



Department of
Developmental Disabilities

Ohio's Part C Annual Performance Report (APR)

FFY 2018 (July 1, 2018– June 30, 2019)

Resubmitted with clarifications April 27, 2020

Introduction

Executive Summary

DODD has continued its focus on the delivery of high quality technical assistance and professional development opportunities to EI service providers to support the effective and appropriate implementation of IDEA Part C regulations and evidence-based EI practices. Much of the past year has been focused on finalizing new rules for the EI program and creating job aids and trainings related to these rules. DODD has welcomed and encouraged active stakeholder involvement. DODD relied heavily on the input of other state agencies, EI providers, and families to craft policies, trainings, and guidance that is clear and effective. These new rules, trainings, and guidance have provided many opportunities for DODD to reaffirm the requirements of Part C of IDEA with Ohio's EI field.

General Supervision System

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

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

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

Technical Assistance System

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

Six EI program consultants work at DODD and provide timely, high quality technical assistance to all 88 Ohio county EI programs. The program consultants work closely with the data and monitoring team to ensure that technical assistance is targeted to local program needs. Program consultants make site visits, engage in conference calls, and complete record reviews and other activities to support local programs' implementation of state and federal Part C regulations and best EI practices. All local programs have an active technical assistance and training plan drafted in concert with the assigned program consultant. This plan reflects local needs and strengths and serves as a roadmap for implementation of IDEA and evidence-based EI practices.

DODD continues to communicate via a formal update memo on a bi-weekly basis with the EI field to provide important updates and explanations about program requirements, due dates, and training opportunities. The memo is geared to local EI program leadership, but any interested person can sign up to receive the communication. As of October 2019, the communication has more than 2,500 recipients. The communications are also archived on the EI program's website.

Professional Development System

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

In this reporting period, Ohio continued to make significant strides forward in the area of professional development. Not only did Ohio create and contract for a number of new trainings, but it continued to ensure that trainings were available in multiple formats. Many trainings are available in an electronic format so they can be accessed remotely and at convenient times for participants. In the current reporting period, DODD and its contractors have produced trainings related to the new EI rules as well as launching a multi-month “course” aimed at supporting EI service coordinators in carrying out the requirements of EI service coordination.

Stakeholder input is sought throughout development of all DODD-created trainings. Not only does DODD involve its State Inter-Agency Coordinating Council (SICC) in discussions and activities related to these trainings, but also pilots all DODD-created trainings with local stakeholders. Any feedback from the SICC, pilot participants, and other stakeholders is incorporated into updated versions of the trainings prior to broader release to the EI field.

Stakeholder Involvement

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

Stakeholders in Ohio are engaged in numerous ways, including calls, public postings inviting input and feedback, quarterly State Interagency Coordinating Council (SICC) meetings, and requests for feedback before any significant program change is made.

The lead agency invites public comment on the APR, annual application for Part C IDEA funds, and any rule or form changes. The public is invited to provide comment for a minimum of thirty calendar days for any document submitted to the USDOE/OSEP. All documents are posted on the program website (<https://ohioearlyintervention.org/>) for a minimum of sixty calendar days.

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

Announcements and solicitations for feedback are distributed widely via the program’s bi-weekly communication and EI website to EI providers, parents, stakeholders, grantees, service providers, and county boards of developmental disabilities. There are currently more than 2,500 persons subscribed to the EI bi-weekly communication. In addition to these electronic communication strategies, DODD engages numerous workgroups, including the SICC and a larger, more diverse EI Stakeholder group, at quarterly in-person meetings to discuss any business in Early Intervention that needs input, feedback, or assistance.

Reporting to the Public:

How and where the State reported to the public on the FFY 2017 performance of each EIS Program located in the State on the targets in the SPP/APR as soon as practicable, but no later than 120 days following the State’s submission of its FFY 2017 APR, as required by 34 CFR §303.702(b)(1)(i)(A); and a description of where, on its website, a complete copy

of the State's SPP/APR, including any revision if the State has revised the targets that it submitted with its FFY 2017 APR in 2019, is available.

DODD provides the public with a report on each EIS program's performance on the APR indicators, as well as each program's determination category by posting the 88 EI program reports on the program website (<https://ohioearlyintervention.org/>) by June 1 of each calendar year. The FFY17 reports were sent to all local EIS programs in December 2018 and an electronic copy of the reports was added to the EI website in January 2019. The FFY18 reports will be added to the website by June 2020.

Indicator 1: Timely Provision of Services

Monitoring Priority: Early Intervention Services In Natural Environments

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

Historical Data and Targets

FFY	2013	2014	2015	2016	2017	2018	2019
Target	100%	100%	100%	100%	100%	100%	100%
Data	96.11%	98.46%	99.05%	99.16%	98.64%	99.40%	

FFY 2018 Data

Number of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	Total number of infants and toddlers with IFSPs	FFY 2018 Data
1,324	1,332	99.40%

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

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

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

State monitoring

Describe the method used to select EIS programs for monitoring.

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

Thirty EIS programs were scheduled to have their data for this indicator monitored for FFY 2018. All children among the 30 selected EIS programs who had services due to start between January 1, 2019 and March 31, 2019 were included in Ohio’s FFY18 TRS analysis. Ohio used monitoring data from its data system as well as from the review and verification of a selection of records to determine the percent compliant for this indicator. A total of one finding was issued to one EIS program upon completion of the baseline analysis. This finding was identified and issued in FFY19, so it will be due for correction in FFY20 and the status of its correction will be reported in the FFY20 APR.

The 1,324 child records counted as being compliant include 141 that were non-timely due to documented extraordinary family circumstances. These 141 child records are included in the numerator and denominator. See below for a breakdown of reasons for untimely receipt of services:

- Extraordinary family circumstances: 141 children
- Staff error: 3 children

- System reason: 2 children
- Data/documentation error: 3 children

There were eight TRS findings due for correction in FFY18, **four of which were based on FFY16 data** and reported in Ohio’s FFY16 APR and **four of which were based on FFY17 data** and reported in Ohio’s FFY17 APR, but **all of which were identified and issued in FFY17**. The findings were corrected in a timely manner and verified in accordance with OSEP Memorandum 09-02. DODD ensured that the EIS program (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program.

Correction of Previous Findings of Noncompliance

Correction of Findings of Noncompliance Identified in FFY 2017

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
8	8	0	0

FFY 2017 Findings of Noncompliance Verified as Corrected

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

Eight findings for this indicator were due for correction in FFY18, all eight of which were corrected in a timely manner. All were verified in accordance with OSEP Memorandum 09-02. DODD ensured that each EIS program (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program.

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

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

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

Using the above approach, the state verified a randomly selected, representative sample of child records from each local program to ensure that for each child, all new services began within thirty days of the signed IFSP or that any delays in this timeline were due to family reasons. If applicable, the state continued to examine data and request records to

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

Findings Based on FFY16 Data

- **Auglaize:** 7 records verified; TRS due dates in October and November 2017
- **Coshocton:** 8 records verified; TRS due dates in November and December 2017
- **Lake:** 22 records verified; TRS due dates in October and November 2017
- **Madison:** 5 records verified; TRS due dates in October and November 2017

Findings Based on FFY17 Data

- **Crawford:** 6 records verified; TRS due dates in March and April 2018
- **Fulton:** 10 records verified; TRS due dates in March and April 2018
- **Hardin:** 3 records verified; TRS due dates in March and April 2018
- **Perry:** 4 records verified; TRS due dates in March and April 2018

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

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

Indicator 2: Services in Natural Environments

Monitoring Priority: Early Intervention Services In Natural Environments

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

Historical Data and Targets

FFY	2013	2014	2015	2016	2017	2018	2019
Target	81.00%	85.00%	90.00%	95.00%	100%	100%	98.00%
Data	80.04%	86.29%	94.41%	98.14%	98.95%	98.43%	

Targets: Description of Stakeholder Input

At the August 13, 2014 SICC meeting, stakeholders proposed that we use the FFY 2012 data as the FFY 2013 target, given we were setting a target for activities which had already taken place. That methodology was applied to all performance indicators. Target methodologies, or different ways we could set the targets, were discussed at the August 2014 SICC meeting. A proposal was provided back to the SICC and the larger EI Stakeholder group in November 2014 at which time each indicator's proposed set of targets was discussed at an in-person meeting. Consensus was reached, with some edits from that discussion resulting in the targets posted for public comment within the APR on November 25, 2014. After the collection of public comment, no changes were needed or made to the targets agreed upon by the SICC and EI Stakeholders.

At the state's March 2019 SICC and larger EI stakeholder group meeting, DODD provided an overview of the APR indicators, along with a summary of the state's targets and results for the FFY13 through FFY18 APR cycle, indicating that the group would have a discussion at the following meeting to set targets for the next APR cycle. At the May 2019 meeting, the group had an in-depth discussion about SPP/APR targets and determined the starting target for the next SPP/APR cycle for all indicators should be the FFY17 percentage (rounded down) and the state's targets should gradually increase by the end of the SPP/APR cycle. By the state's August 2019 meeting, DODD had become aware that the current SPP/APR cycle would be extended for one year, and informed the SICC and larger EI stakeholder group of this. The group reviewed the targets discussed at the previous meeting, and agreed to keep the FFY19 targets the same as what had been discussed and to revisit the targets for future years at a later date.

FFY 2018 Data

Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	Total number of infants and toddlers with IFSPs	FFY 2018 Data
10,938	11,112	98.43%

Indicator 3: Early Childhood Outcomes

Monitoring Priority: Early Intervention Services In Natural Environments

Results indicator: Percent of infants and toddlers with IFSPs who demonstrate improved:

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

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

Historical Data and Targets

	FFY	2013	2014	2015	2016	2017	2018	2019
A1	Target	58.00%	60.00%	61.00%	62.00%	63.00%	64.00%	63.10%
	Data	58.06%	63.22%	57.97%	54.26%	54.04%	53.94%	
A2	Target	66.00%	67.00%	68.00%	69.00%	70.00%	71.00%	67.00%
	Data	62.57%	65.65%	67.17%	67.87%	67.72%	65.40%	
B1	Target	58.00%	60.00%	61.00%	62.00%	63.00%	64.00%	62.90%
	Data	59.58%	62.16%	62.69%	62.08%	60.73%	61.63%	
B2	Target	60.00%	61.00%	62.00%	63.00%	64.00%	65.00%	63.00%
	Data	57.60%	59.96%	63.24%	62.68%	60.81%	57.59%	
C1	Target	64.00%	65.00%	66.00%	67.00%	68.00%	69.00%	63.00%
	Data	63.48%	65.31%	62.78%	64.87%	63.82%	63.80%	
C2	Target	64.00%	65.00%	66.00%	67.00%	68.00%	69.00%	63.50%
	Data	60.95%	63.71%	60.22%	60.16%	58.10%	56.16%	

Targets: Description of Stakeholder Input

At the August 13, 2014 SICC meeting, stakeholders proposed that we use the FFY 2012 data as the FFY 2013 target, given we were setting a target for activities which had already taken place. That methodology was applied to all performance indicators. Target methodologies, or different ways we could set the targets, were discussed at the August 2014 SICC meeting. A proposal was provided back to the SICC and the larger EI Stakeholder group in November 2014 at which time each indicator's proposed set of targets was discussed at an in-person meeting. Consensus was reached, with some edits from that discussion resulting in the targets posted for public comment within the APR on November 25, 2014. After the collection of public comment, no changes were needed or made to the targets agreed upon by the SICC and EI Stakeholders.

At the state's March 2019 SICC and larger EI stakeholder group meeting, DODD provided an overview of the APR indicators, along with a summary of the state's targets and results for the FFY13 through FFY18 APR cycle, indicating that the group would have a discussion at the following meeting to set targets for the next APR cycle. At the May 2019 meeting, the group had an in-depth discussion about SPP/APR targets and determined the starting target for the next SPP/APR cycle for all indicators should be the FFY17 percentage (rounded down) and the state's targets should gradually increase by the end of the SPP/APR cycle. By the state's August 2019 meeting, DODD had become aware that the current SPP/APR cycle would be extended for one year, and informed the SICC and larger EI stakeholder group of

this. The group reviewed the targets discussed at the previous meeting, and agreed to keep the FFY19 targets the same as what had been discussed and to revisit the targets for future years at a later date.¹

FFY 2018 Data

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

	Number of children	Percentage of Total
a. Infants and toddlers who did not improve functioning	68	0.90%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	1,859	24.53%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	695	9.17%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	1,562	20.61%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	3,394	44.79%

	Numerator	Denominator	FFY 2018 Data
A1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	2,257	4,184	53.94%
A2. The percent of infants and toddlers who were functioning within age expectations in each Outcome by the time they turned 3 years of age or exited the program	4,956	7,578	65.40%

¹ Targets were adjusted for indicators 3A1, 3B1, 3B2, and 3C2 during the clarification period in order to meet OSEP's requirement that the targets must be higher than the baseline for each indicator.

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

	Number of Children	Percentage of Total
a. Infants and toddlers who did not improve functioning	60	0.79%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	1,995	26.33%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	1,159	15.29%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	2,142	28.27%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	2,222	29.32%

	Numerator	Denominator	FFY 2018 Data
B1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	3,301	5,356	61.63%
B2. The percent of infants and toddlers who were functioning within age expectations in each Outcome by the time they turned 3 years of age or exited the program	4,364	7,578	57.59%

Outcome C: Use of appropriate behaviors to meet their needs

	Number of Children	Percentage of Total
a. Infants and toddlers who did not improve functioning	51	0.67%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	2,095	27.65%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	1,176	15.52%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	2,606	34.39%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	1,650	21.77%

	Numerator	Denominator	FFY 2018 Data
C1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program	3,782	5,928	63.80%
C2. The percent of infants and toddlers who were functioning within age expectations in each Outcome by the time they turned 3 years of age or exited the program	4,256	7,578	56.16%

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

Measure	Number
The number of infants and toddlers who exited the Part C program during the reporting period, as reported in the State's part C exiting 618 data	11,348
The number of those infants and toddlers who did not receive early intervention services for at least six months before exiting the Part C program.	3,855

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

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

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

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

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

Indicator 4: Family Involvement

Monitoring Priority: Early Intervention Services In Natural Environments

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

- A. Know their rights;
- B. Effectively communicate their children's needs; and
- C. Help their children develop and learn.

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

Historical Data and Targets

	FFY	2013	2014	2015	2016	2017	2018	2019
A	Target	93.00%	95.00%	96.00%	98.00%	99.00%	100%	95.00%
	Data	92.52%	93.13%	93.84%	94.82%	95.43%	96.46%	
B	Target	96.00%	97.00%	98.00%	99.00%	100%	100%	95.00%
	Data	94.38%	94.88%	95.17%	95.42%	95.92%	96.82%	
C	Target ≥	95.00%	96.00%	97.00%	98.00%	99.00%	100%	94.00%
	Data	94.45%	94.67%	94.48%	94.50%	94.89%	96.14%	

Targets: Description of Stakeholder Input

At the August 13, 2014 SICC meeting, stakeholders proposed that we use the FFY 2012 data as the FFY 2013 target, given we were setting a target for activities which had already taken place. That methodology was applied to all performance indicators. Target methodologies, or different ways we could set the targets, were discussed at the August 2014 SICC meeting. A proposal was provided back to the SICC and the larger EI Stakeholder group in November 2014 at which time each indicator's proposed set of targets was discussed at an in-person meeting. Consensus was reached, with some edits from that discussion resulting in the targets posted for public comment within the APR on November 25, 2014. After the collection of public comment, no changes were needed or made to the targets agreed upon by the SICC and EI Stakeholders.

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FFY 2018 Data

Number of respondent families participating in Part C who report that early intervention services have helped the family:	# of Positive Responses	Total Respondents	Percent
4A. Know their rights	1,552	1,609	96.46%
4B. Effectively communicate their children's needs	1,555	1,606	96.82%
4C. Help their children develop and learn	1,546	1,608	96.14%

Overview

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

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

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

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

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

The following modifications to the ECO survey were made:

- Help Me Grow Early Intervention was substituted for Part C throughout the questionnaire as that is how families "know" Part C in Ohio.
- The verbiage of the survey was changed to be at a 5th grade reading level.
- The adapted OSEP items (Help Me Grow Early Intervention has helped me to know my rights in the program; Help Me Grow Early Intervention has helped me to communicate my child's needs; and Help Me Grow Early Intervention has helped me to help my child learn and develop) were the first questions on the questionnaire rather than dispersed throughout the survey as they are on the 2010 OSEP version of the questionnaire.
- DODD added additional open-ended questions for use in Ohio's State Systemic Improvement Plan and to conduct a more in depth qualitative analysis of the survey data.

Administration of the Questionnaire

Families served in Early Intervention on June 1, 2019 were identified as potential recipients. DODD mailed the surveys to families in early August 2019 and surveys were due back by October 1, 2019. In an effort to maximize the number of survey respondents, Ohio implemented the following strategies in its administration of the family questionnaire:

- DODD provided local programs a list of survey recipients so they could encourage families to respond.
- DODD included all families served at a point in time close to the questionnaire distribution in the population receiving the questionnaire.
- The survey was translated into Spanish and distributed to families whose primary caregiver was identified as primarily Spanish-speaking in Ohio's Early Intervention Data System (EIDS).

- Families were provided the option to respond to the questionnaire via mailing it back to DODD or by completing it online in either English or Spanish.
- The questionnaire was discussed at in-person stakeholder meetings and highlighted in the Part C Coordinator’s bi-weekly communication to Ohio’s EI field.
- A work group was formed to specifically discuss increasing response rates and representativeness of the questionnaire. In response to work group suggestions:
 - DODD created a one page educational material for families to describe the purpose of the EI family questionnaire as well as how the data are used.
 - DODD encouraged Service Coordinators to distribute the questionnaire links to families electronically.

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

Questionnaire Responses

Of the 11,131 families who were identified as having children being served on June 1, 2019, a total of 10,841 received questionnaires (with those not receiving questionnaires being due to a deceased child or not having up-to-date address information for the family in the data system). DODD received completed questionnaires from 1,610 families, which is a response rate of 14.85%. Eighty-four of Ohio’s eighty-eight counties were represented in the responses to the Family Questionnaire. The following table outlines the methods families used to respond to the questionnaire.

Table 1: Distribution of Questionnaire Respondents’ Response Type

Response Method	Number	Percent
Mail	1,062	65.96%
Web	548	34.04%
Total	1,610	

Respondent Representativeness

In an effort to increase representativeness of respondents, Ohio communicated with local programs in a more targeted manner regarding encouraging families, especially those in typically underrepresented categories, to respond to the questionnaire. Specifically, DODD:

- Frequently included information about Ohio’s EI Family Questionnaire in the state’s bi-weekly EI Program Updates newsletter
- Discussed the family questionnaire, including increasing representativeness, with the Early Intervention Advisory Council (EIAC), the state’s Interagency Coordinating Council (ICC), as well as a larger stakeholder group
- Formed a small work group with representatives from local programs that hold various roles in the EI system to discuss strategies for increasing representativeness in addition to the overall response rate
- Reached out to Contract Managers in local programs that have a high density of families in underrepresented categories, asking them to encourage these families to respond to the questionnaire

The following tables provide a comparison of the race/ethnicity categories, age ranges, and gender between the respondents and non-respondents of the questionnaire, as well as the totals for all children served in EI in Ohio on June 1, 2019 whose families received the questionnaire.

Table 2: Race and Ethnicity Comparison

Race/Ethnicity	Non-Respondents	Non-Respondents	Respondents	Respondents	All	All
	Number	Percent	Number	Percent	Number	Percent
American Indian or Alaska Native	22	0.24%	3	0.19%	25	0.23%
Asian	270	2.92%	36	2.24%	306	2.82%
Black	1,408	15.25%	103	6.40%	1,511	13.94%
Hispanic	650	7.04%	76	4.72%	726	6.70%
Native Hawaiian or Other Pacific Islander	16	0.17%	2	0.12%	18	0.17%
Two or More Races	486	5.26%	70	4.35%	556	5.13%
White	6,379	69.10%	1,320	81.99%	7,699	71.02%
Total	9,231		1,610		10,841	

Table 3: Child Age Range

Age Range	Non-Respondents	Non-Respondents	Respondents	Respondents	All	All
	Number	Percent	Number	Percent	Number	Percent
0 to 1	1,039	11.26%	175	10.87%	1,214	11.20%
1 to 2	2,848	30.85%	508	31.55%	3,356	30.96%
2 to 3	5,344	57.89%	927	57.58%	6,271	57.85%
Total	9,231		1,610		10,841	

Table 4: Gender

Gender	Non-Respondents	Non-Respondents	Respondents	Respondents	All	All
	Number	Percent	Number	Percent	Number	Percent
Female	3,371	36.52%	582	36.15%	3,953	36.46%
Male	5,860	63.48%	1,028	63.85%	6,888	63.54%
Total	9,231		1,610		10,841	

Age categories and gender of children in respondent families were comparable to non-respondents and all children served on June 1, 2019 whose families received questionnaires. In regard to race/ethnicity, the percentage of Black families responding to the questionnaire increased slightly from the questionnaire completed in 2018. However, White families continued to be overrepresented and Black families were underrepresented among respondents, despite the state's efforts to increase representativeness. Other race and ethnicity group respondents were similar to the overall group receiving the questionnaire. Ohio will continue to make efforts to further increase representativeness of Black respondents with future questionnaires.

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

DODD convened a work group in early 2019 to discuss ways to improve the response rate for the 2019 EI family questionnaire and the representativeness of results. As a result of this work group, DODD prepared a visually appealing one page flyer that provided an overview and explained the purpose of the family questionnaire, including how the data

would be used. DODD also surveyed local EIS program contract managers ahead of the distribution of the survey to determine ways that local EIS programs could improve response rates. The one page flyer was sent to the EI bi-weekly communication list ahead of distributing the family questionnaire. It was also included in the mailed questionnaires to families. After the questionnaire was mailed to families, DODD sent general reminders about the questionnaire in five of its bi-weekly communications to the EI field. Service coordinators were encouraged to use personalized text messages or e-mails to families with links to the online versions of the questionnaire. DODD monitored the response rate and representativeness of the results as DODD received responses to the survey. As a result, DODD reached out directly to six large EIS programs serving diverse counties about boosting response rates and representativeness based on those programs' preliminary results.

Despite these new efforts in 2019, Ohio's response rate and representativeness remained similar to past years. As a result, DODD surveyed local EIS contract managers and service coordinators about their efforts after the family questionnaire response window closed. DODD theorizes that the implementation of new EI rules and forms during the same time period the family questionnaire was open prevented service coordinators from engaging in as many follow up activities related to the family questionnaire as were planned. This will not be an issue in 2020, so DODD will continue to utilize the strategies implemented in 2019 as well as explore other ways to boost the response rate and representativeness.

Indicator 5: Child Find (Birth to One)

Monitoring Priority: Effective General Supervision Part C / Child Find

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

Historical Data and Targets

FFY	2013	2014	2015	2016	2017	2018	2019
Target	1.20%	1.20%	1.30%	1.30%	1.40%	1.40%	1.40%
Data	1.03%	1.01%	0.97%	0.96%	0.92%	0.99%	

Targets: Description of Stakeholder Input

At the August 13, 2014 SICC meeting, stakeholders proposed that we use the FFY 2012 data as the FFY 2013 target, given we were setting a target for activities which had already taken place. That methodology was applied to all performance indicators. Target methodologies, or different ways we could set the targets, were discussed at the August 2014 SICC meeting. A proposal was provided back to the SICC and the larger EI Stakeholder group in November 2014 at which time each indicator's proposed set of targets was discussed at an in-person meeting. Consensus was reached, with some edits from that discussion resulting in the targets posted for public comment within the APR on November 25, 2014. After the collection of public comment, no changes were needed or made to the targets agreed upon by the SICC and EI Stakeholders.

At the state's March 2019 SICC and larger EI stakeholder group meeting, DODD provided an overview of the APR indicators, along with a summary of the state's targets and results for the FFY13 through FFY18 APR cycle, indicating that the group would have a discussion at the following meeting to set targets for the next APR cycle. At the May 2019 meeting, the group had an in-depth discussion about SPP/APR targets and determined the starting target for the next SPP/APR cycle for all indicators should be the FFY17 percentage (rounded down) and the state's targets should gradually increase by the end of the SPP/APR cycle. By the state's August 2019 meeting, DODD had become aware that the current SPP/APR cycle would be extended for one year, and informed the SICC and larger EI stakeholder group of this. The group reviewed the targets discussed at the previous meeting, and agreed to keep the FFY19 targets the same as what had been discussed and to revisit the targets for future years at a later date.²

FFY 2018 Data

Number of infants and toddlers birth to 1 with IFSPs	Population of infants and toddlers birth to 1	FFY 2018 Data
1,328	134,002	0.99%

Compare your results to the national data

Ohio ranked 15th out of 18 among states with Category B Eligibility (Category B: 25% in two or more domains, 30% delay in one or more domains, 1.3 standard deviations in two domains, 1.5 standard deviations in any domain, 33% delay in one domain) and 15th out of 20 among states whose lead agency is an agency other than Health or Education.

² The target was adjusted for Indicator 5 during the clarification period in order to meet OSEP's requirement that the targets must be higher than the baseline for each indicator.

Indicator 6: Child Find (Birth to Three)

Monitoring Priority: Effective General Supervision Part C / Child Find

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

Historical Data and Targets

FFY	2013	2014	2015	2016	2017	2018	2019
Target	2.70%	2.70%	2.80%	2.80%	2.90%	2.90%	2.50%
Data	2.49%	2.46%	2.45%	2.45%	2.53%	2.70%	

Targets: Description of Stakeholder Input

At the August 13, 2014 SICC meeting, stakeholders proposed that we use the FFY 2012 data as the FFY 2013 target, given we were setting a target for activities which had already taken place. That methodology was applied to all performance indicators. Target methodologies, or different ways we could set the targets, were discussed at the August 2014 SICC meeting. A proposal was provided back to the SICC and the larger EI Stakeholder group in November 2014 at which time each indicator's proposed set of targets was discussed at an in-person meeting. Consensus was reached, with some edits from that discussion resulting in the targets posted for public comment within the APR on November 25, 2014. After the collection of public comment, no changes were needed or made to the targets agreed upon by the SICC and EI Stakeholders.

At the state's March 2019 SICC and larger EI stakeholder group meeting, DODD provided an overview of the APR indicators, along with a summary of the state's targets and results for the FFY13 through FFY18 APR cycle, indicating that the group would have a discussion at the following meeting to set targets for the next APR cycle. At the May 2019 meeting, the group had an in-depth discussion about SPP/APR targets and determined the starting target for the next SPP/APR cycle for all indicators should be the FFY17 percentage (rounded down) and the state's targets should gradually increase by the end of the SPP/APR cycle. By the state's August 2019 meeting, DODD had become aware that the current SPP/APR cycle would be extended for one year, and informed the SICC and larger EI stakeholder group of this. The group reviewed the targets discussed at the previous meeting, and agreed to keep the FFY19 targets the same as what had been discussed and to revisit the targets for future years at a later date.

FFY 2018 Data

Number of infants and toddlers birth to 3 with IFSPs	Population of infants and toddlers birth to 3	FFY 2018 Data
11,112	411,064	2.70%

Compare your results to the national data

Ohio ranked 16th out of 18 among states with Category B Eligibility (Category B: 25% in two or more domains, 30% delay in one or more domains, 1.3 standard deviations in two domains, 1.5 standard deviations in any domain, 33% delay in one domain) and 15th out of 20 among states whose lead agency is an agency other than Health or Education.

Indicator 7: 45-day timeline

Monitoring Priority: Effective General Supervision Part C / Child Find

Compliance indicator: Percent of eligible infants and toddlers with IFSPs for whom an initial evaluation and initial assessment and an initial IFSP meeting were conducted within Part C’s 45-day timeline. (20 U.S.C. 1416(a)(3)(B) and 1442)

Historical Data and Targets

FFY	2013	2014	2015	2016	2017	2018	2019
Target	100%	100%	100%	100%	100%	100%	100%
Data	95.96%	97.86%	95.06%	97.23%	99.00%	96.29%	

FFY 2018 Data

Number of eligible infants and toddlers with IFSPs for whom an initial evaluation and assessment and an initial IFSP meeting was conducted within Part C’s 45-day timeline	Number of eligible infants and toddlers evaluated and assessed for whom an initial IFSP meeting was required to be conducted	FFY 2018 Data
778	808	96.29%

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

State monitoring

Describe the method used to select EIS programs for monitoring.

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

Thirty EIS programs were scheduled to have their data for this indicator monitored for FFY18. Ohio used monitoring data from its data system as well as from the review and verification of a selection of records to determine its percent compliance for this indicator. All children among the 30 selected EIS programs who had 45-Day timelines ending between January 1, 2019 and March 31, 2019 were included in Ohio’s FFY18 45-Day analysis. Of the 808 child records examined, 778 (96.29 percent) were compliant. A total of six findings were issued to six EIS programs upon completion of the baseline analysis. These findings were identified and issued in FFY19 and therefore they are due for correction in FFY20 and the status of their correction will be reported in the FFY20 APR.

The 778 child records counted as being compliant include 269 that were non-timely due to documented extraordinary family circumstances. These 269 child records are included in the numerator and denominator. See below for a breakdown of reasons for all missed 45-Day timelines:

- Extraordinary family circumstances: 269 children
- Staff error: 9 children
- System reason: 9 children

- Data/documentation error: 12 children

There were no 45-Day findings due for correction in FFY18. Ohio reported three 45-Day findings in its FFY17 APR **based on FFY17 data**; however, **these findings were not identified and issued until FFY18**, so they will be **due for correction in FFY19** and **the status of their correction will be reported in the FFY19 APR.**

Correction of Previous Findings of Noncompliance

Correction of Findings of Noncompliance Identified in FFY 2017

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

Indicator 8: Early Childhood Transition

Monitoring Priority: Effective General Supervision Part C / Child Find

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

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

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

8A Historical Data and Targets

FFY	2013	2014	2015	2016	2017	2018	2019
Target	100%	100%	100%	100%	100%	100%	100%
Data	98.70%	98.17%	98.53%	99.04%	95.05%	98.27%	

8A FFY 2018 Data

Number of children exiting Part C who have an IFSP with transition steps and services	Number of toddlers with disabilities exiting Part C	FFY 2018 Data
284	289	98.27%

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

State monitoring

Describe the method used to select EIS programs for monitoring.

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

Twenty-eight EIS programs were scheduled to have their data for this indicator monitored for FFY18. Ohio used monitoring data from a self-assessment to determine its percent compliance for this indicator. A sample of children from each of the 28 selected EIS programs who had IFSPs with Transition Steps and Services due between July 1, 2018 and September 30, 2018 were included in Ohio's FFY18 Transition Steps and Services analysis (with the exception of one EIS program that had no applicable data for the time period, for which a representative sample of children with Transition Steps and Services due between October 1, 2018 and December 31, 2018 were examined). Of the 289 child records examined, 284 (98.27 percent) were compliant. A total of four findings were issued to four EIS programs upon completion of the baseline analysis; these findings were identified and issued in FFY18 and therefore the status of their correction will be reported in the FFY19 APR.

The 284 child records counted as being compliant include 14 that were non-timely due to documented extraordinary family circumstances. These 14 child records are included in the numerator and denominator. See below for a breakdown of reasons for missed Transition Steps and Services timelines:

- Extraordinary family circumstances: 14 children
- Staff error: 5 children

Two Steps and Services findings were due for correction in FFY18. These findings were included in the FFY16 APR as they were **based on FFY16 data**, but not **identified and issued until FFY17**. The findings were corrected in a timely manner and verified in accordance with OSEP Memorandum 09-02. DODD ensured that the EIS program (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program. There were also two findings reported in Ohio’s FFY17 APR **based on FFY17 data**, however, **these findings were not identified and issued until FFY18** and therefore **the status of their correction will be reported in the FFY19 APR**.

8A Correction of Previous Findings of Noncompliance

Correction of Findings of Noncompliance Identified in FFY 2017

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

FFY 2017 Findings of Noncompliance Verified as Corrected

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

Two findings for this indicator were due for correction in FFY18, which were corrected in a timely manner and verified in accordance with OSEP Memorandum 09-02. DODD ensured that each EIS program (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program.

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

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

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

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

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

- **Allen:** 9 records verified; Steps and Services due in June and July 2017
- **Scioto:** 5 records verified; Steps and Services due in June and July 2017

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

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

8B Historical Data and Targets

FFY	2013	2014	2015	2016	2017	2018	2019
Target	100%	100%	100%	100%	100%	100%	100%
Data	NVR	0%	100%	99.61%	100%	100%	

8B FFY 2018 Data

Number of toddlers with disabilities exiting Part C where notification to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services	Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B	FFY 2018 Data
5,594	5,594	100%

Describe the method used to collect these data

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

QUESTIONS REGARDING IDENTIFICATION AND CORRECTION OF NONCOMPLIANCE AND REPORTING ON CORRECTION IN THE STATE PERFORMANCE PLAN (SPP)/ANNUAL PERFORMANCE REPORT (APR).

Ohio created a data set from reports distributed to LEAs from EIS programs. Reports due February 1, 2019 were generated using Ohio’s statewide data system of all children turning three between February 1, 2019 and January 31, 2020 who were potentially eligible for Part B, excluding toddlers whose families opted out from notification (692 families opted out, which are not included in the numerator or denominator). The LEAs were informed in a timely manner for all 5,594 (100%) toddlers turning three in the referenced timeframe and whose families did not opt out of notification. DODD also ensured the SEA was notified of all 5,594 children for the February 1, 2019 reporting date in a timely manner, as well as for each quarterly reporting date throughout the fiscal year. As the requirements for the indicators are always the same, a sample of the data from one of the required quarterly reports within the fiscal year is presumed to represent the state and counties’ compliance for the entire fiscal year. No LEA/SEA findings were issued based on FFY18 data.

There were no LEA/SEA findings due for correction in FFY18.

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

State monitoring

Describe the method used to select EIS programs for monitoring.

Ohio created a data set from reports distributed to LEAs from local Help Me Grow EI programs. Reports due February 1, 2019 were generated using Ohio’s statewide data system of all children turning three between February 1, 2019 and January 31, 2020 potentially eligible for Part B, excluding toddlers whose families opted out of notification (692 families opted out, which are not included in the numerator or denominator). Currently, counties are required to send quarterly reports to the LEA (due February 1st, May 1st, August 1st, and November 1st each year) that include all children who will be turning three within a year from the report due date, as long as the family provides consent to share information. Counties are then required to submit proof of doing so to DODD for the February 1 report, which is used for the APR compliance analysis. The LEAs were informed in a timely manner for all 5,594 (100%) toddlers turning three in the referenced time frame and whose families did not opt out of notification. DODD ensured the SEA was notified of all 5,594 children for the February 1, 2019 reporting date in a timely manner, as well as for each quarterly reporting date throughout the fiscal year. As the requirements for the indicators are always the same, a sample of the data from one of the required quarterly reports within the fiscal year is presumed to represent the counties’ compliance for the entire fiscal year.

8B Correction of Previous Findings of Noncompliance

Correction of Findings of Noncompliance Identified in FFY 2017

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

8C Historical Data and Targets

FFY	2013	2014	2015	2016	2017	2018	2019
Target	100%	100%	100%	100%	100%	100%	100%
Data	96.47%	98.90%	99.65%	98.09%	97.44%	97.95%	

8C FFY 2018 Data

Number of toddlers with disabilities exiting Part C where the transition conference occurred at least 90 days, and at the discretion of all parties at least nine months prior to the toddler's third birthday for toddlers potentially eligible for Part B	Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B	FFY 2018 Data
572	584	97.95%

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

State monitoring

Describe the method used to select EIS programs for monitoring.

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

Twenty-eight EIS programs were scheduled to have their data for this indicator monitored for FFY 2018. Ohio used monitoring data from its data system as well as from the review and verification of a selection of records to determine its percent compliance for this indicator. All children among the 28 selected EIS programs who had Transition Planning Conferences due between July 1, 2018 and September 30, 2018 were included in Ohio's FFY18 Transition Planning Conference analysis (with the exception of one EIS program that had no applicable data for the time period, for which all children with TPCs due between October 1, 2018 and December 31, 2018 were examined). Of the 584 child records examined, 572 (97.95 percent) were compliant. A total of seven findings were issued to seven EIS programs upon completion of the baseline analysis; these findings was identified and issued in FFY18 and therefore the status of their correction will be reported in the FFY19 APR.

The 572 child records counted as being compliant include 68 that were non-timely due to documented extraordinary family circumstances. These 68 child records are included in the numerator and denominator. See below for a breakdown of reasons for missed TPC timelines:

- Extraordinary family circumstances: 68 children
- Staff error: 8 children
- System reason: 2 children
- Data/documentation error: 2 children

There were two TPC findings due for correction in FFY18. These findings were included in the FFY16 APR as they were **based on FFY16 data**, but not **identified and issued until FFY17**. These findings were corrected in a timely manner and verified in accordance with OSEP Memorandum 09-02. DODD ensured that each EIS program (1) is correctly

implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program. There was an additional finding reported in Ohio's FFY17 APR **based on FFY17 data**, however, **this finding was not identified and issued until FFY18** and therefore **the status of its correction will be reported in the FFY19 APR.**

8C Correction of Previous Findings of Noncompliance

Correction of Findings of Noncompliance Identified in FFY 2017

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

FFY 2017 Findings of Noncompliance Verified as Corrected

Describe how the State verified that each LEA with noncompliance is correctly implementing the regulatory requirements

Two findings for this indicator was due for correction in FFY18, which were corrected in a timely manner and verified in accordance with OSEP Memorandum 09-02. DODD ensured that each EIS program (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program.

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

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

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

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

- **Crawford:** 4 records verified; TPCs due in June and July 2017
- **Scioto:** 5 records verified; TPCs due in June and July 2017

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

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

Indicator 9: Resolution Sessions

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

Historical Data and Targets

FFY	2013	2014	2015	2016	2017	2018	2019
Target	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Data	N/A	N/A	N/A	N/A	N/A	100%	

Targets: Description of Stakeholder Input

N/A

FFY 2018 Data

3.1(a) Number resolutions sessions resolved through settlement agreements	3.1 Number of resolutions sessions	FFY 2018 Data
1	1	100%

Indicator 10: Mediation

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

Historical Data and Targets

FFY	2013	2014	2015	2016	2017	2018	2019
Target	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Data	N/A	N/A	N/A	N/A	N/A	N/A	

Targets: Description of Stakeholder Input

N/A

FFY 2018 Data

2.1.a.i Mediation agreements related to due process complaints	2.1.b.i Mediation agreements not related to due process complaints	2.1 Number of mediations held	FFY 2018 Data
0	0	0	N/A