation of the service.	First Steps, Participating State Agencies	July 2012	Staff of First Steps, Participating State Agencies
MONITORING: Revision of provider contracts to address requirements for timely receipt of services and sanctions for failure to meet the requirement. Revision to and ongoing use of data reporting options to capture drill down of specific reasons for non-compliance. Ensure that service coordinators have training in and access to the array of reporting options for increased accuracy in determination of root causes of non-compliance. For each instance of non-compliance for this indicator, verification that service coordinators sought an alternate provider when available, and if so, was the family offered the choice of the alternate provider.	First Steps , Participating State Agencies	July, 2012 July, 2012 Ongoing Ongoing	Staff of First Steps, Participating State Agencies

Monitoring Priority: Early Intervention Services In Natural Environments

Indicator 2: Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings. (20 U.S.C. 1416(a)(3)(A) and 1442)

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

FFY	Measurable and Rigorous Target
2010	96%

Actual Target Data for 2010: 99%; Target met.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2010:

Data are from South Carolina early intervention system database, using data for the §618 data, Table 2, October 1 - December 1, 2010.

Numerator: Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or programs for typically developing children

Denominator: Total number of infants and toddlers with IFSPs

Comparison to FFY 2009:

FFY	# Children with IFSPs			Calculation		
	TOTAL	Primary IFSP service site in home/ community settings	Primary IFSP service site in other settings	Numerator	Denominator	%
2009	4,600	4,531	69	4,531	4,600	99%
2010	4,625	4,576	49	4,576	4,625	99%

Explanation of Progress for FFY 2010:

The percentage of infants and toddlers receiving services in the home or programs for typically developing children for FFY 2010 remained consistent with FFY 2009. Both current performance and consistency of performance across FFY 2009 and 2010 is attributed to the service model of SCDDSN, whereby Part C Service Coordination is bundled with the service of special instruction; i.e., initial and ongoing service coordination is provided by this agency only if special instruction 'indicators' are met prior to development of the initial IFSP. This procedure was originally developed during 2006-2008 to address both the contingencies of SCDDSN Part C services as well as the resulting shortage of (unbundled) ongoing service coordination. Currently 91% of children currently

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eligible for Part C services are receiving service coordination and special instruction from SCDDSN, regardless of any additional Part C services that may be on the IFSPs for these children. This is, therefore, a significant factor in the calculation of the primary IFSP service site for the vast majority of children served in South Carolina. Data may not be representative of procedures where services are identified during development of the Initial IFSP rather than prior to development of the Initial IFSP.

Improvement Activities

Activities initiated, completed or in process July 1, 2010 – June 30, 2011 to improve performance:

Activity	Lead Person/Agency	Completion Date	Notes (including resources needed)
POLICY/PROCEDURES: Proposed revisions to the state’s policies and procedures as submitted to OSEP in June 2010 and amended in October 2011 include revision to the criteria for special instruction, and separation of special instruction from service coordination. State leaders continue to work toward implementation of this revision to BabyNet policy.	First Steps and Participating State Agencies	Ongoing	Staff of First Steps, ICC, TECS, Participating State Agencies
TRAINING and TA: Update policy, procedure and best practice training and technical assistance related to provision of services in the natural environment, the general role of all EIS providers relative to family training, and in use of a primary service provider model. Provide statewide training opportunities.	First Steps and Participating State Agencies	Ongoing	Staff of First Steps, ICC, TECS, Participating State Agencies
<p>TRAINING and TA: Provide statewide training related to definitions of service settings and how to report data within database (BabyTrac). Update BabyTrac Manual to include these definitions.</p> <p>Develop and implement data reports to monitor initial and ongoing service frequencies, including special instruction services</p> <p>Develop and implement mechanisms to capture data related to teaming and synthesis of family training across IFSP team members, including coordination with Medicaid and commercial insurance providers requirements for family training</p>	First Steps and Participating State Agencies	<p>Ongoing</p> <p>April, 2011</p> <p>Ongoing</p>	<p>Staff of First Steps, ICC, TECS, Participating State Agencies</p> <p>State data system vendor</p>
TRAINING and TA: Require CSPD training of all BabyNet service providers, including comprehensive module	First Steps, TECS and Participating State Agencies	Ongoing	Staff of First Steps, ICC, TECS, Participating

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dedicated to provision of services in the natural environment with an emphasis on Part C statute requiring services within the child’s everyday routines, activities, and places. Research to practice and the practicality of services within the natural environment is stressed throughout the training.			State Agencies
Combine sections of NCSEAM Family Survey and administer annually to determine family perception and impact of implementation of revised policies	SC First Steps	July 2012; ongoing	TECS

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for 2011:The Improvement Activity related to family perception and impact of policy revisions has been removed from Indicator 2 and added to Indicator 4 to correspond to South Carolina’s Results work. As reviewed in South Carolina’s Continuous Improvement Visit October 31-November 4, 2011, the following Improvement Activities are added to those above for FFY 2011. These revisions to proposed Improvement Activities are included in South Carolina’s amended State Performance Plan.

Activity	Lead Person/ Agency	Completion Date	Notes (including resources needed)
POLICY/PROCEDURES: State leaders will continue to continue to work toward development and implementation of appropriate identification of the following during the Initial IFSP Team Meeting: 1) ongoing service coordination; 2) identification of needed services.	First Steps and Participating State Agencies	July, 2012	Staff of First Steps, ICC, TECS, Participating State Agencies

Monitoring Priority: Early Intervention Services In Natural Environments

Indicator 3: Percent of infants and toddlers with IFSPs who demonstrate improved:

- A. Positive social-emotional skills (including social relationships);
- B. Acquisition and use of knowledge and skills (including early language/ communication); and
- C. Use of appropriate behaviors to meet their needs. (20 U.S.C. 1416(a)(3)(A) and 1442)

Measurement:

Outcomes:

- A. Positive social-emotional skills (including social relationships);
- B. Acquisition and use of knowledge and skills (including early language/communication); and
- C. Use of appropriate behaviors to meet their needs.

Progress categories for A, B and C:

- a. Percent of infants and toddlers who did not improve functioning = [(# of infants and toddlers who did not improve functioning) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
- b. Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = [(# of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
- c. Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it = [(# of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
- d. Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers = [(# of infants and toddlers who improved functioning to reach a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
- e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers = [(# of infants and toddlers who maintained functioning at a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

Summary Statements for Each of the Three Outcomes:

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

Measurement for Summary Statement 1:

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

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

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

Targets and Actual Data for Part C Children Exiting in FFY 2010 (2010-11) and Comparison to Actual Data for Part C Children Exiting from FFY 2010

Summary Statements	Actual FFY 2009 (% of children)	Actual FFY 2010 (% of children)	Targets FFY 2011 (% of children)
Outcome A: Positive social-emotional skills (including social relationships)			
1. 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 exited the program	80% (n=1422)	85% (n=1637)	86%
2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program	65% (n=1556)	66% (n=1613)	66%
Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)			
1. 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 exited the program	81% (n=1492)	85% (n=1695)	85%
2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program	63% (n=1501)	63% (n=1557)	63%
Outcome C: Use of appropriate behaviors to meet their needs			
1. 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 exited the program	81% (n=1434)	86% (n=1655)	86%
2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program	66% (n=1581)	66% (n=1623)	66%

Progress Data for Part C Children FFY 2010

Outcome 3a: Positive social-emotional skills (including social relationships):	Number of children	% of children
a. Percent of children who did not improve functioning	N=25	1.0%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	N=264	10.8%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	N=541	22.1%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	N=1096	44.9%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	N=517	21.2%
Total	N= 2443	100%

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Outcome 3b: Acquisition and use of knowledge and skills (including early language/communication):	Number of children	% of children
a. Percent of children who did not improve functioning	N=20	0.8%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	N=278	11.3%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	N=606	24.6%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	N=1089	44.3%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	N=468	19.0%
Total	N=2461	100%
Outcome 3c: Use of appropriate behaviors to meet their needs:	Number of children	% of children
a. Percent of children who did not improve functioning	N=25	1.0%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	N=247	10.1%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	N=554	22.6%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	N=1101	45.0%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	N=522	21.3%
Total	N=2449	100%

Discussion of Summary Statements and a-e Progress Data for FFY 2010:

FFY2009 actual Summary Statement Data from was compared to FFY2010 actual Summary Statement Data. Comparisons indicated noted progress in summary statements for Outcomes A #1 & #2; B #1; and C #1 with maintenance of same percentage of children for statement #2 of Outcome B and C. The comparisons revealed that all established FFY2010 targets were met or exceeded by the actual FFY2010 data. Child Outcomes data was reported on all children who had complete outcomes data in each category, accounting for differing numbers of children in each category shown above. This collection indicates the ongoing data quality issues being addressed by our Part C program.

Child Outcomes data is collected in a separate database. There is ongoing monitoring and monthly cross referencing with two databases (BabyTrac and TECS) to reconcile data and ensure that child outcomes data is reported on all exiting children within criteria. Data quality is continuing to be addressed through reports and field work. Child Missing Data Reports are sent monthly to program managers in an effort to capture the children who have no data inputted but should have been in child outcomes data sample. Missing Data Component Reports are frequently sent to program managers and with direct contact made to Service Coordinator to determine the missing data components not reported within a specific outcome category for children who have all other reported child outcomes data. Although databases are reconciled monthly there continues to be inconsistencies between the two databases.

FFY2009 a-e Progress Data was compared to FFY2010 Progress Data to look for patterns in data and compare expectations to actual. It is observed for Outcome A, B & C that the largest percent of children who exited “improved functioning to reach a level comparable to same-aged peers” (category d.) in FFY2009 and FFY2010. Outcome A, B & C FFY2009 data indicates the second largest percent of children who exited “maintained functioning at a level comparable to same aged peers” (category e.); however FFY2010 Outcome A, B, & C data indicates the second largest percent of children who exited “improved functioning to a level nearer to same-aged peers but did not reach” (category c.). The data reveals a slight shift in percentages of children from category e to c being the second largest.

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Overall, the above data indicates that the Part C program impacted children positively in all three outcome summary categories, even with a larger amount of children being included in child outcomes data sample. There continues to be a need to address data quality issues 1) to obtain complete data in all child outcomes categories on every child; 2) to ensure that all children who meet the criteria at exit are included in the child outcomes sample; and 3) general supervision and continued training to ensure that the child outcomes process is fully understood and implemented correctly for rating decisions.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

Improvement Activities- The following activities were completed during FFY 2010; these activities have contributed to the increase in reportable numbers. Training and TA activities and improved activities with SPOE and Service Coordination have helped to improve the confidence levels of service coordinators with inputting data. Overall monitoring reveals fewer missing data components.

Activity	Lead Person/Agency	Completion Date	Notes (including resources needed)
Ongoing training with BabyNet system personnel to increase knowledge and skill regarding child outcomes and child outcomes processes. Fidelity of data captured and teaming for rating consensus.	SC First Steps, State ICC, TECS	On-going	NECTAC/ECO SC First Steps, TECS
Ongoing training with BabyNet system personnel to increase comfort and utilization of electronic database portal for collection of "entry" and "exit" data.	SC First Steps, State ICC, and TECS	On-going	NECTAC/ECO SC First Steps, TECS
Regular (monthly) contact monitoring for correlation of the consistency between electronic databases to ensure same number of children entering BabyNet system are being reported in the electronic database with an <i>entry</i> rating and the same number transitioning from the BabyNet system are being reported in the electronic database with an <i>exit</i> rating.	SC First Steps, SC Budget and Control Board, and TECS	On-going	SC First Steps, TECS, State Data System Vendor
Regular (at least monthly) communication to report electronic data input inadequacies to BabyNet personnel.	SC First Steps and TECS	On-going	SC First Steps, TECS, Participating State Agencies; Information for dissemination to local levels.
Implement quality assurance/monitoring activities to ensure internal reliability of rating decision making processes through BabyNet monitoring system (i.e. COSF reviews).	SC First Steps	On-going	BNSO
Ongoing synthesis of child outcomes process with general BabyNet policies.	SC First Steps	On-going	SC First Steps, TECS, Participating

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			State Agencies
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Progress/Slippage- Statewide data reporting continues to move toward being more representative of children served in the state system. On-going training regarding reporting and fidelity of child outcomes data are continued needs within the South Carolina Part C system. Overall, there has been an increased awareness of the child outcomes process and responsibilities of service providers with 1) ongoing follow-up reports to service coordinators regarding return rates and data inputted in both data systems; 2) ongoing training and technical assistance to professional and family organizations concerning child outcomes within BabyNet; and 3) ongoing communication with Interagency Program Managers regarding progress or slippage in child outcomes data activities.

All targets set for FFY2010 were maintained or exceeded. Progress was noted with an increased percentage of children who exit program at a level comparable to same-aged peers. Overall progress was noted increase in the percentage of children 1) who substantially increased their rate of growth by the time they exited the program and 2) who exited the program functioning within age expectations. No slippage was noted with this indicator for FFY2010.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for 2011: The 2010 FFY’s actual data will serve as our FFY2011 targets per stakeholder and Interagency Coordinating Council (ICC) input. These revisions to proposed Improvement Activities are included in South Carolina’s amended State Performance Plan.

Activity	Lead Person/ Agency	Completion Date	Notes (including resources needed)
TRAINING and TA: Provide child outcomes related training to include data collection and monitoring. Training with BabyNet system personnel to increase knowledge and skill regarding child outcomes and child outcomes processes. Fidelity of data captured and teaming for consensus rating. Training with BabyNet system personnel to increase utilization of electronic database portal for collection of “entry” and “exit” data.	First Steps, TECS, and Participating State Agencies	Ongoing	Staff of First Steps, TECS, DDSN, SCSDB, Family Connections and Pro-Parents
TRAINING and TA: Integration of Early Child Outcomes in IFSP Process to include discussion of the three global child outcomes during initial intake with families and throughout IFSP development process.	First Steps, TECS and Participating State Agencies	Ongoing	Staff of First Steps, TECS, DDSN, SCSDB, Family Connections and Pro-Parents
MONITORING: Regular (monthly) contact monitoring for correlation of the consistency between electronic databases to ensure same number of children entering BabyNet system are being reported in the electronic database with an <i>entry</i> rating and the same number transitioning from the BabyNet system are	First Steps, TECS and Participating State Agencies	Ongoing	Staff of First Steps, TECS, DDSN, SCSDB, and SCBCB

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<p>being reported in the electronic database with an <i>exit</i> rating. Regular (at least monthly) communication to report electronic data input inadequacies to BabyNet personnel.</p>			
<p>MONITORING: Update General Supervision Plan to include child outcomes monitoring for system record review; improve data system validity and reliability checks; monthly data reports and communication to Interagency Program Managers.</p>	<p>First Steps and Participating State Agencies</p>	<p>Initiated</p>	<p>Staff of First Steps, TECS, DDSN, SCSDB, and SCBCB</p>

Monitoring Priority: Early Intervention Services In Natural Environments

Indicator 4: Percent of families participating in Part C who report that early intervention services have helped the family:

- A. Know their rights;
- B. Effectively communicate their children's needs; and
- C. Help their children develop and learn. (20 U.S.C. 1416(a)(3)(A) and 1442)

Measurement:

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

Target Data and Actual Target Data for FFY 2010:

Target Data and Actual Target Data	FFY 2010 Target	FFY 2010 Actual	
A. Know their rights	76%	317	79%
B. Effectively communicate their children's needs	71%	309	77%
C. Help their children develop and learn	86%	358	89%

Description of State Data:

Family Surveys were distributed to all SC families with children with planned and unplanned exits from the Part C system. South Carolina uses the National Center for Special Education Accountability Monitoring NCSEAM family survey which requires Rasch Analysis. Children who had been in the system for less than six months prior to transitioning/exiting due to factors such as relocation, voluntary exits, or deceased were excluded from the data collection process. Surveys were distributed to families within 30 days of a child's exit from the SC Part C system in an effort to improve consistency of contact/address information. Family contact information for mailings was provided by the SC Budget and Control Board, the contractor who manages the Part C electronic data system known as *BabyTrac*. A total of 1437 families met the established criteria for FFY 2010. Of the 1437 mailed surveys, 28% (n=403) returned completed surveys with valid responses, with 72% (n=1034) being no contact/refused to complete survey (e.g. no responses or from mailer).

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Data collected for FFY 2010 is representative of the overall population of children being served and exiting the early intervention system. The data representativeness is expressed at a 99%, +/-5 confidence interval based on the sample population of 1437 children and families with return responses from 403 children and families. The largest percent of children were identified as White (66%, n=267) with Black (22%, n=87) and Hispanic/Latino (5%, n=21) races being next which is representative of state data. The largest percent of children were enrolled in early intervention services for 6-12 months (45%), with 12% of children enrolled for 31-36 months. South Carolina exceeded their Targets and the National Average for this indicator using the NCSEAM standard.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010: All targets set for FFY2010 were exceeded. Progress noted with an increased percentage of families in all three outcome areas. Overall progress noted exceeds the national mean in the Part C SPP/APR 2011 Indicator Analyses (using the NCSEAM standard) in all three areas. No slippage noted with this indicator for FFY2010.

Improvement Activities- The following activities were initiated during FFY2010; these activities have contributed to the increase in reportable numbers and increased confidence in reporting.

Activity	Lead Person/ Agency	Completion Date	Notes (including resources needed)
Monthly mail-outs. Family Survey mail outs within 30-days of child's planned and unplanned BabyNet "exits/transitions" to all families with stated criteria to improve overall response rate of completed surveys.	TECS	On-going	First Steps, SC Budget and Control Board
Regular (at least monthly) communication to exchange needed information for monthly mail outs of Family Surveys.	TECS	On-going	First Steps, SC Budget and Control Board (includes BabyTrac folder with available information for access by TECS Staff)
***Training of community family support groups regarding proxy service and processes.	First Steps, ICC, TECS, and local community partners	On-going	Pro-Parents, Family Connections
Implement quality assurance/monitoring activities to ensure internal reliability of manual and electronic validation systems through at least quarterly internal audits.	TECS and First Steps	On-going	
Training of BabyNet personnel related to helping families know their rights; effectively communicating their child's needs; helping them help their children develop and learn.	TECS, First Steps and local community partners	On-going	Participating State Agencies
***Training of community family support groups related to helping families know their rights; effectively communicating their child's needs; helping them help their children develop and learn.	First Steps, ICC, and TECS	On-going	Pro-Parents, Family Connections.

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Discussion of Completed Improvement Activities:

The improvement activities with the red asterisk marks indicate that these activities were initiated during the FFY2009 cycle and remained ongoing activities for FFY2010.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/ Resources for 2011:

The improvement activities without the red asterisk mark indicate activities that were identified and initiated during FFY 2010. The first of the following Improvement Activities has been deleted from Indicator 2, and revised for inclusion in Indicator 4 following the Results work initiated during the South Carolina Continuous Improvement Visit (November 3-4, 2011),

Based on the interpretation of the state data, South Carolina has decided to re-establish the baseline data for our Part C system. The 2010 FFY's actual data will serve as our new target data for FFY 2011 per stakeholder and Interagency Coordinating Council (ICC) input. These revisions to proposed Improvement Activities are included in South Carolina's amended State Performance Plan.

Activity	Lead Person/ Agency	Completion Date	Notes (including resources needed)
Combine sections of NCSEAM Family Survey and administer annually to determine family perception and impact of implementation of revised policies	Results Work Stakeholder Group	Initiation July 2012; ongoing thereafter	TECS
***TRAINING and TA: Training of community family support groups regarding proxy service and processes.	First Steps and Participating State Agencies	Ongoing	Staff of First Steps, TECS, DDSN, SCSDB, Family Connections and Pro-Parents
*** TRAINING and TA: Training of community family support groups related to helping families know their rights; effectively communicating their child's needs; helping them help their children develop and learn.	First Steps, TECS and Participating State Agencies	Ongoing	Staff of First Steps, TECS, DDSN, SCSDB, Family Connections and Pro-Parents
TRAINING and TA: Development of Updated Orientation Materials related to working with families for new and existing families and service providers.	First Steps, TECS and Participating State Agencies	Ongoing	Staff of First Steps, TECS, DDSN, SCSDB, Family Connections and Pro-Parents
TRAINING and TA: Development of a Family Inclusion Training for providers to include such topics as Importance of Cultural Competency; Review of Family Outcomes and Satisfaction Survey Purpose and tools; Family Role as IFSP Team Member; Tips for Communication with Families; Tips for Providing Services in	First Steps, TECS and Participating State Agencies	Ongoing	Staff of First Steps, TECS, DDSN, SCSDB, Family Connections and Pro-Parents

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Challenging Family Environments			
TRAINING and TA: Develop Training for Family Leadership Symposium including what families expected from part C (research to practice collaboration with SC Department of Education-SDE)	First Steps, TECS and Participating State Agencies	Ongoing	Staff of First Steps, TECS, DDSN, SCSDB, Family Connections and Pro-Parents
MONITORING: Update General Supervision Plan to include ongoing monitoring of materials provided during Intake Process related to the three global Family Outcomes.	First Steps, TECS and Participating State Agencies	Ongoing	Staff of First Steps, TECS, DDSN, SCSDB, Family Connections and Pro-Parents

Monitoring Priority: Effective General Supervision Part C/Child Find

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

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

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

FFY	Measurable and Rigorous Target
2010	Meet or Exceed percent calculated for national data

Actual Target Data for 2010: 0.57% Target unmet national target is 1.03%.

Data Source:

Data collected on Table 1 of Information Collection 1820-0557 (*Report of Children Receiving Early Intervention Services in Accordance with Part C*), submitted February 1, 2011.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2010:

Comparison to 2009 Data:

FFY	SOUTH CAROLINA			NATIONAL DATA		
	Total Population Birth to 1	# Children with IFSPs	% Children with IFSPs	Total Population Birth to 1	# Children with IFSPs	% Children with IFSPs
2009	60,666	488	0.80%	4,314,824	44,341	1.03%
2010	58,999	334	0.57%	3,989,384	40,962	1.03%

Explanation of Progress or Slippage that occurred for FFY 2010:

Slippage on this indicator is attributed to ongoing issues related to the Lead Agency transition and transfer in FFY 2009. In FFY 2010 the local System Point of Entry Offices and BabyNet Coordination Teams continue to experience transition issues related to lead agency transfer to First Steps. Slippage can also be attributed to lower overall population children ages birth to 12 months, and redesign of child find and public awareness activities following system restructuring.

Note: National data does not include outlying areas, these data will not be available until 2012 which could impact overall national target percentages.

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Activities initiated, completed or in process during FFY 2010 (July 1, 2010- June 30, 2011):

Activity	Lead Person/Agency	Completion Date	Notes (including resources needed)
Ongoing use of OSEP funded research and activities regarding early identification of potentially eligible children	SC First Steps	On-going	TECS
Establish and maintain communication with primary referral sources regarding early identification and procedures for making referrals, with specific emphasis on the state birthing hospitals, midwife association(s), NICUs, and OB practices	SC First Steps	Initiated February 2011; ongoing	BabyNet State Staff, First Steps County Partnerships
Dissemination of TA supports to primary referral sources regarding established risk conditions and training in use of developmental screening instruments	SC First Steps	July 2011; ongoing	TECS
TRAINING AND TA: 4 regional presentations to guardian ad litem through the University of South Carolina Children's Law Center.	SC First Steps, Family Connections, and Participating State Agencies	Completed	BabyNet State Staff, Family Connections, TECS
Implementation of revised public awareness and child find plans and materials	Family Connection of South Carolina	April 2011; ongoing	---
Collaboration with SC Department of Education child find for central referral point services	SC First Steps	April 2011; ongoing	BabyNet State Staff , SC Department of Education, PRO-Parents of South Carolina (PTIC)
**POLICY/PROCEDURE: Revised contract with Family Connection of South Carolina (state family-to-family support organization) to specify public awareness and child find responsibilities, including revision of public awareness and child find materials.	First Steps, Family Connections, and Participating State Agencies	Completed	BabyNet State Staff and Family Connections
Development and dissemination of statewide central directory of resources	SC First Steps	Initiate July 2011; implement beginning July 2012	Family Connection of South Carolina
Investigate data system capacity to directly connect central referral point to system point of entry offices for electronic delivery of referrals	SC First Steps	In progress	TECS, NECTAC
Continued participation in development and support of efforts to establish a Child Development InfoLine (as BabyNet central referral point) and Help Me Grow follow-up supports (developmental screening) to children	SC First Steps	Initiated February 2010; ongoing	United Way of South Carolina 211 System, Greenville Hospital

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found ineligible for BabyNet services			Systems, Help Me Grow National Replication Project
Implementation of Help Me Grow	United Way of South Carolina 211	June 2013	---

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/Resources for 2011: Ongoing activities noted above will be evaluated to determine if restructuring of SPOE, additional screening and other efforts are needed. There will be monthly monitors and tracking to ensure that all resources are being implemented as outlined in state policies and procedures. Training and TA activities will include individualized evaluations to ensure the effectiveness of these activities. Monitoring activities will be done by participating agencies with an evaluation report provided to the Part C lead agency on the above activities. These revisions to proposed Improvement Activities are included in South Carolina's amended State Performance Plan.

Activity	Lead Person/Agency	Completion Date	Notes (including resources needed)
POLICY/PROCEDURE: Development and dissemination of new referral form for use by primary referral sources, including, but not limited to South Carolina chapters for AAP, American Academy of Family Medicine, South Carolina Obstetrical and Gynecological Society, the State Department of Social Services (divisions of child protective services/ foster/care/adoptive services, and child care services), birthing hospitals and NICUs, all Head Start, Early Head Start, Migrant/Seasonal Head Start, and American Indian/Native Alaskan Head Start centers in South Carolina, All BabyNet System Personnel (agency staff, BabyNet Service Coordinators, and BabyNet Service Providers), SC Department of Education, All First Steps County Partnerships, and United Way 211.	First Steps and Participating State Agencies	Ongoing	Staff of First Steps, DDSN, SCSDDB, Family Connections, Pro-Parents and First Steps County Partnerships
TRAINING AND TA: Local coordination teams implement child find activities in geographic areas having a low rate of referral. Targeted child find activities are designed statewide.	First Steps, Family Connections, and Participating State Agencies	Ongoing	Staff of First Steps, Family Connections, DDSN, SCSDDB, and Pro-Parents
TRAINING AND TA: Collaboration with local WIC programs to identify potentially eligible children at birth.	First Steps, Family Connections, and Participating State Agencies	Ongoing	Staff of First Steps, Family Connections, DDSN, SCSDDB, and Pro-Parents

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<p>TRAINING AND TA: Communication with local First Steps County Partnerships regarding making referrals to BabyNet.</p>	<p>First Steps, Family Connections, and Participating State Agencies</p>	<p>Ongoing</p>	<p>Staff of First Steps, Family Connections, DDSN, SCSDB, Pro-Parents and First Steps County Partnerships</p>
<p>TRAINING AND TA: Joined in state's Help Me Grow initiative through Greenville Hospital System and United Way 211 to develop a central referral system and referral follow-up for children found ineligible for Part C and Part B §619 services.</p>	<p>First Steps, Family Connections, Help Me Grow and Participating State Agencies</p>	<p>Ongoing</p>	<p>Staff of First Steps, Family Connections, Help Me Grow, DDSN, SCSDB, , Pro-Parents, First Steps County Partnerships</p>
<p>MONITORING: Lead agency assures that routine contact is maintained with NICU in order to facilitate early BabyNet referrals.</p>	<p>First Steps, Family Connections, and Participating State Agencies</p>	<p>Ongoing</p>	<p>Staff of First Steps, Family Connections, DDSN, SCSDB, and Pro-Parents</p>

Monitoring Priority: Effective General Supervision Part C/Child Find

Indicator 6: Percent of infants and toddlers birth to 3 with IFSPs compared to national data.

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

Measurement: Percent=[(# of infants and toddler birth to 3 with IFSPs) divided by the (population of infants and toddlers birth to 3)] times 100 compared to national data.

FFY	Measurable and Rigorous Target
2010	Meet or Exceed percent calculated for national data

Actual Target Data for 2010: 2.57%; Target unmet national target 2.82%.

Data Source:

Data collected on Table 1 of Information Collection 1820-0557 (*Report of Children Receiving Early Intervention Services in Accordance with Part C*), submitted February 1, 2011.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2010:

Comparison to 2009 Data:

FFY	SOUTH CAROLINA			NATIONAL DATA		
	Total Population	# Children with IFSPs	% Children with IFSPs	Total Population	# Children with IFSPs	% Children with IFSPs
2009	188,609	4600	2.44%	13,055,982	348,604	2.67
2010	180,307	4625	2.57%	12,152,003	342,389	2.82

Explanation of Progress/Slippage:

Although the number of children served increased from 2.44% in FFY 2009 to 2.57% in FFY 2010, the established target was not met. Progress is attributed to the increased number of children found eligible in the SC Part C program.

Note: National data does not include outlying areas, this data will not be available until 2012 which could impact overall national target percentages.

Activities initiated, completed or in process during FFY 2010 (July 1, 2010- June 30, 2011):

Activity	Lead Person/ Agency	Completion Date	Notes (including resources needed)
Ongoing use of OSEP funded research and activities regarding early identification of potentially eligible children	SC First Steps	On-going	Team for Early Childhood Solutions

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Establish and maintain communication with primary referral sources regarding early identification and procedures for making referrals (including sending results of developmental screenings as available), with specific emphasis on pediatricians, family medicine, early care and education, child protective/foster/adoptive services (CAPTA), homeless shelters, Head Start and Early Head Start, First Steps County Partnerships, and United Way 211	SC First Steps	Initiated February 2011; ongoing	BabyNet State Office Associates, First Steps County Partnerships
Dissemination of TA supports to primary referral sources regarding established risk conditions and training in use of developmental screening instruments	SC First Steps	July 2011; ongoing	Team for Early Childhood Solutions
Implementation of revised public awareness and child find plans and materials	Family Connection of South Carolina	April 2011; ongoing	---
Continued collaboration with the Act Early/Learn the Signs State Team, AUCD, CDC and state UCEDD regarding early identification of children with Autism Spectrum Disorder	SC First Steps	Initiated January 2009; ongoing	BabyNet State Office Associates Center for Disability Resources South Carolina Autism Treatment Networks
Collaboration with SC Department of Education child find for central referral point services	SC First Steps	April 2011; ongoing	BabyNet State Office Associates SC Department of Education PRO-Parents of South Carolina (PTIC)
Development and dissemination of statewide central directory of resources	SC First Steps	Initiate July 2011; implement beginning July 2012	Family Connection of South Carolina
Investigate data system capacity to directly connect central referral point to system point of entry offices for electronic delivery of referrals	SC First Steps	In progress	TECS, NECTAC
Continued participation in development and support of efforts to establish a Child Development InfoLine (as BabyNet central referral point) and Help Me Grow follow-up	SC First Steps	Initiated February 2010; ongoing	United Way of South Carolina 211 System

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supports (developmental screening) to children found ineligible for BabyNet services			Greenville Hospital Systems Help Me Grow National Replication Project
Statewide implementation of Help Me Grow and United Way 211 Child Development InfoLine	United Way of South Carolina 211	June 2013	---

Discussion of Completed Improvement Activities:

The improvement activities with the red asterisk marks indicate that these activities were completed during the FFY2010 cycle. The improvement activities without the red asterisk mark indicate activities that were identified and initiated during FFY2010.

Revisions, with Justification, to Targets/Improvement Activities/Timelines/ Resources for 2011:

Ongoing activities cited below will be evaluated to determine if restructuring of SPOE, additional screening and other efforts are needed. There will be monthly monitors and tracking to ensure that all resources are being implemented as outlined in our policies and procedures. Training and TA activities will include individualized evaluations to ensure the effectiveness of these activities. Monitoring activities will be done by partnering agencies with an evaluation report provided to the Part C lead agency on the above activities. These revisions to proposed Improvement Activities are included in South Carolina's amended State Performance Plan.

Activity	Team Lead	Progress	Notes
POLICY/PROCEDURE: Interagency planning to assure maximum use of all resources available to support Part C services. Adjustments were made by local coordination teams and at the state level to distribute resources as needed to maintain total caseload despite increasing numbers of referrals and completed IFSPs.	First Steps, Family Connections, and Participating State Agencies	Ongoing	Staff of First Steps, Family Connections, DDSN, SCSD, , Pro-Parents
**POLICY/PROCEDURE: Revised contract with Family Connection of South Carolina (state family-to-family support organization) to specify public awareness and child find responsibilities, including revision of public awareness and child find materials.	First Steps, Family Connections, and Participating State Agencies	Completed	Staff of First Steps and Family Connections
POLICY/PROCEDURE: Developed and disseminated new referral form for use by primary referral sources, including, but not limited to South Carolina chapters for AAP, American Academy of Family Medicine, South Carolina Obstetrical and Gynecological Society, the State Department of Social Services (divisions of child protective services/foster/care/adoptive services, and	First Steps, Family Connections, and Participating State Agencies	Ongoing	Staff of First Steps, Family Connections, DDSN, SCSD, Pro-Parents

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child care services), birthing hospitals and NICUs, all Head Start, Early Head Start, Migrant/Seasonal Head Start, and American Indian/Native Alaskan Head Start centers in South Carolina, All BabyNet System Personnel (agency staff, BabyNet Service Coordinators, and BabyNet Service Providers), SC Department of Education, All First Steps County Partnerships, and United Way 211.			
POLICY/PROCEDURE: Efforts to streamline paperwork requirements wherever possible to free BabyNet staff time for direct services.	First Steps, Family Connections, and Participating State Agencies	Ongoing	Staff of First Steps, Family Connections, DDSN, SCSDDB, , Pro-Parents
TRAINING AND TA: Communication with local First Steps County Partnerships regarding making referrals to BabyNet.	First Steps, Family Connections, and Participating State Agencies	Ongoing	Staff of First Steps, Family Connections, Help Me Grow, DDSN, SCSDDB, , Pro-Parents, First Steps County Partnerships
TRAINING AND TA: Joined in state's Help Me Grow initiative through Greenville Hospital System and United Way 211 to develop a central referral system and referral follow-up for children found ineligible for Part C and Part D § 619 services.	First Steps, Family Connections, Help Me Grow and Participating State Agencies	Ongoing	Staff of First Steps, Family Connections, Help Me Grow, DDSN, SCSDDB, , Pro-Parents, First Steps County Partnerships
**TRAINING AND TA: 4 regional presentations to guardian ad litem through the University of South Carolina Children's Law Center.	First Steps, Family Connections, and Participating State Agencies	Completed	Staff of First Steps, Family Connections, TECS, DDSN, SCSDDB, , Pro-Parents
MONITORING: Maintenance of child find activities in order to assure continued referral to BabyNet whenever developmental delay is suspected. This results in a large number of referrals for each child ultimately completing an initial IFSP. However, it provides the opportunity for family contact, referral to other services and reinforcement of BabyNet program availability to a large number of SC families.	First Steps, Family Connections, and Participating State Agencies	Ongoing	Staff of First Steps, Family Connections, DDSN, SCSDDB, , Pro-Parents

Monitoring Priority: Effective General Supervision Part C/Child Find

Indicator 7: 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)

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

FFY	Measurable and Rigorous Target
2010	100%

Actual Target Data for FFY 2010: 91%; Target unmet.

Infants Evaluated and Assessed and provided an Initial IFSP meeting Within Part C’s 45-day timeline:

Number of infants and toddlers with IFSPs for whom an eligibility evaluation, assessment unique strengths and needs, and an initial IFSP meeting was conducted within Part C’s 45-day timeline.	547
Number of infants and toddlers with whom an eligibility evaluation, assessment unique strengths and needs, and an initial IFSP meeting was required to be conducted	4245
Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C’s 45-day timeline (Percent = [(a) divided by (b)] times 100)	13%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:

During South Carolina’s MSIP Continuous Improvement Visit October 31-November 4, 2011, it was determined that given the current state structure of the 45-day process, the assessment of the child’s unique strengths and needs occurs prior to the development of the initial IFSP only for children with established risk conditions. The data below reflect timely 45-day services only for this subset of children. An additional 3317 children received timely evaluation and development of the initial IFSP; however, formal assessment of the child’s unique strengths and needs occurred after the 45-day timeline and therefore represent non-compliance with requirements for this indicator.

Data are from South Carolina early intervention system database, using data for the entire reporting year (July 1, 2010 – June 30, 2011). Both numerator and denominator include data for children whose delays were attributed to exceptional family circumstances

July 1 2009-June 30 2010 = 580

July 1 2010-June 30 2011 = 547

Numerator: **547** (# Children with timely evaluation and development of initial IFSP between July 1, 2010 and June 30, 2011, *including* children with documented exceptional family circumstances.)

Denominator: **4245** (# All children with evaluation and development of an initial IFSP between July 1, 2010 and June 30, 2011, *including* children with documented exceptional family circumstances.)

Comparison to FFY 2009: Children with evaluation, assessment, and Initial IFSP developed within 45 days

FFY 2009:	14%
FFY 2010:	13%

Explanation of Progress and Slippage that occurred in FFY 2010:

Given feedback provided by OSEP during South Carolina’s Continuous Improvement Visit in October 2011, South Carolina is amending its data for FFY 2009, and reporting 14% compliance for this indicator for FFY 2009 (580 of 4111 children with initial IFSPs) and 13% compliance for this indicator for FFY 2010 (547 of 4252 children with initial IFSPs) due to failure to ensure the structure of the state’s early intervention system includes the assessment of the child’s unique strengths and needs prior to development of the initial IFSP. **This calculation error, based on inaccurate interpretation of the measurement table and resulting state structure of the 45-day process for Indicator 7 for FFY 2009, is noted in Indicators 9 and 14 for this APR.**

Findings of Non-Compliance for Indicator 7: South Carolina did not make findings of non-compliance in FFY 2009. The slippage reported above is further documented by SC First Steps as an increase in the number of instances of non-compliance for Indicator 7.

Following extension review and revision of the State’s system of General Supervision in concert with OSEP, South Carolina issued findings of non-compliance as defined by OSEP Memorandum 09-02 in FFY 2011 for FFY 2010. Findings were issued to service coordination vendors (i.e., the lowest level of supervision accountable for correction of non-compliance). In the event the service coordination vendor served more than one county, *and* non-compliance existed in multiple counties served by the vendor, a finding was issued to the vendor for each county in which non-compliance has been documented.

Previously reported instances of non-compliance, the percent corrected in less than one year, the percent corrected in more than one year, and the percent of instances not yet verified as corrected for this indicator were based on children for whom only an evaluation and initial IFSP had been completed, and therefore are invalid. Because this data did not include assessment of the child’s unique strengths and needs prior to development of the initial IFSP, South Carolina will provide revised data for FFY 2007-2009 in the May 7, 2012 FFY 2011 Grant Award Special Conditions Progress Report

OSEP has requested that SCFS determine if BabyNet system personnel: a) are correctly implementing 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and b) have conducted the initial evaluation, assessment, and IFSP meeting, although late, for any child for whom the 45-day timeline was not met, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02.

SCFS cannot currently verify 100% compliance for this indicator, due to failure of the lead agency to ensure the structure of the state’s early intervention system includes the assessment of the child’s unique

strengths and needs prior to development of the initial IFSP. Policies and procedures to be implemented July 1, 2012, include revised structures and mechanisms (such as contracts for intake service coordination) to assure the system point of entry offices have sufficient personnel to be compliant with this indicator and related requirements. Additionally, general supervision structures, including training and technical assistance in the requirements for this indicator, will be reported in SCFS's response to OSEP's Continuous Improvement Visit Letter on June 8, 2012.

Activities initiated, completed or in process during July 1, 2010 – June 30, 2011 (FFY 2010) to improve performance and/or correct noncompliance identified in FFY 2010 and/or noncompliance identified in previous years that was not corrected within one year

Activity	Lead Person/ Agency	Completion Date	Notes (including resources needed)
Ongoing use of OSEP TA regarding research and activities regarding use of data system for identification and verification of correction of non-compliance	SC First Steps	On-going	DAC MSRRC NECTAC State data system vendor and Part C Data Manager
Review and revise current interagency memoranda of agreement to reflect current state policies	SC First Steps	June, 2011 and annually thereafter	BabyNet Interagency Directors' Workgroup Kerr & Co Financial Consultants MSRRC NECTAC
As part of General Supervision functions, provide training to all current and future BabyNet System Personnel possess demonstrable knowledge regarding the related requirements, policies and procedures for 45-day process, including development of the initial IFSP	SC First Steps	Initiated February 2011; ongoing	TECS
Utilize results of functional analysis of SPOE caseloads to ensure distribution of intake service coordinators is sufficient to support referral volume.	SC First Steps	Initiate April 2011; ongoing	Local SPOE Offices
Per current state policy, initiate implementation of dedicated evaluation and assessment teams	SC First Steps	Initiate April 2011; Discontinued	Contract for training of E&A teams in use of standardized evaluation instrument and use of informed clinical opinion for eligibility determination
Per current state policy, initiate implementation of revised procedures for identification of special instruction services	SC First Steps	Initiate April 2011; ongoing	Ongoing discussion with SCDDSN

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/ Resources for 2011: In addition to the ongoing Improvement Activities above, several factors in FFY 2010 have necessitated revision to Improvement Activities for this Indicator. Responsibilities for System Point of

Entry functions, including fifty-two staff, were transferred by legislative proviso from DHEC to SC First Steps effective July 1, 2011. Also in July of 2011, an RFP for dedicated evaluation and assessment teams for redesign of the 45-day process was awarded but later withdrawn by the vendor following feedback from SCDDSN regarding perceived conflict of interest. SC First Steps is awaiting receipt of the Continuous Improvement Visit Letter from OSEP, and anticipates additional Improvement Activities following feedback regarding validity of current state procedures for Indicator 7. These revisions to proposed Improvement Activities are included in South Carolina's amended State Performance Plan.

Activity	Lead Person/ Agency	Completion Date	Notes (including resources needed)
POLICY/PROCEDURE: Redesign of 45-day process to ensure completion of all required components in a timely manner (assignment of service coordinator, assurance of procedural safeguards, evaluation for eligibility, assessment of child and family, development of Initial IFSP, and appropriate identification of needed services)	First Steps, Participating State Agencies	Initiated January 2011	NECTAC, MidSouth RRC, DAC
TRAINING AND TA: Update policy, procedure and best practice training related to timely IFSP development. Provide statewide training opportunities.	First Steps	Ongoing	TECS, Participating State Agencies, Family Connections, Pro- Parents
TRAINING AND TA: Per revisions to state eligibility criteria for OSEP formula grant MOE assurance, provision of training and ongoing TA to SPOE staff in use of the Battelle Developmental Inventory-II, and training and TA to ongoing service coordination personnel regarding interpretation of Battelle results	First Steps	Ongoing	First Steps, TECS, Participating State Agencies
MONITORING: Develop a field in the database (BabyTrac) to capture whether the root cause of non-compliance is with SPOE or Ongoing Service Coordination. Develop a report that identifies the areas of non-compliance.	First Steps	Ongoing	SC Budget and Control Board, TECS and Participating State Agencies
MONITORING: The BabyNet data system (BabyTrac) contains reports and alerts to assist in managing caseload and monitoring due date for the initial IFSP.	First Steps	Ongoing	SC Budget and Control Board TECS, Participating State Agencies
MONITORING: Data reports have been developed in BabyTrac system for monthly monitoring and correction of missing data for this Indicator.	First Steps	Ongoing	SC Budget and Control Board TECS, Participating State Agencies
MONITORING: Interagency review and analysis of performance data at	First Steps	Ongoing	SC Budget and Control Board TECS,

<p>local and state level to explore the root cause for overdue initial IFSPs. Supervisors are required to report to quarterly coordination teams the reason for overdue data. Review of data and discussion at local team meetings verify that the delay in completion of the intake visit often coincides with the late initial IFSP. Corrective action plans will address agency non-compliance.</p>			<p>Participating State Agencies</p>
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Monitoring Priority: Effective General Supervision Part C/Child Find

Indicator 8: Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including:

- A. IFSPs with transition steps and services;
- B. Notification to LEA, if child potentially eligible for Part B; and
- C. Transition conference, if child potentially eligible for Part B.
(20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement:

- A. Percent = [(# of children exiting Part C who have an IFSP with transition steps and services) divided by the (# of children exiting Part C)] times 100.
- B. Percent = [(# of children exiting Part C and potentially eligible for Part B where notification to the LEA occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.
- C. Percent = [(# of children exiting Part C and potentially eligible for Part B where the transition conference occurred) divided by the (# of children exiting Part C who were potentially eligible for Part B)] times 100.

FFY 2010	Measurable and Rigorous Target
8A	100%
8B	100%
8C	100%

Actual Target Data, 8A for FFY 2010: 100%; Target met.

Actual Target Data, 8B for FFY 2010: 100%; Target met.

Actual Target Data, 8C for FFY 2010: 84%; Target unmet.

Data are from South Carolina early intervention system database, using data for the entire reporting year (July 1, 2010 – June 30, 2011).

Children Exiting Part C who Received Timely Transition Planning:

OSEP has requested that SCFS verify if the data reported for Indicator 8a are valid and reliable. Using BabyNet Service Coordination Vendor file reviews conducted between July 1, 2009 and June 30, 2010, a sample 339 children from 32 randomly selected service coordinators indicate that for 176 children in the sample, timely transition planning occurred. For 11 children in the sample, transition planning was late. The sample also revealed, however, that for 109 children the file review omitted documentation of transition planning, and that transition planning was not appropriate at the time of the file review for 44 children. SCFS believes the data to be representative and valid, and amends the previously reported data for this indicator as 60% based on a sample size of 295 children for whom transition planning would have been required. As noted below, this represents slippage of data from FFY 2009. In the May 7, 2012 progress report for the FFY 2011 Grant Award Special Conditions, SCFS will provide data on the 109 children in this sample for whom compliant transition planning was omitted from the file reviews.

a. Number of children exiting Part C who have an IFSP with transition steps and services	975
b. Number of children exiting Part C	1625
Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday (Percent = [(a) divided by (b)] times 100)	60%

Children Exiting Part C who Received Timely Transition Planning (Notification to LEA):

a. Number of children exiting Part C and potentially eligible for Part B where the notification to the LEA occurred	1625
b. Number of children exiting Part C who were potentially eligible for Part B	1625
Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday (Notification to LEA) (Percent = [(a) divided by (b)] times 100)	100%

Children Exiting Part C who Received Timely Transition Planning (Transition Conference):

OSEP has requested that SCFS determine a) is correctly implementing 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)) (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and b) has conducted a transition conference, although late, for any child potentially eligible for Part B whose transition conference was not timely, unless the child is no longer within the jurisdiction of the EIS program, consistent with OSEP Memo 09-02.

a. SCFS cannot currently verify 100% compliance for this indicator.

b. A request has been sent to Program Managers for BabyNet participating state agencies for submission by May 1, 2012, of documentation from early intervention records for each child with a late transition conference from FFY 2007 through FFY 2010, to verify that although late, the transition conference did in fact take place services for each identified instance of non-compliance. SCFS is therefore at this time unable to demonstrate or report correction of instances of non-compliance identified between FFY 2007 and 2009 for Indicator 8c, but will do so in the May 7 2012 progress report for FFY 2011 Grant Award Special Conditions.

c. Verification of provision of late services as well as compliance with Indicator 1 and related requirements for subsequent children for FFY 2007-2010 will be reported in the FFY 2011 Grant Award Special Conditions Progress Report of May 7, 2012.

a. Number of children exiting Part C and potentially eligible for Part B where the transition conference occurred	1413
b. Number of children exiting Part C who were potentially eligible for Part B	1625
Percent of all children exiting Part C who received timely transition planning to support the child's transition to preschool and other appropriate community services by their third birthday (Transition Conference) (Percent = [(a) divided by (b)] times 100)	87%

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for (Insert FFY):

Comparison to FFY 2009 performance

Indicator 8	FFY 2009	FFY 2010
A	100%	60%
B	100%	100%
C	84%	87%

Findings of Non-Compliance for Indicator 8c:

South Carolina did not make findings of non-compliance for this indicator. The slight improvement in performance reported above is further documented by SC First Steps as a decrease in the number of instance of non-compliance for Indicator 8c.

Following extension review and revision of the State's system of General Supervision in concert with OSEP, South Carolina issues findings of non-compliance to service coordination vendors (i.e., the lowest level of supervision accountable for correction of non-compliance). In the event the service coordination vendor serves more than one county, *and* non-compliance exists in multiple counties served by the vendor, a finding is issued to the vendor for each county in which non-compliance has been documented.

As noted above, SCFS is at this time unable to demonstrate or report correction of instances of non-compliance identified between FFY 2007 and 2009 for Indicator 8c, but will do so in the May 7 2012 progress report for FFY 2011 Grant Award Special Conditions.

Findings for FFY 2010 were issued in October, 2011. Verification of correction of Prong One and Prong 2 is in progress, and will be reported in the APR submitted in February 2013.

YEAR	2009	2010
INSTANCES OF NON-COMPLIANCE	70 instances for 40 of 65 Service Coordination Vendors (62%)	71 findings for 40 of 66 Service Coordination Vendors (61%)
% FINDINGS CORRECTED < 1 YEAR	56%	Findings for FFY 2010 were issued in October, 2011. Verification of correction of Prong One and Prong 2 is in progress, and will be

		reported in the APR submitted in February 2013.
% FINDINGS CORRECTED > 1 YEAR	44%	
% FINDINGS NOT YET VERIFIED AS CORRECTED	100%	

Explanation of Progress or Slippage that occurred in FFY 2010:

Although the target for Indicator 8C was not met, data shows slight improvement from FFY 2009 to FFY 2010. This is a direct result of emphasis on timely completion of transition conferences, and policy clarifications regarding this requirement. Training focusing on policy, procedure and best practice relating to transition also is believed to have contributed to progress.

Discussion of Improvement Activities:

Activities initiated, completed or in progress July 1, 2010 – June 30, 2011 to improve performance or correct previously identified non-compliance: Activity	Lead Person/ Agency	Completion Date	Notes (including resources needed)
Ongoing use of OSEP TA regarding research and activities regarding use of data system for identification and verification of correction of non-compliance	SC First Steps	On-going	DAC MSRRC NECTAC State data system vendor and Part C Data Manager
Review and revise current interagency memoranda of agreement to reflect current state policies	SC First Steps	June, 2011 and annually thereafter	BabyNet Interagency Directors' Workgroup SCDOE/Office of Exceptional Children Kerr & Co Financial Consultants MSRRC NECTAC
As part of General Supervision functions, provide training to all current and future BabyNet System Personnel possess demonstrable knowledge regarding the related requirements, policies and procedures for transition notification, referral, planning and supports, including the transition conference with the LEA	SC First Steps	Initiated February 2011; ongoing	TECS
Develop and implement focused monitoring of transition supports and services as documented in IFSPs	SC First Steps	Initiate April-June 2011; ongoing	Participating State Agencies
Utilize results of shared data with the Office of Exceptional Children at the SC Department of Education to identify needs for targeted technical assistance	Part C Data Manager	Initiated January 2011; ongoing	SCDOE/Office of Exceptional Children 619 staff and data manager
Utilize results of focused monitoring to identify needs for targeted technical assistance	SC First Steps	Initiate September 2011; ongoing	BabyNet State Staff
Provide joint training opportunities for BabyNet and LEA personnel regarding transition requirements and performance	SC First Steps, SCDOE/Office of Exceptional Children	Initiate March 2011; ongoing	Part B & C Data

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/ Resources for 2011:

Ongoing activities mentioned above will be evaluated to determine if restructuring of SPOE, additional screening and other efforts are needed. There will be monthly monitors and tracking to ensure that all resources are being implemented as outlined in our policies and procedures. Training and TA activities will include individualized evaluations to ensure the effectiveness of these activities. Monitoring activities will be done by partnering agencies with an evaluation report provided to the Part C lead agency on the above activities. These revisions to proposed Improvement Activities are included in South Carolina's amended State Performance Plan.

Activity	Lead Person/ Agency	Completion Date	Notes (including resources needed)
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PART C STATE ANNUAL PERFORMANCE REPORT (APR) FFY 2010

SOUTH CAROLINA

POLICY/PROCEDURE: Continued use of IFSP form modified in FFY 2006 to facilitate completion and documentation of transition planning beginning with initial development.	First Steps, SC Department of Education (SCDOE), and Participating State Agencies	Ongoing	First Steps, SCDOE, and Participating State Agencies
POLICY/PROCEDURE: Continued monthly notification to LEAs of all children who turned 24 months old or completed initial IFSP after age 24 months in the previous month using data system report designed for this purpose. This report is now sent to the designated Special Education Director for each LEA. The report is also sent to one other LEA staff member upon request.	First Steps, TECS, SCDOE, SC Budget and Control Board (SCBCB), and Participating State Agencies	Ongoing	First Steps, TECS, SCDOE, SCBCB and Participating State Agencies
POLICY/PROCEDURE: Modification of the report described above to require that a notification be sent to each LEA each month even if no children are reported. Copies of these reports are retained for verification.	First Steps, TECS, and Participating State Agencies	Ongoing	First Steps, TECS, SCDOE, SCBCB and Participating State Agencies
POLICY/PROCEDURE: Transition procedures were updated to address Part B concerns related to the transition process. These changes are to be included in next update of policy and procedure manual to be effective July 1, 2012. When implemented, these changes will result in more consistency and improved performance.	First Steps, TECS, SCDOE, and Participating State Agencies	Initiated	First Steps, TECS, SCDOE, SCBCB and Participating State Agencies
TRAINING AND TA: SC worked very closely with technical assistance from the Data Accountability Center, the MidSouth Regional Resource Center, and the National Early Childhood Technical Assistance Center during the latter half of the reporting period to develop process for identification and correction of non-compliance. The state received consultation regarding issues related to performance on this indicator.	First Steps, TECS, SCDOE, SCBCB, and Participating State Agencies	Ongoing	First Steps, TECS, SCDOE, SCBCB and Participating State Agencies
TRAINING AND TA: Conduct joint trainings on transition policy, procedures, and best practice with First Steps BabyNet State Office Program Associates, TECS and SC Department of Education specifically for the purpose of discussing transition and reviewing strategies to improve the process.	First Steps, TECS, and SCDOE	Ongoing	First Steps, TECS, SCDOE and Partnering Agencies
TRAINING AND TA: All service coordinators were notified of missing data and given the opportunity to provide missing data for this indicator in July-August, 2011 prior to issuing of findings.	First Steps, TECS and SCBCB		First Steps, TECS, SCBCB and Participating State Agencies
MONITORING: Data system modifications were completed to alert service coordinators to transition conference due dates (previously only reports available documented conferences already past due). Ongoing training is provided to staff as a reminder to review these reports on a systematic basis.	First Steps, TECS and SCBCB	Ongoing	First Steps, TECS, SCBCB and Participating State Agencies
MONITORING: First Steps State Staff are in the process of developing a file review tool for verification of Indicator 8A, and verification of data for Indicators 8A-8C.	First Steps		Planned initiation for FFY 2012

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 9: General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification. (20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement: Percent of noncompliance corrected within one year of identification:

a. # of findings of noncompliance.

b. # of corrections completed as soon as possible but in no case later than one year from identification.

Percent = [(b) divided by (a)] times 100.

FFY	Measurable and Rigorous Target
2010	0%

As noted previously in Indicators 1, 7, 8a, and 8c, SCFS has thus far only identified instances of non-compliance for FFY 2007-2009, and did not issue findings for non-compliance. Additionally, as reported during the Continuous Improvement Visit in October-November, 2011, SCFS' efforts in this area of general supervision has focused on identification of correction, but correction has not been verified for any of the aforementioned indicators, and amends the correction data for FFY 2009 from 88% to 0%. In preparation for the May 7, 2012 Special Conditions Progress Report for FFY 2011, documentation verifying correction (consistent with OSEP Memo 09-02) of each identified instance of non-compliance in FFY 2007-2010 has been requested from the Program Managers of BabyNet participating agencies.

SCFS also failed to issue findings of non-compliance for FFY 2009 for complaint decisions, and will be amending data accordingly.

The following procedures for timely identification and correction of non-compliance were reached after extensive review and revision by SC First Steps and OSEP, with the assistance of DAC, MidSouth RRC, and NECTAC.

The South Carolina early intervention data system (BabyTrac) is used to determine the frequency of non-compliance for Indicators 1, 7, and 8c. Using the data system, the following steps are taken in making findings of non-compliance:

1. Reports for Indicators 1, 7, and 8c are run on a monthly basis to monitor if any data are missing or if implausible errors are present. Program managers for each participating state agency providing service coordination are responsible for follow-up with service coordination vendors to ensure provision of missing data and/or correction of errors.

2. Reports for a 12-month period of data (July 1 through June 30) for all service coordination vendors are run from BabyTrac by July 10th of each year.

3. Data for each indicator is analyzed for the following:
 - a. Missing data
 - b. Any instances of non-compliance
 - c. In each instance of non-compliance, if data indicate that although late, the activity (initial IFSP, delivery of services, and convening of the transition conference) did occur prior to the child's exit from Part C services.
4. By August 1st of each year, service coordination vendors are notified in writing of the above, and are given a period of 30 days to provide missing data, correct inaccurate data, and/or provide justification as to why an instance of non-compliance should be attributed to a different service coordination vendor.
5. By September 1st of each year (i.e., following entry of missing/correct data and receipt of any justification for transfer of responsibility), the BabyTrac reports are run a second time to capture changes.
6. By September 30th of each year, findings of non-compliance are issued in writing to service coordination vendors (i.e., the lowest level of supervision responsible for correction of non-compliance). In the event the service coordination vendor serves more than one county, *and* non-compliance exists in multiple counties served by the vendor, a finding is issued to the vendor's supervisor for each county in which non-compliance has been documented, and copied to the program manager of the appropriate participating state agency. The finding letter includes the following information:
 - a. The number of instances of non-compliance by indicator, and the county/ies in which non-compliance is documented;.
 - b. The number of findings by indicator;
 - c. The timeframe during which performance for subsequent child will be monitored (October 1st-November 30th of each year); and
 - d. The date by which the finding/s will either be considered corrected, or, if non-compliance exists for subsequent children, the effective date of a plan of correction.
7. BabyNet State Office staff assigned to General Supervision are responsible for:
 - a. Using both data system reports and sampling of records, verification of correction of non-compliance identified between July 1-June 30 (Prong 1 of correction);
 - b. Using both data system reports and sampling of records, verification of compliant performance for subsequent children (Prong 2 of correction);
 - c. For vendors for which correction of non-compliance cannot be verified, and/or non-compliance persisted for subsequent children, developing and monitoring plans of correction with assigned counties.
 - d. Providing or arranging for the provision of technical assistance as appropriate.

In advance of South Carolina's MSIP Continuous Improvement Visit, the state's draft system for timely identification and timely correction of non-compliance was utilized to issue findings of non-compliance for FFY 2010, as indicated above. However, because these findings were not issued within 90 days of the end of the SPP reporting period, the Lead Agency will be reporting the status of verification of correction in the APR for FFY 2011. During and following the CIV, the state's system for timely identification and correction of non-compliance was finalized with support and assistance from OSEP, DAC, MSRRC, and NECTAC, and is now on file with OSEP per South Carolina's Progress report of November 30, 2011. **Consequently, the actual Target Data for FFY 2010 must be reported as 0%**

Previous submissions of the South Carolina Part C APR reported the following regarding instances and correction of non-compliance: FFY

FFY	# Instances of Non-Compliance Identified:	# Corrected within 1 year of identification	% Corrected < 1 year of identification	% Corrected > 1 year of identification	% Not yet Verified as Corrected
2009	214	106	50%	38%	100%
2010	0	---	---	---	---
2011	297	---	---	---	100%

Discussion of Improvement Activities Completed for 2010: Part C State Annual Performance Report (APR)

Activities initiated, completed or in process July 1, 2010 – June 30, 2011 to improve performance and/or correct noncompliance identified in FFY 2009 and/or noncompliance identified in previous years that was not corrected within one year:

Activity	Lead Person/Agency	Completed	Notes (including resources needed)
Development of record review protocol that can be used to document correction of noncompliance.	First Steps, Participating State Agencies	In progress	Staff of First Steps, OSEP, DAC, MSRRRC, NECTAC
Update general supervision plan	First Steps	Completed	Staff of First Steps
Dissemination and review of general supervision guidelines for all participating agencies.	First Steps	Completed	Staff of First Steps, TECS
Review of general supervision guidelines with contracted Part C service providers.	First Steps, TECS	In progress	Staff of First Steps
Acquire new data system	First Steps	In progress	Staff of First Steps
Training and technical assistance to all BabyNet System Personnel regarding performance indicators, related requirements, and data reporting requirements per BabyNet Policies and Procedures	First Steps, Participating State Agencies	Ongoing	Staff of First Steps, DDSN, SCSDB
Initiate random audits of service providers relative to Indicators 1 & 2	First Steps	Ongoing	Staff of First Steps
Initiate random audits of service coordinators relative to Indicators 3 and 8c	First Steps, Participating State Agencies	In progress	Staff of First Steps, TECS

Revisions, with Justification, to Targets/Improvement Activities/Timelines/ Resources for 2011:

During and immediately following South Carolina's Continuous Improvement Visit in 2011, a comprehensive technical assistance plan was developed in collaboration with DAC, MidSouth RRC, NECTAC, and OSEP to address a broad array of general supervision processes and issues. The TA Plan is therefore submitted as an attachment to South Carolina's FFY 2010 APR as the revised Improvement Activities for Indicators 9 and 14 for FFY 2011 and is included in South Carolina's amended State Performance Plan.

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 10: Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint, or because the parent (or individual or organization) and the public agency agree to extend the time to engage in mediation or other alternative means of dispute resolution, if available in the State. (20 U.S.C. 1416(a)(3)(B) and 1442)

Measurement: Percent = [(1.1(b) + 1.1(c)) divided by 1.1] times 100.

FFY	Measurable and Rigorous Target
2010	100%

Actual Target Data for FFY 2010: 100%

WRITTEN, SIGNED COMPLAINTS	
(1) Total number of written, signed complaints filed	3
(1.1) Complaints with reports issued	3
(a) Reports with findings of noncompliance	3
(b) Reports within timeline	3
(c) Reports within extended timelines	0
(1.2) Complaints pending	0
(a) Complaints pending a due process hearing	0
(1.3) Complaints withdrawn or dismissed	0

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2010:

Comparison to FFY 2009 data

FFY	# Complaints received	# Complaints resolved within 60 days	% Complaints resolved ≤ 60 days	# Complaints requiring > 60 days to resolve
2009	9	8	100%	1
2010	3	3	100%	0

Explanation of progress or slippage

Part C State Annual Performance Report (APR) FFY 2010 SOUTH CAROLINA

Progress was made in FFY 2010 in that there was a decrease in the number of formal written complaints.

Improvement activities initiated, completed or in progress during FFY 2010 to improve performance and/or correct previously identified non-compliance:

Activity	Lead Person/ Agency	Completion Date	Notes (including resources needed)
Review of current BabyNet procedural safeguard protocols	SC First Steps	April 2011 and ongoing	BabyNet Procedural Safeguards Officer
Coordinate with improvement activities for Indicator c-4a to ensure	SC First Steps	July 2011 and ongoing	Team for Early Childhood Solutions
Improved system for receiving feedback on informal issues and concerns	SC First Steps	July 2011 and ongoing	BabyNet Office of Provider Relations
Standardize information recorded for all feedback received on BabyNet services	SC First Steps	April 2011 and ongoing	BabyNet Procedural Safeguards Officer and BabyNet Office of Provider Relations
Provide training and technical assistance to all BabyNet System Personnel (to include all contracted service providers) regarding BabyNet policies and procedures, especially those related to procedural safeguards, all related requirements, and all contractual obligations.	SC First Steps	Initiated February 2011; ongoing thereafter	SC First Steps and TECS

Within the BabyNet system every effort continues to be made to identify and correct problems on the local level as soon as concerns are identified. Concerns are generally heard first by the service coordinator; if they cannot be satisfactorily handled at that level, the matter is forwarded in order (as appropriate) to the supervisor in the service coordinating agency, Program Manager, BabyNet State Office Associate, and BabyNet complaints officer. Throughout the process, the appropriate BabyNet staff is involved in addressing the concern. All *written* complaints received at any level are forwarded to the complaints officer. At that point, every effort is made to resolve the issue without mediation or formal hearing.

All previously described activities designed to make all providers of BabyNet services aware of program policies and procedures contribute to reduction of complaints by assuring that all are aware of program requirements and expectations.

Inter-agency commitment to maintaining lines of communication at multiple levels also contributes to prompt and satisfactory resolution of complaints about the Part C system operation.

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/ Resources for 2011: N/A

Part C State Annual Performance Report (APR) FFY 2010 SOUTH CAROLINA

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 11: Percent of fully adjudicated due process hearing requests that were fully adjudicated within the applicable timeline or a timeline that is properly extended by the hearing officer at the request of either party. (20 U.S.C. 1416(a)(3)(B) and 1442)

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

FFY	Measurable and Rigorous Target
2010	100%

Actual Target Data for 2010: No hearing requests

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2010: No Hearing Requests were received in FFY 2010; Improvement Activities to continue without revision.

Activity	Lead Person/ Agency	Completion Date	Notes (including resources needed)
Develop and maintain list of trained due process hearing officers	SC First Steps	June 2011 and ongoing	BabyNet Procedural Safeguards Officer
Coordinate with improvement activities for Indicator C-4a to ensure articulation between SC First Steps the SC Department of Education	SC First Steps	July 2011 and ongoing	TECS, SC DOE
Provide training and technical assistance to all BabyNet System Personnel (to include all contracted service providers) regarding BabyNet policies and procedures, especially those related to procedural safeguards, all related requirements, and all contractual obligations.	SC First Steps	Initiated February 2011; ongoing thereafter	SC First Steps and TECS

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/ Resources for 2011: N/A

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 12: Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements (applicable if Part B due process procedures are adopted). (20 U.S.C. 1416(a)(3)(B) and 1442)

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

FFY	Measurable and Rigorous Target
2010	100%

Actual Target Data for 2010: No resolution sessions.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2010: N/A

Revisions, with Justification, to Targets/Improvement Activities/Timelines/ Resources for 2011:
N/A

Part C State Annual Performance Report (APR) FFY 2010 SOUTH CAROLINA

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 13: Percent of mediations held that resulted in mediation agreements.
(20 U.S.C. 1416(a)(3)(B) and 1442)

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

FFY	Measurable and Rigorous Target
2010	75-85%

Actual Target Data for 2010: No mediation agreements.

Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2010: No Mediation Agreements were requested in FFY 2010; Improvement Activities to continue without revision.

Activity	Lead Person/ Agency	Completion Date	Notes (including resources needed)
Develop and maintain list of trained mediators	SC First Steps	April 2011 and ongoing	BabyNet Procedural Safeguards Officer
Coordinate with improvement activities for Indicator C-4a to ensure articulation between SC First Steps the SC Department of Education	SC First Steps	July 2011 and ongoing	Team for Early Childhood Solutions
Provide training and technical assistance to all BabyNet System Personnel (to include all contracted service providers) regarding BabyNet policies and procedures, especially those related to procedural safeguards, all related requirements, and all contractual obligations.	SC First Steps	Initiated February 2011; ongoing thereafter	SC First Steps and TECS

Revisions, with Justification, to Proposed Targets/Improvement Activities/Timelines/ Resources for 2011: N/A

Monitoring Priority: Effective General Supervision Part C / General Supervision

Indicator 14: State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate. (20 U.S.C. 1416(a)(3)(B) and 1442)

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

- a. Submitted on or before due dates (February 1 for child count and settings and November 1 for exiting and dispute resolution); and
- b. Accurate, including covering the correct year and following the correct measurement.

FFY	Measurable and Rigorous Target
2010	100%

Actual Target Data for 2010: 82% (based on the Self-Scoring Rubric recommended by OSEP for reporting on this indicator)

Improvement Activities Completed and Explanation of Progress or Slippage that occurred for 2010:

SC performance on this indicator decreased from 93% in FFY 2009 to 80% for FFY 2010 following 1) identification of error in data system calculations for Indicator 1; 2) clarification of requirements for Indicator 7; 3) failure of Lead Agency to issue findings of non-compliance for Indicator 9 within 90 days of SPP reporting period for FFY 2010; and 4) failure of Lead Agency to verify correction of non-compliance.

Revisions, with Justification, to Targets/Improvement Activities/Timelines/ Resources for 2011:

During and immediately following South Carolina's Continuous Improvement Visit in 2011, a comprehensive technical assistance plan was developed in collaboration with DAC, MidSouth RRC, NECTAC, and OSEP to address a broad array of general supervision processes and issues. The TA Plan is therefore submitted as an attachment to South Carolina's FFY 2010 APR as the revised Improvement Activities for Indicators 9 and 14 for FFY 2011, and is included in South Carolina's amended State Performance Plan.

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**ATTACHMENT A:
INDICATOR C-9 WORKSHEET**

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2009 (7/1/09 through 6/30/10)	(a) # of Findings of noncompliance identified in FFY 2009 (7/1/09 through 6/30/10)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
1. Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	46	100	42
	Dispute Resolution: Complaints, Hearings	0	0	0
2. Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
3. Percent of infants and toddlers with IFSPs who demonstrate improved outcomes	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
4. Percent of families participating in Part C who report that early intervention services have helped the family	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0

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	Dispute Resolution: Complaints, Hearings	0	0	0
5. Percent of infants and toddlers birth to 1 with IFSPs	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
6. Percent of infants and toddlers birth to 3 with IFSPs	Dispute Resolution: Complaints, Hearings	0	0	0
7. 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.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	25	44	25
	Dispute Resolution: Complaints, Hearings	0	0	0
8. 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:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
8. Percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the lead agency has: B. Notified (consistent	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0

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with any opt-out policy adopted by the State) the SEA and the LEA where the child resides at least 90 days prior to the toddler's third birthday for toddlers potentially eligible for Part B preschool services; and	Dispute Resolution: Complaints, Hearings	0	0	0
8. Percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has: 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.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	40	70	39
	Dispute Resolution: Complaints, Hearings	0	0	0
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0

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OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	0	0	0
	Dispute Resolution: Complaints, Hearings	0	0	0
Sum the numbers down Column a and Column b			214	106

Percent of noncompliance corrected within one year of identification = 50%
 (column (b) sum divided by column (a) sum) times 100

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ATTACHMENT B: Indicator 14 - SPP/APR Data			
APR Indicator	Valid and reliable	Correct calculation	Total
1	0	1	1
2	0	1	1
3	0	1	1
4	0	1	1
5	0	1	1
6	0	0	0
7	0	1	1
8A	0	1	1
8B	0	1	1
8C	0	1	1
9	0	0	0
10	1	1	2
11	1	1	2
12	1	1	2
13	1	1	2
		Subtotal	17
APR Score Calculation	Timely Submission Points - If the FFY 2009 APR was submitted on-time, place the number 5 in the cell on the right.		5
	Grand Total – (Sum of subtotal and Timely Submission Points) =		22

618 Data – Indicator 14					
Table	Timely	Complete Data	Passed Edit Check	Responded to Date Note Requests	Total
Table 1 – Child Count Due Date: 2/2/11	1	1	1	1	4
Table 2 – Program Settings Due Date: 2/2/11	1	1	1	1	4
Table 3 – Exiting Due Date: 11/2/11	0	1	1	N/A	2
Table 4 – Dispute Resolution Due Date: 11/2/11	1	1	1	N/A	3
				Subtotal	13
618 Score Calculation			Grand Total (subtotal x 2.5)		32.5

Indicator #14 Calculation	
A. APR Grand Total	22
B. 618 Grand Total	32.5
C. APR Grand Total (A) + 618 Grand Total (B) =	54.5
Total N/A in APR	1

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Total N/A in 618	2
Base	66.5
D. Subtotal (C divided by Base*) =	.82
E. Indicator Score (Subtotal D x 100) =	82

* Note any cell marked as N/A will decrease the denominator by 1 for APR and 2.5 for 618