State Performance Plan / Annual Performance Report:
Part C

for
STATE FORMULA GRANT PROGRAMS
under the
Individuals with Disabilities Education Act

For reporting on
FFY18

Idaho

PART C DUE February 3, 2020
Idaho State Performance Plan and Annual Performance Report for Part C, Federal Fiscal Year 2018

Introduction

Instructions

Provide sufficient detail to ensure that the Secretary and the public are informed of and understand the State’s systems designed to drive improved results for infants and toddlers with disabilities and their families and to ensure that the Lead Agency (LA) meets the requirements of Part C of the IDEA. This introduction must include descriptions of the State’s General Supervision System, Technical Assistance System, Professional Development System, Stakeholder Involvement, and Reporting to the Public.

Intro - Indicator Data

Executive Summary

Overall, the Federal Fiscal Year (FFY) 2018 Annual Performance reporting period remained relatively stable for the Idaho Infant Toddler Program (ITP). While progress was made in some indicators, and held steady in others, we continue to face ongoing challenges with turnover in service coordinator and service provider staff and contractors.

In FFY 18, ITP experienced a 17% separation rate for service providers.

- State employees – 12%
- Contractors – 20%

In FFY 18, ITP experienced a 15% separation rate for service coordinators.

- State employees – 12%
- Contractors – 18%

Additionally, ITP continues to experience an increase in the number of referrals and children served without adequate funding and resources to keep up with the growth.

Increase in Referrals

- FFY 18 – 5.4%
- FFY 17 – 9%
- Past three years – 9%
- Past eight years – 28%

Increase in Children Served

- FFY 18 - 4%
- FFY 17– 5.8%
- Past three years – 10%
- Past eight years – 25%

While ITP worked with Medicaid to develop and implement a new Early, Periodic, Diagnostic, and Treatment (EPSDT) Early Intervention State Plan Amendment to align Medicaid benefits with Part C of the Individuals with Disabilities Education Act (IDEA), system issues causing denials on a regular basis have made it difficult for ITP to forecast consistent receipt revenue. These system issues have also expended part of the program’s data system enhancement budget and resources in an unforeseen manner. ITP was able to add 5 part-time service provider contractors across the state during the first quarter of FFY 2019, thus allowing the busiest region in the state to form an additional team. However, with the continued turnover and increase in referrals and children served, ITP remains understaffed and under-resourced.

ITP is currently working on a virtual early intervention project to determine what it would take for staff and contractors to provide virtual services. We hope to implement this mode of service delivery within six months to a year. We don’t anticipate that the addition of virtual early intervention services will solve Idaho’s resource challenges. However, we believe it will assist with providing services to children and their families in rural areas, areas struggling to find providers, during inclement weather, and to children with compromised immune systems, illnesses, etc. We also believe virtual early intervention has the potential to reduce contractor travel costs, especially when completing joint visits with another service provider or service coordinator.

Time and resources continue to be dedicated to implementing and evaluating the State Systemic Improvement Plan (SSIP) strategies outlined in the implementation plan for Phase III. However, consistent turnover, increased referrals and enrollment, and the resulting higher caseloads have made it increasingly difficult for regional programs, service providers and service coordinators to pilot, implement, and scale up activities identified in the SSIP. Additionally, State Lead Agency staff continue to take on large volumes of work without any substantive new resources.
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. Please refer to the Attachment section of the data system for the description of Idaho’s General Supervision System, as the text exceeds the 8000 character limit.

The Infant Toddler Program has established and will use proper methods of administering a General Supervision System within the state.

Overview of Monitoring System
The Infant Toddler Program uses specific quality indicators and compliance measures to determine regional performance of regulatory requirements and other standards identified by the Office of Special Education Programs (OSEP) and the state of Idaho.

- The Lead Agency monitors data pertaining to these standards and indicators on a regular basis.
- Many indicators are monitored on a regular basis by hub leaders and human services supervisors.
- Summary reports are routinely provided to the Infant Toddler Coordinating Council and other stakeholders.
- Monitoring data is used to inform discussions and policy decisions.
- The state’s web-based data system and the Early Childhood Outcome (ECO) Family Outcomes Survey-Revised (FOS-R) are closely aligned with compliance and performance indicators.
- Idaho’s general supervision system employs self-assessments by regional programs.
- Technical assistance (TA) is used to ensure correction of non-compliance and improved performance.

Advisory Council
Monitoring of agencies, institutions, organizations, and activities used by the state to implement Part C is completed by the Department with the advice and assistance of the Infant Toddler Coordinating Council and the Regional Early Childhood Committees.

Data System and Verification
The Idaho Infant Toddler Program’s electronic data collection and management system is web-based and contains all collected child enrollment, demographic, and caregiver data, as well as service coordination provision, eligibility categories, and service categories. The data system has undergone extensive revisions to create improved capacity for data collection, analysis, report generation, and billing capabilities, and it continues to be enhanced. The data system provides real-time data to both regional and Central Office personnel. Data in the web-based system is used to:

- Report 618 data to OSEP;
- Respond to many compliance and performance indicators in each program’s self-assessment;
- Determine compliance and performance standards for SPP/APR indicators.

Data from the web-based data system populates relevant local program compliance and performance indicators included in the Regional Annual Performance Report (RAPR). Reports are generated in Central Office and data is transferred to the RAPR document. Utilizing Crystal Reports/Tableau software, the Lead Agency reviews the web-based data entry at regular intervals to ensure accuracy, reliability, and non-duplication. This review is also performed annually for the APR and RAPR.

Family Survey
Idaho Infant Toddler Program utilizes results from the ECO Family Outcomes Survey-Revised to help identify issues and areas for improvement.

Self-Assessment
Annual regional assessments are completed by local programs utilizing a standardized tool called the Regional Annual Performance Report (RAPR). Self-assessment indicators developed by the state (focusing on both compliance and quality) are aligned with the SPP/APR and the state’s web-based data system. The Lead Agency populates relevant self-assessment indicators with data from the data system, ECO Family Outcomes Survey-Revised results, and child outcome data, and sends it to regional programs to complete other elements from targeted file reviews, regional complaint logs and other sources of information. Programs are required to use other data sources when completing the self-assessment and determining performance in meeting targets (e.g., record review, family survey, previous monitoring reports, Interagency Agreements, etc.) The Lead Agency verifies programs’ self-assessment data through desk audit procedures such as comparison of data reports from multiple data sources (e.g., file review and web-based data system reports). The Lead Agency provides TA to programs in developing a negotiated action plan, which identifies concrete steps/timelines to remediate system challenges, and address areas of concern or desired growth as well as areas of non-compliance as appropriate (e.g., regional Corrective Action Plans). To help achieve the targeted objectives, regional programs include baseline data and measurable, time-specific objectives and performance targets, as well as identified needs for TA and training in corrective action and enhancement plans. In implementing corrective action and enhancement plans, the hub/regional leadership team is responsible for:

- Ensuring the plan is implemented as developed.
- Documenting that the activities listed are occurring within the timelines identified in the plan.
- Reviewing progress quarterly and adjusting the plan and the activities as warranted.
- For compliance issues, reporting performance data and status of record review findings in the Corrective Action Plan (CAP).
- Requesting specific technical assistance from Central Office to implement the plan and resolve system challenges and any identified areas of non-compliance.
- Advising Central Office of barriers (and possible solutions) to implementation that are not controlled at the regional level.
For regional programs that identify non-compliance, the Lead Agency will complete quarterly corrective action plan monitoring calls to assess status and progress. In instances where no progress toward expected targets is made over a period of more than two quarters, monthly monitoring, increased technical assistance, further troubleshooting, or other sanctions may be implemented.

Technical Assistance for Monitoring
The Lead Agency provides TA to regional programs on the use of the web-based data system and in the development and implementation of CAPs and enhancement plans. The Lead Agency can require specific TA if non-compliance and improvements are not addressed in a timely manner. Hub/regional leadership teams access TA from in-state and national experts as needed to ensure correction of non-compliance, improve performance in meeting targets, and enhance quality practices to improve outcomes for children and their families.

Analysis of Complaints and/or Due Process Resolutions for Monitoring and TA Purposes
All families are provided with information on complaint and dispute resolution processes, including the availability of mediation. Formal and informal complaints are managed by the Lead Agency where a log of complaints and resolutions is maintained. When a family submits a complaint, they are informed about the procedural safeguards and advised how to submit a formal complaint in writing, should they choose to do so. Families are also informed about mediation and encouraged to consider it as an option for resolving the dispute. Should a family request mediation or due process, the Lead Agency contacts appropriate mediators/hearing officers, confirms arrangements, and facilitates connection between the family and the mediator/hearing officer.

The Lead Agency investigates administrative complaints. The Lead Agency also aggregates data/results from formal/informal complaints and due process hearings to identify or emphasize areas that need attention or for managing provider contracts.

When non-compliance or areas needing improvement are identified, CAPs and enhancement plans are written, and the Lead Agency ensures that correction of non-compliance occurs. The Lead Agency also ensures the timely completion of findings/resolutions, and analyzes data to modify policies, procedures, and practices as warranted.

Data Collection for SPP/APR
Idaho’s web-based data system is aligned with the SPP/APR indicators. The Regional Annual Performance Report document is completed annually by all regions, and findings are used in the development of the SPP/APR. If available, information about Complaints and Due Process Hearings are aggregated and analyzed. The ECO Family Outcomes Survey-Revised results and child outcomes data also inform the SPP/APR.

Enforcement, Including Sanctions
The Infant Toddler Program enforces compliance and performance through the following measures:

- Reporting data to the public.
- Using results of the program’s self-assessment to identify non-compliance, target technical assistance, and support programs in developing meaningful and effective improvement plans.
- Reviewing compliance or performance issues with the Infant Toddler Coordinating Council.
- Identifying systemic non-compliance or low performance and ensuing corrective actions. These issues may be identified through review of data, program self-assessment, complaints, and due process activities.

In instances where correction of non-compliance does not occur within 12 months of identification, the Lead Agency will take one or more of the following enforcement actions:

- Advising the region of available sources for technical assistance.
- Directing the use of regional program funds on areas where the region needs assistance.
- Requiring the region to prepare a corrective action plan, an improvement plan, and/or to enter into a compliance agreement with the Lead Agency, including upper level administrators.
- Withholding of Part C funds from the region, in extreme circumstances, by the Lead Agency.

Regional programs will impose the following hierarchy of monitoring and enforcement actions for contracted services:

- Monitoring of contracts at least every six months.
- Releasing payments only upon receipt of documentation of actual service provision.
- Denying or recouping payment for services for which non-compliance is documented.
- Halting all new referrals until deficiency is substantially remediated by the contractor.
- Amending the provider contract to shorten the term by revising the end date.
- Terminating or choosing not to renew the provider contract.

After written notification of impending enforcement action, the Contractor may elect to meet with Lead Agency staff to review the available data, the steps necessary to achieve compliance, and the requirements for demonstrating improvement sufficient to reverse any enforcement action imposed.
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.

Idaho has the following mechanisms in place to ensure timely delivery of high-quality, evidence-based technical assistance and support to regional early intervention programs:

- Tri-annual in-person meetings with hub leadership.
- Monthly hub leadership conference calls.
- Regional Annual Performance Report.
- Corrective Action Plans.
- Periodic TA calls with each region.
- Infant Toddler Program eManuel.
- Infant Toddler Program Key Information Data System (ITPKIDS) web-based data system and Crystal Reports/Tableau software.
- Statewide evidence-based early intervention mentors.
- Mentorship and reflective supervision with statewide mentors and multi-disciplinary teams.
- Mentorship and reflective supervision with statewide mentors and early childhood experts Dathan Rush and M'Lisa Shelden.

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.

Idaho Code, Title 16, Chapter 1 assures a system of personnel development that provides:

- Interdisciplinary pre-service and in-service training.
- Training of a variety of personnel needed to meet the requirements of Part C.
- Training specific to implementing strategies for the recruitment and retention of early intervention service providers to:
  - Meet the interrelated social-emotional, health, developmental, and educational needs of eligible infants and toddlers.
  - Assist families in enhancing the development of their children, and in participating fully in the development and implementation of the Individualized Family Service Plan (IFSP).
- Training personnel to work in rural and home-based settings.
- Training personnel to coordinate transitions.
- Training personnel in social-emotional development of young children.

The procedures and activities associated with training personnel to implement services for infants, toddlers and their families comprise a Comprehensive System of Personnel Development (CSPD). The CSPD Part C system includes the following criteria:

- Annual update of the staffing and training needs assessment that identifies statewide personnel development needs.
- Development of a statewide plan for addressing personnel development needs.
- Assurance that in-service training relates to the topics and competencies identified in needs assessments.
- Provision of specialized orientation to newly hired or contracted professionals, as well as specialized continued education to long-term practitioners.
- Dissemination of information regarding pre-service and in-service training courses, workshops, webinars, and conferences.
- In-service training coordinated through the hub/regional Infant Toddler Program to public health and private providers, primary referral sources, professionals, service coordinators, and parents regarding requirements for:
  - Child Find
  - Multidisciplinary evaluation/assessment
  - Individualized Family Service Plan/Service Coordination
  - Procedural Safeguards
  - Understanding the basic components of the Idaho Early Intervention System
  - Meeting the interrelated social or emotional, health, developmental, and educational needs of Part C eligible children
  - Assisting families in enhancing the development of their children by encouraging and facilitating full participation in the development and implementation of their Individualized Family Service Plans

Ongoing training to Part C providers is offered in each hub/region. An online eManuel has been provided for procedures on child find, evaluation and assessment, individualized family service plans and transition, and procedural safeguards. Training in these components is required for all providers and is available as needed. Early intervention providers are provided training in the principles of evidence-based practices for infants and toddlers with disabilities and their families. Online training modules support key principles in early intervention quality practices in service coordination and IFSPs.

Additionally, regional/hub supervisors regularly contact and train groups and individual primary referral sources to orient them to the Infant Toddler Program, and share information regarding the benefits of early intervention, risks and eligibility criteria, how to make referrals, and procedural requirements. Pediatric and medical groups, the Idaho Perinatal Project, parent organizations, child care providers, Family and Community Services child protection workers, Maternal and Infant Early Childhood Home Visitors, and Special Nutrition Program for Women, Infants, and Children (WIC) clinicians are examples of target audiences included in the program's outreach efforts.

Parent education activities are facilitated by Idaho Parents Unlimited (IPUL), the Parent Training Information Center, and Regional Early Childhood Committees. Idaho Parents Unlimited, through their regional consultants, offers training on IFSP development, resource identification and coordination, parent rights, etc. Idaho Parents Unlimited also sponsors a semi-annual parent conference with a wide variety of sessions concerning parenting and disability issues.

Central Office staff hold regular technical assistance and coordination meetings with the Infant Toddler Program’s regional/hub leaders. Additionally, the program manager arranges technical assistance visits to each region to assist with program coordination.
The Department of Health and Welfare and the Infant Toddler Coordinating Council recognize the expertise of professionals for addressing pre-service and in-service training needs. National professional organizations and their Idaho chapters or affiliates assist organizations in implementing the Part C Comprehensive System of Personnel Development (CSPD).

Idaho has a Consortium for the Preparation of Early Childhood Professionals made up of faculty from each institution of higher education in the state, and representatives from various early childhood agencies and professional organizations. The Consortium facilitates coordination of university programs for the Early Childhood/Early Childhood Special Education Blended Certificate and articulation from two-year to four-year programs. Additionally, the Consortium partners with the Department of Health and Welfare to coordinate internship placements and to promote the use of evidence-based practice training in pre-service programs.

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

The Central Office Infant Toddler Program staff identified the need for stakeholder input regarding new SSP indicator targets, including the newly added FFY 19 targets. Staff met to review the previous SPP indicator targets and actual data to identify potential starting points for the new FFY 2013-2018 and newly added FFY 19 targets. Central Office staff presented their findings during a tri-annual Hub Leadership meeting. During this meeting, resource limitations, the ongoing increase in referrals and enrollment, and the new and continuing SSIP requirements were discussed, as well as how to effectively maintain/improve the SPP Performance Indicators. Using the information from the discussion, draft targets were identified for each SPP indicator to take forward first to the EC3’s Infant Toddler Program Committee and then to the full Early Childhood Coordinating Council. For the new FFY 19 targets, the draft targets were identified for each SPP indicator to take forward to the Infant Toddler Coordinating Council.

1. Indicator #2 - Idaho has made steady progress during the previous federal fiscal years to ensure services were being provided in a child’s natural environment. Additionally, Idaho has strong policies and procedures in place and has developed contract language to ensure continued progress.

2. Indicator #3 – Idaho has met few targets in the previous Federal Fiscal Year for this indicator. We believe the State Systemic Improvement Plan (SSIP) will have positive long-term impact in this area. Idaho may have to reset the baseline and targets for this indicator based on the newly updated ECO process, tools, and resources that have been implemented statewide.

3. Indicator #4 – A new baseline and targets were set in the FFY 2015 SPP/APR. The new baseline was set using the 2nd and 3rd quarters’ data and new targets were set based on continued efforts to solidify the new family survey process. Realistic gains are expected to be made by FFY 18. Idaho continues to work on improving the family survey response rate, which may have an impact on existing targets and actual data reported in the future.

4. Indicators #5 and #6 – During the previous federal fiscal years for these indicators, Idaho remained fairly steady, until the 2008 recession. As a result, the state put measures in place to increase the number of birth-to-one-year-olds and birth-to-three-year-olds being served, with great success. We anticipate making slow and steady progress but know this is a potential area of concern due to the program’s resource capacity.

5. Indicator #9 – Not applicable for Idaho Part C.

6. Indicator #10 – Idaho has not received any mediation requests during the previous federal fiscal years.

7. Indicator #11 – Idaho submitted the baseline and SPP targets when submitting Indicator #11 in April of 2017.

FFY 2013-2018 Targets
The Early Childhood Coordinating Council’s Infant Toddler Program Committee met to review and discuss the proposed targets identified during the Hub Leadership meeting. Committee members asked whether the SSIP would impact the current level of success in meeting performance indicators. There may be some impact on performance, but we want to move forward and do our best to continue to make slow and steady progress.

The Infant Toddler Program Committee accepted the newly proposed targets and recommended we present them to the full Early Childhood Coordinating Council for review and approval.

The Infant Toddler Program Committee, along with the Part C Coordinator, presented information on previous targets and actual data, along with the FFY 2013-2018 SPP targets, to the Early Childhood Coordinating Council, with a rationale for how the new targets were identified. Council members fully approved the new targets, especially in light of the program’s current resource capacity and additional work required to complete the SSIP to improve child outcome results.

FFY 2019 Targets
The Infant Toddler Coordinating Council’s Executive Committee met to review and discuss the proposed targets identified during the Hub Leadership meeting. Committee members inquired whether the increase in referrals and enrolled children, continued shortage of resources, high contractor turnover and work being completed for the SSIP would impact current performance. While we have done a good job so far, program and staff/contractors continue to feel the pressure. We will continue to do our best we can with the challenges presented. The Executive Committee accepted the newly proposed targets and recommended we present them to the Infant Toddler Coordinating Council.

The Executive Committee, along with the Part C Coordinator, presented information on previous targets and actual data, along with FFY 2013-2018 targets and the newly proposed FFY 2019 targets to the Infant Toddler Coordinating Council, with rationale for how the new targets were identified. Council members unanimously approved the new FFY 2019 targets.

Apply stakeholder involvement from introduction to all Part C results indicators (y/n)
Yes
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.

Idaho posted results on the performance of all seven regions and the state for the FFY 2018 SPP/APR on the Idaho Department of Health and Welfare’s Idaho Infant Toddler Program website (https://healthandwelfare.idaho.gov/default.aspx?TabId=4120) on February 1, 2020 for any member of the public to access as we submit the FFY 2018 SPP/APR to OSEP. Additionally, the results were reviewed and shared through other forums such as meetings with the hub and regional supervisors, program managers, and Infant Toddler Coordinating Council.

Intro - Prior FFY Required Actions
None

Response to actions required in FFY 2017 SPP/APR
N/A

Intro - OSEP Response

Intro - Required Actions
Indicator 1: Timely Provision of Services

Instructions and Measurement

**Monitoring Priority:** Early Intervention Services In Natural Environments

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

**Data Source**
Data to be taken from monitoring or State data system and must be based on actual, not an average, number of days. Include the 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).

**Measurement**
Percent = (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) * 100.

Account for untimely receipt of services, including the reasons for delays.

**Instructions**
If data are from State monitoring, describe the method used to select early intervention service (EIS) programs for monitoring. If data are from a State database, describe the procedures used to collect these data. States report in both the numerator and denominator under Indicator 1 on the number of children for whom the State ensured the timely initiation of new services identified on the IFSP. Include the timely initiation of new early intervention services from both initial IFSPs and subsequent IFSPs.

Targets must be 100%.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data and if data are from the State’s monitoring, describe the procedures used to collect these data. States report in both the numerator and denominator under Indicator 1 on the number of children for whom the State ensured the timely initiation of new services identified on the IFSP. Include the timely initiation of new early intervention services from both initial IFSPs and subsequent IFSPs. Provide actual numbers used in the calculation.

The State’s timeliness measure for this indicator must be either: (1) a time period that runs from when the parent consents to IFSP services; or (2) the IFSP initiation date (established by the IFSP Team, including the parent).

States are not required to report in their calculation the number of children for whom the State has identified the cause for the delay as exceptional family circumstances, as defined in 34 CFR §303.310(b), documented in the child’s record. If a State chooses to report in its calculation children for whom the State has identified the cause for the delay as exceptional family circumstances documented in the child’s record, the numbers of these children are to be included in the numerator and denominator. Include in the discussion of the data, the numbers the State used to determine its calculation under this indicator and report separately the number of documented delays attributable to exceptional family circumstances.

Provide detailed information about the timely correction of noncompliance as noted in the Office of Special Education Programs’ (OSEP’s) response table for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, methods to ensure correction, and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2018 SPP/APR, the data for FFY 2017), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

1 - Indicator Data

**Historical Data**

<table>
<thead>
<tr>
<th>Baseline</th>
<th>2005</th>
<th>72.00%</th>
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<tbody>
<tr>
<td>FFY</td>
<td>2013</td>
<td>2014</td>
</tr>
<tr>
<td>Target</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Data</td>
<td>96.32%</td>
<td>95.77%</td>
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</table>

**Targets**

<table>
<thead>
<tr>
<th>FFY</th>
<th>2018</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

**FFY 2018 SPP/APR Data**

<table>
<thead>
<tr>
<th>Number of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner</th>
<th>Total number of infants and toddlers with IFSPs</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>2,047</td>
<td>2,595</td>
<td>93.08%</td>
<td>100%</td>
<td>86.67%</td>
<td>Did Not Meet Target</td>
<td>Slippage</td>
</tr>
</tbody>
</table>
Provide reasons for slippage, if applicable
The following includes a list of reasons for timely provision of services slippage in FFY 2018:

1. Additional locations in the state with provision of timely services challenges
   - In previous years, regular challenges with provision of timely services were common in the West Hub (regions 3 and 4) area of the state, which is the most urban area in Idaho with the largest number of referrals and children being served. In FFY 2018, two additional regions encountered challenges with the provision of timely services, thus causing slippage from FFY 2017.

2. Contractor turnover
   - In FFY 2017, Idaho encountered a 19% contracted service provider turnover rate. In FFY 2018, the turnover rate increased to 21%.
   - The turnover has put an incredible strain on regional leaders who continually train new contractors, as most do not come into the program with early intervention experience or knowledge of IDEA, Part C requirements.
   - The program does not have the capacity for staff/contractors to take on additional cases when service providers leave their job.

3. The vast majority of contractors statewide only work 1-3 days a week for the program, as they also work in hospitals or private clinics.

4. Increase in referrals
   - FFY 2016 - Idaho received 170 additional unduplicated referrals from the previous year.
   - FFY 2017 - Idaho received 184 additional unduplicated referrals from the previous year.
   - FFY 2018 - Idaho received 252 additional unduplicated referrals from the previous year.

5. Increase in number of children being served
   - The Infant Toddler Program has seen a 25% increase in the cumulative numbers of children being served over the past 8 years.

6. Increased caseloads
   - With the increased number of referrals and children being served over the past few years, service providers’ caseloads have continued to increase.

7. While Idaho did implement new Medicaid EI EPSDT benefits in July of 2018, challenges with Medicaid denials occurring on a regular basis contributed to variability and unpredictability of receipt funding. As a result, only 6 part-time contractors were recently added in July of 2019.

8. State general funds and federal grant funds have not kept up with the continued pace of growth for the program.

9. Due to budgetary constraints, the program has not been able to provide across-the-board increases in service provider contractor rates for numerous years.

Number of documented delays attributable to exceptional family circumstances
This number will be added to the “Number of infants and toddlers with IFSPs who receive their early intervention services on their IFSPs in a timely manner” field above to calculate the numerator for this indicator.

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Include your State’s criteria for “timely” receipt of early intervention services (i.e., the time period from parent consent to when IFSP services are actually initiated).
In Idaho, the criteria for timely receipt of early intervention services is defined as the actual start date being equal to or less than the projected start date for any new service initiated in an IFSP within the FFY 2018 year.

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

Describe the method used to select EIS programs for monitoring.
N/A

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period). The full FFY 2018 reporting year: July 1, 2018 – June 30, 2019.

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.
A statewide report encompassing all new services projected to start in FFY 2018 was generated from the ITPKIDS web-based data system. Idaho uses several methods to ensure the accuracy of timely service data, including:

- Hub leaders use Crystal Reports on a weekly-to-monthly basis to identify any missing or inaccurate data.
- Standardized bi-annual QA review is conducted in each region ensuring that data and continuing service reports recorded in ITPKIDS match documents uploaded in ITPKIDS.
- Central Office generates reports for the annual R-APR, SPP/APR, and Corrective Action Plan processes to identify missing or inaccurate data.
- The program’s data system, ITPKIDS, allows only one Projected and Actual Start Date to be recorded for a service.
- The Infant Toddler Program data analyst provides program managers and hub leaders with quarterly and annual summary reports on timeliness and identifies any necessary data cleanup.
- The Infant Toddler Program data analyst and central office staff analyze reports quarterly and annually to determine causes.
Necessary modifications are made in ITPKIDS when inaccuracies are identified. Infant Toddler Program central office staff and data analyst work together to identify state- or local-level patterns or trends. When patterns are identified, actions to rectify the issues include but are not limited to the following:

- Staff training using ITPKIDS through videos, user guides, and supervisor-led trainings upon hire.
- Collection of qualitative information regarding the data via discussion of issues at quarterly hub leadership meetings for hub leaders to inform their local staff and contractors.
- In-person, phone, or email communication with hub leaders identifying data areas to be addressed and necessary follow up.
- ITPKIDS business team discusses potential modifications to the system to prevent future issues.

If needed, provide additional information about this indicator here.

In Idaho, exceptional family circumstances were included as timely when calculating the percentage of children receiving timely services.

Statewide, 202 children experienced delays in timely service delivery due to exceptional family/extenuating circumstances. Examples of family circumstances include:

- Unable to contact family
- Family declined service
- Family no show
- Conflict with family scheduling appointment
- Child/family illness or hospitalization
- Family request for later service start date

Statewide, 346 children experienced a delay in timely services due to an agency reason. Examples of agency reasons include:

- High caseload/therapist unavailable
- Staff/contractor turnover
- Delay in evaluation
- Therapist ill
- Interpretation/translation issue

### Correction of Findings of Noncompliance Identified in FFY 2017

<table>
<thead>
<tr>
<th>Findings of Noncompliance Identified</th>
<th>Findings of Noncompliance Verified as Corrected Within One Year</th>
<th>Findings of Noncompliance Subsequently Corrected</th>
<th>Findings Not Yet Verified as Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>1</td>
<td>0</td>
<td>1</td>
</tr>
</tbody>
</table>

**FFY 2017 Findings of Noncompliance Verified as Corrected**

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

Idaho demonstrated that it corrected one of two findings of noncompliance identified in FFY 17. Consistent with the requirements in OSEP Memo 09-02, Idaho reports verification that one of the two EIS regional programs with noncompliance in FFY 17: (1) have corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the program; and (2) are correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through onsite monitoring or a State data system.

In FFY 17, 170 children did not receive services in a timely manner. These 170 children were located in 6 of the 7 regional EIS programs. Two (2) of the 6 regional EIS programs were issued findings of noncompliance, whereas 4 regional programs were not issued findings due to achieving pre-finding correction (performing at 100% and correcting all child specific noncompliance) during the RAPR review process. The RAPR review process occurs prior to issuing findings (see prong 2 correction below).

For Prong 1 correction, data from ITPKIDS was used to verify child specific correction for the 20 children who did not receive timely services in FFY 17 and who were located in the 2 regional EIS programs that were issued findings of noncompliance in FFY 17. The state verified:

- 9/20 children received the services, although untimely.
- 1/20 children were no longer in the program.

The FFY 17 RAPR review process was used to verify child specific correction for the additional 150 children who did not receive timely services in FFY 17 and were located in the 4 regional EIS programs in FFY 17 that were not issued a finding of noncompliance due to achieving pre-finding correction. The state verified:

- 138/150 children received the services, although untimely.
- 7/150 children were no longer in the program.
- 5/150 parents declined services.

For Prong 2 correction, subsequent review of data (completed later than June 30, 2018 and generated from the ITPKIDS web-based data system) was used to verify that 1 of the 2 regional EIS programs were correctly implementing the timely services requirement in FFY 2017.

- Policies and procedures were reviewed, and staff/contractors received TA on regulatory requirements.
- 1/2 regional EIS programs were verified as correcting noncompliance within one year of written findings by reviewing one new month of indicator 1 data for the program.
  - The review reflected the 1 program was at 100% for this requirement.
1/2 regional EIS programs did not achieve 100% compliance for this requirement within one year of written noncompliance notification (see FFY 17 Findings of Noncompliance Not Yet Verified as Corrected section below).

4/4 regional EIS programs achieved pre-finding correction by reviewing one new month of Indicator 1 data during the FFY 17 RAPR review process. (These programs were not issued a finding of noncompliance since they also corrected child specific noncompliance prior to issuing a written notification of findings.)

- The review reflected each of the 4 programs were at 100% for this requirement.

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

Correction of each individual incidence of noncompliance is verified through ITPKIDS. ITPKIDS captures the Projected and Actual Start Dates for every new service initiated in an IFSP. If the Actual Start Date is later than the Projected Start Date, ITPKIDS requires users to record a delay reason before they can save the service record.

Central Office staff generate and review timely service reports (using data from ITPKIDS described above) during the annual R-APR, SPP/APR, Corrective Action Plan process, and at other necessary intervals, to verify that each individual instance of non-compliance is corrected unless the child is no longer within the jurisdiction of the EIS program, the family declined services, or the EIS program was unable to make contact with the family.

FFY 2017 Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

1/2 regional EIS programs has not yet corrected their FFY 17 noncompliance (prong 2 – not at 100%) within one year of written findings. A corrective action plan with strategies to reach and sustain compliance was developed in FFY 17. The regional EIS program continues to submit required data with a report on activities completed to correct their outstanding finding of noncompliance monthly.

The local early intervention program with FFY 2017 noncompliance not yet corrected continues to experience a high volume of referrals and an increase in children being served. Additionally, this local early intervention program continues to encounter challenges with contractor turnover, length of vacancies, and recruitment of contractors. This program is located in the Treasure Valley, the most urban area of Idaho with the most competition for service coordinators and service providers.

This outstanding finding of noncompliance is not a systemic issue, but a resource and capacity issue. The hub leaders and supervisors in this program continue to try and find efficiencies, but with the rising number of children being referred and served, compounded with turnover, length of vacancies, and recruitment challenges, it is an uphill battle. They continually review caseloads and timely services data to stretch their resources.

At the state level, the Part C Coordinator and Infant Toddler Program Operations Manager continue to work with leadership to identify ways to secure additional funding and resources. It is important to note that the Part C Program in Idaho is not in the Department of Education, making it even more difficult to leverage other resources within the educational system.

The State Lead Agency is currently working on developing and implementing the use of virtual early intervention. While we hope this will help ease some of the challenges identified above, with the continued turnover and growth in Idaho, we don’t envision this being the only solution.

Correction of Findings of Noncompliance Identified Prior to FFY 2017

<table>
<thead>
<tr>
<th>Year Findings of Noncompliance Were Identified</th>
<th>Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2017 APR</th>
<th>Findings of Noncompliance Verified as Corrected</th>
<th>Findings Not Yet Verified as Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Findings of Noncompliance Verified as Corrected

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

N/A

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

N/A

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

N/A

Findings of Noncompliance Verified as Corrected

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

N/A

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

N/A
Findings of Noncompliance Not Yet Verified as Corrected
Actions taken if noncompliance not corrected
N/A

Findings of Noncompliance Verified as Corrected
Describe how the State verified that the source of noncompliance is correctly implementing the *regulatory requirements*
N/A
Describe how the State verified that each *individual case of noncompliance* was corrected
N/A

Findings of Noncompliance Not Yet Verified as Corrected
Actions taken if noncompliance not corrected
N/A

1 - Prior FFY Required Actions
None

Response to actions required in FFY 2017 SPP/APR

1 - OSEP Response

1 - Required Actions
**Indicator 2: Services in Natural Environments**

**Instructions and Measurement**

**Monitoring Priority:** Early Intervention Services In Natural Environments

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

**Data Source**
Data collected under section 618 of the IDEA (IDEA Part C Child Count and Settings data collection in the EDFactors Metadata and Process System (EMAPS)).

**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.

**Instructions**
- Sampling from the State’s 618 data is not allowed.
- Describe the results of the calculations and compare the results to the target.
- The data reported in this indicator should be consistent with the State’s 618 data reported in Table 2. If not, explain.

### 2 - Indicator Data

**Baseline**

<table>
<thead>
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<th>FFY</th>
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<table>
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<th>Target&gt;=</th>
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<th>2015</th>
<th>2016</th>
<th>2017</th>
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<tbody>
<tr>
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**Data**

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<th>FFY</th>
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<th>2019</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>98.52%</td>
<td>99.17%</td>
</tr>
</tbody>
</table>

**Targets**

<table>
<thead>
<tr>
<th>FFY</th>
<th>2018</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target&gt;=</td>
<td>96.00%</td>
<td>96.50%</td>
</tr>
</tbody>
</table>

**Targets: Description of Stakeholder Input**

The Central Office Infant Toddler Program staff identified the need for stakeholder input regarding new SSP indicator targets, including the newly added FFY 19 targets. Staff met to review the previous SPP indicator targets and actual data to identify potential starting points for the new FFY 2013-2018 and newly added FFY 19 targets. Central Office staff presented their findings during a tri-annual Hub Leadership meeting. During this meeting, resource limitations, the ongoing increase in referrals and enrollment, and the new and continuing SSIP requirements were discussed, as well as how to effectively maintain/improve the SPP Performance Indicators. Using the information from the discussion, draft targets were identified for each SPP indicator to take forward first to the EC3’s Infant Toddler Program Committee and then to the full Early Childhood Coordinating Council. For the new FFY 19 targets, the draft targets were identified for each SPP indicator to take forward to the Infant Toddler Coordinating Council.

1. **Indicator #2** – Idaho has made steady progress during the previous federal fiscal years to ensure services were being provided in a child’s natural environment. Additionally, Idaho has strong policies and procedures in place and has developed contract language to ensure continued progress.

2. **Indicator #3** – Idaho has met few targets in the previous Federal Fiscal Year for this indicator. We believe the State Systemic Improvement Plan (SSIP) will have positive long-term impact in this area. Idaho may have to reset the baseline and targets for this indicator based on the newly updated ECO process, tools, and resources that have been implemented statewide.

3. **Indicator #4** – A new baseline and targets were set in the FFY 2015 SPP/ APR. The new baseline was set using the 2nd and 3rd quarters’ data and new targets were set based on continued efforts to solidify the new family survey process. Realistic gains are expected to be made by FFY 18. Idaho continues to work on improving the family survey response rate, which may have an impact on existing targets and actual data reported in the future.

4. **Indicators #5 and #6** – During the previous federal fiscal years for these indicators, Idaho remained fairly steady, until the 2008 recession. As a result, the state put measures in place to increase the number of birth-to-one-year-olds and birth-to-three-year-olds being served, with great success. We anticipate making slow and steady progress but know this is a potential area of concern due to the program’s resource capacity.

5. **Indicator #9** – Not applicable for Idaho Part C.

6. **Indicator #10** – Idaho has not received any mediation requests during the previous federal fiscal years.

7. **Indicator #11** – Idaho submitted the baseline and SPP targets when submitting Indicator #11 in April of 2017.
FFY 2013-2018 Targets
The Early Childhood Coordinating Council’s Infant Toddler Program Committee met to review and discuss the proposed targets identified during the Hub Leadership meeting. Committee members asked whether the SSIP would impact the current level of success in meeting performance indicators. There may be some impact on performance, but we want to move forward and do our best to continue to make slow and steady progress.

The Infant Toddler Program Committee accepted the newly proposed targets and recommended we present them to the full Early Childhood Coordinating Council for review and approval.

The Infant Toddler Program Committee, along with the Part C Coordinator, presented information on previous targets and actual data, along with the FFY 2013-2018 SPP targets, to the Early Childhood Coordinating Council, with a rationale for how the new targets were identified. Council members fully approved the new targets, especially in light of the program’s current resource capacity and additional work required to complete the SSIP to improve child outcome results.

FFY 2019 Targets
The Infant Toddler Coordinating Council’s Executive Committee met to review and discuss the proposed targets identified during the Hub Leadership meeting. Committee members inquired whether the increase in referrals and enrolled children, continued shortage of resources, high contractor turnover and work being completed for the SSIP would impact current performance. While we have done a good job so far, program and staff/contractors continue to feel the pressure. We will continue to do the best we can with the challenges presented. The Executive Committee accepted the newly proposed targets and recommended we present them to the Infant Toddler Coordinating Council.

The Executive Committee, along with the Part C Coordinator, presented information on previous targets and actual data, along with FFY 2013-2018 targets and the newly proposed FFY 2019 targets to the Infant Toddler Coordinating Council, with rationale for how the new targets were identified. Council members unanimously approved the new FFY 2019 targets.

Prepopulated Data

<table>
<thead>
<tr>
<th>Source</th>
<th>Date</th>
<th>Description</th>
<th>Data</th>
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<tbody>
<tr>
<td>SY 2018-19 Child Count/Educational Environment Data Groups</td>
<td>07/10/2019</td>
<td>Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings</td>
<td>2,083</td>
</tr>
<tr>
<td>SY 2018-19 Child Count/Educational Environment Data Groups</td>
<td>07/10/2019</td>
<td>Total number of infants and toddlers with IFSPs</td>
<td>2,083</td>
</tr>
</tbody>
</table>

FFY 2018 SPP/APR Data

<table>
<thead>
<tr>
<th>Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings</th>
<th>Total number of Infants and toddlers with IFSPs</th>
<th>FFFY 2017 Data</th>
<th>FFFY 2018 Target</th>
<th>FFFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>2,083</td>
<td>2,083</td>
<td>99.80%</td>
<td>96.00%</td>
<td>100.00%</td>
<td>Met Target</td>
<td>No Slippage</td>
</tr>
</tbody>
</table>

Provide reasons for slippage, if applicable
N/A

Provide additional information about this indicator (optional)
N/A

2 - Prior FFFY Required Actions
None
Response to actions required in FFFY 2017 SPP/APR

2 - OSEP Response

2 - Required Actions
Indicator 3: Early Childhood Outcomes  
**Instructions and Measurement**

**Monitoring Priority:** Early Intervention Services In Natural Environments

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

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

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

**Data Source**

State selected data source.

**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 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 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 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 assessed)] 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.

**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 (total # of infants and toddlers reported in progress categories (a) + (b) + (c) + (d) + (e))] times 100.

**Instructions**

**Sampling of infants and toddlers with IFSPs** is allowed. When sampling is used, submit a description of the sampling methodology outlining how the design will yield valid and reliable estimates. (See General Instructions page 2 for additional instructions on sampling.)

In the measurement, include in the numerator and denominator only infants and toddlers with IFSPs who received early intervention services for at least six months before exiting the Part C program.

Report: (1) 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 data under Section 618 of the IDEA; and (2) 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.

Describe the results of the calculations and compare the results to the targets. States will use the progress categories for each of the three Outcomes to calculate and report the two Summary Statements.

Report progress data and calculate Summary Statements to compare against the six targets. Provide the actual numbers and percentages for the five reporting categories for each of the three outcomes.

In presenting results, provide the criteria for defining “comparable to same-aged peers.” If a State is using the Early Childhood Outcomes Center (ECO) Child Outcomes Summary Process (COS), then the criteria for defining “comparable to same-aged peers” has been defined as a child who has been assigned a score of 6 or 7 on the COS.

In addition, list the instruments and procedures used to gather data for this indicator, including if the State is using the ECO COS.

If the State’s Part C eligibility criteria include infants and toddlers who are at risk of having substantial developmental delays (or “at-risk infants and toddlers”) under IDEA section 632(5)(B)(i), the State must report data in two ways. First, it must report on all eligible children but exclude its at-risk infants and toddlers (i.e., include just those infants and toddlers experiencing developmental delay (or “developmentally delayed children”) or having a...
diagnosed physical or mental condition that has a high probability of resulting in developmental delay (or “children with diagnosed conditions”). Second, the State must separately report outcome data on either: (1) just its at-risk infants and toddlers; or (2) aggregated performance data on all of the infants and toddlers it serves under Part C (including developmentally delayed children, children with diagnosed conditions, and at-risk infants and toddlers).

3 - Indicator Data

Does your State’s Part C eligibility criteria include infants and toddlers who are at risk of having substantial developmental delays (or “at-risk infants and toddlers”) under IDEA section 632(5)(B)(i)? [yes/no]  No

Historical Data

<table>
<thead>
<tr>
<th></th>
<th>Baseline</th>
<th>FFY 2013</th>
<th>FFY 2014</th>
<th>FFY 2015</th>
<th>FFY 2016</th>
<th>FFY 2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1</td>
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<tr>
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<tr>
<td>A2</td>
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Targets:

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<th>FFY</th>
<th>2018</th>
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</thead>
<tbody>
<tr>
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</tr>
<tr>
<td>C2</td>
<td>59.80%</td>
<td>59.80%</td>
</tr>
</tbody>
</table>

Targets: Description of Stakeholder Input

The Central Office Infant Toddler Program staff identified the need for stakeholder input regarding new SSP indicator targets, including the newly added FFY 19 targets. Staff met to review the previous SPP indicator targets and actual data to identify potential starting points for the new FFY 2013-2018 and newly added FFY 19 targets. Central Office staff presented their findings during a tri-annual Hub Leadership meeting. During this meeting, resource limitations, the ongoing increase in referrals and enrollment, and the new and continuing SSIP requirements were discussed, as well as how to effectively maintain/improve the SPP Performance Indicators. Using the information from the discussion, draft targets were identified for each SSP indicator to take forward to the Infant Toddler Coordinating Council.

1. Indicator #2 - Idaho has made steady progress during the previous federal fiscal years to ensure services were being provided in a child’s natural environment. Additionally, Idaho has strong policies and procedures in place and has developed contract language to ensure continued progress.

2. Indicator #3 – Idaho has met few targets in the previous Federal Fiscal Year for this indicator. We believe the State Systemic Improvement Plan (SSIP) will have positive long-term impact in this area. Idaho may have to reset the baseline and targets for this indicator based on the newly updated ECO process, tools, and resources that have been implemented statewide.

3. Indicator #4 – A new baseline and targets were set in the FFY 2015 SPP/APR. The new baseline was set using the 2nd and 3rd quarters’ data and new targets were set based on continued efforts to solidify the new family survey process. Realistic gains are expected to be made by FFY 18. Idaho continues to work on improving the family survey response rate, which may have an impact on existing targets and actual data reported in the future.
4. Indicators #5 and #6 – During the previous federal fiscal years for these indicators, Idaho remained fairly steady, until the 2008 recession. As a result, the state put measures in place to increase the number of birth-to-one-year-olds and birth-to-three-year-olds being served, with great success. We anticipate making slow and steady progress but know this is a potential area of concern due to the program's resource capacity.

5. Indicator #9 – Not applicable for Idaho Part C.

6. Indicator #10 – Idaho has not received any mediation requests during the previous federal fiscal years.

7. Indicator #11 – Idaho submitted the baseline and SPP targets when submitting Indicator #11 in April of 2017.

**FFY 2013-2018 Targets**

The Early Childhood Coordinating Council’s Infant Toddler Program Committee met to review and discuss the proposed targets identified during the Hub Leadership meeting. Committee members asked whether the SSIP would impact the current level of success in meeting performance indicators. There may be some impact on performance, but we want to move forward and do our best to continue to make slow and steady progress.

The Infant Toddler Program Committee accepted the newly proposed targets and recommended we present them to the full Early Childhood Coordinating Council for review and approval.

The Infant Toddler Program Committee, along with the Part C Coordinator, presented information on previous targets and actual data, along with the FFY 2013-2018 SPP targets, to the Early Childhood Coordinating Council, with a rationale for how the new targets were identified. Council members fully approved the new targets, especially in light of the program's current resource capacity and additional work required to complete the SSIP to improve child outcome results.

**FFY 2019 Targets**

The Infant Toddler Coordinating Council’s Executive Committee met to review and discuss the proposed targets identified during the Hub Leadership meeting. Committee members inquired whether the increase in referrals and enrolled children, continued shortage of resources, high contractor turnover and work being completed for the SSIP would impact current performance. While we have done a good job so far, program and staff/contractors continue to feel the pressure. We will continue to do the best we can with the challenges presented. The Executive Committee accepted the newly proposed targets and recommended we present them to the Infant Toddler Coordinating Council.

The Executive Committee, along with the Part C Coordinator, presented information on previous targets and actual data, along with FFY 2013-2018 targets and the newly proposed FFY 2019 targets to the Infant Toddler Coordinating Council, with rationale for how the new targets were identified. Council members unanimously approved the new FFY 2019 targets.

**FFY 2018 SPP/APR Data**

**Number of infants and toddlers with IFSPs assessed**

1,461

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

<table>
<thead>
<tr>
<th>Number of children</th>
<th>Percentage of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Infants and toddlers who did not improve functioning</td>
<td>8</td>
</tr>
<tr>
<td>b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers</td>
<td>511</td>
</tr>
<tr>
<td>c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it</td>
<td>153</td>
</tr>
<tr>
<td>d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers</td>
<td>395</td>
</tr>
<tr>
<td>e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers</td>
<td>394</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Numerator</th>
<th>Denominator</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>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</td>
<td>548</td>
<td>1,067</td>
<td>52.38%</td>
<td>65.00%</td>
<td>51.36%</td>
<td>Did Not Meet Target</td>
</tr>
</tbody>
</table>
Provide reasons for A1 slippage, if applicable

During the data and infrastructure analysis phase of the SSIP, Idaho learned that our providers were inconsistently using the ECO process, tools, and resources to determine ECO ratings. Clearly, our program needed a more consistent process to ensure that standardized ECO processes, tools, and resources are used and implemented to gain a higher level of confidence in the consistency and accuracy of the state's ECO data.

In addition, Idaho learned that among the local leadership and providers there existed varying comprehension of the ECO process. Staff/contractors viewed development through a domain-specific lens in determining the three child outcomes areas while considering the child’s broader development and functioning. They overlooked the importance of using information on functional behaviors and use of behaviors in a meaningful way. Staff/contractors continue to be challenged in acquiring and implementing this knowledge in their practice. Leadership continues to provide support and opportunities for practicing these skills.

Since the need was identified, Idaho has been focusing on improving and standardizing the Early Childhood Outcomes process, tools, and resources. We've completed an ECO pilot in three of the seven regions in our state. We've gathered feedback and collated the pilot data. We used that data to create and implement final ECO action plans in the pilot sites, followed by the development of plans in the remaining regions with statewide scale-up.

Pre-pilot discussions, SSIP activities and statewide scale-up of the newly ECO processes put the much-needed focus on the ECOs beginning with the inclusion of ECO data at Statewide Leadership meetings in FFY 2015. Leadership in the regions has consistently been exposed to ECO data, patterns, and trends, and have shared the data with their staff. This data sharing continues to prompt more scrutiny and awareness of the ECO process and available tools and resources throughout the state. We continue to believe the ongoing focus and statewide scale-up of the ECOs have produced increased reflection on tools and processes and that the result will be more accurate and reliable ECO data.

Our 2019 analysis of Part C FFY 2017 SPP/APR national data trends continues to validate that other states are experiencing the same downward trends in child outcomes that we have seen in Idaho. Anecdotal data from our pilot project indicated that variable child outcome ratings may have been caused by inconsistent use of the decision tree and some confusion around the age-anchoring process. Idaho still believes we may need to identify new baseline and targets in the next few years once we have adequate statewide data from the newly updated ECO process, tools and resources. With sufficient time for regions to implement the new ECO processes for children to receive entry and exit ECO ratings, we continue to anticipate that standardized tools and processes will reduce the fluctuation of ECO data. This will enable Idaho to accurately choose achievable targets and, through increased monitoring and assessment of data, improve child outcomes over the next several years.

Provide reasons for A2 slippage, if applicable

N/A

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

<table>
<thead>
<tr>
<th>Number of Children</th>
<th>Percentage of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Infants and toddlers who did not improve functioning</td>
<td>9</td>
</tr>
<tr>
<td>b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers</td>
<td>554</td>
</tr>
<tr>
<td>c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it</td>
<td>238</td>
</tr>
<tr>
<td>d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers</td>
<td>473</td>
</tr>
<tr>
<td>e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers</td>
<td>187</td>
</tr>
</tbody>
</table>

B1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program

<table>
<thead>
<tr>
<th>Numerator</th>
<th>Denominator</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>711</td>
<td>1,274</td>
<td>57.02%</td>
<td>67.20%</td>
<td>55.81%</td>
<td>Did Not Meet Target</td>
<td>Slippage</td>
</tr>
</tbody>
</table>
B2. The percent of infants and toddlers who were functioning within age expectations in Outcome B by the time they turned 3 years of age or exited the program

<table>
<thead>
<tr>
<th>Numerator</th>
<th>Denominator</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>660</td>
<td>1,461</td>
<td>42.54%</td>
<td>52.00%</td>
<td>45.17%</td>
<td>Did Not Meet Target</td>
<td>No Slippage</td>
</tr>
</tbody>
</table>

Provide reasons for B1 slippage, if applicable
During the data and infrastructure analysis phase of the SSIP, Idaho learned that our providers were inconsistently using the ECO process, tools, and resources to determine ECO ratings. Clearly, our program needed a more consistent process to ensure that standardized ECO processes, tools, and resources are used and implemented to gain a higher level of confidence in the consistency and accuracy of the state's ECO data.

In addition, Idaho learned that among the local leadership and providers there existed varying comprehension of the ECO process. Staff contractors viewed development through a domain-specific lens in determining the three child outcomes areas while considering the child's broader development and functioning. They overlooked the importance of using information on functional behaviors and use of behaviors in a meaningful way. Staff contractors continue to be challenged in acquiring and implementing this knowledge in their practice. Leadership continues to provide support and opportunities for practicing these skills.

Since the need was identified, Idaho has been focusing on improving and standardizing the Early Childhood Outcomes process, tools, and resources. We've completed an ECO pilot in three of the seven regions in our state. We've gathered feedback and collated the pilot data. We used that data to create and implement final ECO action plans in the pilot sites, followed by the development of plans in the remaining regions with statewide scale-up.

Pre-pilot discussions, SSIP activities and statewide scale-up of the newly ECO processes put the much-needed focus on the ECOs beginning with the inclusion of ECO data at Statewide Leadership meetings in FFY 2015. Leadership in the regions has consistently been exposed to ECO data, patterns, and trends, and have shared the data with their staff. This data sharing continues to prompt more scrutiny and awareness of the ECO process and available tools and resources throughout the state. We continue to believe the ongoing focus and statewide scale-up of the ECOs have produced increased reflection on tools and processes and that the result will be more accurate and reliable ECO data.

Our 2019 analysis of Part C FFY 2017 SPP/APR national data trends continues to validate that other states are experiencing the same downward trends in child outcomes that we have seen in Idaho. Anecdotal data from our pilot project indicated that variable child outcome ratings may have been caused by inconsistent use of the decision tree and some confusion around the age-anchoring process. Idaho still believes we may need to identify new baseline and targets in the next few years once we have adequate statewide data from the newly updated ECO process, tools and resources. With sufficient time for regions to implement the new ECO processes for children to receive entry and exit ECO ratings, we continue to anticipate that standardized tools and processes will reduce the fluctuation of ECO data. This will enable Idaho to accurately choose achievable targets and, through increased monitoring and assessment of data, improve child outcomes over the next several years.

Provide reasons for B2 slippage, if applicable
N/A

Outcome C: Use of appropriate behaviors to meet their needs

<table>
<thead>
<tr>
<th>Number of Children</th>
<th>Percentage of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Infants and toddlers who did not improve functioning</td>
<td>10</td>
</tr>
<tr>
<td>b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers</td>
<td>455</td>
</tr>
<tr>
<td>c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it</td>
<td>184</td>
</tr>
<tr>
<td>d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers</td>
<td>558</td>
</tr>
<tr>
<td>e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers</td>
<td>254</td>
</tr>
</tbody>
</table>

C1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program

<table>
<thead>
<tr>
<th>Numerator</th>
<th>Denominator</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>742</td>
<td>1,207</td>
<td>64.30%</td>
<td>71.80%</td>
<td>61.47%</td>
<td>Did Not Meet Target</td>
<td>Slippage</td>
</tr>
</tbody>
</table>
## C2. The percent of infants and toddlers who were functioning within age expectations in Outcome C by the time they turned 3 years of age or exited the program

<table>
<thead>
<tr>
<th>Numerator</th>
<th>Denominator</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>812</td>
<td>1,461</td>
<td>55.49%</td>
<td>59.80%</td>
<td>55.58%</td>
<td>Did Not Meet Target</td>
<td>No Slippage</td>
</tr>
</tbody>
</table>

### Provide reasons for C1 slippage, if applicable

During the data and infrastructure analysis phase of the SSIP, Idaho learned that our providers were inconsistently using the ECO process, tools, and resources to determine ECO ratings. Clearly, our program needed a more consistent process to ensure that standardized ECO processes, tools, and resources are used and implemented to gain a higher level of confidence in the consistency and accuracy of the state's ECO data.

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### Provide reasons for C2 slippage, if applicable

N/A

### Will your separate report be just the at-risk infants and toddlers or aggregated performance data on all of the infants and toddlers it serves under Part C?

N/A – Idaho does not serve at-risk infants and toddlers.

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

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>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</td>
<td>2,092</td>
</tr>
<tr>
<td>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</td>
<td>631</td>
</tr>
</tbody>
</table>

### Was sampling used?

No

### Has your previously-approved sampling plan changed?

N/A

### If the plan has changed, please provide sampling plan.

N/A

### Describe the sampling methodology outlining how the design will yield valid and reliable estimates.

N/A

### Did you use the Early Childhood Outcomes Center (ECO) Child Outcomes Summary Form (COS) process? (yes/no)

Yes
Provide the criteria for defining “comparable to same-aged peers.”

Idaho uses the Early Childhood Outcomes Center (ECO) Child Outcomes Summary (COS) process. As a result, the criteria for defining “comparable to same-aged peers” has been defined as a child who has been assigned a score of 6 or 7 on the COS.

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

Child outcome data is required to be collected for all children enrolled in our program who receive early intervention services for six months or longer. The following includes the newly updated ECO instruments and procedures used to gather data for this indicator that have been scaled up statewide as part of our State Systemic Improvement Plan efforts:

Family Communication

Entry ECO Ratings

At a minimum, regions must provide and discuss these with families using one of the following communication resources:
- ECO Family Flyer
- ECO Family Guide

In addition, the Child Outcomes Step by Step video is available for families to access using the link in the ECO Family Flyer or on the ITP Website.

Exit ECO Ratings

At a minimum, regions must use one of the following communication resources to prepare the family/caregiver for the exit ECO rating process:
- ECO Family Flyer
- ECO Family Guide

In addition, the Child Outcomes Step by Step video is available for families to access using the link listed in the ECO Family Flyer, ECO Family Guide, or on the ITP Website.

Information Gathering

Entry ECO Ratings

At a minimum, regions must complete an approved ECO Anchor Assessment tool as defined in the ITP eManual

AND

At a minimum, regions must complete the following ECO information-gathering tools to learn about the child’s functioning across settings and situations:

For Preemies and Infants
- Use the ECO Parent Questionnaire for Preemies/Infants

AND

For Older Infants and Toddlers

Use either the
- ECO Guiding Questions
- ECO Parent Questionnaire for Toddlers

Exit ECO Ratings

At a minimum, regions must complete an approved ECO Anchor Assessment tool as defined in the ITP eManual.
- Circumstances such as loss of contact, unexpected family/caregiver move, etc. warrant a review of the child’s file in place of an ECO Anchor Assessment.

AND

At a minimum, regions must complete the following:
- Use the information gathered from the ECO Anchor Assessment with the family/caregiver to discuss the child’s current level of functioning
- Review medical records
- Review IFSP outcomes
- Review of all evaluations/assessments

Determining ECO Ratings

Entry/Exit ECO Ratings

At a minimum, regions must use one of the following ECO rating tools to ensure the 7-point scale is consistently and accurately used during the rating process with families:
- ECO Decision Tree (with or without rating numbers)
In addition, if an anchor assessment tool other than the MEISR is used to gather information for entry or exit ECO ratings, the ECO Crosswalk MUST be used to complete the age anchoring process. In this instance, regions must have a process to ensure that teams understand both the sequence and milestones in which children acquire skills and the age range in which they are acquired.

If the MEISR is used as an anchor assessment, it is not necessary to use the ECO Crosswalk. Use of the MEISR provides an age anchoring opportunity and the ability to view the child’s functioning in different settings.

An optional tool to summarize/compile/organize information gathered from the ECO tools and anchor assessment is the Child Outcome Summary Worksheet.

Documentation
Entry/Exit ECO Ratings
All regions must use the Child Outcome Summary Form to document the ECO ratings and attach in ITPKIDS.

Provide additional information about this indicator (optional)
N/A

3 - Prior FFY Required Actions
None

Response to actions required in FFY 2017 SPP/APR
N/A

3 - OSEP Response

3 - Required Actions
**Indicator 4: Family Involvement**

**Instructions and Measurement**

**Monitoring Priority:** Early Intervention Services In Natural Environments

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

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

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

**Data Source**

State selected data source. State must describe the data source in the SPP/APR.

**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.

**Instructions**

Sampling of families participating in Part C is allowed. When sampling is used, submit a description of the sampling methodology outlining how the design will yield valid and reliable estimates. (See General Instructions page 2 for additional instructions on sampling.)

Provide the actual numbers used in the calculation.

Describe the results of the calculations and compare the results to the target.

While a survey is not required for this indicator, a State using a survey must submit a copy of any new or revised survey with its SPP/APR.

Report the number of families to whom the surveys were distributed.

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. States should consider categories such as race and ethnicity, age of the infant or toddler, and geographic location in the State.

If the analysis shows that the demographics of the families responding are 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. In identifying such strategies, the State should consider factors such as how the State distributed the survey to families (e.g., by mail, by e-mail, on-line, by telephone, in-person), if a survey was used, and how responses were collected.

States are encouraged to work in collaboration with their OSEP-funded parent centers in collecting data.

### 4 - Indicator Data

#### Historical Data

<table>
<thead>
<tr>
<th>Baseline</th>
<th>FFY</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>A 2015</td>
<td>Target&gt;=</td>
<td>65.00%</td>
<td>66.00%</td>
<td>92.93%</td>
<td>92.93%</td>
<td>93.00%</td>
</tr>
<tr>
<td>A 92.93%</td>
<td>Data</td>
<td>68.80%</td>
<td>97.10%</td>
<td>92.93%</td>
<td>92.11%</td>
<td>94.67%</td>
</tr>
<tr>
<td>B 2015</td>
<td>Target&gt;=</td>
<td>62.00%</td>
<td>63.00%</td>
<td>92.68%</td>
<td>92.68%</td>
<td>93.00%</td>
</tr>
<tr>
<td>B 92.68%</td>
<td>Data</td>
<td>66.18%</td>
<td>95.65%</td>
<td>92.68%</td>
<td>92.98%</td>
<td>94.33%</td>
</tr>
<tr>
<td>C 2015</td>
<td>Target&gt;=</td>
<td>76.00%</td>
<td>77.00%</td>
<td>90.98%</td>
<td>90.98%</td>
<td>92.00%</td>
</tr>
<tr>
<td>C 90.98%</td>
<td>Data</td>
<td>79.59%</td>
<td>94.20%</td>
<td>90.98%</td>
<td>92.98%</td>
<td>95.33%</td>
</tr>
</tbody>
</table>

#### Targets

<table>
<thead>
<tr>
<th>FFY</th>
<th>2018</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target A&gt;=</td>
<td>94.00%</td>
<td>95.00%</td>
</tr>
<tr>
<td>Target B&gt;=</td>
<td>94.00%</td>
<td>94.50%</td>
</tr>
<tr>
<td>Target C&gt;=</td>
<td>93.00%</td>
<td>94.00%</td>
</tr>
</tbody>
</table>

**Targets: Description of Stakeholder Input**

The Central Office Infant Toddler Program staff identified the need for stakeholder input regarding new SSP indicator targets, including the newly added FFY 19 targets. Staff met to review the previous SPP indicator targets and actual data to identify potential starting points for the new FFY 2013-2018 and newly added FFY 19 targets. Central Office staff presented their findings during a tri-annual Hub Leadership meeting. During this meeting, resource limitations, the ongoing increase in referrals and enrollment, and the new and continuing SSIP requirements were discussed, as well as how to
effectively maintain/improve the SPP Performance Indicators. Using the information from the discussion, draft targets were identified for each SPP indicator to take forward first to the EC3’s Infant Toddler Program Committee and then to the full Early Childhood Coordinating Council.

For the new FFY 19 targets, the draft targets were identified for each SPP indicator to take forward to the Infant Toddler Coordinating Council.

1. **Indicator #2** - Idaho has made steady progress during the previous federal fiscal years to ensure services were being provided in a child’s natural environment. Additionally, Idaho has strong policies and procedures in place and has developed contract language to ensure continued progress.

2. **Indicator #3** - Idaho has met few targets in the previous Federal Fiscal Year for this indicator. We believe the State Systemic Improvement Plan (SSIP) will have positive long-term impact in this area. Idaho may have to reset the baseline and targets for this indicator based on the newly updated ECO process, tools, and resources that have been implemented statewide.

3. **Indicator #4** - A new baseline and targets were set in the FFY 2015 SPP/APR. The new baseline was set using the 2nd and 3rd quarters’ data and new targets were set based on continued efforts to solidify the new family survey process. Realistic gains are expected to be made by FFY 18.

4. **Indicators #5 and #6** - During the previous federal fiscal years for these indicators, Idaho remained fairly steady, until the 2008 recession. As a result, the state put measures in place to increase the number of birth-to-one-year-olds and birth-to-three-year-olds being served, with great success. We anticipate making slow and steady progress but know this is a potential area of concern due to the program’s resource capacity.

5. **Indicator #9** - Not applicable for Idaho Part C.

6. **Indicator #10** - Idaho has not received any mediation requests during the previous federal fiscal years.

7. **Indicator #11** - Idaho submitted the baseline and SPP targets when submitting Indicator #11 in April of 2017.

**FFY 2013-2018 Targets**

The Early Childhood Coordinating Council’s Infant Toddler Program Committee met to review and discuss the proposed targets identified during the Hub Leadership meeting. Committee members asked whether the SSIP would impact the current level of success in meeting performance indicators.

There may be some impact on performance, but we want to move forward and do our best to continue to make slow and steady progress.

The Infant Toddler Program Committee accepted the newly proposed targets and recommended we present them to the full Early Childhood Coordinating Council for review and approval.

The Infant Toddler Program Committee, along with the Part C Coordinator, presented information on previous targets and actual data, along with the FFY 2013-2018 SPP targets, to the Early Childhood Coordinating Council, with a rationale for how the new targets were identified. Council members fully approved the new targets, especially in light of the program’s current resource capacity and additional work required to complete the SSIP to improve child outcome results.

**New Stakeholder Input (FFY 2015 - FFY 2018)**

A family survey workgroup convened in FFY 2014 to obtain stakeholder input on changes to Idaho's family survey tool and process. As a result, Idaho is now using the ECO Family Outcomes Survey-Revised (FOS-R) along with different delivery and response methods to gather family outcome data required by the Office of Special Education Programs (OSEP). As a result of using a different survey tool with different calculation methodologies, Idaho was tasked with identifying new baseline data using FFY 2015 data and new targets for FFY 2016 - FFY 2018.

Idaho engaged in the following activities to obtain stakeholder input regarding setting the new baseline using FFY 2015 data and new targets for FFY 2016 - FFY 2018:

- Central Office staff reviewed the new data to identify a potential starting point with the new baseline and FFY 2016 – FFY 2018 targets:
  - Data was calculated using survey results from the 2nd and 3rd quarter. This data set represented the time period when fidelity to the new methodology seemed to be the greatest. Proposed targets were discussed based on continued efforts to solidify the new process and realistic gains expected to be made by FFY 2018.
  - Central Office staff presented the current data to the leadership team during a triannual Statewide Leadership meeting to identify a proposed FFY 2015 baseline and a potential starting point for the new FFY 2016 – FFY 2018 targets. During this meeting, current resources, the continued family survey improvement process, and the continued SSIP requirements were discussed, as well as how to effectively improve performance for this indicator. Based on the data above, a proposed FFY 2015 baseline and new targets for FFY 2016 - FFY 2018 were developed.
  - The Part C Coordinator and data manager presented information on both the previous and the new family survey tools and processes, previous baseline, targets, and actual data, along with the newly proposed FFY 2015 baseline and FFY 2016 - FFY 2018 targets to the Infant Toddler Coordinating Council. They provided the Council with a rationale for how the new baseline and targets were identified. Council members fully approved the new targets, especially in light of the updated family survey process and the resources necessary to implement the new process.

**FFY 2019 Targets**

The Infant Toddler Coordinating Council’s Executive Committee met to review and discuss the proposed targets identified during the Hub Leadership meeting. Committee members inquired whether the increase in referrals and enrolled children, continued shortage of resources, high contractor turnover and work being completed for the SSIP would impact current performance. While we have done a good job so far, program and staff/contractors continue to feel the pressure. We will continue to do the best we can with the challenges presented. The Executive Committee accepted the newly proposed targets and recommended we present them to the Infant Toddler Coordinating Council.

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The Executive Committee, along with the Part C Coordinator, presented information on previous targets and actual data, along with FFY 2013-2018 targets and the newly proposed FFY 2019 targets to the Infant Toddler Coordinating Council, with rationale for how the new targets were identified. Council members unanimously approved the new FFY 2019 targets.

**FFY 2018 SPP/APR Data**

| The number of families to whom surveys were distributed | 1,920 |
| Number of respondent families participating in Part C | 259 |
| A1. Number of respondent families participating in Part C who report that early intervention services have helped the family know their rights | 244 |
| A2. Number of responses to the question of whether early intervention services have helped the family know their rights | 259 |
| B1. Number of respondent families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs | 248 |
| B2. Number of responses to the question of whether early intervention services have helped the family effectively communicate their children's needs | 259 |
| C1. Number of respondent families participating in Part C who report that early intervention services have helped the family help their children develop and learn | 247 |
| C2. Number of responses to the question of whether early intervention services have helped the family help their children develop and learn | 259 |

<table>
<thead>
<tr>
<th>I. Percent of families participating in Part C who report that early intervention services have helped the family know their rights (A1 divided by A2)</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>94.67%</td>
<td>94.00%</td>
<td>94.21%</td>
<td>Met Target</td>
<td>No Slippage</td>
</tr>
<tr>
<td>B. Percent of families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs (B1 divided by B2)</td>
<td>94.33%</td>
<td>94.00%</td>
<td>95.75%</td>
<td>Met Target</td>
<td>No Slippage</td>
</tr>
<tr>
<td>C. Percent of families participating in Part C who report that early intervention services have helped the family help their children develop and learn (C1 divided by C2)</td>
<td>95.33%</td>
<td>93.00%</td>
<td>95.37%</td>
<td>Met Target</td>
<td>No Slippage</td>
</tr>
</tbody>
</table>

Provide reasons for part A slippage, if applicable  N/A

Provide reasons for part B slippage, if applicable  N/A

Provide reasons for part C slippage, if applicable  N/A

Describe the sampling methodology outlining how the design will yield valid and reliable estimates.  N/A

Was sampling used?  No

If yes, has your previously-approved sampling plan changed?  N/A

If the plan has changed, please provide the sampling plan.  N/A

Was a collection tool used?  Yes

If yes, is it a new or revised collection tool?  No

If your collection tool has changed, upload it here  N/A

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

If not, describe the strategies that the State will use to ensure that in the future the response data are representative of those demographics.  N/A
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.

Idaho uses the ECO Family Outcomes Survey-Revised (FOS-R) to gather family outcomes data required by the Office of Special Education Programs (OSEP). Central Office directly manages the survey process, analysis, and summarization of the data.

This indicator represents findings of the FOS-R survey conducted by the Idaho Infant Toddler Program (ITP) to address indicator #4, the “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.”

The survey administered by ITP includes seventeen questions with a 5-point rating scale which assesses the extent to which families have achieved each outcome item, ranging from 1 = Not at all Helpful to 5 = Extremely Helpful. The survey measures the extent to which early intervention helped families achieve positive outcomes specified in Indicator #4. Idaho’s Central Office data analyst used the recommended FOS-R calculation method to calculate the data reported to OSEP.

Service Coordinators provide an invitation to complete the family survey electronically via text message or email and provide families with information on the importance of obtaining feedback to assist with program improvement. If families want to complete a hard copy of the survey, they are instructed to contact Central Office to handle their request.

Families complete the survey using a link to “Key Survey,” an online tool used by the Department of Health and Welfare to create and manage surveys and other documents, or by requesting a hard copy of the survey from Central Office. A unique child identifier randomly generated by the program’s web-based data system, ITPKIDS, is associated with each survey, providing anonymity and enabling tracking of respondent demographics. This identifier is also used to eliminate duplicate responses and to ensure that responses are valid (based on the requirement that surveys be given only at 6-month IFSP reviews).

The following includes state level data depicting the race/ethnicity demographics of families responding to the family survey in FFY 18:

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asian</td>
<td>25%</td>
</tr>
<tr>
<td>African American</td>
<td>21.1%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>13.3%</td>
</tr>
<tr>
<td>Mixed</td>
<td>13.4%</td>
</tr>
<tr>
<td>Native American</td>
<td>8.3%</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>33.3%</td>
</tr>
<tr>
<td>White</td>
<td>13.9%</td>
</tr>
</tbody>
</table>

The following includes state level data depicting the age of the child for families responding to the family survey in FFY 18:

<table>
<thead>
<tr>
<th>Age</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Birth - 1 year old</td>
<td>15.5%</td>
</tr>
<tr>
<td>1-2 year old</td>
<td>13.1%</td>
</tr>
<tr>
<td>2-3 year old</td>
<td>13.8%</td>
</tr>
</tbody>
</table>

Even with the many changes implemented over the past few years, Idaho continues to encounter challenges with increasing the overall family survey response rate. In September of 2019, the State Lead Agency piloted a phone based contact study out of central office for families who did not complete the family survey in three regions of the state. The Lead Agency phoned 112 families in these regions whose children had a 6-month review during the period from May 1 through August 13 of 2019. A total of 46 families (41%) completed the family survey, with a range of 46% to 38% across the regions. The results yielded that this method was effective in boosting response rates, and relatively efficient. This method could be a viable option for boosting response rates among the least well represented respondent groups, such as Native Americans. When resources permit, it could eventually supplement the online responding for all families, effectively more than doubling the current response rate of 13.5%. However, COVID-19 has put any actions to expand this method on hold. Idaho recognizes the need to increase the overall response rate and has identified the need to increase response rates for certain race/ethnicity categories.

Idaho used results from July 1, 2018 – June 30, 2019 to report data for FFY 2018. The response rates by regions for that time period ranged from 6.2% to 25.6% with a statewide percentage of 13.5%. The survey is available in English and Spanish. Sampling was not used in the distribution process. The family of each child with a 6-month IFSP review between July 1, 2018 and June 30, 2019 was offered participation in the survey. In total, 259 valid, complete surveys were received.

Provide additional information about this indicator (optional)

N/A

4 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

4 - OSEP Response
**Indicator 5: Child Find (Birth to One)**

**Instructions and Measurement**

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

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

**Data Source**
Data collected under section 618 of the IDEA (IDEA Part C Child Count and Settings data collection in the EDFacts Metadata and Process System (EMAPS)) and Census (for the denominator).

**Measurement**
Percent = \left(\frac{\# ~ \text{of infants and toddlers birth to 1 with IFSPs}}{\text{population of infants and toddlers birth to 1}}\right) \times 100.

**Instructions**
Sampling from the State’s 618 data is not allowed.

Describe the results of the calculations and compare the results to the target and to national data. The data reported in this indicator should be consistent with the State’s reported 618 data reported in Table 1. If not, explain why.

**5 - Indicator Data**

**Historical Data**

<table>
<thead>
<tr>
<th>Baseline</th>
<th>2005</th>
<th>1.75%</th>
</tr>
</thead>
<tbody>
<tr>
<td>FFY 2013</td>
<td>1.64%</td>
<td>1.66%</td>
</tr>
<tr>
<td>Target &gt;=</td>
<td>1.76%</td>
<td>1.51%</td>
</tr>
</tbody>
</table>

**Targets**

<table>
<thead>
<tr>
<th>FFY</th>
<th>2018</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target &gt;=</td>
<td>1.76%</td>
<td>1.76%</td>
</tr>
</tbody>
</table>

**Targets: Description of Stakeholder Input**

The Central Office Infant Toddler Program staff identified the need for stakeholder input regarding new SSP indicator targets, including the newly added FFY 19 targets. Staff met to review the previous SPP indicator targets and actual data to identify potential starting points for the new FFY 2013-2018 and newly added FFY 19 targets. Central Office staff presented their findings during a tri-annual Hub Leadership meeting. During this meeting, resource limitations, the ongoing increase in referrals and enrollment, and the new and continuing SSIP requirements were discussed, as well as how to effectively maintain/improve the SPP Performance Indicators. Using the information from the discussion, draft targets were identified for each SPP indicator to take forward first to the EC3’s Infant Toddler Program Committee and then to the full Early Childhood Coordinating Council. For the new FFY 19 targets, the draft targets were identified for each SPP indicator to take forward to the Infant Toddler Coordinating Council.

1. **Indicator #2** - Idaho has made steady progress during the previous federal fiscal years to ensure services were being provided in a child’s natural environment. Additionally, Idaho has strong policies and procedures in place and has developed contract language to ensure continued progress.

2. **Indicator #3** - Idaho has met few targets in the previous Federal Fiscal Year for this indicator. We believe the State Systemic Improvement Plan (SSIP) will have positive long-term impact in this area. Idaho may have to reset the baseline and targets for this indicator based on the newly updated ECO process, tools, and resources that have been implemented statewide.

3. **Indicator #4** - A new baseline and targets were set in the FFY 2015 SPP/APR. The new baseline was set using the 2nd and 3rd quarters’ data and new targets were set based on continued efforts to solidify the new family survey process. Realistic gains are expected to be made by FFY 18. Idaho continues to work on improving the family survey response rate, which may have an impact on existing targets and actual data reported in the future.

4. **Indicators #5 and #6** – During the previous federal fiscal years for these indicators, Idaho remained fairly steady, until the 2008 recession. As a result, the state put measures in place to increase the number of birth-to-one-year-olds and birth-to-three-year-olds being served, with great success. We anticipate making slow and steady progress but know this is a potential area of concern due to the program’s resource capacity.

5. **Indicator #9** - Not applicable for Idaho Part C.

6. **Indicator #10** – Idaho has not received any mediation requests during the previous federal fiscal years.

7. **Indicator #11** – Idaho submitted the baseline and SPP targets when submitting Indicator #11 in April of 2017.

**FFY 2013-2018 Targets**
The Early Childhood Coordinating Council’s Infant Toddler Program Committee met to review and discuss the proposed targets identified during the Hub Leadership meeting. Committee members asked whether the SSIP would impact the current level of success in meeting performance indicators. There may be some impact on performance, but we want to move forward and do our best to continue to make slow and steady progress.

The Infant Toddler Program Committee accepted the newly proposed targets and recommended we present them to the full Early Childhood Coordinating Council for review and approval.
The Infant Toddler Program Committee, along with the Part C Coordinator, presented information on previous targets and actual data, along with the FFY 2013-2018 SPP targets, to the Early Childhood Coordinating Council, with a rationale for how the new targets were identified. Council members fully approved the new targets, especially in light of the program’s current resource capacity and additional work required to complete the SSIP to improve child outcome results.

**FFY 2019 Targets**

The Infant Toddler Coordinating Council’s Executive Committee met to review and discuss the proposed targets identified during the Hub Leadership meeting. Committee members inquired whether the increase in referrals and enrolled children, continued shortage of resources, high contractor turnover and work being completed for the SSIP would impact current performance. While we have done a good job so far, program and staff/contractors continue to feel the pressure. We will continue to do the best we can with the challenges presented. The Executive Committee accepted the newly proposed targets and recommended we present them to the Infant Toddler Coordinating Council.

The Executive Committee, along with the Part C Coordinator, presented information on previous targets and actual data, along with FFY 2013-2018 targets and the newly proposed FFY 2019 targets to the Infant Toddler Coordinating Council, with rationale for how the new targets were identified. Council members unanimously approved the new FFY 2019 targets.

**Prepopulated Data**

<table>
<thead>
<tr>
<th>Source</th>
<th>Date</th>
<th>Description</th>
<th>Data</th>
</tr>
</thead>
<tbody>
<tr>
<td>SY 2018-19 Child Count/Educational Environment Data Groups</td>
<td>07/10/2019</td>
<td>Number of infants and toddlers birth to 1 with IFSPs</td>
<td>351</td>
</tr>
<tr>
<td>Annual State Resident Population Estimates for 6 Race Groups (5 Race Alone Groups and Two or More Races) by Age, Sex, and Hispanic Origin</td>
<td>06/20/2019</td>
<td>Population of infants and toddlers birth to 1</td>
<td>22,348</td>
</tr>
</tbody>
</table>

**FFY 2018 SPP/APR Data**

<table>
<thead>
<tr>
<th>Number of infants and toddlers birth to 1 with IFSPs</th>
<th>Population of infants and toddlers birth to 1</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>351</td>
<td>22,348</td>
<td>1.50%</td>
<td>1.76%</td>
<td>1.57%</td>
<td>Did Not Meet Target</td>
<td>No Slippage</td>
</tr>
</tbody>
</table>

Provide reasons for slippage, if applicable

N/A

**Compare your results to the national data**

Idaho placed 2nd in the nation when ranked among other states with Category C eligibility criteria (obtained from the Infant Toddler Coordinator’s Association, 2020).

Idaho served 1.57% of the state’s infants age birth to one year of age. This figure is .32% above the national average of 1.25% for all 50 states, D.C., and P.R.

Provide additional information about this indicator (optional)

N/A

**5 - Prior FFY Required Actions**

None

**Response to actions required in FFY 2017 SPP/APR**

**5 - OSEP Response**

**5 - Required Actions**
**Indicator 6: Child Find (Birth to Three)**

**Instructions and Measurement**

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

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

**Data Source**
Data collected under IDEA section 618 of the IDEA ([IDEA Part C Child Count and Settings data collection in the EDFacts Metadata and Process System (EMAPS)](https://www.ed.gov) and Census (for the denominator).

**Measurement**
Percent = [# of infants and toddlers birth to 3 with IFSPs] divided by the [# of population of infants and toddlers birth to 3] times 100.

**Instructions**
Describing the results of the calculations and compare the results to the target and to national data. The data reported in this indicator should be consistent with the State’s reported 618 data reported in Table 1. If not, explain why.

### 6 - Indicator Data

<table>
<thead>
<tr>
<th>Baseline</th>
<th>2005</th>
<th>2.90%</th>
</tr>
</thead>
<tbody>
<tr>
<td>FFY</td>
<td>2013</td>
<td>2014</td>
</tr>
<tr>
<td>Target</td>
<td>2.75%</td>
<td>2.77%</td>
</tr>
</tbody>
</table>

#### Targets

<table>
<thead>
<tr>
<th>FFY</th>
<th>2018</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target</td>
<td>2.91%</td>
<td>2.95%</td>
</tr>
</tbody>
</table>

**Targets: Description of Stakeholder Input**

The Central Office Infant Toddler Program staff identified the need for stakeholder input regarding new SSP indicator targets, including the newly added FFY 19 targets. Staff met to review the previous SPP indicator targets and actual data to identify potential starting points for the new FFY 2013-2018 and newly added FFY 19 targets. Central Office staff provided their findings during a tri-annual Hub Leadership meeting. During this meeting, resource limitations, the ongoing increase in referrals and enrollment, and the new and continuing SSIP requirements were discussed, as well as how to effectively maintain/improve the SPP Performance Indicators. Using the information from the discussion, draft targets were identified for each SPP indicator to take forward first to the EC3’s Infant Toddler Program Committee and then to the full Early Childhood Coordinating Council. For the new FFY 19 targets, the draft targets were identified for each SPP indicator to take forward to the Infant Toddler Coordinating Council.

1. **Indicator #2** - Idaho has made steady progress during the previous federal fiscal years to ensure services were being provided in a child’s natural environment. Additionally, Idaho has strong policies and procedures in place and has developed contract language to ensure continued progress.

2. **Indicator #3** – Idaho has met few targets in the previous Federal Fiscal Year for this indicator. We believe the State Systemic Improvement Plan (SSIP) will have positive long-term impact in this area. Idaho may have to reset the baseline and targets for this indicator based on the newly updated ECO process, tools, and resources that have been implemented statewide.

3. **Indicator #4** – A new baseline and targets were set in the FFY 2015 SPP/APR. The new baseline was set using the 2nd and 3rd quarters’ data and new targets were set based on continued efforts to solidify the new family survey process. Realistic gains are expected to be made by FFY 18. Idaho continues to work on improving the family survey response rate, which may have an impact on existing targets and actual data reported in the future.

4. **Indicators #5 and #6** – During the previous federal fiscal years for these indicators, Idaho remained fairly steady, until the 2008 recession. As a result, the state put measures in place to increase the number of birth-to-one-year-olds and birth-to-three-year-olds being served, with great success. We anticipate making slow and steady progress, but now this is a potential area of concern due to the program’s resource capacity.

5. **Indicator #9** – Not applicable for Idaho Part C.

6. **Indicator #10** – Idaho has not received any mediation requests during the previous federal fiscal years.

7. **Indicator #11** – Idaho submitted the baseline and SPP targets when submitting Indicator #11 in April of 2017.

**FFY 2013-2018 Targets**

The Early Childhood Coordinating Council’s Infant Toddler Program Committee met to review and discuss the proposed targets identified during the Hub Leadership meeting. Committee members asked whether the SSIP would impact the current level of success in meeting performance indicators. There may be some impact on performance, but we want to move forward and do our best to continue to make slow and steady progress. The Infant Toddler Program Committee accepted the newly proposed targets and recommended we present them to the full Early Childhood Coordinating Council for review and approval. The Infant Toddler Program Committee, along with the Part C Coordinator, presented information on previous targets and actual data, along with the FFY 2013-2018 SPP targets, to the Early Childhood Coordinating Council, with a rationale for how the new targets were identified. Council members fully approved the new targets, especially in light of the program’s current resource capacity and additional work required to complete the SSIP to improve child outcome results.
FFY 2019 Targets
The Infant Toddler Coordinating Council’s Executive Committee met to review and discuss the proposed targets identified during the Hub Leadership meeting. Committee members inquired whether the increase in referrals and enrolled children, continued shortage of resources, high contractor turnover and work being completed for the SSIP would impact current performance. While we have done a good job so far, program and staff/contractors continue to feel the pressure. We will continue to do the best we can with the challenges presented. The Executive Committee accepted the newly proposed targets and recommended we present them to the Infant Toddler Coordinating Council.

The Executive Committee, along with the Part C Coordinator, presented information on previous targets and actual data, along with FFY 2013-2018 targets and the newly proposed FFY 2019 targets to the Infant Toddler Coordinating Council, with rationale for how the new targets were identified. Council members unanimously approved the new FFY 2019 targets.

Prepopulated Data

<table>
<thead>
<tr>
<th>Source</th>
<th>Date</th>
<th>Description</th>
<th>Data</th>
</tr>
</thead>
<tbody>
<tr>
<td>SY 2018-19 Child Count/Educational Environment Data Groups</td>
<td>07/10/2019</td>
<td>Number of infants and toddlers birth to 3 with IFSPs</td>
<td>2,083</td>
</tr>
<tr>
<td>Annual State Resident Population Estimates for 6 Race Groups (5 Race Alone Groups and Two or More Races) by Age, Sex, and Hispanic Origin</td>
<td>06/20/2019</td>
<td>Population of infants and toddlers birth to 3</td>
<td>68,567</td>
</tr>
</tbody>
</table>

FFY 2018 SPP/APR Data

<table>
<thead>
<tr>
<th>Number of infants and toddlers birth to 3 with IFSPs</th>
<th>Population of infants and toddlers birth to 3</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>2,083</td>
<td>68,567</td>
<td>2.92%</td>
<td>2.91%</td>
<td>3.04%</td>
<td>Met Target</td>
<td>No Slippage</td>
</tr>
</tbody>
</table>

Provide reasons for slippage, if applicable
N/A

Compare your results to the national data
Idaho placed 8th in the nation when ranked among other states with Category C eligibility criteria (obtained from the Infant Toddler Coordinator’s Association, 2020). Idaho served 3.04% of the state’s infants birth to three years of age.

This figure is .44% below the national average of 3.48% for all 50 states, D.C., and P.R.

Provide additional information about this indicator (optional)
N/A

6 - Prior FFY Required Actions
None

Response to actions required in FFY 2017 SPP/APR

6 - OSEP Response

6 - Required Actions
Indicator 7: 45-Day Timeline

Instructions and Measurement

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

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

**Data Source**

Data to be taken from monitoring or State data system and must address the timeline from point of referral to initial IFSP meeting based on actual, not an average, number of days.

**Measurement**

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) divided by the (# of eligible infants and toddlers evaluated and assessed for whom an initial IFSP meeting was required to be conducted)] times 100.

Account for untimely evaluations, assessments, and initial IFSP meetings, including the reasons for delays.

**Instructions**

If data are from State monitoring, describe the method used to select EIS programs for monitoring. If data are from a State database, describe the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period) and how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Targets must be 100%.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data and if data are from the State’s monitoring, describe the procedures used to collect these data. Provide actual numbers used in the calculation.

States are not required to report in their calculation the number of children for whom the State has identified the cause for the delay as exceptional family circumstances, as defined in 34 CFR §303.310(b), documented in the child’s record. If a State chooses to report in its calculation children for whom the State has identified the cause for the delay as exceptional family circumstances documented in the child’s record, the numbers of these children are to be included in the numerator and denominator. Include in the discussion of the data, the numbers the State used to determine its calculation under this indicator and report separately the number of documented delays attributable to exceptional family circumstances.

Provide detailed information about the timely correction of noncompliance as noted in OSEP’s response table for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, methods to ensure correction, and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2018 SPP/APR, the data for FFY 2017), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

### 7 - Indicator Data

#### Historical Data

<table>
<thead>
<tr>
<th>Baseline</th>
<th>2005</th>
<th>90.30%</th>
</tr>
</thead>
<tbody>
<tr>
<td>FFY 2013</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Target</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Data</td>
<td>94.10%</td>
<td>96.59%</td>
</tr>
</tbody>
</table>

#### Targets

<table>
<thead>
<tr>
<th>FFY</th>
<th>2018</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

#### FFY 2018 SPP/APR Data

<table>
<thead>
<tr>
<th>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</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,483</td>
<td>2,160</td>
<td>94.45%</td>
<td>100%</td>
<td>91.94%</td>
<td>Did Not Meet</td>
</tr>
</tbody>
</table>
Provide reasons for slippage, if applicable
The following includes a list of reasons for the IFSP 45-day slippage in FFY 18:

1. Staff and contractor turnover
   • In FFY 17, Idaho encountered a 21% state staff and 29% contracted service coordinator turnover rate. In FFY 18, Idaho encountered a 12% state staff and 18% contracted service coordinator turnover rate. While the overall statewide turnover rate has decreased over the past year, the West Hub, with the greatest number of referrals and children being served across the state, has lost 14 contractors and 2 state staff since March of 2019.
   • The turnover has put an incredible strain on regional leaders who continually train new contractors as most do not come into the program with early intervention experience or knowledge of IDEA, Part C requirements.
   • The program does not have a built-in buffer for staff/contractors to take on additional caseloads when service coordinators leave their job.
   • With the continued growth in Idaho, the job market is becoming more competitive than it has ever been. Additionally, the quality of the candidates applying for service coordination positions has declined in the past few years.

2. Increase in referrals
   • FFY 16 - Idaho received 170 additional unduplicated referrals from the previous year.
   • FFY 17 - Idaho received 184 additional unduplicated referrals from the previous year.
   • FFY 18 - Idaho received 252 additional unduplicated referrals from the previous year.

3. Increase in number of children being served
   • The Infant Toddler Program has seen a 25% increase in the cumulative numbers of children being served over the past 8 years.

4. Increased caseloads
   • With the increased number of referrals and children being served over the past few years and consistent turnover, caseloads have continued to increase for service coordinators.

5. While Idaho did implement new Medicaid EI EPSDT benefits in July of 2018, challenges with Medicaid denials occurring on a regular basis contributed to variability and unpredictability of receipt funding. As a result, no new service coordinator resources are being added at this time.

6. State general funds and federal grant funds have not kept up with the continued growth of the program.

7. Due to budgetary constraints, the program has not been able to provide increases in service coordinator and service provider contractor rates for numerous years.

Number of documented delays attributable to exceptional family circumstances
This number will be added to the "Number of eligible infants and toddlers with IFSPs for whom an initial evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline" field above to calculate the numerator for this indicator.

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

Describe the method used to select EIS programs for monitoring.
N/A

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

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.
Timely Individualized Family Service Plans (IFSPs) are calculated based on the actual number of days between the date of referral and the date of the child’s initial Individualized Family Service Plan meeting. In Idaho, the 45-day clock to complete the initial Individualized Family Service Plan begins the date a referral is received. A statewide report encompassing all initial Individualized Family Service Plans completed on 7/1/18 through 6/30/2019 was generated from the ITPKIDS database.

Idaho has a number of methods to ensure compliance with the 45-day timeline, including:
   • Monthly reports run by hub leaders identify missing or inaccurate data.
   • Reports run by Central Office staff during the Regional Annual Performance Report, State Performance Plan/Annual Performance Report, and Corrective Action Plan processes identify missing or inaccurate data.
   • Calculation in ITPKIDS of the timeliness of an initial Individualized Family Service Plan based on the referral date. If the initial Individualized Family Service Plan date is greater than 45 days from the referral date, ITPKIDS requires the user to record a late reason.
• Only members of the Central Office ITPKIDS business team may modify a referral or Individualized Family Service Plan date recorded in the database.
• An ITPKIDS query captures the dates of initial IFSPs for a specified period of time.
• Reports run by Infant Toddler Program data analyst and hub leaders identify referrals currently greater than 45 days that do not have an initial IFSP recorded in ITPKIDS.
• Reports run by Infant Toddler Program data analyst and Central Office identify incorrect 45-day late reasons recorded by users.

Corrections are made in ITPKIDS when data inaccuracies are identified. Infant Toddler Program Central Office staff and data analyst work together to identify any state or local error patterns or trends. When patterns are identified, actions to rectify the issues include, but are not limited to, the following:

• Staff training through ITPKIDS training videos, user guides, and supervisor-led training upon hire.
• Collection of qualitative information regarding the data via discussion of issues at triannual Statewide Leadership meetings for hub leaders to inform their local staff.
• In-person, phone, or email communication with hub leaders identifying data areas to be addressed and actions needed.
• The ITPKIDS business team discusses potential modifications to the system to prevent future issues.
• If necessary, the ITPKIDS training videos and user guides are modified.

Provide additional information about this indicator (optional)
In Idaho, exceptional family circumstances were included as timely when calculating the percentage of children receiving timely services.

Statewide, five hundred and three (503) children experienced delays in IFSP due to exceptional family/extenuating circumstances. Examples of family circumstances include but are not limited to:

• Unable to contact family
• Family declined service
• Family no show
• Conflict with family scheduling appointment
• Child/family illness or hospitalization
• Family request for later service start date

Statewide, one hundred and seventy-four (174) children experienced delays in IFSPs due to agency reasons. Examples of agency reasons include but are not limited to:

• Conflict with agency scheduling appointment
• Staff unavailability
• High referrals/caseloads
• Staff/contractor turnover
• Delay in receiving documentation to determine eligibility

Correction of Findings of Noncompliance Identified in FFY 2017

<table>
<thead>
<tr>
<th>Findings of Noncompliance Identified</th>
<th>Findings of Noncompliance Verified as Corrected Within One Year</th>
<th>Findings of Noncompliance Subsequently Corrected</th>
<th>Findings Not Yet Verified as Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>3</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

FFY 2017 Findings of Noncompliance Verified as Corrected

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

Idaho demonstrated that it corrected all findings of non-compliance identified in FFY 2017, consistent with the requirements of OSEP Memo 09-02. Specifically, Idaho reports verification that three programs with non-compliance in FFY 2017: (1) have corrected each individual case of non-compliance, unless the child is no longer within the jurisdiction of the program; and (2) are correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through onsite monitoring or a State data system.

In FFY 17, 113 children did not have an IFSP implemented within the 45-day timeline. These 113 children were located in 7 regional programs. Three (3) of the 7 regional programs were issued findings of noncompliance, whereas 4 regional programs were not issued findings due to achieving pre-finding correction (performing at 100% and correcting all child specific noncompliance) during the RAPR review process. The RAPR review process occurs prior to issuing written findings (see Prong 2 correction below).
For Prong 1 correction, data from ITPKIDS was used to verify child specific correction for the 74 children who did not have an IFSP implemented within the 45-day timeline in FFY 2017 and who were located in the 3 regional EIS programs that were issued findings in FFY 2017. The state verified:

- 74/74 children had an IFSP developed, although untimely.

The FFY 2017 RAPR review process was used to verify child specific correction for the additional 39 children who did not have an IFSP implemented within the 45-day timeline in FFY 17 and who were located in the 4 regional EIS programs in FFY 17 that were not issued a finding due to achieved pre-finding correction. The state verified:

- 39/39 children had an IFSP developed, although untimely.

For Prong 2 correction, subsequent review of data (completed later than June 30, 2018 and generated from the ITPKIDS web-based data system) was used to verify that programs were correctly implementing the 45-day timeline requirement in FFY 17.

- Policies and procedures were reviewed, and staff/contractors received TA on regulatory requirements.
- The 3 regional EIS programs who had findings issued were verified as correcting noncompliance within one year of written findings by reviewing one new month of indicator 7 data for each program.
  - The review reflected each of the 3 programs with findings were at 100% for this requirement.
- The additional 4 regional EIS programs achieved pre-finding correction during the FFY 17 RAPR review process by reviewing one new month of indicator 7 data and were not issued findings of noncompliance. (These programs were not issued a finding of noncompliance since they also corrected child specific noncompliance prior to issuing a written notification of findings.)
  - The review of additional data reflected each of the 4 programs that were not issued findings were at 100% for this requirement prior to issuing written findings.

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

Correction of each individual incidence of non-compliance is verified through ITPKIDS. ITPKIDS captures the referral date and initial IFSP date. It also calculates the 45-day timeline based on the referral date, for service coordinators to track. If the initial IFSP date is greater than 45 days from the referral date, ITPKIDS requires users to record a delay reason before they can save the IFSP.

Central Office staff generate and review timely services reports (using the data from ITPKIDS described above) during the annual R-APR, SPP/APR, and Corrective Action Plan processes, and at other necessary intervals, to verify that each individual instance of non-compliance is corrected unless the child is no longer within the jurisdiction of the EIS program, the family declined services, or the EIS program was unable to make contact with the family.

FFY 2017 Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

N/A

<table>
<thead>
<tr>
<th>Year Findings of Noncompliance Were Identified</th>
<th>Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2017 APR</th>
<th>Findings of Noncompliance Verified as Corrected</th>
<th>Findings Not Yet Verified as Corrected</th>
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<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Findings of Noncompliance Verified as Corrected

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

N/A

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

N/A

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

N/A

Findings of Noncompliance Verified as Corrected

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

N/A

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

N/A
Findings of Noncompliance Not Yet Verified as Corrected
Actions taken if noncompliance not corrected
N/A

Findings of Noncompliance Verified as Corrected
Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements
N/A
Describe how the State verified that each individual case of noncompliance was corrected
N/A

Findings of Noncompliance Not Yet Verified as Corrected
Actions taken if noncompliance not corrected
N/A

7 - Prior FFY Required Actions
None

Response to actions required in FFY 2017 SPP/APR

7 - OSEP Response

7 - Required Actions
Indicator 8A: Early Childhood Transition

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part C / Effective Transition

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

A. Developed an IFSP with transition steps and services at least 90 days, and at the discretion of all parties, not more than nine months prior to the toddler’s third birthday;

B. Notified (consistent with any opt-out policy adopted by the State) the 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)

Data Source

Data to be taken from monitoring or State data system.

Measurement

A. Percent = [(# of toddlers with disabilities exiting Part C who have 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 their third birthday) divided by the (# of toddlers with disabilities exiting Part C)] times 100.

B. Percent = [(# of toddlers with disabilities exiting Part C where notification (consistent with any opt-out policy adopted by the State) to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services) divided by the (# of toddlers with disabilities exiting Part C who were potentially eligible for Part B)] times 100.

C. Percent = [(# of toddlers with disabilities exiting Part C where the transition conference occurred 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) divided by the (# of toddlers with disabilities exiting Part C who were potentially eligible for Part B)] times 100.

Account for untimely transition planning under 8A, 8B, and 8C, including the reasons for delays.

Instructions

Indicators 8A, 8B, and 8C: Targets must be 100%.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data. Provide the actual numbers used in the calculation.

Indicators 8A and 8C: If data are from the State’s monitoring, describe the procedures used to collect these data. If data are from State monitoring, also describe the method used to select EIS programs for monitoring. If data are from a State database, describe the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period) and how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Indicators 8A and 8C: States are not required to report in their calculation the number of children for whom the State has identified the cause for the delay as exceptional family circumstances, as defined in 34 CFR §303.310(b), documented in the child’s record. If a State chooses to report in its calculation children for whom the State has identified the cause for the delay as exceptional family circumstances documented in the child’s record, the numbers of these children are to be included in the numerator and denominator. Include in the discussion of the data, the numbers the State used to determine its calculation under this indicator and report separately the number of documented delays attributable to exceptional family circumstances.

Indicator 8B: Under 34 CFR §303.401(e), the State may adopt a written policy that requires the lead agency to provide notice to the parent of an eligible child with an IFSP of the impending notification to the SEA and LEA under IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §303.209(b)(1) and (2) and permits the parent within a specified time period to “opt-out” of the referral. Under the State’s opt-out policy, the State is not required to include in the calculation under 8B (in either the numerator or denominator) the number of children for whom the parents have opted out. However, the State must include in the discussion of data, the number of parents who opted out. In addition, any written opt-out policy must be on file with the Department of Education as part of the State’s Part C application under IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §§303.209(b) and 303.401(d).

Indicator 8C: The measurement is intended to capture those children for whom a transition conference must be held within the required timeline and, as such, only children between 2 years 3 months and age 3 should be included in the denominator.

Indicator 8C: Do not include in the calculation, but provide a separate number for those toddlers for whom the parent did not provide approval for the transition conference.

Indicators 8A, 8B, and 8C: Provide detailed information about the timely correction of noncompliance as noted in OSEP’s response table for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, methods to ensure correction, and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2018 SPP/APR, the data for FFY 2017), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

8A - Indicator Data

Historical Data

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<th>Baseline</th>
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</tr>
<tr>
<td>2013</td>
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</tr>
<tr>
<td>2015</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>2016</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>2017</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Target</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data</td>
<td>97.14%</td>
<td>97.14%</td>
</tr>
</tbody>
</table>
Targets

<table>
<thead>
<tr>
<th></th>
<th>FFY 2018</th>
<th>FFY 2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

FFY 2018 SPP/APR Data

Data include only those toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has developed an IFSP with transition steps and services at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler’s third birthday. (yes/no)

YES

If no, please explain.

N/A

<table>
<thead>
<tr>
<th>Number of children exiting Part C who have an IFSP with transition steps and services</th>
<th>Number of toddlers with disabilities exiting Part C</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>93</td>
<td>103</td>
<td>92.38%</td>
<td>100%</td>
<td>92.23%</td>
<td>Did Not Meet Target</td>
<td>No Slippage</td>
</tr>
</tbody>
</table>

Provide reasons for slippage, if applicable

N/A

Number of documented delays attributable to exceptional family circumstances

This number will be added to the “Number of children exiting Part C who have an IFSP with transition steps and services” field to calculate the numerator for this indicator.

2

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

State database

Describe the method used to select EIS programs for monitoring.

N/A

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

To obtain data for indicators 8A, 8B, and 8C, the Central Office data analyst pulled a random file sample from the ITPKIDS web-based data system within the full FFY 2018 reporting year (July 1, 2018 – June 30, 2019).

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

The following processes describe how this indicator accurately reflects data for infants and toddlers with Individualized Family Service Plans (IFSPs) for the full reporting period:

1. The Central Office data analyst pulled a random file sample from the data system (ITPKIDS) within the FFY 2017 reporting year.
2. The Part C Coordinator sent instructions with the list of child names to each region to complete the file review for indicators 8A, 8B, and 8C.
3. Hub leaders or supervisors completed the file review and submitted the results to the Part C Coordinator.
4. The Part C Coordinator reviewed the results, clarified any questions, and calculated the results.
5. The Part C Coordinator used data from ITPKIDS to review and verify findings of the file review.

To ensure accuracy of the file sample pulled from ITPKIDS, the ITP data analyst and hub leaders run reports on a regular basis to identify any children over the age of three for whom an exit record does not exist in the data system.

Provide additional information about this indicator (optional)

In Idaho, exceptional family circumstances were included as timely when calculating the percentage of children with a timely development of IFSP transition steps and services.

Statewide, 2 children experienced delays in the development of IFSP transition steps and services due to exceptional family/extenuating circumstances. Examples offamily circumstances include:

- Conflict with family scheduling
- Child/family illness or hospitalization
Statewide, 8 children experienced delays in the development of IFSP transition steps and services due to an agency reason. Examples of agency reasons include:

- IFSP transition steps and services developed later than 90 days prior to the child's 3rd birthday due to SC issue. (caseloads, new SCs, etc.)
- IFSP transition steps and services completed earlier than nine months prior to the child's 3rd birthday.

### Correction of Findings of Noncompliance Identified in FFY 2017

<table>
<thead>
<tr>
<th>Findings of Noncompliance Identified</th>
<th>Findings of Noncompliance Verified as Corrected Within One Year</th>
<th>Findings of Noncompliance Subsequently Corrected</th>
<th>Findings Not Yet Verified as Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>4</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

**FFY 2017 Findings of Noncompliance Verified as Corrected**

Describe how the State verified that each individual case of noncompliance is correctly implementing the regulatory requirements

Idaho demonstrated that it corrected all findings of non-compliance identified in FFY 17, consistent with the requirements in OSEP Memo 09-02. Specifically, Idaho reports verification that the EIS programs with noncompliance identified in FFY 17: (1) have corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program; and (2) are correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through onsite monitoring or the state’s data system.

In FFY 17, 8 children did not have 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 their third birthday. These 8 children were located in 6 of the 7 regional EIS programs. Four (4) of the 6 regional EIS programs were issued findings of noncompliance, whereas 2 regional EIS programs were not issued findings due to achieving pre-finding correction (performing at 100% and correcting all child specific noncompliance) during the RAPR review process. The RAPR review process occurs prior to issuing written findings (see Prong 2 correction below).

For Prong 1 correction, data from the FFY 17 file sample reviews (also contained in ITPKIDS) was used to verify child specific correction for 5 children who did not have 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 their third birthday in FFY 2017 and who were located in the 4 regional EIS programs that were issued findings of noncompliance in FFY 17. The state verified:

- 2/5 children had transition steps and services in their IFSP, although developed outside of the 90 days, and at the discretion of all parties, not more than 9 months prior to the child’s 3rd birthday time frame.
- 3/5 children were no longer in the program

The FFY 17 RAPR review process was used to verify child specific correction for the additional 3 children who did not have 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 their third birthday in FFY 17 and who were located in the 4 regional EIS programs that were issued findings of noncompliance in FFY 17. The state verified:

- 1/3 children had transition steps and services in their IFSP, although developed outside of the 90 days, and at the discretion of all parties, not more than 9 months prior to the child’s 3rd birthday timeframe.
- 2/3 children were no longer in the program

For Prong 2 correction, subsequent file review samples (completed later than June 30, 2018 and generated from the ITPKIDS web-based data system) was used to verify that the 4 regional EIS programs were correctly implementing the IFSP transition steps and services at least 90 days, and at the discretion of all parties not more than nine months, prior to their third birthday in FFY 2017.

- Policies and procedures were reviewed, and staff/contractors received TA on regulatory requirements.
- A new document was created in 2019 that addresses late referrals. This document was created with OSEP’s guidance, using “Federal IDEA Part C & Part B Transition Requirements for Late Referrals to IDEA Part C”, NECTAC and RRCP. The document was disseminated to regional leadership for the purpose of training new and existing staff.
- The 4 regional EIS programs who had findings issued were verified as correcting noncompliance within one year of written findings by reviewing one new month of indicator 8A data for each program.
  - The review reflected each of the 4 programs were at 100% for this requirement.
- The additional 2 regional EIS programs achieved pre-finding correction during the FFY 17 RAPR review process by reviewing one new month of indicator 8A data and were not issued a finding of non-compliance since they also corrected child specific noncompliance prior to issuing a written notification of findings.
  - The review reflected each of the 2 programs were at 100% for this requirement.

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

Correction of each individual instance of noncompliance is normally verified through ITPKIDS or file reviews generated by ITPKIDS. However, the eight children identified without transition steps and services in their IFSP in FFY 2017 exited prior to correction. Therefore, it was not possible to verify correction for these children.

Even though Idaho was not able to correct each instance of noncompliance, local programs revisited the transition policies, timelines, and work lists in the ITPKIDS web-based data system with new and existing staff/contractors to ensure a full understanding of the requirements and timelines for this.
Idaho Part C SPP/ APR

indicator. As part of the corrective action process, regions identified strategies in their corrective action plan that included reviewing regional policies regarding transition, reviewing IFSPs, and providing training to staff related to required IFSP transition steps and services.

FFY 2017 Findings of Noncompliance Not Yet Verified as Corrected
Actions taken if noncompliance not corrected
N/A

Correction of Findings of Noncompliance Identified Prior to FFY 2017

<table>
<thead>
<tr>
<th>Year Findings of Noncompliance Were Identified</th>
<th>Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2017 APR</th>
<th>Findings of Noncompliance Verified as Corrected</th>
<th>Findings Not Yet Verified as Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Findings of Noncompliance Verified as Corrected
Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements
N/A
Describe how the State verified that each individual case of noncompliance was corrected
N/A

Findings of Noncompliance Not Yet Verified as Corrected
Actions taken if noncompliance not corrected
N/A

Findings of Noncompliance Verified as Corrected
Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements
N/A
Describe how the State verified that each individual case of noncompliance was corrected
N/A

Findings of Noncompliance Not Yet Verified as Corrected
Actions taken if noncompliance not corrected
N/A

Findings of Noncompliance Verified as Corrected
Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements
N/A
Describe how the State verified that each individual case of noncompliance was corrected
N/A

Findings of Noncompliance Not Yet Verified as Corrected
Actions taken if noncompliance not corrected
N/A

8A - Prior FFY Required Actions
None

Response to actions required in FFY 2017 SPP/ APR

8A - OSEP Response

8A - Required Actions
Indicator 8B: Early Childhood Transition

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part C / Effective Transition

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

A. Developed an IFSP with transition steps and services at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler’s third birthday;

B. Notified (consistent with any opt-out policy adopted by the State) the 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)

Data Source

Data to be taken from monitoring or State data system.

Measurement

A. Percent = [(# of toddlers with disabilities exiting Part C who have 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 their third birthday) divided by the (# of toddlers with disabilities exiting Part C)] times 100.

B. Percent = [(# of toddlers with disabilities exiting Part C where notification (consistent with any opt-out policy adopted by the State) to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services) divided by the (# of toddlers with disabilities exiting Part C who were potentially eligible for Part B)] times 100.

C. Percent = [(# of toddlers with disabilities exiting Part C where the transition conference occurred 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) divided by the (# of toddlers with disabilities exiting Part C who were potentially eligible for Part B)] times 100.

Account for untimely transition planning under 8A, 8B, and 8C, including the reasons for delays.

Instructions

Indicators 8A, 8B, and 8C: Targets must be 100%.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data. Provide the actual numbers used in the calculation.

Indicators 8A and 8C: If data are from the State’s monitoring, describe the procedures used to collect these data. If data are from State monitoring, also describe the method used to select EIS programs for monitoring. If data are from a State database, describe the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period) and how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Indicators 8A and 8C: States are not required to report in their calculation the number of children for whom the State has identified the cause for the delay as exceptional family circumstances, as defined in 34 CFR §303.310(b), documented in the child’s record. If a State chooses to report in its calculation children for whom the State has identified the cause for the delay as exceptional family circumstances documented in the child’s record, the numbers of these children are to be included in the numerator and denominator. Include in the discussion of the data, the numbers the State used to determine its calculation under this indicator and report separately the number of documented delays attributable to exceptional family circumstances.

Indicator 8B: Under 34 CFR §303.401(e), the State may adopt a written policy that requires the lead agency to provide notice to the parent of an eligible child with an IFSP of the impending notification to the SEA and LEA under IDEA section 637(a)(9)(A)(ii) and 34 CFR §303.209(b)(1) and (2) and permits the parent within a specified time period to “opt-out” of the referral. Under the State’s opt-out policy, the State is not required to include in the calculation under 8B (in either the numerator or denominator) the number of children for whom the parents have opted out. However, the State must include in the discussion of data, the number of parents who opted out. In addition, any written opt-out policy must be on file with the Department of Education as part of the State’s Part C application under IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §§303.209(b) and 303.401(d).

Indicator 8C: The measurement is intended to capture those children for whom a transition conference must be held within the required timeline and, as such, only children between 2 years 3 months and age 3 should be included in the denominator.

Indicator 8C: Do not include in the calculation, but provide a separate number for those toddlers for whom the parent did not provide approval for the transition conference.

Indicators 8A, 8B, and 8C: Provide detailed information about the timely correction of noncompliance as noted in OSEP’s response table for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, methods to ensure correction, and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2018 SPP/APR, the data for FFY 2017), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

8B - Indicator Data

Historical Data

<table>
<thead>
<tr>
<th>Baseline</th>
<th>2005</th>
<th>87.50%</th>
</tr>
</thead>
<tbody>
<tr>
<td>FFY 2013</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Target</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Data</td>
<td>100.00%</td>
<td>99.04%</td>
</tr>
<tr>
<td></td>
<td>99.05%</td>
<td>95.19%</td>
</tr>
<tr>
<td></td>
<td>97.14%</td>
<td></td>
</tr>
<tr>
<td>FFY 2018 SPP/APR Data</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------------------</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Data include only those toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has developed an IFSP with transition steps and services at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler's third birthday (yes/no)
Yes

Data include notification to both the SEA and LEA
Yes

If no, please explain.
N/A

<table>
<thead>
<tr>
<th>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</th>
<th>Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>96</td>
<td>103</td>
<td>97.14%</td>
<td>100%</td>
<td>93.20%</td>
<td>Did Not Meet Target</td>
<td>Slippage</td>
</tr>
</tbody>
</table>

Provide reasons for slippage, if applicable
The Infant Toddler Program has had a statewide centralized process in place for many years in which two staff members are responsible to notify the SEA and appropriate LEA once a child is deemed eligible for Part C and may be potentially eligible for special education services under Part B of the Individuals with Disabilities Education Act (IDEA). There are two specific data fields in Idaho’s web-based data system that these centralized staff use to capture whether a child is Part B Potentially Eligible, and the date SEA/LEA Notification is sent, if applicable.

As a result of the FFY 18 regional program data collected for this indicator, we know the FFY 18 slippage is limited to the West Hub (regions 3 and 4 of the state). Since June of 2018, the West Hub has had 14 contracted Service Coordinators and one state staff SC leave their position. Database research completed by the State Lead Agency revealed that Service Coordinators in the West Hub had created data errors in the Program’s web-based data system either by:

1. Mistakenly entering the date of the Part C Transition Conference in the SEA/LEA Notification Date field,
   or
2. Replacing the SEA/LEA Notification Date with the date of the Part C Transition Conference.

Once these issues were identified, the State Lead Agency modified existing user roles such that Service Coordinators have “read only” access to the Part B Potentially Eligible and SEA/LEA Notification Date fields in the web-based data system. We are confident this modification will resolve the issue encountered for the FFY 18 data in the West Hub.

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

Describe the method used to collect these data
The following method was used to collect data for Indicator 8B:

1. The Central Office data analyst pulled a random file sample from the Infant Toddler Program Key Information Data System (ITPKIDS) within the FFY 2018 reporting year.
2. The Part C Coordinator sent each region instructions and the list of client names to complete the file review for indicators 8A, 8B, and 8C.
3. Hub leaders completed the reviews and submitted the results to the Part C Coordinator.
4. The Part C Coordinator reviewed/verified the findings, clarified any questions, and calculated the results.
Do you have a written opt-out policy? (yes/no)
No

If yes, is the policy on file with the Department? (yes/no)
N/A

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

Describe the method used to select EIS programs for monitoring.
N/A

Provide the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period).
To obtain data for indicators 8A, 8B, and 8C, the Central Office data analyst pulled a random file sample from the ITPKIDS web-based data system within the full FFY 2018 reporting year (July 1, 2018 – June 30, 2019).

Describe how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.
The following processes describe how this indicator accurately reflects data for infants and toddlers with Individualized Family Service Plans (IFSPs) for the full reporting period:

1. The Central Office data analyst pulled a random file sample from the data system (ITPKIDS) within the FFY 2018 reporting year.
2. The Part C Coordinator sent instructions with the list of child names to each region to complete the file review for indicators 8A, 8B, and 8C.
3. Hub leaders or supervisors completed the file review and submitted the results to the Part C Coordinator.
4. The Part C Coordinator reviewed the results, clarified any questions, and calculated the results.
5. The Part C Coordinator used data from ITPKIDS to review and verify findings of the file review.

To ensure accuracy of the file sample pulled from ITPKIDS, the ITP data analyst and hub leaders run reports on a regular basis to identify any children over the age of three for whom an exit record does not exist in the data system.

Provide additional information about this indicator (optional)
N/A

### Correction of Findings of Noncompliance Identified in FFY 2017

<table>
<thead>
<tr>
<th>Findings of Noncompliance Identified</th>
<th>Findings of Noncompliance Verified as Corrected Within One Year</th>
<th>Findings of Noncompliance Subsequently Corrected</th>
<th>Findings Not Yet Verified as Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>3</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

### FFY 2017 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements
Idaho demonstrated that it corrected all findings of non-compliance identified in FFY 17, consistent with the requirements in OSEP Memo 09-02. Specifically, Idaho reports verification that the EIS programs with noncompliance identified in FFY 17: (1) have corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program; and (2) are correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through onsite monitoring or a State data system.

In FFY 17, 3 children did not have the SEA and LEA notification sent at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services in FFY 2017. These 3 children were located in 3 of the 7 regional EIS programs.

For Prong 1 correction, data from the FFY 2017 file sample reviews (also contained in ITPKIDS) was used to verify child specific correction for 3 children who did not have the SEA and LEA notification sent at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services in FFY 2017 and who were located in the 3 regional EIS programs. The state verified:

- 2/3 children had their SEA and LEA Notification sent, although late.
- 1/3 children were no longer in the program.
For Prong 2 correction, subsequent file review samples (completed later than June 30, 2018 and generated from the ITPKIDS web-based data system) was used to verify that the 3 regional EIS programs were correctly implementing the SEA and LEA notification being sent at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services in FFY 17.

- Policies and procedures were reviewed, and staff/contractors received TA on regulatory requirements.
- A new document was created in 2019 that addresses late referrals. This document was created with OSEP’s guidance, using “Federal IDEA Part C & Part B Transition Requirements for Late Referrals to IDEA Part C”, NECTAC and RRCP. The document was disseminated to regional leadership for the purpose of training new and existing staff.
- The 3 regional EIS programs who had findings issued were verified as correcting noncompliance within one year of written findings by reviewing one new month of 8B data for each program.
  - The review reflected each of the 3 programs were at 100% for this requirement.

Describe how the State verified that each individual case of noncompliance was corrected
Correction of each individual incidence of noncompliance is verified through ITPKIDS. ITPKIDS captures the SEA/LEA Notification date for all Part B Potentially Eligible children enrolled in the Infant Toddler Program as well as corresponding Transition notes completed by the centralized SEA/LEA Notification staff.

Central Office reviews the results from the transition file review using ITPKIDS to verify that each individual instance of non-compliance is corrected unless the child is no longer within the jurisdiction of the EIS program.

FFY 2017 Findings of Noncompliance Not Yet Verified as Corrected
Actions taken if noncompliance not corrected
N/A

<table>
<thead>
<tr>
<th>Year Findings of Noncompliance Were Identified</th>
<th>Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2017 APR</th>
<th>Findings of Noncompliance Verified as Corrected</th>
<th>Findings Not Yet Verified as Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Findings of Noncompliance Verified as Corrected
Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements
N/A
Describe how the State verified that each individual case of noncompliance was corrected
N/A

Findings of Noncompliance Not Yet Verified as Corrected
Actions taken if noncompliance not corrected
N/A

Findings of Noncompliance Verified as Corrected
Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements
N/A
Describe how the State verified that each individual case of noncompliance was corrected
N/A

Findings of Noncompliance Not Yet Verified as Corrected
Actions taken if noncompliance not corrected
N/A

Findings of Noncompliance Verified as Corrected
Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements
N/A
Describe how the State verified that each individual case of noncompliance was corrected
N/A

Findings of Noncompliance Not Yet Verified as Corrected
Actions taken if noncompliance not corrected
N/A

Findings of Noncompliance Verified as Corrected
Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements
N/A
Describe how the State verified that each individual case of noncompliance was corrected
N/A

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Findings of Noncompliance Not Yet Verified as Corrected
Actions taken if noncompliance not corrected
N/A

8B - Prior FFY Required Actions
None

Response to actions required in FFY 2017 SPP/APR

8B - OSEP Response

8B - Required Actions
Indicator 8C: Early Childhood Transition

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part C / Effective Transition

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

A. Developed an IFSP with transition steps and services at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler’s third birthday;

B. Notified (consistent with any opt-out policy adopted by the State) the 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)

Data Source
Data to be taken from monitoring or State data system.

Measurement

A. Percent = [ (# of toddlers with disabilities exiting Part C who have 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 their third birthday) divided by ( # of toddlers with disabilities exiting Part C)] times 100.

B. Percent = [ (# of toddlers with disabilities exiting Part C where notification (consistent with any opt-out policy adopted by the State) to the SEA and LEA occurred at least 90 days prior to their third birthday for toddlers potentially eligible for Part B preschool services) divided by ( # of toddlers with disabilities exiting Part C who were potentially eligible for Part B)] times 100.

C. Percent = [ (# of toddlers with disabilities exiting Part C where the transition conference occurred 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) divided by the ( # of toddlers with disabilities exiting Part C who were potentially eligible for Part B)] times 100.

Account for untimely transition planning under 8A, 8B, and 8C, including the reasons for delays.

Instructions

Indicators 8A, 8B, and 8C: Targets must be 100%.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data. Provide the actual numbers used in the calculation.

Indicators 8A and 8C: If data are from the State’s monitoring, describe the procedures used to collect these data. If data are from State monitoring, also describe the method used to select EIS programs for monitoring. If data are from a State database, describe the time period in which the data were collected (e.g., September through December, fourth quarter, selection from the full reporting period) and how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

Indicators 8A and 8C: States are not required to report in their calculation the number of children for whom the State has identified the cause for the delay as exceptional family circumstances, as defined in 34 CFR §303.310(b), documented in the child’s record. If a State chooses to report in its calculation children for whom the State has identified the cause for the delay as exceptional family circumstances documented in the child’s record, the numbers of these children are to be included in the numerator and denominator. Include in the discussion of the data, the numbers the State used to determine its calculation under this indicator and report separately the number of documented delays attributable to exceptional family circumstances.

Indicator 8B: Under 34 CFR §303.401(e), the State may adopt a written policy that requires the lead agency to provide notice to the parent of an eligible child with an IFSP of the impending notification to the SEA and LEA under IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §303.209(b)(1) and (2) and permits the parent within a specified time period to “opt-out” of the referral. Under the State’s opt-out policy, the State is not required to include in the calculation under 8B (in either the numerator or denominator) the number of children for whom the parents have opted out. However, the State must include in the discussion of data, the number of parents who opted out. In addition, any written opt-out policy must be on file with the Department of Education as part of the State’s Part C application under IDEA section 637(a)(9)(A)(ii)(I) and 34 CFR §§303.209(b) and 303.401(d).

Indicator 8C: The measurement is intended to capture those children for whom a transition conference must be held within the required timeline and, as such, only children between 2 years 3 months and age 3 should be included in the denominator.

Indicator 8C: Do not include in the calculation, but provide a separate number for those toddlers for whom the parent did not provide approval for the transition conference.

Indicators 8A, 8B, and 8C: Provide detailed information about the timely correction of noncompliance as noted in OSEP’s response table for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, methods to ensure correction, and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2018 SPP/APR, the data for FFY 2017), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

8C - Indicator Data

Historical Data

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<thead>
<tr>
<th></th>
<th>Baseline</th>
<th>2005</th>
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</thead>
<tbody>
<tr>
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<tr>
<td>Target</td>
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<td>100%</td>
<td>100%</td>
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<tr>
<td>Data</td>
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45
Targets

<table>
<thead>
<tr>
<th>FFY</th>
<th>2018</th>
<th>2019</th>
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</thead>
<tbody>
<tr>
<td>Target</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

FFY 2018 SPP/APR Data

Data reflect only those toddlers for whom the Lead Agency has conducted the transition conference held with the approval of the family at least 90 days, and at the discretion of all parties, not more than nine months, prior to the toddler’s third birthday for toddlers potentially eligible for Part B preschool services (yes/no)

Yes

If no, please explain.

N/A

<table>
<thead>
<tr>
<th>Number of toddlers with disabilities exiting Part C where the transition conference occurred 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</th>
<th>Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
</tr>
</thead>
<tbody>
<tr>
<td>89</td>
<td>103</td>
<td>92.38%</td>
<td>100%</td>
<td>96.12%</td>
<td>Did Not Meet Target</td>
<td>No Slippage</td>
</tr>
</tbody>
</table>

Provide reasons for slippage, if applicable

N/A

Number of toddlers for whom the parent did not provide approval for the transition conference

This number will be subtracted from the "Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B" field to calculate the denominator for this indicator.

0

Number of documented delays attributable to exceptional family circumstances

This number will be added to the "Number of toddlers with disabilities exiting Part C where the transition conference occurred at least 90 days, and at the discretion of all parties not more than nine months prior to the toddler’s third birthday for toddlers potentially eligible for Part B" field to calculate the numerator for this indicator.

10

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

State database

Describe the method used to select EIS programs for monitoring.

N/A

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

To obtain data for indicators 8A, 8B, and 8C, the Central Office data analyst pulled a random file sample from the ITPKIDS web-based data system within the full FFY 2018 reporting year (July 1, 2018 – June 30, 2019).

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

The following processes describe how this indicator accurately reflects data for infants and toddlers with Individualized Family Service Plans (IFSPs) for the full reporting period:

1. The Central Office data analyst pulled a random file sample from the data system (ITPKIDS) within the FFY 2018 reporting year.
2. The Part C Coordinator sent instructions with the list of child names to each region to complete the file review for indicators 8A, 8B, and 8C.
3. Hub leaders or supervisors completed the file review and submitted the results to the Part C Coordinator.
4. The Part C Coordinator reviewed the results, clarified questions, and calculated the results.
5. The Part C Coordinator used data from ITPKIDS to review and verify findings of the file review.
To ensure accuracy of the file sample pulled from ITPKIDS, the ITP data analyst and hub leaders run reports on a regular basis to identify any children over the age of three for whom an exit record does not exist in the data system.

Provide additional information about this indicator (optional)

In Idaho, exceptional family circumstances were included as timely when calculating the percentage of children with a timely transition conference held.

Statewide, 10 children experienced delays in holding a timely transition conference due to exceptional family/extenuating circumstances. Examples of family circumstances include:

- Conflict with family scheduling transition conference
- Child/family illness or hospitalization
- Family indecisiveness
- Family request to hold transition conference at a later date

Statewide, 4 children experienced delays in holding a timely transition conference due to an agency reason. Examples of agency reasons include:

- SC's were late on Part C transition conference timeline (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)
- Child's case transitioned to brand new SC resulting in missing the required transition conference timeline (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).
- Conflict with SC schedule

Correction of Findings of Noncompliance Identified in FFY 2017

<table>
<thead>
<tr>
<th>Findings of Noncompliance Identified</th>
<th>Findings of Noncompliance Verified as Corrected Within One Year</th>
<th>Findings of Noncompliance Subsequently Corrected</th>
<th>Findings Not Yet Verified as Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>3</td>
<td>0</td>
<td>1</td>
</tr>
</tbody>
</table>

FFY 2017 Findings of Noncompliance Verified as Corrected

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

Idaho demonstrated that it corrected three of four findings of noncompliance identified in FFY 17. Consistent with the requirements in OSEP Memo 09-02, Idaho reports verification that all but one EIS regional programs with noncompliance in FFY 17: (1) have corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program; and (2) are correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through onsite monitoring or a State data system.

In FFY 17, 8 children did not have the Part C transition conference held 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. These 8 children were located in 4 of 7 regional EIS programs.

For Prong 1 correction, data from the FFY 2017 file sample reviews (also contained in ITPKIDS) was used to verify child specific correction for 8 children who did not have the Part C transition conference held 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 in FFY 2017 and who were located in 4 regional EIS programs that were issued findings of noncompliance in FFY 17. The state verified:

- 7/8 children had their Part C Transition Conference held, although late.
- 1/8 children were no longer in the program.

For Prong 2 correction, subsequent file review samples (completed later than June 30, 2018 and generated from the ITPKIDS web-based data system) was used to verify that 3 of the 4 regional EIS programs were correctly implementing the Part C transition conference held 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 in FFY 17.

- Policies and procedures were reviewed, and staff/contractors received TA on regulatory requirements.
- A new document was created in 2019 that addresses late referrals. This document was created with OSEP’s guidance, using “Federal IDEA Part C & Part B Transition Requirements for Late Referrals to IDEA Part C”, NECTAC and RRCP. The document was disseminated to regional leadership for the purpose of training new and existing staff.
- 3/4 regional EIS programs who had findings issued were verified as correcting noncompliance within one year of written findings by reviewing one new month of BC data for each program.
  - The review reflected 3 of 4 regional EIS programs were at 100% for this requirement
- 1/4 regional EIS programs did not achieve 100% compliance for this requirement within a year of written noncompliance notification (see FFY 17 Findings of Noncompliance Not Yet Verified as Corrected section below).

Describe how the State verified that each individual case of noncompliance was corrected
Correction of each individual incidence of noncompliance is verified through ITPKIDS. ITPKIDS captures the Transition Conference date and late reason, if applicable, for all children enrolled in the Infant Toddler Program as well as corresponding Continuing Service Report notes completed by service coordinators documenting the transition conference.

Central Office reviews the results from the transition file review using ITPKIDS to verify that each individual instance of non-compliance is corrected unless the child is no longer within the jurisdiction of the EIS program, the family declined to participate in the transition conference, or the EIS program was unable to make contact with the family.

**FFY 2017 Findings of Noncompliance Not Yet Verified as Corrected**

**Actions taken if noncompliance not corrected**

1/4 regional EIS programs has not yet corrected their FFY 17 noncompliance (prong 2- not at 100%) within one year of written findings. A corrective action plan with strategies to reach and sustain compliance was developed in FFY 17. The regional EIS program continues to submit required data with a report on activities completed to correct their outstanding finding of noncompliance monthly.

The local early intervention program with FFY 2017 noncompliance not yet corrected continues to experience a high volume of referrals and an increase in children served. Additionally, this local early intervention program continues to encounter challenges with contractor turnover, duration of vacancies, and recruitment of contractors. This program is located in the Treasure Valley, the most urban area of Idaho with the most competition for service coordinators and service providers and the highest number of children served in the state.

This outstanding finding of noncompliance is not a systemic issue, but a resource and capacity issue. The hub leaders and supervisors in this program continue to try and find efficiencies, but with the rising number of children being referred and served, compounded with service coordinator contractor turnover, lengthy vacancies, and recruitment challenges, it is an uphill battle. They continually train new and existing staff and contractors on the requirement to conduct 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. This program also continues to work on ensuring that a Part B representative is invited to the transition conference for children who are Part B potentially eligible.

**Correction of Findings of Noncompliance Identified Prior to FFY 2017**

<table>
<thead>
<tr>
<th>Year Findings of Noncompliance Were Identified</th>
<th>Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2017 APR</th>
<th>Findings of Noncompliance Verified as Corrected</th>
<th>Findings Not Yet Verified as Corrected</th>
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</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
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<td>N/A</td>
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</tbody>
</table>

**Findings of Noncompliance Verified as Corrected**

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

N/A

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

N/A

**Findings of Noncompliance Not Yet Verified as Corrected**

Actions taken if noncompliance not corrected

N/A

**Findings of Noncompliance Verified as Corrected**

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

N/A

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

N/A

**Findings of Noncompliance Not Yet Verified as Corrected**

Actions taken if noncompliance not corrected

N/A

**Findings of Noncompliance Verified as Corrected**

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

N/A

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

N/A

**Findings of Noncompliance Not Yet Verified as Corrected**

Actions taken if noncompliance not corrected

XXX
C - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

8C - OSEP Response

8C - Required Actions
Indicator 9: Resolution Sessions

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part C / General Supervision

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

Data Source
Data collected under section 618 of the IDEA (IDEA Part C Dispute Resolution Survey in the EDFacts Metadata and Process System (EMAPS)).

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

Instructions
Sampling from the State’s 618 data is not allowed.
This indicator is not applicable to a State that has adopted Part C due process procedures under section 639 of the IDEA.
Describe the results of the calculations and compare the results to the target.
States are not required to establish baseline or targets if the number of resolution sessions is less than 10. In a reporting period when the number of resolution sessions reaches 10 or greater, the State must develop baseline and targets and report them in the corresponding SPP/APR.
States may express their targets in a range (e.g., 75-85%).
If the data reported in this indicator are not the same as the State’s 618 data, explain.
States are not required to report data at the EIS program level.

9 - Indicator Data

Not Applicable
Select yes if this indicator is not applicable.
NA

Provide an explanation of why it is not applicable below.
Indicator #9 is not applicable as Part B due process procedures have not been adopted by Idaho Part C.

Select yes to use target ranges.
NA

Select yes if the data reported in this indicator are not the same as the State’s data reported under section 618 of the IDEA.
NA

Provide an explanation below.
NA

Prepopulated Data

<table>
<thead>
<tr>
<th>Source</th>
<th>Date</th>
<th>Description</th>
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<tr>
<td>SY 2018-19 EMAPS IDEA Part C Dispute Resolution Survey; Section C: Due Process Complaints</td>
<td>11/11/2019</td>
<td>3.1 Number of resolution sessions</td>
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<tr>
<td>SY 2018-19 EMAPS IDEA Part C Dispute Resolution Survey; Section C: Due Process Complaints</td>
<td>11/11/2019</td>
<td>3.1(a) Number resolution sessions resolved through settlement agreements</td>
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Targets: Description of Stakeholder Input

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Historical Data

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### Targets

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<tr>
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### FFY 2018 SPP/APR Data

<table>
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<tr>
<th>3.1(a) Number resolutions sessions resolved through settlement agreements</th>
<th>3.1 Number of resolutions sessions</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
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### Targets

<table>
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<tr>
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<th>2018 (low)</th>
<th>2018 (high)</th>
<th>2019 (low)</th>
<th>2019 (high)</th>
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<tbody>
<tr>
<td>Target</td>
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### FFY 2018 SPP/APR Data

<table>
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<tr>
<th>3.1(a) Number resolutions sessions resolved through settlement agreements</th>
<th>3.1 Number of resolutions sessions</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target (low)</th>
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<th>FFY 2018 Data</th>
<th>Status</th>
<th>Slippage</th>
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<tbody>
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</table>

Provide reasons for slippage, if applicable

NA

Provide additional information about this indicator (optional)

NA

### 9 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

### 9 - OSEP Response

### 9 - Required Actions
**Indicator 10: Mediation**

**Instructions and Measurement**

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

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

**Data Source**
Data collected under section 618 of the IDEA (IDEA Part C Dispute Resolution Survey in the EDFacts Metadata and Process System (EMAPS)).

**Measurement**
Percent = \((2.1(a)(i) + 2.1(b)(i)) \text{ divided by } 2.1\) times 100.

**Instructions**
Sampling from the State’s 618 data is not allowed.

Describe the results of the calculations and compare the results to the target.

States are not required to establish baseline or targets if the number of mediations is less than 10. In a reporting period when the number of mediations reaches 10 or greater, the State must develop baseline and targets and report them in the corresponding SPP/APR.

States may express their targets in a range (e.g., 75-85%).

If the data reported in this indicator are not the same as the State’s 618 data, explain.

States are not required to report data at the EIS program level.

**10 - Indicator Data**

**Select yes to use target ranges**

Target Range not used

Select yes if the data reported in this indicator are not the same as the State’s data reported under section 618 of the IDEA.

No

**Provide an explanation below**

**Prepopulated Data**

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<th>Source</th>
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<td>2.1.a.i Mediations agreements related to due process complaints</td>
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<td>SY 2018-19 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests</td>
<td>11/11/2019</td>
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**Targets: Description of Stakeholder Input**

N/A

**Historical Data**

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**Targets**

<table>
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<tr>
<th>FFY</th>
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### FFY 2018 SPP/APR Data

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<tr>
<th>2.1.a.i Mediation agreements related to due process complaints</th>
<th>2.1.b.i Mediation agreements not related to due process complaints</th>
<th>2.1 Number of mediations held</th>
<th>FFY 2017 Data</th>
<th>FFY 2018 Target</th>
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<th>Status</th>
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<th>2018 (low)</th>
<th>2018 (high)</th>
<th>2019 (low)</th>
<th>2019 (high)</th>
</tr>
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<tbody>
<tr>
<td>Target</td>
<td>N/A</td>
<td>N/A</td>
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</tr>
</tbody>
</table>

### FFY 2018 SPP/APR Data

Provide reasons for slippage, if applicable
N/A

Provide additional information about this indicator (optional)
Idaho has not received any mediation requests since the inception of the SPP/APR. As a result, Idaho is not required to provide targets until any fiscal year in which ten or more mediations were held.

### 10 - Prior FFY Required Actions

None

Response to actions required in FFY 2017 SPP/APR

### 10 - OSEP Response

### 10 - Required Actions
Certification

Instructions

Choose the appropriate selection and complete all the certification information fields. Then click the "Submit" button to submit your APR.

Certify

I certify that I am the Director of the State's Lead Agency under Part C of the IDEA, or his or her designee, and that the State's submission of its IDEA Part C State Performance Plan/Annual Performance Report is accurate.

Select the certifier’s role

Name and title of the individual certifying the accuracy of the State's submission of its IDEA Part B State Performance Plan/Annual Performance Report.

Name: Dave Jeppesen

Title: Director of Idaho Department of Health and Welfare

Email: Dave.Jeppesen@dhw.idaho.gov

Phone: 208-334-5500

Submitted on: