

# Kansas Part C State Verification Visit

September 11 - 14, 2006

## Anticipated Outcomes

- OSEP will gain an understanding as to how the state's accountability system works.
- OSEP will gain a clear understanding of the extent to which Kansas' Part C data is reliable in making focused monitoring decisions.
- OSEP will be able to determine the extent to which Kansas' systems are effective in ensuring compliance and improving performance.

## Verification Visit Purpose

Accountability is determined through the following systems:

- 1) Kansas' general supervision system
- 2) Kansas' data collection & reporting system

Kansas' goal is to assess and improve network performance, child & family outcomes, and procedural safeguards.

## Kansas' General Supervision

- KDHE began the process of implementing an improved monitoring system in the fall of 2004.
- The new system was designed to address weaknesses identified by KDHE staff and local service providers in the existing system.
- The emphasis on data collection in a compressed visit to local sites was transitioned into a year-round data collection and desk audit cycle, with site visits occurring less frequently.
- The improved monitoring system employed by KDHE was modeled after OSEP's Continuous Improvement and Focused Monitoring System.

## Kansas' General Supervision Structure

- 36 local networks serve all 105 counties
- Largest in Area: Arrowhead West (Dodge City) - 13 counties.
- Smallest in Area: City of Atchison
- Mean: 2.92 counties
  
- Largest in 0-3 Population: Johnson County - 1034 (12/1 count)
- Smallest in 0-3 Population: Prairie Band Pottawatomie Indians - 3 (12/1 count)
- Mean: 155.2 children

## Kansas' General Supervision Structure

- Local control
- Housed in the Kansas Department of Health and Environment (KDHE)
- Small state staff allows for quick adaptation to change
- System can be modeled after OSEP
- Broad responsibilities for state staff allows for broad understanding of monitoring system (not compartmentalized)

## Kansas' General Supervision Guiding Principles

- The family is the most influential factor in a child's life.
- The family is the most knowledgeable about their child and family's needs.
- All children with disabilities should have the opportunity to achieve their maximum potential.
- All children should be checked periodically to be assured that they are growing and developing normally.
- Child and family needs change rapidly during the child's first three years, therefore, services should be flexible.
- For services to be most effective, they must be individualized to meet the needs of the child and family.
- The local community is the preferred place for a child and family to receive services.

## Kansas' General Supervision Guiding Principles (Cont.)

- A child with a disability should be served in natural environments, including the home and community settings in which children without disabilities participate, to the maximum extent appropriate to meet the needs of the child.
- No one agency or program can offer the full array of early intervention services that a child and family may need.
- Comprehensive services can be achieved through coordinated efforts by various disciplines from multiple agencies.

# General Supervision Changes

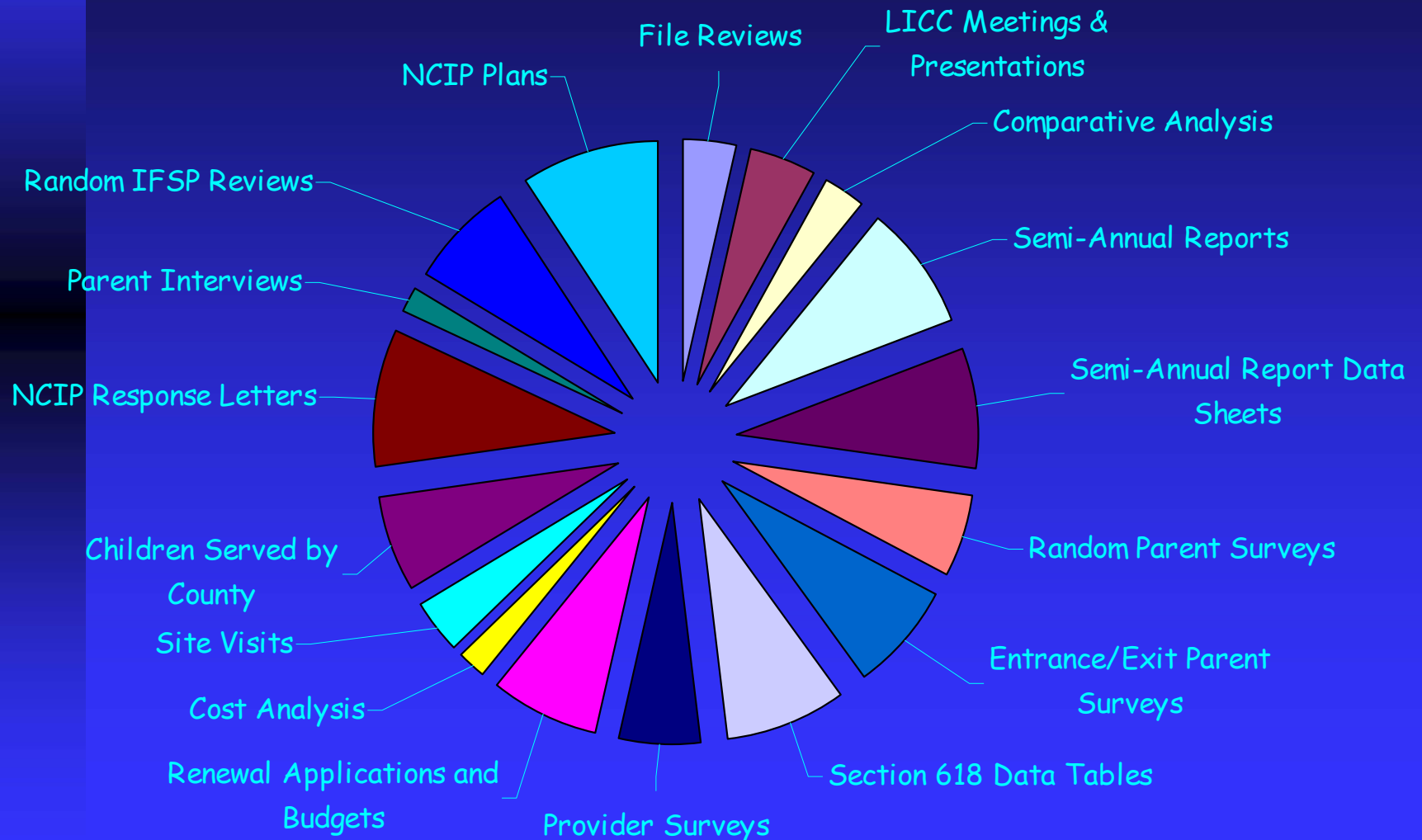
## Current System

- Semi-Annual Reports
- Semi-Annual Report Data Sheets
- Renewal Applications and Budgets
- Network Continuous Improvement Plans (NCIP)
- NCIP responses
- Entrance/Exit Parent Survey
- Random Parent Survey
- Provider Survey
- LICC Meetings/Presentations
- Parent Interviews
- Random IFSP Reviews
- Children Served by County
- Cost Analysis
- Comparative Analysis
- Site Visits
- File Reviews
- 618 Data Tables

## Previous System

- Semi-Annual Reports
- Renewal Applications & Budgets
- LICC Meetings/Presentations
- Locally-Chosen Parent Interviews
- Provider Interviews
- Site Visits
- Locally-Chosen File Reviews
- Locally-Chosen IFSP Reviews
- 618 Data Tables

# Components of General Supervision in Kansas



## General Supervision Cyclical Data Documents

- KDHE collects data from various sources on a continuous, quarterly, semi-annual or annual basis to evaluate local program performance.
- The following documents are collected from all 36 networks during every monitoring cycle:
  - Continuous Collection
    - 1) Entrance/Exit Parent Surveys
    - 2) Parent Interviews
  - Quarterly Collection
    - 1) Infant-Toddler Database Update
    - 2) LICC Meeting Dates

## General Supervision Cyclical Data Documents (Cont.)

- Semi-Annual Collection

- 1) Semi-Annual Reports

- Annual Collection

- 1) Renewal Application and Budget

- 2) Random Parent Survey

- 3) Provider Survey

- 4) Randomly-Selected IFSP's

- 5) Network Continuous Improvement Plans (NCIP)

## General Supervision Cyclical Data Documents (Cont.)

- In addition to collecting and reviewing data documents submitted by local agencies, KDHE compiles, analyzes and reports back to locals as part of the improvement process
- Documents furnished by KDHE to local programs include:
  - 1) Semi-Annual Report Data Sheets
  - 2) Survey Results
  - 3) Children Served by County
  - 4) Cost Analysis
  - 5) Comparative Analysis
  - 6) Network Continuous Improvement Plan Responses

## Focused Monitoring Methods

- If KDHE identifies a concern that has not been addressed adequately by the local program through the NCIP, a targeted monitoring/corrective program is initiated.
- KDHE employs the following targeted monitoring tools if the local agency is in agreement that our NCIP recommendations are valid:
  - 1) LICC Meetings and Presentations
  - 2) Parent Interviews
  - 3) Site Visits
  - 4) File Reviews
  - 5) KITS Technical Assistance Plans

## Focused Monitoring Methods-Accountability Guidelines

- If the local program refuses to address concerns identified by KDHE, the Protocol for Assurance of Accountability is enacted.
- Goal: To assure the provision of appropriate services to children in the community
- Individualized to circumstances and the nature of the concern.
- First Step: Informal discussion between state staff and network contact, with state staff recommendations and local network remedial action
- Second Step: If there is no resolution, a second documented conversation and letter to LICC chair will be sent to reiterate the agreed-upon solution

## Focused Monitoring Methods-Accountability Guidelines (Cont.)

- Third Step: KDHE sends notification to the network contact of failure to comply with signed assurances. Technical assistance is required and an advisory team will address the situation through technical assistance and reports to KDHE.
- Potential Consequences for noncompliance include:
  - 1) News releases to the entire community regarding non-compliance
  - 2) Opportunity for a public meeting
  - 3) Assignment of "interim" providers or network coordinators
  - 4) Recouping materials
  - 5) Withholding of funds
  - 6) Provisional contracts
  - 7) Dissolution of contract

## Semi-Annual Reports

- Data entered on the infant-toddler database by June 30 and December 31 of each year.
- Collects data on child-find, evaluation eligibility (including timelines), services/IFSP's.
- Collects narrative information regarding parent complaints, public awareness activities, LICC activities, and trainings.

## Semi-Annual Report Data Sheets

- Report prepared by KDHE using raw data entered by local programs into the infant-toddler database
- Report compares local network performance to the state as a whole, and also includes a five year's worth of trend data.
- Assists networks with analysis of specific performance measures within child-find, eligibility, and services categories.

## Applications & Budgets

- The cover sheet identifies the lead agency, the geographic area served, the funds requested, and includes signatures from lead and fiscal agency representatives.
- The local program budget sheet includes costs for personnel, travel, supplies, capital equipment, and other costs. It details FTE salaries and time worked, along with local applicant contributions vs. KDHE funds.
- The budget narrative page serves as justification for the amounts requested in the budget sheet.
- Assurances must be signed by the chair of the LICC and a representative of the lead agency. These assurances address federal and state requirements.
- A community service plan must be on file with KDHE. It is not required of renewal applications unless there has been a change in service delivery models.
- Five key communicators and their contact information must be identified. A LICC membership list is also to be included.

## Entrance/Exit Parent Surveys

- Distributed by local service providers to every parent after writing the initial IFSP (entrance) and at transition (exit).
- Surveys are accompanied by a postage-paid return envelope that is mailed directly to KDHE.
- KDHE compiles the results, sorts them by network, and compares them to state averages and OSEP requirements.
- KDHE reports the results back to local programs
- Data is current at any point during the year.
- Tracking method: KDHE has the ability to track surveys by network and by family (tracking by family is not currently being used).
- CODEBOOK & REPORT DEMONSTRATION...

## Randomly-Selected Parent Surveys

- Dependent upon 36 updated local infant-toddler databases.
- Structured to produce data that allows for a 99% level of confidence that results are within +/-3% of the entire Part C population.
- Surveys are mailed directly to parents from KDHE, and include a postage-paid return envelope back to KDHE.
- Results will be compiled by network and compared to the state averages and OSEP requirements.
- Results for some questions will be cross-referenced with those from entrance/exit surveys.
- Will be sent in the fall of each year.

## Provider Surveys

- Developed but not yet distributed.
- Will be distributed to service providers via local Part C coordinators.
- Completed surveys will be returned directly to KDHE.
- Questions mirror those on the randomly-selected parent survey, but are asked from a service provider perspective.
- Results will be compared to parent results to determine if there is consistency in responses.
- Significant deviations in responses will be investigated.

## Parent Interviews

- Parent interviews may be derived in two ways:
  - 1) Parent Contacts KDHE: Comments on entrance/exit parent surveys, phone calls, emails, letters, and verbal complaints to LICC or SICC members result in investigations that include interviews of willing parents.
  - 2) KDHE Contacts Parents: File reviews, site visits, or data discrepancies may result in KDHE interviewing willing parents regarding local service provision.

## IFSP Reviews

- Two IFSP reviews are conducted:
  - 1) Local programs send four IFSP's with their spring semi-annual reports for review. IFSP selection is made at the local level.
  - 2) KDHE will randomly select IFSP's from the statewide database once it is updated by all 36 networks. The selection process will include a representative of all networks, but will include a maximum of four from each network.
    - ◆ The randomness of the selection process ensures that all IFSP's have a chance of selection.
    - ◆ This process is not intended to be representative, but rather serves as a compliance tool.

## Children Served by County

- Local programs report in their semi-annual reports the number of children served by county.
- KDHE reviews 12/1 counts and annual cumulative counts by network to determine the adequacy of local program service levels.
- If a local network is below the state average in birth-to-one or birth-to-three counts, KDHE reviews cumulative count percentages by county to determine counties in need of improvement.
- Numerous local programs have commented on the value of this tool.

## Cost Analysis

- Funding formula used by KDHE to disburse contract awards:  
25% Live Birth +75% Cumulative Count
- In 2004, at the request of local networks, the funding formula was revisited.
- Contention came from large, rural networks that service provision was more costly in their areas, and the funding formula should be adjusted accordingly.
- KDHE conducted a cost analysis that measured costs based on geographic area served, cumulative count served, and personnel costs in urban vs. rural programs.
- Observations were inconclusive with regards to cost burdens in rural vs. urban programs.

## Comparative Analysis

- Local programs requested a child-count tracking method that compared all 36 programs over a five year period.
- Goal: To determine the level of consistency in service levels across programs.
- Pertinent to the state's funding formula.
- KDHE sets the eligibility criteria, but does not determine eligibility through evaluations (done at the local level).
- Allows KDHE to identify trends and focus on networks that do not achieve the OSEP minimum targets of 1% and 2%.

## Site Visits

- Conducted as part of a complaint investigation or exploration of a concern/inconsistency in data that has been identified by KDHE.
- Local networks request technical assistance with self-identified concerns.
- Concerns raised by other local agencies/partners, Part C program peers, or other state agencies may also result in a site visit.
- Information gathered and data sources utilized during the visit depends on the nature of the issue.

## File Reviews

- Conducted as part of a complaint investigation or exploration of a concern/inconsistency in data that has been identified by KDHE.
- Random Selection Review: KDHE staff determine through evidence collected at the local and/or state level that a concern or inconsistency exists in a local program. KDHE informs the local program that a review team will be on site and randomly selecting files for review.
- Specific File Review: Parent complaints result in an on-site review of the child's file, along with parent interviews and staff interviews.
- This type of file review only occurs in a site visit, but not all site visits include file reviews.

## 618 Data Tables

- KDHE uses 618 data to monitor service delivery locations, demographics (disproportionality), percentages of live birth rates served for 0-1 and 0-3 populations, transition data, and staffing.
- Since section 618 data is self-reported by local programs, KDHE utilizes numerous other data sources to verify each program's report.
- Local programs access 618 data through their local infant-toddler databases.

## Networks Rankings Data

- KDHE does not publicly rank networks—local programs are compared to their past performance and the state as a whole in public documents.
- In-house, KDHE has developed a system that ranks local programs based on their performance in key indicators.
- Rankings include 13 performance measures, and ranks networks 1-36.
- KDHE targets improvement strategies to address networks that rank the lowest in each specific category.
- Overall numeric score is determined by combining all 13 categories and determining an average score.
- Rankings will be publicly released once the trial period is completed and data from random parent surveys is available.

## Network Continuous Improvement Plans (NCIP)

- Modeled after OSEP's Annual Performance Report.
- Includes five indicators:
  - 1) Local Program Supervision
  - 2) Child Find and Public Awareness
  - 3) Family-Centered Services
  - 4) Natural Environments
  - 5) Early Childhood Transition
- Submitted annually with the local program's renewal application.
- Evidence of community involvement (including parents) in developing the plan must be demonstrated.
- Accumulated data must support the local NCIP areas of emphasis and improvement activities.

## NCIP Responses

- KDHE reviews NCIP plans in conjunction with all local and state data sources that pertain to network performance on an annual basis.
- Based on accumulated data, KDHE develops a set of state-identified priorities for each local program.
- KDHE compares its findings to the items identified by local agencies in their NCIP plans.
- If a local agency has appropriately identified and addressed concerns through its plan, KDHE allows the local plan to proceed as written.
- If a local agency neglects to address a concern identified by KDHE, the state agency will make a recommendation or address the concern as a compliance issue, depending on its nature.

## NCIP Responses (Cont.)

- Compliance issues must be addressed in the timeframe designated by KDHE. Failure to appropriately address compliance issues results in the implementation of the Protocol for Assurance of Accountability.
- Recommendations are areas of concern identified by KDHE, either through worse-than-expected performance or negative trends, that local networks are expected to address. They are not necessarily compliance issues, but could be in the future.
- Strengths are listed in responses to programs that KDHE believes could serve as a model for other programs around the state.

## LICC Meetings/Presentations

- KDHE presents local network data from the NCIP notebook to the LICC at a regularly-scheduled meeting.
- Data and data sources are described in detail to LICC members.
- NCIP plans are discussed, with input from KDHE regarding the local improvement initiatives.
- KDHE may make recommendations regarding current services or future NCIP plans.
- KDHE meets local stakeholders, listens to local presentations, highlights positive local performance, assists with planning, provides feedback, and answers questions.

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## 618 Data Collection Background - Part C

- 1) What is the name of the Part C data manager?  
Include how long this person has been in that position.
  - Ryan Weir - has held that position for  $3\frac{1}{2}$  years.

## 618 Data Collection Background - Part C (Cont.)

- 2) Is this a full-time data position, or does the person have other responsibilities besides data management?
  - This position is a program analyst. Other responsibilities include 1) monitoring oversight, 2) OSEP reporting, 3) network performance feedback, 4) LICC assistance, 5) SICC assistance, 6) grant reviews, and 7) policy analysis.

## 618 Data Collection Background - Part C (Cont.)

3) Is anyone else responsible at the State level for 618 data collection functions?

- Diane Alexander, Accounting Specialist collects 618 data.
- Joe Porting, Benefits Coordinator, assists with data analysis.

## 618 Data Collection Background - Part C (Cont.)

- 4) Does the State implement contractual arrangements for system development, system management, and/or data collection?
  - Kansas contracts with Jim North, owner of JNI Software, Inc. for raw data collection.

## Features of JNI Software:

- Web-based
- Real time
- Collects core data required by KDHE, including child find, referrals, evaluation/eligibility, services, IFSP development, timelines, parent complaints, justifications (valid and noncompliant), cumulative counts, and 12/1 counts by network
- Can be individualized by local networks for additional purposes
- Accessible to KDHE
- Easy to query

## 618 Data Collection/Verification - Part C

1. Describe the status of the development and implementation of the State's data system.
  - The data program utilized by KDHE includes four components:
    - 1) Precise Data Entry
    - 2) Data Collection
    - 3) Data Analysis and Reporting
    - 4) Data Utilization

## Precise Data Entry

- KDHE Contracts with JNI Software, Inc. for the management of the Infant-Toddler Database (will be covered later this afternoon).
  - ◆ All 36 local programs input data into the infant-toddler database
  - ◆ Database is structured in a way that reduces the possibility for data entry errors.
  - ◆ KDHE conducts trainings on data definitions, and provides an infant-toddler database operating manual.
  - ◆ Jim North, the database manager, provides periodic training at regional meetings regarding input methods.

## Data Collection

- The infant-toddler database is web-based, allowing KDHE to access the most current data available.
- All local data reports are developed and filed through the data system, thus reducing the possibility for transcription errors that could occur at collection.
- KDHE downloads local data files that have been marked as ready on the database and compiles the data into pertinent categories.
- Data collected at the state level is not imputed into the database—it is directly entered by the Program Analyst.
- Outside data sources include the Kansas State Dept. of Education, Vital Statistics, Social and Rehabilitative Services, and KITS (Assistive Technology).

## Data Analysis and Reporting

- KDHE staff analyze the compiled data and identify local trends and gauge performance by comparison to state averages and OSEP requirements.
- Data are prepared in reports that are sent back to local programs for review and planning purposes.
- KDHE evaluates statewide data and searches for strengths, concerns, and overall trends.
- KDHE evaluates local data and targets improvement efforts on specific OSEP indicators.

## Data Utilization

- KDHE provides data to local programs in a meaningful format that assists local stakeholders in making improvement-related decisions.
- Local networks use KDHE data reports, in addition to other local data sources, in evaluating the current situation within their programs, setting objectives, explaining progress or regression, creating goals, and identifying activities to reach their goals.
- KDHE evaluates local program performance by using a data-driven monitoring process. Trends, compliance with OSEP requirements, and comparative performance are assessed.
- KDHE compiles locally reported data and state-generated data to address OSEP indicators in the State Performance Plan and Annual Performance Reports.

## 618 Data Collection/Verification - Part C (Cont).

### 2. How are data collected on infants, toddlers, and families entered into a database?

- Data are entered local level by a designated person for the infant-toddler database.
- Diane Alexander, Accounting Specialist, collects local 618 data and compiles Federal Data Table Reports
- Ryan Weir, Program Analyst, collects semi-annual report data, survey data, and other data for reports to local programs.

## 618 Data Collection/Verification - Part C (Cont).

### 3. Do Interagency Agreements, MOUs, or contracts address the reporting of data?

a) Local Level: KDHE contracts (with the local agencies who provide Part C services) include data entry on the infant-toddler database. In addition to the contracts, this is also covered in the assurances that are signed by the lead agency, fiscal agency, and LICC chair.

b) State Level: KDHE collects, analyzes, and reports on all 618 data. KSDE certifies the qualifications of personnel.

## 618 Data Collection/Verification - Part C (Cont.)

4. Describe how the data system incorporates information within the Lead Agency and from other agencies and/or providers, including SEA.
  - Infant-Toddler database contains data imputed by local programs only.
  - KDHE has access to the database, but cannot make changes to imputed data.
  - KDHE collects data from sources not included in the database (e.g. surveys, renewal applications, cost analysis, comparative analysis, etc.)
  - Data sharing with KSDE addresses transition and outcomes measures.
  - Data from KITS is useful in determining program performance, but is not part of the cyclical reporting process.

## 618 Data Collection/Verification - Part C (Cont.)

5. Throughout the data collection process, how does the State ensure reliability *in the system*?
  - KDHE's data collection system includes 1) a reliable database that accurately collects and computes data, 2) reliable data input personnel, 3) a reliable method of transmitting data, 4) reliable transcription at the state level.

## Reliable Database

- KDHE contracts with JNI Software, Inc. to monitor and manage the infant-toddler database.
- Data system has not failed in four years of usage.
- Web-based system that is reliable to the extent that the internet exists.
- Jim North (database administrator) monitors the database on a daily basis, encourages feedback from local programs regarding its performance, and promptly adjusts fields that may have a glitch.
- Database can be administered from any location and is not dependent on physical headquarters (Jim lives in Florida).

## Reliable Data Input Personnel

- KDHE contracts with JNI Software, Inc. to monitor and manage the infant-toddler database.
- Jim North conducts personalized trainings for new data entry personnel (either in person or by phone) prior to local data being imputed into the system.
- JNI Software, Inc. user manual includes a tutorial of all universal data fields. Definitions are also included. NOTE: programs can tailor the database to collect other local data. This is not included in the tutorial.
- Jim North conducts periodic trainings around the state for data entry personnel.
- JNI Software, Inc. has established a hotline for data entry personnel to find answers to data entry questions.

## Reliable Transmission of Data

- KDHE accesses local program data through the website: [www.jnisoftware.net/ITS](http://www.jnisoftware.net/ITS)
- Local programs mark their data as “ready” on their database. KDHE can access all local program databases, but those marked as “ready” have been completed and are considered an official submission.
- Data collected from the database has only been imputed one time—by the local data entry person.

## Reliable Transcription

- Transcription of data from the infant-toddler database into other report formats is double-checked for accuracy by comparison to other reports that include the same data.
- Data collected from sources other than the infant-toddler database are double-checked by more than one staff person (e.g. renewal application math, semi-annual report data sheets, etc.)
- Survey data is transcribed automatically through formulas imputed into the database. Raw scores entered into the codebook are not double-checked.

## 618 Data Collection/Verification - Part C (Cont.)

6. Throughout the data collection process, how does the State ensure the reliability of the data?
- Reliable data produces the same results for a given case when the data measure is applied several different times.
  - Reliability of data is primarily a concern for data that involves a random selection process. Most KDHE data sources are not random, but rather are universal.
  - If the data system is reliable, then universal data collected at the state is also reliable.
  - In cases where the entire universe of Part C children are not represented, KDHE uses two methods to determine reliability:

## Test-Retest Method of Determining Reliability:

- KDHE applies the same measure to the same sample set at more than one point in time.
- Reliable to the extent that results are stable over time.
- Time and knowledge can affect the results (entrance/exit parent surveys can track this—although they do not as of yet).
- Relevance to Data Entry: If a local data manager imputes an error into the database, subsequent views of the file (at a maximum of every six months) will identify the error.

## Alternative Forms Method of Determining Reliability:

- KDHE applies different forms of data measures to a sample set of the universe.
- Example: Program Performance from a parent and provider perspective
  - ◆ Entrance/Exit parent survey disbursed to all parents at initial IFSP and transition
  - ◆ Random Survey (constructed with 99% confidence, +/-3% margin for error) measures all questions in entrance/exit survey, plus other functional questions.
  - ◆ Provider Survey asks providers the same questions as the random survey, but from a provider perspective
- Will function to eliminate test effect because they measure the same concepts three different ways.

## 618 Data Collection/Verification - Part C (Cont.)

7. Throughout the data collection process, how does the State ensure the validity of the data and consistency with OSEP data instructions?

- Measurement error can create reliable data that is not valid, because reliability does not guarantee validity.
- In contrast, data cannot be valid without being reliable. Therefore, ensuring validity requires first ensuring reliability.
- In order to be valid, data must measure that which we hope to measure. To do so, an agreed-upon measurement system must be in place.
- KDHE measures validity through three methods:

## Pragmatic Data Validation

- KDHE checks the results obtained from the use of the database in imputing data against results of other indicators that are known to be valid measures of the data set.
  - ◆ KDHE reviews of renewal contracts
  - ◆ Semi-Annual Report data sheets
  - ◆ Entrance/Exit Parent surveys

## Predictive Data Validation

- KDHE tests the predictive validity of the infant-toddler database by predicting 618 results and cumulative count results in advance of their actual submission
  - ◆ KDHE predicts 12/1 counts and cumulative counts based on child find data and trends identified in semi-annual reports.
  - ◆ Done locally and statewide

## Construct Data Validation

- KDHE infers the validity of 618 data from evidence accumulated and compared to:
  - ◆ Six-Month cumulative count data
  - ◆ Annual cumulative count data
  - ◆ Screenings data
  - ◆ Evaluation data
- KDHE is searching for levels of deviation in these indicators statewide, as well as in each local program.

## 618 Data Collection/Verification - Part C (Cont.)

### 8. Describe methods used for aggregating and/or disaggregating data.

- Since data comes from each of 36 local programs, it is collected in a disaggregated system.
- KDHE aggregates data from the infant-toddler database once it is marked as "ready."
- KDHE disaggregates local data and live birth data by network in the case of race and ethnicity to determine if there are instances of disproportionality.
- Data collected at the state level is always compiled by network prior to creating an aggregate state measure.

## 618 Data Collection/Verification - Part C (Cont.)

9. If sampling is utilized, specify what data and what method is used.
  - KDHE has not sampled in data collection prior to this year.
  - EXCEPTION: Local networks used to submit locally-selected IFSP's for review with semi-annual reports.
  - KDHE will utilize a random sampling technique to generate representative responses from all 36 networks around the state (a minimum of 452 surveys is required for the most minimal representation—i.e. one survey sent to a parent in the smallest network).
  - SEE: Randomly-Selected Parent Survey Methodology
  - KDHE randomly selects IFSP's for review.

## 618 Data Collection/Verification - Part C (Cont.)

10. Describe any issues in the State's collection of data. (Child count, EI Services, Program Settings, exiting, and personnel).
  - Timeliness of submittal of 618 tables.
  - Updated database required for random parent survey to be distributed and random IFSP's to be collected.

## 618 Data Collection/Verification - Part C (Cont.)

11. Describe methods used to ensure security of the data system at the lead agency and local levels.
  - Lead Agency:
    - ◆ Data with personal identifiers is stored in locked cabinets.
    - ◆ All KDHE computers are password protected.
    - ◆ Individual child information is not identified on the state's access to the database.
  - Local Programs
    - ◆ KDHE provides training regarding HIPPA and FERPA.
    - ◆ Infant-Toddler Database is password protected.
    - ◆ Database website is <https://> (secured)
    - ◆ ECO—Specific personnel from each program have been identified as the designated data entry clerk.
    - ◆ Submitted IFSP's include blacked-out identifiers.

## 618 Data Reporting - Part C

1. How are data transmitted to the lead agency (e.g., paper transmittal, computer disk, Web-based, email attachment, etc.).
  - KDHE collects data from the infant-toddler database by using a web-based system.
  - Paper transmittals occur for IFSP's, applications and budgets, surveys, and semi-annual report narratives.
  - Electronic transmittals are used for most Network Continuous Improvement Plans and special requests from KDHE.

## 618 Data Reporting - Part C (Cont.)

2. How are data made available to the public and in what format (e.g., Web sites, links, etc.)? Note: this is not required but can assist in knowing how data is used for system change.
  - KDHE compiles, analyzes, and reports on raw data from the local programs. Data is reported in local and statewide formats.
  - Data reports (not raw data) are distributed to LICC's, the SICC, and other stakeholders through:
    - ◆ Presentations at local or state stakeholder meetings
    - ◆ Annual Performance Reports
    - ◆ KDHE's website
    - ◆ State ICC meetings

## 618 Data Reporting - Part C (Cont.)

3. What did WESTAT report as the State's reporting data issues for the last three submissions (e.g., timeliness, data discrepancies, missing data)?
  - SEE: WESTAT report files
  - 2002 & 2003 included no significant changes
  - 2004 criteria changes to 10% year-to-year difference created flags that previously would not have been identified.

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September 11 - 14, 2006

## General Supervision of 618 Data - Part C

1. Describe the type of training provided to all personnel who are responsible for data input. (Locally, at State level, data managers, and those who analyze and report data, etc.)
  - KDHE has focused data input training on personnel at the local level.
  - With the exception of the infant-toddler database, KDHE staff developed all other databases utilized in Part C data collection and analysis.

## Local Data Input Training

- KDHE contracts with JNI Software, Inc. to monitor and manage the infant-toddler database.
- Jim North conducts personalized trainings for new data entry personnel (either in person or by phone) prior to local data being imputed into the system.
- JNI Software, Inc. user manual includes a tutorial of all universal data fields. Definitions are also included. NOTE: programs can tailor the database to collect other local data. This is not included in the tutorial.
- Jim North conducts periodic trainings around the state for data entry personnel.
- JNI Software, Inc. has established a hotline for data entry personnel to find answers to data entry questions.

## State Data Input Training & Analysis

- Diane Alexander, Accounting Specialist, has been trained by Jim North in downloading data from the infant-toddler database.
- Ryan Weir, Program Analyst, is the developer and sole data input clerk for the following data sources:
  - ◆ Semi-annual report data sheets
  - ◆ Entrance/Exit Parent Survey Codebook
  - ◆ Random Parent Survey Codebook
  - ◆ Provider Survey Codebook
  - ◆ Children Served by County
  - ◆ Cost Analysis
  - ◆ Comparative Analysis
  - ◆ Live Births by Race
- Also serves as the data analyst and prepares data reports for local programs.
- Training includes a MPA, with emphasis in budgeting, research methods, and statistical analysis.

## General Supervision of 618 Data - Part C (Cont.)

2. Describe the type and availability of ongoing technical assistance and support for personnel responsible for data.
  - Jim North conducts personalized trainings for new data entry personnel (either in person or by phone) prior to local data being imputed into the system.
  - JNI Software, Inc. user manual includes a tutorial of all universal data fields. Definitions are also included. NOTE: programs can tailor the database to collect other local data. This is not included in the tutorial.
  - Jim North conducts periodic trainings around the state for data entry personnel.
  - JNI Software, Inc. has established a hotline for data entry personnel to find answers to data entry questions

## General Supervision of 618 Data - Part C (Cont.)

3. How does the State access OSEP-sponsored technical assistance? How is this information communicated to other personnel in the State?

- NECTAC website
- OSEP Correspondence and Trainings
- Mountain Plains RRC website, trainings, and correspondence
  
- KITS disseminates information presented to KDHE by OSEP and MPRRC.
- KDHE sends email updates, which have replaced TA Bulletins
- KDHE emphasizes awareness of the NECTAC, MPRRC and OSEP websites.

## General Supervision of 618 Data - Part C (Cont.)

4. If the local data are not reliable or valid, what methods are used to ensure correction of errors?
  - KDHE reports back to locals on all local data submissions, through semi-annual report data sheets/comments or NCIP response letters.
  - Semi-annual report data sheets and comments address significant changes from period to period, or trends identified by KDHE. The database is designed to identify inconsistencies. KDHE comments require corrections.
  - NCIP responses address data imputed into the infant-toddler database, as well as from state sources. Reports back to locals would include instructions for correcting errors.

## General Supervision of 618 Data - Part C (Cont.)

5. Has the Lead Agency identified audit findings either at the state or local level over the last two years? If so, what were they.
  - File review audits are conducted after KDHE has identified a concern. File review audits are used for evidence gathering and focus on a specific concern that KDHE has identified (e.g. appropriate services, timelines).

## General Supervision of 618 Data - Part C (Cont.)

6. Describe how the State uses 618 data for monitoring and in determining trends. (Refer to general supervision and assessment desk audit for cross-referencing).
  - KDHE uses 618 data in the NCIP process when evaluating performance.
  - KDHE compares the demographics of children served with the general population within each local program.
  - KDHE tracks 12/1 counts on birth-to-one and birth-to-three children served on semi-annual report data sheets.

## Part C Monitoring System Background

1(a). What is the Name of the Part C Coordinator and number of years in that position?

- Currently, the Part C coordinator position is unfilled in Kansas.
- KDHE is actively recruiting for the position, and will continue to do so until filled.
- Carolyn Nelson, Director of Children's Developmental Services, is serving as acting Part C Coordinator.
- Carolyn has previously held the Part C Coordinator position.

## Part C Monitoring System Background (Cont.)

- 1(b). What is the Lead Agency Designee and within what department or division is Part C administered.
- Kansas Infant-Toddler Services is part of the Children's Developmental Section of the Bureau for Children, Youth and Families, which is housed under the Division of Health in the Kansas Department of Health and Environment.

# KDHE Organizational Chart

- SEE: Hard Copy

## Part C Monitoring System Background (Cont.)

2. Describe the organizational structure of the interagency system for Part C, indicating staffing patterns, responsibilities, relationships with collaborators and contractors.
  - Local Control
  - Local Lead Agencies are determined by LICC's with approval by the state.
  - LICC's identify the service area and the lead and fiscal agents to provide those services
  - Local Lead Agents: Education (11), Community Developmental Disability Organizations (8), Private Not-for-Profits (14), Hospitals (2), Indian Reservation (1).

## Staffing Patterns

- Local Lead agencies provide services in a variety of ways:
  - Hire staff directly with 100% of FTE devoted to Part C services
  - Hire staff and split FTE with other programs
  - Contract with service providers for specific services
  - In-kind staffing
  - Services provided by private agency, and agency bills insurance or Medicaid—no Part C funds used.
- 
- All lead agencies have signed assurances that services will be provided to all eligible children by qualified staff in a timely manner. KDHE reviews renewal applications for staffing, but does not review contracts.

## Responsibilities

- Local Programs are responsible for the delivery of Part C services by qualified staff to eligible children in a timely manner, and reporting to the state how this is accomplished locally.
- KDHE collects, analyzes, and reports on performance at the local and state levels.
- KDHE is responsible for ensuring that OSEP requirements are achieved. This is accomplished through KDHE's completion of the State Performance Plan and Annual Performance Reports.

## Relationships

- Local programs form relationships with other local agencies to ensure that there is not a duplication of services.
- Local ICC's are required by State Law to meet at least quarterly, although most LICC's meet more frequently.
- State ICC meets monthly, and includes the Kansas State Department of Education, Social and Rehabilitative Services, Service Providers, the Kansas Board of Regents, Head Start/Early Head Start, Parents, and the Kansas Insurance Department.
- KDHE contracts with KITS, Families Together, Inc., the Assistive Technology for Kansans Project, JNI Software, Inc., and the Occupational Therapy Project for monitoring, technical assistance, advocacy, and family training.

## Part C Monitoring System Background (Cont.)

3. Describe any OSEP-identified issues with the State's Application.
  - KDHE was granted conditional approval from OSEP pending the updating of state policies and procedures. KDHE will complete the update prior to June 30, 2007.

## Part C Monitoring System Background (Cont.)

- 4(a). List any entities, and the service responsibilities of each, with whom the State has current Interagency Agreements and/or MOU's for the provision of early intervention services.
- 4(b). Describe any area(s) that are not covered by an Interagency Agreement or MOU (coordination of services, transition, dispute resolution, reimbursement, payor of last resort, and fiscal arrangements).
- 4(c). Describe how the State monitors the implementation of Interagency Agreements (or MOU's) to ensure that services are not delayed or denied and strategies used when Interagency Agreements (or MOU's) are not implemented.

■ CAROLYN

## Part C Monitoring System Background (Cont.)

5. Describe any funding issues that may negatively impact part C eligible children and their families.
  - Total funding per child has declined by 20% based on 12/1 counts since 1999 (\$2,522.50 in 1999 vs. \$2,030.71 in 2006).
  - Federal funding per child during the same time period has also declined by 20% (\$1,314.50 in 1999 vs. \$1,056.40 in 2006).
  - Additional \$1,850,000.00 added by Kansas Legislature for SFY 2007. (Cannot determine new funding per child until child count is available).

## Part C Monitoring System Background (Cont.)

6. If the State has a *GSEG*, describe the focus of the grant as it relates to the monitoring process for Part C.
  - CAROLYN

## Part C Monitoring System Background (Cont.)

7. Describe any court orders, consent decrees or official findings in the State that affect the provision of early intervention services and the impact of these on monitoring.
  - There are no court orders, consent decrees, or official findings that affect early intervention services.
  - KDHE has received one formal complaint and one mediation request over the last five years. Both issues were resolved appropriately, but Kansas' system has not been tested enough to be considered reliable as of yet.

## Part C Monitoring Structure

1. Describe the administrative structure of monitoring in the State (e.g., contractual, Part C only, using interagency agreements, etc.)
  - KDHE's contract with JNI Software, Inc. includes data that is used for analysis and reporting in the monitoring process.
  - KDHE, the state Part C lead agent, performs all monitoring of timely and appropriate services on a local level.
  - KSDE, the lead agency for Part B, ensures through its categorical aid audits that all Part C service personnel are qualified service providers.

## Part C Monitoring Structure (Cont.)

2. Describe how the State monitors public or private agencies responsible for carrying out Part C requirements.
  - KDHE requires local programs to provide data on a cyclical basis.
  - KDHE collects certain data sets as part of the monitoring process.
  - The combination of data sources is analyzed by KDHE, and guides the monitoring and improvement process.
  - This will be discussed extensively in KDHE's explanation of General Supervision.

## Part C Monitoring Structure (Cont.)

3. Describe methods the State utilizes to ensure continuous improvement.
  - KDHE uses the local Network Continuous Improvement Plan (NCIP) to direct improvement.
  - KDHE provides NCIP feedback to local programs through LICC meetings.
  - Components of the NCIP are covered in the General Supervision discussion.

## Part C Monitoring Structure (Cont.)

4(a). What financial resources does the State utilize for monitoring Part C?

- KDHE uses only a portion of the Federal funds for monitoring.
- No state or local dollars are used, and most federal funding is disbursed to the local programs.

## Part C Monitoring Structure (Cont.)

4(b). What human resources (State staff, contractors, peer monitors, volunteers, etc.) does the State utilize for monitoring Part C?

- KDHE utilizes Joe Porting, Benefits Coordinator, and Ryan Weir, Program Analyst, as monitors for all 36 local programs.
- KDHE receives certification of qualified service providers from audits performed by KSDE staff. If there is a concern regarding staff qualifications, categorical aid is withheld (categorical aid constitutes more dollars for local programs than state and federal dollars combined).

## Part C Monitoring Structure (Cont.)

5. Describe the training for selected monitors around their roles and responsibilities.
  - KDHE developed the state monitoring system to mirror OSEP's system.
  - KDHE staff attend relevant OSEP and Mountain Plains RRC conferences and trainings.
  - The KDHE staff that developed the monitoring structure are the two that perform all monitoring activities.

## Part C Monitoring Structure (Cont.)

6. Describe how Part C monitors and their activities are supervised.
  - KDHE recently reclassified the Part C Coordinator position to supervise the Benefits Coordinator and Program Analyst (local program monitors).
  - Carolyn Nelson, Director of Children's Developmental Services, and acting Part C Coordinator, currently supervises monitors.
  - The State ICC offers advice and assistance on monitoring activities, including the recent task force assembled to develop procedures for selecting local lead agencies when LICC's fail to do so.

## Part C Monitoring Structure (Cont.)

7. Describe how stakeholders are involved in the monitoring process (e.g., parents, advocates, providers, ICC, interagency partners).
  - The State ICC offers advice and assistance on monitoring activities.
  - Local ICC membership includes parents, providers, advocates, and community partners (education, social welfare, health, etc.)
  - NCIP plans must be developed with local ICC input. Evidence of their involvement must be demonstrated.

## Part C Monitoring Structure (Cont.)

9(a). If the state monitors entities on a cyclical basis, describe the cycle.

- SEE: Timelines and Guidelines for Contract Administration
- Required submissions by local programs
- KDHE conducts monitoring activities on a year-round and/or basis (e.g. Entrance/Exit Parent Surveys, Random Surveys, Cost Analysis, Cumulative Count by County).

## Part C Monitoring Structure (Cont.)

9(b). If all entities do not receive an on-site data collection visit as part of the cycle, describe the criteria for determining which entities will NOT be visited.

- KDHE collects the exact same data points from all 36 networks on an annual basis. This is not done on-site.
- KDHE analyzes and reports on the data, and determines specific points of concern within individual networks.
- The on-site data collection and/or verification process is triggered when there is a concern or discrepancy in the data that has been reported....OR...A complaint has been made by a parent or local agency...OR...The local network requests a visit.

## Part C Monitoring Structure (Cont.)

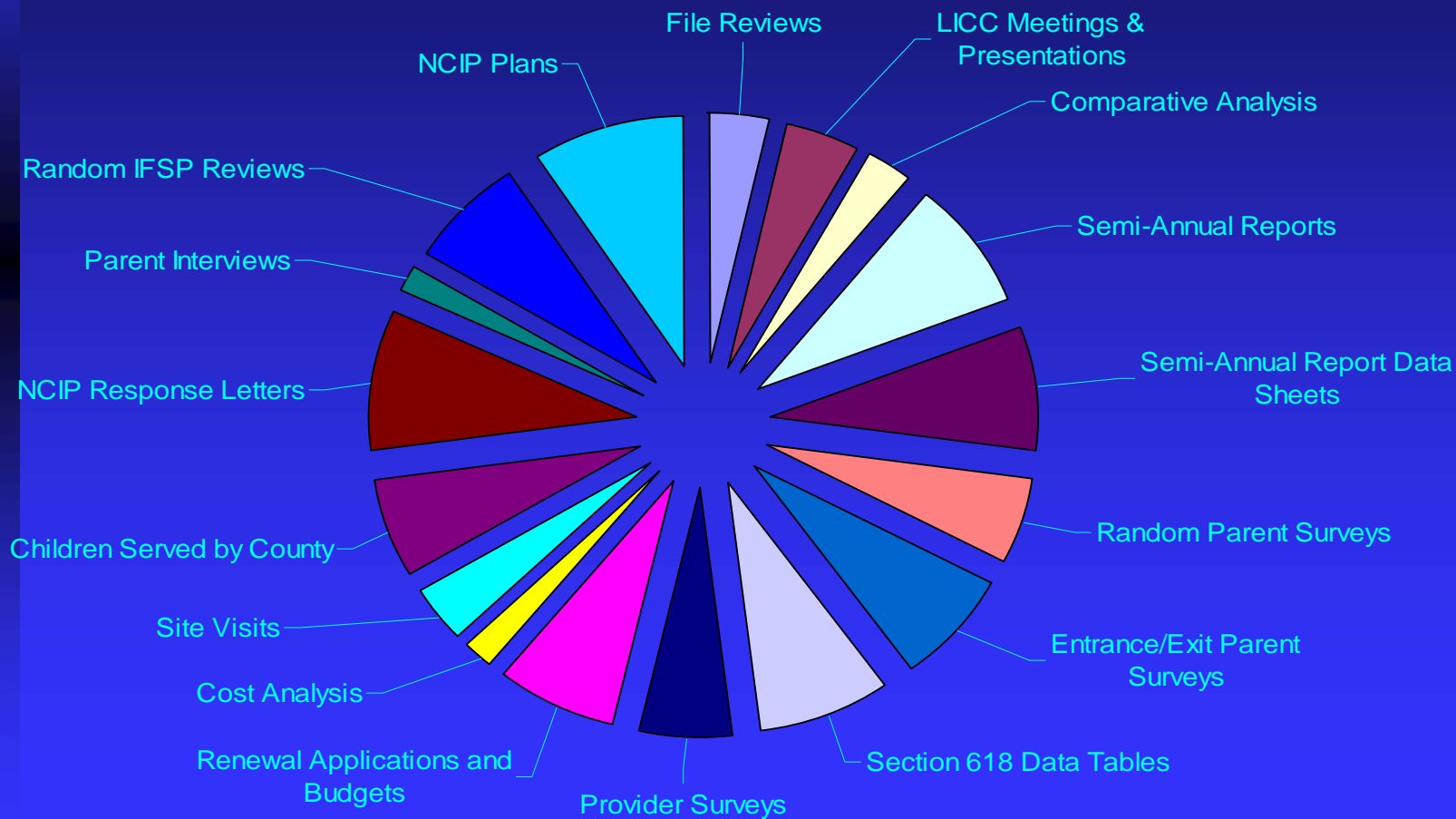
10. If there is no cycle, how does the State select entities for data collection, including on-site collection.
  - KDHE has a data collection cycle, as described in question 9(b).

## Part C Monitoring Structure (Cont.)

11. Describe how the State ensures that entities NOT selected for an on-site visit are in compliance with IDEA?
  - KDHE's data collection, analysis, verification, and reporting process determines compliance.
  - On-site visits are not as effective in identifying concerns as the state's data collection system, unless there is a targeted concern that monitors are reviewing within the local program.

# Part C Monitoring Data Systems

## 1. What data are used as an integral part of the State's monitoring system?



## Part C Monitoring Data Systems (Cont.)

2. If the state uses interviews, describe who is interviewed and how the interviewees are selected.
  - Every family has the potential for an interview through an entrance/exit parent survey.
  - KDHE staff interview LICC members, including parents, service providers, and staff from community partners during LICC visits.
  - KDHE staff interview parents or agencies that lodge complaints, either formal or informal (Lakemary, Johnson County).

## Part C Monitoring Data Systems (Cont.)

3. If the State uses record reviews, describe how records are selected and how they are reviewed (e.g., checklists, off-site, on-site, as interview guides, etc.)
  - KDHE reviews and analyzes data collected from all 36 networks.
  - Concerns identified through the review process are targeted within each local program.
  - Parent complaints (formal or informal) always result in a file review on-site if a solution is not agreed upon by the family and local program.
  - If an appropriate plan is not determined locally, or if there is a discrepancy in data, KDHE will conduct a file review on-site.

## Part C Monitoring Data Systems (Cont.)

4. If the State reviews documents (other than child records), describe how they are selected and how they are reviewed (e.g. checklists, off-site, on-site, as interview guides, etc.)
  - Same procedure as in child record reviews.

## Part C Monitoring Data Systems (Cont.)

5. Describe any periodic or episodic methods used by the state to collect data off-site.
  - SEE: KDHE's data sources for General Supervision.

## Part C Monitoring Data Systems (Cont.)

### 6. Describe how the state validates monitoring data.

- Measurement error can create reliable data that is not valid, because reliability does not guarantee validity.
- In contrast, data cannot be valid without being reliable. Therefore, ensuring validity requires first ensuring reliability.
- In order to be valid, data must measure that which we hope to measure. To do so, an agreed-upon measurement system must be in place.
- KDHE measures validity through three methods:

## Pragmatic Data Validation

- KDHE checks the results obtained from the use of the database in imputing data against results of other indicators that are known to be valid measures of the data set.
  - ◆ KDHE reviews of renewal contracts
  - ◆ Semi-Annual Report data sheets
  - ◆ Entrance/Exit Parent surveys

## Predictive Data Validation

- KDHE tests the predictive validity of the infant-toddler database by predicting results and cumulative count results in advance of their actual submission
  - ◆ KDHE predicts 12/1 counts and cumulative counts based on child find data and trends identified in semi-annual reports.
  - ◆ Done locally and statewide

## Construct Data Validation

- KDHE infers the validity of monitoring data from evidence accumulated and compared to:
  - ◆ Six-Month cumulative count data
  - ◆ Annual cumulative count data
  - ◆ Screenings data
  - ◆ Evaluation data
- KDHE is searching for levels of deviation in these indicators statewide, as well as in each local program.

## Part C Monitoring Data Systems (Cont.)

### 7. Describe how the state ensures the reliability of monitoring data.

- Reliable data produces the same results for a given case when the data measure is applied several different times.
- Reliability of data is primarily a concern for data that involves a random selection process. Most KDHE data sources are not random, but rather are universal.
- If the data system is reliable, then universal data collected at the state is also reliable.
- In cases where the entire universe of Part C children are not represented, KDHE uses two methods to determine reliability:

## Test-Retest Method of Determining Reliability:

- KDHE applies the same measure to the same sample set at more than one point in time.
- Reliable to the extent that results are stable over time.
- Time and knowledge can affect the results (entrance/exit parent surveys can track this—although they do not as of yet).
- Relevance to Data Entry: If a local data manager imputes an error into the database, subsequent views of the file (at a maximum of every six months) will identify the error.

## Alternative Forms Method of Determining Reliability:

- KDHE applies different forms of data measures to a sample set of the universe.
- Example: Program Performance from a parent and provider perspective
  - ◆ Entrance/Exit parent survey disbursed to all parents at initial IFSP and transition
  - ◆ Random Survey (constructed with 99% confidence, +/-3% margin for error) measures all questions in entrance/exit survey, plus other functional questions.
  - ◆ Provider Survey asks providers the same questions as the random survey, but from a provider perspective
- Will function to eliminate test effect because they measure the same concepts three different ways.

## Part C Monitoring Data Systems (Cont.)

8. Describe how data is analyzed across monitored entities to identify systemic issues.
  - KDHE collects the same data from all 36 local programs. The same performance measures are applied to all programs.
  - KDHE uses data from these performance measures to identify systemic issues within each local program.

## Part C Monitoring Data Systems (Cont.)

9(a). Describe the reporting procedures for monitoring (e.g., debriefings, timely written reports, Web site, etc.)

- KDHE reports data to networks through the following monitoring tools:
  - ◆ Semi-Annual Report data sheets
  - ◆ NCIP response letters
  - ◆ Children Served by County
  - ◆ Cost Analysis
  - ◆ Comparative Analysis
  - ◆ Live Births by Race & Ethnicity
  - ◆ Survey Results
- KDHE reports these results to the LICC's

## Part C Monitoring Data Systems (Cont.)

9(b). Describe how the State ensures that the monitoring results and information area available and accessible to the public.

- KDHE make available statewide data on its website.
- Local program data is made available via reports to LICC's, stakeholders, and other community agencies.
- Local agencies must demonstrate the LICC's are active in the development of the NCIP and renewal applications.
- Local agencies are responsible for completing annual reports.

## Part C Monitoring Data Systems (Cont.)

10. Describe activities used by the State to evaluate and improve the collection, accuracy, analysis, and reporting of data.
  - KDHE withholds funds from programs that do not report their data appropriately and on time.
  - Semi-Annual Report Data sheets identify concerns, strengths, and five-year trends, including consistency in reporting techniques.
  - NCIP plans and response letters demonstrate improvement from year 1 to year 2.
  - Entrance/exit parent survey return rates have increased dramatically.
  - Training and data definitions are revisited frequently at regional meetings to ensure accuracy.

## Part C Monitoring Data Systems (Cont.)

11. Describe how the State utilizes trend data from monitoring (including HODs, complaint decisions, mediation agreements, etc.) to determine the impact of monitoring on child and family outcomes (EISNE, etc.)
  - KDHE utilizes semi-annual report trend data over a five year period to determine the direction of performance.
  - NCIP plans are expected to address trends within each local program (positive or negative).
  - In a state of local control, all 36 networks are evaluated individually. Therefore, trend data is network-specific for all measures.
  - KDHE is not concerned with statewide aggregates—local program improvement is the priority.

## Part C Monitoring Data Systems (Cont.)

12. Describe how the Lead Agency integrates monitoring data, including trend data, into decision-making processes across the state.
  - KDHE reports data back to local programs in a way that highlights trends and comparisons to statewide averages.
  - Local programs are expected to compare their performance to state averages, and evaluate trends, when they complete their NCIP plans.
  - At the state level, KDHE identifies training needs or the effectiveness of various initiatives based on trends (e.g. procedural safeguards).

## Part C Monitoring Effectiveness

1. Describe how the State measures the effectiveness of its monitoring system.
  - KDHE measures effectiveness through compliance with indicators in Kansas' Annual Performance Report to OSEP.
  - Monitoring effectiveness can be measured and observed.
    - ◆ Measured Effectiveness
      - ◆ Semi-Annual Report data sheet trends (Eligibility, timelines, child-find, referrals)
      - ◆ Entrance/exit parent survey response rates
      - ◆ 618 Data Tables
    - ◆ Observed Effectiveness
      - ◆ NCIP improvement
      - ◆ Community Involvement in LICC's.

## Part C Monitoring Effectiveness

2. Describe the methods used by the State to disseminate promising practices (including utilization of relationships with IHEs).
  - KITS Newsletter and Trainings (University of Kansas)
  - Technical Assistance Plans (University of Kansas)
  - Occupational Therapy Project Training (University of Kansas)
  - Early Childhood Outcomes Training (University of Kansas)
  - Primary Coaching Model Training (Puckett Institute)
  - ECHO (K-State, KU, Pitt. St, Wichita St., FHSU., Emporia St.)
  - KDEC Presentations
  - NCIP Program Strengths
  - Emails
  - Families Together (Parent Training and Information Center)
  - NECTAC Website
  - MPRRC Website
  - Assistive Technology Training (University of Kansas)
  - Family Service Coordination Training (University of Connecticut)
  - Kansas Child Care Training Opportunities (Kansas State University)

## Part C Monitoring Effectiveness (Cont.)

3. Describe how the effectiveness of various incentives and/or sanctions related to monitoring findings is evaluated by the State.
  - KDHE's monitoring process includes the withholding of funds for networks that are not in compliance.
  - KDHE does not offer incentives other than for public recognition for compliance.
  - Innovative practices are eligible for a small monetary award from KITS at the KDEC Conference.
  - KDHE reviews improvement plans and gauges the effectiveness of monitoring processes on an annual basis.

## Part C Monitoring Enforcement

1. Describe the State's authority to enforce correction of identified deficiencies.
  - SEE: Protocol for Assurance of Accountability

## Part C Monitoring Enforcement (Cont.)

2. Describe any instances when the State used its authority to enforce correction of identified deficiencies.

- NCIP compliance issues
- Semi-Annual Report comments
- Northeast Kansas Fiscal Issues
- PACT (Liberal) Occupational Therapist Issue
- Salina Natural Environments

## Part C Monitoring Enforcement (Cont.)

3. Describe how the State follows up monitoring findings to ensure correction of identified systemic deficiencies.
  - NCIP plans are reviewed over the course of the year through semi-annual reports, data tables, surveys, etc. to measure progress toward goals.
  - Subsequent NCIP plans address the previous year's goals and continued improvement plans.

## Part C Monitoring Enforcement (Cont.)

4. Describe how the State ensures that training and Technical Assistance is provided when necessary to correct noncompliance.
  - Technical Assistance is required as part of KDHE's Protocol for Assurance of Accountability.
  - Contract with KITS to develop Technical Assistance Plans
  - Peer Modeling from other local programs
  - Experts (MPRRC, Puckett Institute, Uconn) provide training on compliance and best practice issues

## Part C Monitoring Enforcement (Cont.)

5(a). Describe how the state ensures the implementation of Hearing Officer Decisions.

- This has never been done in Kansas.
- Protocol for Assurance of Accountability
- Withholding funding

## Part C Monitoring Enforcement (Cont.)

5(b). Describe how the State ensures the implementation of State complaint decisions.

- SEE: Lakemary Center resolution
- Phone conversation with parents
- Phone conversation with Lakemary staff
- Interview with parents
- File review, including service logs and IFSP at Lakemary
- Reviewed state and Federal Law
- Issued KDHE's findings

## Part C Monitoring Enforcement (Cont.)

5(c). Describe how the State ensures implementation of mediation agreements.

- SEE: Mediation Agreement Documentation.