

**State Performance Plan / Annual Performance Report:  
Part C**

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

**For reporting on  
FFY18**

**Mississippi**



**PART C DUE February 3, 2020**

**U.S. DEPARTMENT OF EDUCATION  
WASHINGTON, DC 20202**

## **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**

The Mississippi State Department of Health (MSDH) is the lead agency responsible for administering Part C of IDEA, known as the Mississippi First Steps Early Intervention Program (MSFSEIP). The MSDH has organized the State's 82 counties into three public health regions, each of which operates multiple Local FSEIP responsible for ensure all eligible infants and toddlers and their families receive early intervention services. The Northern Region has two Local FSEIPs and the Central and Southern Regions have three Local FSEIPs each, for a total of eight Local FSEIPs. The MSFSEIP provides general supervision and technical assistance to each of the Local FSEIPs as well as opportunities for professional development for early interventionists across the state. Stakeholders are engaged in multiple workgroups providing feedback on systemic improvement efforts as well as general advice on program administration. The MSFSEIP works with the Local FSEIPs to collect and report data in a timely manner.

During FFY2018, the MSDH implemented new procedures required by state law for approving agreements with vendors, including early intervention service providers, as well as a new electronic approval routing and storage solution. As a results, many agreements with new and existing providers were not implemented in a timely manner. These changes resulted in a failure to meet 45-Day timelines (Indicator 7) and to provide Timely Services (Indicator 1) in some instances. As a result of these changes, the MSFSEIP assisted the Local FSEIPs in tracking approval of providers and ensuring compensatory services were provided when applicable. In FFY2018, the State experienced slippage in Indicators 4 [4A, 4B] (Family Outcomes) and 7 (45-Day Timeline). All Local FSEIPs, except for Local FSEIP 7, were monitored, and findings of noncompliance were issued for Indicators 1 (Timely Services), 7 (45-Day), 8A (Transition Steps and Services), 8B (Transition Notification), and 8C (Transition Conference). The MSFSEIP was not able to verify correction within one year for these findings. Therefore, all seven monitored Local FSEIPs have ongoing finding of noncompliance in Indicator 1 (Timely Services) and Indicator 7 (45-Day Timeline). In addition, four Local FSEIP (i.e., 4, 5, 6, and 8) have ongoing findings in Indicator 8A (Transition Steps and Services) and 8B (Transition Notification), and five Local FSEIPs (i.e., 4, 5, 6, 8, and 9) have ongoing findings in Indicator 8C (Transition Conference). The MSFSEIP continues to provide technical assistance to these Local FSEIPs to assist them in identifying and addressing root causes of noncompliance and improving their performance to improve outcomes for children and families. Furthermore, the MSFSEIP and Local FSEIPs continued implementation of systematic improvement efforts to enhance the program infrastructure and to implement evidence-based practices.

Mississippi's determination for FFY2017 was "Needs Assistance" based on ongoing issues with Indicator 1 (Timely Services) and Longstanding Noncompliance that had not been corrected related to this indicator. Root cause analyses revealed that Local FSEIP were not adequately tracking their data to ensure they were complying with all Federally-required timelines. Mississippi participated in targeted technical assistance provided by the IDEA Data Center in Spring 2018 to assist local programs in using their data to inform decisions and improvement efforts. Mississippi selected Local FSEIP 5 to participate based on the program's longstanding noncompliance on Indicator 1 (Timely Services). This work led to the development and implementation of a tracking tool that could serve as an early warning system to Service Coordinators of approaching timelines and a supervision tool for Program Coordinators in providing oversight of Service Coordinators. In July 2018, all Local FSEIP personnel were trained to use the tool. Local FSEIP 5 was

mandated to use the tool and the remaining Local FSEIP implemented the tool on a voluntary basis. After monitoring in Fall 2018 revealed additional compliance issues, all Local FSEIP were mandated to implement the tracking tool beginning December 2018. In the Spring 2019, Local FSEIP 5 began receiving intensive monitoring of individual Service Coordinators reviewing their tracking tools and identifying additional underlying issues. Additional analyses indicated a need to track provider caseloads more carefully. As a result, the MSFSEIP developed a provider caseload tracking tool which was then implemented in May 2019. These efforts are continuing to enhance the ability of Local FSEIP to identify and address issues to ensure compliance with required timelines.

### **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.**

The MSFSEIP has implemented a general supervision system that includes universal, focused, and targeted monitoring approaches to ensure each Local FSEIP implements all Federal regulations and State policies and procedures for Part C of IDEA. The MSFSEIP monitors Local FSEIPs using a combination of methods including annual self-assessments, annual fiscal audits, annual onsite visits, data reviews (i.e., reviews of data in the Child Registry), desk audits (i.e., reviews of paper records), interviews, observations, and issues identified during dispute resolutions, as applicable.

The MSFSEIP has a Monitoring Coordinator and assigns additional State staff to assist with conducting monitoring reviews, desk audits, interviews, observations, and onsite visits. In addition, Local FSEIPs receive technical assistance from MSFSEIP employees and contractual personnel to address program-specific concerns (see TA Section below). These supports are intended to assist Local FSEIP staff with identifying the root cause(s) of noncompliance within the FSEIP and ensure timely correction of noncompliance. The MSFSEIP takes enforcement actions, as appropriate, against any Local FSEIP that fails to correct noncompliance in a timely manner.

The MSFSEIP is developing a more robust and responsive general supervision model to incorporate universal, focused, and targeted TA with the State's general supervision efforts.

### **Technical Assistance System:**

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

The MSFSEIP provides ongoing technical assistance by identifying Local FSEIP needs and providing general, focused, and targeted TA to Local FSEIP and service providers. The MSFSEIP identify Local FSEIP training needs by periodic data analyses, QTA reports, and specific requests for TA. General TA is provided by MSFSEIP staff through monthly conference calls and quarterly Local FSEIP meetings. Focused and targeted TA are provided by MSFSEIP employees and an assigned QTA using a variety of methods, as needed, including via phone and email, onsite visits, observation and feedback sessions, coaching, assisted preliminary desk audits, conference calls, and video-conferences. As needed, personnel will accompany Service Coordinators and Providers on home visits to offer guidance and support during comprehensive evaluations, Individualized Family Service Plan (IFSP) meetings, and service delivery as well as assist with reviewing paper records and data quality in the electronic Child Registry. Technical assistance is provided to Program and Service Coordinators to identify root cause(s) of noncompliance, develop strategies and activities for any Local FSEIP-developed Corrective Action Plans (CAPs), and implement CAPs.

The MSFSEIP has an Operations Director who oversees the Monitoring Coordinator and QTA. The Operations Director works with national experts on implementing train-the-trainer models of TA service delivery. The Operations Director and Part C Coordinator ensure personnel receive quality professional development and offer supervision and guidance on early intervention best practices via monthly meetings and reviews of monthly reports. The MSFSEIP State personnel have participated in national professional conferences and in TA opportunities provided through OSEP TA Centers. In addition, they engage in ongoing professional

development via webinars and Professional Learning Communities (PLCs).

The MSFSEIP is developing a more robust technical assistance model to include universal, focused, and targeted TA to better align with the State's general supervision efforts. The TA system is preparing local coaches and regional training coordinators to support implementation of evidence-based practices in addition to the supports offered by the QTA.

### **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.**

The MSFSEIP provides annual training to Local FSEIP staff and providers on Federal regulations and State policies and procedures. In addition, the MSFSEIP provides Regional and Local FSEIP trainings on referral procedures, data system and child record maintenance, family rights, evaluation and eligibility determination, IFSP development and revisions, timely services, transition, working with families of children who are deaf/hard of hearing, routines-based model implementation, ongoing child assessments, and financial management.

As a part of the State Systemic Improvement Plan (SSIP), the MSFSEIP's reconstituted Comprehensive System of Personnel Development (CSPD) Leadership Team continued revisions of personnel standards and development of orientation and credentialing procedures for early intervention personnel with support from national experts, OSEP-funded TA Centers, and other State Part C programs. The expanded CSPD Leadership Team supported the MSFSEIP's ability to develop new partnerships to expand professional development opportunities. All training under development includes three levels of support: knowledge development, skill development, and knowledge and skill application. Knowledge development is provided through online training modules and self-study with integrated assessments. Skill development is provided through real-time online or face-to-face training with integrated application exercises. Knowledge and skill application is provided via field-based observation and on-the-job coaching. The progress of all MSFSEIP and Local FSEIP staff and providers will be tracked through these levels of learning experiences. This new approach to professional development will ensure service providers have the knowledge and skills to provide services effectively to improve results for infants and toddlers with disabilities and their families. The MSFSEIP has begun implementing these CSPD initiatives as part of the Phase III of the SSIP.

### **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 MSFSEIP has multiple avenues to engage stakeholders in advising the program. The State Interagency Coordinating Council (SICC), including SSIP Stakeholders, meets quarterly for a public meeting and more frequently for workgroup activities. The SICC is comprised of parents, service providers, state agency representatives from Health, Education, Human Services, Child Protective Services, Medicaid, and Insurance, representatives from Head Start, the Institute of Higher Learning (IHL), University programs, and advocacy groups, and other community leaders.

On November 14, 2014, the SICC assisted the MSFSEIP in setting the FFY2014-FFY2018 APR targets for Indicators 2, 3, and 4:

Indicator 2: Natural Environment target to set to remain at 95% for FFY2014-FFY2018.

Indicator 3: Child Outcomes:

Summary Statement 1 for Outcomes A - C targets were set to remain at 85% for FFY2014-FFY2018.

Summary Statement 2 for Outcomes A - C targets were set as follow:

A2 – 65% for FFY2014-FFY2018

B2 – 63% for FFY2014-FFY2015

B2 – 64% for FFY2016

B2 – 64.5% for FFY2017

B2 – 65% for FFY2018

C2 – 63% for FFY2014-FFY2015

C2 – 63.5% for FFY2016

C2 – 64% for FFY2017-FFY2018

Indicator 4: Family Survey targets were set at 92% for FFY2014-FFY2018.

On February 13, 2015, the SICC assisted the MSFSEIP in setting APR targets for Indicators 5 and 6:

Indicator 5: Child Find 0-1 target was set as follows:

For FFY2014, the target was set at 0.61%

For FFY2015, the target was set at 0.62%

For FFY2016, the target was set at 0.63%

For FFY2017, the target was set at 0.64%

For FFY2018, the target was set at 0.65%

Indicator 6: Child Find 0-3 target was as follows:

For FFY2014, the target was set at 1.72%

For FFY2015, the target was set at 1.74%

For FFY2016, the target was set at 1.76%

For FFY2017, the target was set at 1.78%

For FFY2018, the target was set at 1.80%

In both meetings, the SICC reviewed historical targets and performance data trends for Mississippi and national averages. The Stakeholders discussed emerging issues in the MSFSEIP and assisted in setting "ambitious but realistic" targets for the MSFSEIP for the next six-year grant cycle.

On October 25, 2019 the SICC assisted the MSFSEIP in setting the FFY2018-FFY2019 APR targets for Indicators 2, 3, 4 5, and 6:

Indicator 2: Natural Environment target to set to 95%.

Indicator 3: Child Outcomes:

Summary Statement 1 targets were set as follows:

A (positive social-emotional skills) - 85%

B (acquisition and use of knowledge and skills) - 85%

C (use of appropriate behaviors to meet their needs) - 85%

Summary Statement 2 targets were set as follows:

A (positive social-emotional skills) - 65%

B (acquisition and use of knowledge and skills) - 65%

C (use of appropriate behaviors to meet their needs) - 64%

Indicator 4: Family Survey targets were set to remain at 92%.

Indicator 5: Child Find 0-1 target was set at 0.68%.

Indicator 6: Child Find 0-3 target was set at 1.84%.

In addition at the October 25, 2019 meeting, the SSIP Stakeholders reviewed the overall SSIP Theory of Action and planned activities to improve infrastructure and implement evidence-based practices. The Stakeholders evaluated the current progress and determined the planned activities for the coming year should be continued, specifically focusing on new infrastructure, i.e., data system and professional development system, and continued implementation of evidence-based practices, until fidelity is met.

**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.**

The MSFSEIP shared the complete APR at its SICC/SSIP Stakeholder Meeting as well as a results summary page. The MSFSEIP discussed the results by Indicator and answered all public questions posed. The performance of each Local FSEIP was disaggregated and shared at subsequent SICC meetings providing comparison relative to the MSFSEIP targets. The MSFSEIP also publishes several years of APR data on the MSDH website ([http://msdh.ms.gov/msdhsite/\\_static/41,0,74,63.html](http://msdh.ms.gov/msdhsite/_static/41,0,74,63.html)). The website also provides information (i.e., phone and email contact information) to submit comments about the SPP/APR.

### **Intro - Prior FFY Required Actions**

None

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

### **Intro - OSEP Response**

The State's determinations for both 2018 and 2019 were Needs Assistance. Pursuant to section 616(e)(1) of the IDEA and 34 C.F.R. § 300.604(a), OSEP's June 18, 2019 determination letter informed the State that it must report with its FFY 2018 SPP/APR submission, due February 3, 2020, on: (1) the technical assistance sources from which the State received assistance; and (2) the actions the State took as a result of that technical assistance. The State did not provide any of the required information.

The State did not, as required, attach a signed copy of their 2020 Annual Report Certification of the Interagency Coordinating Council (ICC) Form. OSEP notes that the State must provide verification that the attachment it includes in its FFY 2018 SPP/APR submission is in compliance with Section 508 of the Rehabilitation Act of 1973, as amended (Section 508), as required by Section 508 and noted in the FFY 2018 SPP/APR User Guides and technical webinar.

The State did not provide verification that the Indicator C-11/State Systemic Improvement Plan (SSIP) attachment included in its FFY 2018 SPP/APR submission is in compliance with Section 508 of the Rehabilitation Act of 1973, as amended (Section 508), as required by Section 508 and noted in the FFY 2018 SPP/APR User Guides and technical webinar.

The State provided a FFY 2019 target for Indicator C-11/, SSIP and OSEP accepts that target.

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

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 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. 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**

<b>Baseline</b>	2005	76.00%			
<b>FFY</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Target	100%	100%	100%	100%	100%
Data	94.19%	90.67%	90.23%	86.80%	86.14%

**Targets**

<b>FFY</b>	<b>2018</b>	<b>2019</b>
Target	100%	100%

**FFY 2018 SPP/APR Data**

<b>Number of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner</b>	<b>Total number of infants and toddlers with IFSPs</b>	<b>FFY 2017 Data</b>	<b>FFY 2018 Target</b>	<b>FFY 2018 Data</b>	<b>Status</b>	<b>Slippage</b>
1,762	2,185	86.14%	100%	85.26%	Did Not Meet Target	No Slippage

**Provide reasons for slippage, if applicable**

XXX

**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.*

101

**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).**

Mississippi First Step Early Intervention Program's criteria for "timely" receipt of services is defined as receiving all early intervention services identified on the IFSP no later than 30 business days after written parental consent for services.

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

State database

**Describe the method used to select EIS programs for monitoring.**

XXX

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

July 1, 2018 - June 30, 2019

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

This report includes the complete data for infants and toddlers with IFSPs covering the entire reporting period from July 1, 2018 - June 30, 2019.

**If needed, provide additional information about this indicator here.**

The State had 322 instances of missed timelines due to system-based issues. Most delays in Local FSEIP 5, 8, and 9 were related to significant provider shortages. Other Local FSEIPs, which also have some provider shortages, mainly experienced delays early in the fiscal year related to the failure to implement contracts with providers by July 1, 2018 (see Introduction).

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

<b>Findings of Noncompliance Identified</b>	<b>Findings of Noncompliance Verified as Corrected Within One Year</b>	<b>Findings of Noncompliance Subsequently Corrected</b>	<b>Findings Not Yet Verified as Corrected</b>
6			6

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

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

All cases that caused the non compliance have been addressed and fixed. Programs had to resubmit new Correction of Action Plans to address continued noncompliance.

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

<b>Year Findings of Noncompliance Were Identified</b>	<b>Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2017 APR</b>	<b>Findings of Noncompliance Verified as Corrected</b>	<b>Findings Not Yet Verified as Corrected</b>
FFY 2016	1	1	0
FFY 2013	1	0	1

**FFY 2016**

**Findings of Noncompliance Verified as Corrected**

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

Based on an analysis of local contributing factors and the extent of noncompliance, the FSEIP 7 was issued a state-developed Correction Action Plan (CAP) to address timely delivery of services. This corrective action plan focused on ensuring correction of all instances of identified noncompliance (Prong I) and activities to address root causes of noncompliance, mostly related to provider issues (e.g., recruitment of additional providers and better utilization of providers to balance caseloads). The FSEIP 7 submitted to the State evidence of correction of all instances of noncompliance (Prong I) and documentation of completion of all CAP activities to address root causes of noncompliance. This evidence was reviewed and verified by the MSFSEIP.

Subsequently, the MSFSEIP pulled and reviewed one month of data for FSEIP 7, including all records with services due (N=10). The MSFSEIP verified all services (100%) reviewed, after the CAP activities were completed, met the state definition of timely services (Prong II). Based on follow-up record reviews, Local FSEIP 7 was found in compliance with providing services in a timely manner.

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

The MSFSEIP verified that Local FSEIP 7 corrected each individual case of noncompliance. In all instances, all services documented on the IFSP were verified as having started using records from providers and updated documentation in the Child Registry (data system).

**FFY 2016**

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

**Actions taken if noncompliance not corrected**

XXX

**FFY 2013**

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

**FFY 2013**

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

**Actions taken if noncompliance not corrected**

Local FSEIP 5 has not provided evidence of correction of Prong II of noncompliance for the Timely Provision of Services. Throughout FFY2018, the State personnel provided intensive technical assistance and monitoring of Local FSEIP 5 to address provider shortages, Service Coordination supervision, and appropriate documentation. Individual file reviews and guidance was provided by State personnel and an assigned QTA to the Local FSEIP 5 Program Coordinator and Service Coordinators. As of January 1, 2020, a MSFSEIP staff member was reassigned as the Local FSEIP 5 Program Coordinator to address ongoing issues of noncompliance, including the Timely Provision of Services.

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

XXX

**1 - Prior FFY Required Actions**

None

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

**1 - OSEP Response**

The State did not demonstrate that the EIS program or provider corrected the findings of noncompliance identified in FY 2016 because it did not report that it verified correction of those findings, consistent with the requirements in OSEP Memo 09-02. Specifically, the State did not report that it verified that each EIS program or provider with noncompliance identified in FFY 2016: (1) is correctly implementing the specific

regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider.

The State did not provide the reasons for delay, as required by the measurement table.

**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 ED Facts 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

### Historical Data

Baseline	2005	97.00%			
FFY	2013	2014	2015	2016	2017
Target $\geq$	95.00%	95.00%	95.00%	95.00%	95.00%
Data	94.34%	93.22%	91.30%	89.71%	88.86%

### Targets

FFY	2018	2019
Target $\geq$ =	95.00%	95.00%

### Targets: Description of Stakeholder Input

The MSFSEIP has multiple avenues to engage stakeholders in advising the program. The State Interagency Coordinating Council (SICC), including SSIP Stakeholders, meets quarterly for a public meeting and more frequently for workgroup activities. The SICC is comprised of parents, service providers, state agency representatives from Health, Education, Human Services, Child Protective Services, Medicaid, and Insurance, representatives from Head Start, the Institute of Higher Learning (IHL), University programs, and advocacy groups, and other community leaders.

On November 14, 2014, the SICC assisted the MSFSEIP in setting the FFY2014-FFY2018 APR targets for Indicators 2, 3, and 4:

Indicator 2: Natural Environment target to set to remain at 95% for FFY2014-FFY2018.

Indicator 3: Child Outcomes:

Summary Statement 1 for Outcomes A - C targets were set to remain at 85% for FFY2014-FFY2018.

Summary Statement 2 for Outcomes A - C targets were set as follow:

A2 – 65% for FFY2014-FFY2018

B2 – 63% for FFY2014-FFY2015

B2 – 64% for FFY2016

B2 – 64.5% for FFY2017

B2 – 65% for FFY2018

C2 – 63% for FFY2014-FFY2015

C2 – 63.5% for FFY2016

C2 – 64% for FFY2017-FFY2018

Indicator 4: Family Survey targets were set at 92% for FFY2014-FFY2018.

On February 13, 2015, the SICC assisted the MSFSEIP in setting APR targets for Indicators 5 and 6:

Indicator 5: Child Find 0-1 target was set as follows:

For FFY2014, the target was set at 0.61%

For FFY2015, the target was set at 0.62%

For FFY2016, the target was set at 0.63%

For FFY2017, the target was set at 0.64%

For FFY2018, the target was set at 0.65%

Indicator 6: Child Find 0-3 target was as follows:

For FFY2014, the target was set at 1.72%

For FFY2015, the target was set at 1.74%

For FFY2016, the target was set at 1.76%

For FFY2017, the target was set at 1.78%

For FFY2018, the target was set at 1.80%

In both meetings, the SICC reviewed historical targets and performance data trends for Mississippi and national averages. The Stakeholders discussed emerging issues in the MSFSEIP and assisted in setting "ambitious but realistic" targets for the MSFSEIP for the next six-year grant cycle.

On October 25, 2019 the SICC assisted the MSFSEIP in setting the FFY2018-FFY2019 APR targets for Indicators 2, 3, 4 5, and 6:

Indicator 2: Natural Environment target to set to 95%.

Indicator 3: Child Outcomes:

Summary Statement 1 targets were set as follows:

A (positive social-emotional skills) - 85%

B (acquisition and use of knowledge and skills) - 85%

C (use of appropriate behaviors to meet their needs) - 85%

Summary Statement 2 targets were set as follows:

A (positive social-emotional skills) - 65%

B (acquisition and use of knowledge and skills) - 65%

C (use of appropriate behaviors to meet their needs) - 64%

Indicator 4: Family Survey targets were set to remain at 92%.

Indicator 5: Child Find 0-1 target was set at 0.68%.

Indicator 6: Child Find 0-3 target was set at 1.84%.

In addition at the October 25, 2019 meeting, the SSIP Stakeholders reviewed the overall SSIP Theory of Action and planned activities to improve infrastructure and implement evidence-based practices. The Stakeholders evaluated the current progress and determined the planned activities for the coming year should be continued, specifically focusing on new infrastructure, i.e., data system and professional development system, and continued implementation of evidence-based practices, until fidelity is met.

The Mississippi First Steps Program met with its SICC members on November 14, 2014 and October 25, 2019 and set targets for the Natural Environment. Targets were set at 95% for 2014 - 2018 and 90% for 2019. These targets are based on historical data and the State's capacity to serve children in the Natural Environment.

## **Prepopulated Data**

Source	Date	Description	Data
SY 2018-19 Child Count/Educational Environment Data Groups	07/10/2019	Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	1,896
SY 2018-19 Child Count/Educational Environment Data Groups	07/10/2019	Total number of infants and toddlers with IFSPs	2,150

**FFY 2018 SPP/APR Data**

Number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	Total number of Infants and toddlers with IFSPs	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
1,896	2,150	88.86%	95.00%	88.19%	Did Not Meet Target	No Slippage

**Provide reasons for slippage, if applicable**

XXX

**Provide additional information about this indicator (optional)**

**2 - Prior FFY Required Actions**

None

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

**2 - OSEP Response**

The State revised its target for FFY 2018 and provided a target for FFY 2019 for this indicator, but OSEP cannot accept the FFY 2019 target because the State's end target for FFY 2019 does not reflect improvement over the baseline data. The State must revise its FFY 2019 target to reflect improvement.

**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 reach a level comparable to same-aged peers = [(# of infants and toddlers who improved functioning to reach a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.
- e. Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers = [(# of infants and toddlers who maintained functioning at a level comparable to same-aged peers) divided by (# of infants and toddlers with IFSPs assessed)] times 100.

Summary Statements for Each of the Three Outcomes:

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

#### **Measurement for Summary Statement 1:**

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

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

#### **Measurement for Summary Statement 2:**

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

### **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

### **Targets: Description of Stakeholder Input**

The MSFSEIP has multiple avenues to engage stakeholders in advising the program. The State Interagency Coordinating Council (SICC), including SSIP Stakeholders, meets quarterly for a public meeting and more frequently for workgroup activities. The SICC is comprised of parents, service providers, state agency representatives from Health, Education, Human Services, Child Protective Services, Medicaid, and Insurance, representatives from Head Start, the Institute of Higher Learning (IHL), University programs, and advocacy groups, and other community leaders.

On November 14, 2014, the SICC assisted the MSFSEIP in setting the FFY2014-FFY2018 APR targets for

Indicators 2, 3, and 4:

Indicator 2: Natural Environment target to set to remain at 95% for FFY2014-FFY2018.

Indicator 3: Child Outcomes:

Summary Statement 1 for Outcomes A - C targets were set to remain at 85% for FFY2014-FFY2018.

Summary Statement 2 for Outcomes A - C targets were set as follow:

A2 – 65% for FFY2014-FFY2018

B2 – 63% for FFY2014-FFY2015

B2 – 64% for FFY2016

B2 – 64.5% for FFY2017

B2 – 65% for FFY2018

C2 – 63% for FFY2014-FFY2015

C2 – 63.5% for FFY2016

C2 – 64% for FFY2017-FFY2018

Indicator 4: Family Survey targets were set at 92% for FFY2014-FFY2018.

On February 13, 2015, the SICC assisted the MSFSEIP in setting APR targets for Indicators 5 and 6:

Indicator 5: Child Find 0-1 target was set as follows:

For FFY2014, the target was set at 0.61%

For FFY2015, the target was set at 0.62%

For FFY2016, the target was set at 0.63%

For FFY2017, the target was set at 0.64%

For FFY2018, the target was set at 0.65%

Indicator 6: Child Find 0-3 target was as follows:

For FFY2014, the target was set at 1.72%

For FFY2015, the target was set at 1.74%

For FFY2016, the target was set at 1.76%

For FFY2017, the target was set at 1.78%

For FFY2018, the target was set at 1.80%

In both meetings, the SICC reviewed historical targets and performance data trends for Mississippi and national averages. The Stakeholders discussed emerging issues in the MSFSEIP and assisted in setting "ambitious but realistic" targets for the MSFSEIP for the next six-year grant cycle.

On October 25, 2019 the SICC assisted the MSFSEIP in setting the FFY2018-FFY2019 APR targets for Indicators 2, 3, 4 5, and 6:

Indicator 2: Natural Environment target to set to 95%.

Indicator 3: Child Outcomes:

Summary Statement 1 targets were set as follows:

A (positive social-emotional skills) - 85%

B (acquisition and use of knowledge and skills) - 85%

C (use of appropriate behaviors to meet their needs) - 85%

Summary Statement 2 targets were set as follows:

A (positive social-emotional skills) - 65%

B (acquisition and use of knowledge and skills) - 65%

C (use of appropriate behaviors to meet their needs) - 64%

Indicator 4: Family Survey targets were set to remain at 92%.

Indicator 5: Child Find 0-1 target was set at 0.68%.

Indicator 6: Child Find 0-3 target was set at 1.84%.

In addition at the October 25, 2019 meeting, the SSIP Stakeholders reviewed the overall SSIP Theory of Action and planned activities to improve infrastructure and implement evidence-based practices. The Stakeholders

evaluated the current progress and determined the planned activities for the coming year should be continued, specifically focusing on new infrastructure, i.e., data system and professional development system, and continued implementation of evidence-based practices, until fidelity is met.

The Mississippi First Steps Program met with its SICC members on November 14, 2014 and October 25, 2019 and set targets for Childhood Outcomes. Targets for Summary Statement 1 for Outcomes A-C were set at 85% and Summary Statement 2 for Outcomes were adjusted to 63% for 2014 - 2018. Targets for 2019 were set at Summary Statement 1 for Outcomes A and B to 80% and C to 82.5%. For Summary Statement 2 Outcomes A and B set at 55% and C was set at 58%. These targets are based on the number of children that exited the program and were not meeting age expectation, the population of children with medical conditions that have a high probability of slowly progressing, target data of other states, and setting ambitious but realistic targets for the percentage of children who exit Part C meeting age expectations according to the stakeholders.

### Historical Data

	Baseline	FFY	2013	2014	2015	2016	2017
<b>A1</b>	2013	Target>= =	84.69%	85.00%	85.00%	85.00%	85.00%
<b>A1</b>	84.69%	Data	84.69%	83.74%	79.05%	77.78%	81.28%
<b>A2</b>	2013	Target>= =	64.46%	65.00%	65.00%	65.00%	65.00%
<b>A2</b>	64.46%	Data	64.46%	62.71%	65.45%	61.53%	60.22%
<b>B1</b>	2013	Target>= =	84.18%	85.00%	85.00%	85.00%	85.00%
<b>B1</b>	84.18%	Data	84.18%	80.80%	81.05%	77.92%	80.69%
<b>B2</b>	2013	Target>= =	62.25%	63.00%	63.00%	64.00%	64.50%
<b>B2</b>	62.65%	Data	62.65%	61.49%	61.23%	57.18%	53.04%
<b>C1</b>	2013	Target>= =	84.25%	85.00%	85.00%	85.00%	85.00%
<b>C1</b>	84.25%	Data	84.25%	83.99%	83.67%	80.80%	80.98%
<b>C2</b>	2013	Target>= =	61.36%	63.00%	63.00%	63.50%	64.00%
<b>C2</b>	61.36%	Data	61.36%	63.77%	61.56%	56.99%	55.43%

### Targets

FFY	2018	2019
Target A1>=	85.00%	85.00%
Target A2>=	65.00%	65.00%
Target B1>=	85.00%	85.00%

Target B2>=	65.00%	65.00%
Target C1>=	85.00%	85.00%
Target C2>=	64.00%	64.00%

**FFY 2018 SPP/APR Data**

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

1,349

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

	<b>Number of children</b>	<b>Percentage of Total</b>
a. Infants and toddlers who did not improve functioning	14	1.04%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	178	13.19%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	326	24.17%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	460	34.10%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	371	27.50%

	<b>Numerator</b>	<b>Denominator</b>	<b>FFY 2017 Data</b>	<b>FFY 2018 Target</b>	<b>FFY 2018 Data</b>	<b>Status</b>	<b>Slippage</b>
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	786	978	81.28%	85.00%	80.37%	Did Not Meet Target	No Slippage
A2. The percent of infants and toddlers who were functioning within age expectations in Outcome A by the time they turned 3 years of age or exited the program	831	1,349	60.22%	65.00%	61.60%	Did Not Meet Target	No Slippage

**Provide reasons for A1 slippage, if applicable**

XXX

**Provide reasons for A2 slippage, if applicable**

XXX

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

	<b>Number of Children</b>	<b>Percentage of Total</b>
a. Infants and toddlers who did not improve functioning	13	0.96%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	165	12.23%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	459	34.03%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	466	34.54%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	246	18.24%

	<b>Numerator</b>	<b>Denominator</b>	<b>FFY 2017 Data</b>	<b>FFY 2018 Target</b>	<b>FFY 2018 Data</b>	<b>Status</b>	<b>Slippage</b>
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	925	1,103	80.69%	85.00%	83.86%	Did Not Meet Target	No Slippage
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	712	1,349	53.04%	65.00%	52.78%	Did Not Meet Target	No Slippage

**Provide reasons for B1 slippage, if applicable**

XXX

**Provide reasons for B2 slippage, if applicable**

XXX

**Outcome C: Use of appropriate behaviors to meet their needs**

	<b>Number of Children</b>	<b>Percentage of Total</b>
a. Infants and toddlers who did not improve functioning	14	1.04%
b. Infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	202	14.97%
c. Infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it	381	28.24%
d. Infants and toddlers who improved functioning to reach a level comparable to same-aged peers	500	37.06%
e. Infants and toddlers who maintained functioning at a level comparable to same-aged peers	252	18.68%

	<b>Numerator</b>	<b>Denominator</b>	<b>FFY 2017 Data</b>	<b>FFY 2018 Target</b>	<b>FFY 2018 Data</b>	<b>Status</b>	<b>Slippage</b>
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	881	1,097	80.98%	85.00%	80.31%	Did Not Meet Target	No Slippage
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	752	1,349	55.43%	64.00%	55.74%	Did Not Meet Target	No Slippage

**Provide reasons for C1 slippage, if applicable**

XXX

**Provide reasons for C2 slippage, if applicable**

XXX

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

The number of infants and toddlers who exited the Part C program during the reporting period, as reported in the State's part C exiting 618 data	2,106
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.	180

	Yes / No
Was sampling used?	NO
Has your previously-approved sampling plan changed?	
If the plan has changed, please provide sampling plan.	

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

**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.”**

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

Each child's evaluation team, including the Service Coordinator and parent, uses assessment data collected at entry to determine child outcomes ratings using the Early Childhood Outcomes Center (ECO) Child Outcomes Summary (COS) process. At exit, the child's IFSP team, including the Service Coordinator and parent, uses results of ongoing assessments data collected at exit to determine child outcomes ratings using the Early Childhood Outcomes Center (ECO) Child Outcomes Summary (COS) process

**Provide additional information about this indicator (optional)**

### **3 - Prior FFY Required Actions**

None

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

### **3 - OSEP Response**

The State provided targets for FFY 2019 for this indicator, but OSEP cannot accept the targets because the State's end target for FFY 2019 does not reflect improvement over the baseline data. The State must revise its FFY 2019 target to reflect improvement.

### **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

	Baseline	FFY	2013	2014	2015	2016	2017
A	2006	Target >=	92.00%	92.00%	92.00%	92.00%	92.00%
A	84.00%	Data	88.25%	90.70%	86.84%	89.33%	91.85%
B	2006	Target >=	92.00%	92.00%	92.00%	92.00%	92.00%
B	87.00%	Data	89.72%	92.87%	87.80%	90.97%	93.01%
C	2006	Target >=	92.00%	92.00%	92.00%	92.00%	92.00%
C	88.00%	Data	88.25%	89.30%	86.63%	90.27%	89.80%

##### Targets

FFY	2018	2019
Target A>=	92.00%	92.00%
Target B>=	92.00%	92.00%
Target C>=	92.00%	92.00%

##### Targets: Description of Stakeholder Input

The MSFSEIP has multiple avenues to engage stakeholders in advising the program. The State Interagency Coordinating Council (SICC), including SSIP Stakeholders, meets quarterly for a public meeting and more frequently for workgroup activities. The SICC is comprised of parents, service providers, state agency representatives from Health, Education, Human Services, Child Protective Services, Medicaid, and Insurance, representatives from Head Start, the Institute of Higher Learning (IHL), University programs, and advocacy groups, and other community leaders.

On November 14, 2014, the SICC assisted the MSFSEIP in setting the FFY2014-FFY2018 APR targets for Indicators 2, 3, and 4:

Indicator 2: Natural Environment target to set to remain at 95% for FFY2014-FFY2018.

Indicator 3: Child Outcomes:

Summary Statement 1 for Outcomes A - C targets were set to remain at 85% for FFY2014-FFY2018.

Summary Statement 2 for Outcomes A - C targets were set as follow:

A2 – 65% for FFY2014-FFY2018

B2 – 63% for FFY2014-FFY2015

B2 – 64% for FFY2016

B2 – 64.5% for FFY2017

B2 – 65% for FFY2018

C2 – 63% for FFY2014-FFY2015

C2 – 63.5% for FFY2016

C2 – 64% for FFY2017-FFY2018

Indicator 4: Family Survey targets were set at 92% for FFY2014-FFY2018.

On February 13, 2015, the SICC assisted the MSFSEIP in setting APR targets for Indicators 5 and 6:

Indicator 5: Child Find 0-1 target was set as follows:

For FFY2014, the target was set at 0.61%

For FFY2015, the target was set at 0.62%

For FFY2016, the target was set at 0.63%

For FFY2017, the target was set at 0.64%

For FFY2018, the target was set at 0.65%

Indicator 6: Child Find 0-3 target was as follows:

For FFY2014, the target was set at 1.72%

For FFY2015, the target was set at 1.74%

For FFY2016, the target was set at 1.76%

For FFY2017, the target was set at 1.78%

For FFY2018, the target was set at 1.80%

In both meetings, the SICC reviewed historical targets and performance data trends for Mississippi and national averages. The Stakeholders discussed emerging issues in the MSFSEIP and assisted in setting "ambitious but realistic" targets for the MSFSEIP for the next six-year grant cycle.

On October 25, 2019 the SICC assisted the MSFSEIP in setting the FFY2018-FFY2019 APR targets for Indicators 2, 3, 4 5, and 6:

Indicator 2: Natural Environment target to set to 95%.

Indicator 3: Child Outcomes:

Summary Statement 1 targets were set as follows:

A (positive social-emotional skills) - 85%

B (acquisition and use of knowledge and skills) - 85%

C (use of appropriate behaviors to meet their needs) - 85%

Summary Statement 2 targets were set as follows:

A (positive social-emotional skills) - 65%

B (acquisition and use of knowledge and skills) - 65%

C (use of appropriate behaviors to meet their needs) - 64%

Indicator 4: Family Survey targets were set to remain at 92%.

Indicator 5: Child Find 0-1 target was set at 0.68%.

Indicator 6: Child Find 0-3 target was set at 1.84%.

In addition at the October 25, 2019 meeting, the SSIP Stakeholders reviewed the overall SSIP Theory of Action and planned activities to improve infrastructure and implement evidence-based practices. The Stakeholders evaluated the current progress and determined the planned activities for the coming year should be continued, specifically focusing on new infrastructure, i.e., data system and professional development system, and continued implementation of evidence-based practices, until fidelity is met.

#### **FFY 2018 SPP/APR Data**

The number of families to whom surveys were distributed	1,573
Number of respondent families participating in Part C	577

A1. Number of respondent families participating in Part C who report that early intervention services have helped the family know their rights	520
A2. Number of responses to the question of whether early intervention services have helped the family know their rights	577
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	521
B2. Number of responses to the question of whether early intervention services have helped the family effectively communicate their children's needs	577
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	514
C2. Number of responses to the question of whether early intervention services have helped the family help their children develop and learn	577

	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
A. Percent of families participating in Part C who report that early intervention services have helped the family know their rights (A1 divided by A2)	91.85%	92.00%	90.12%	Did Not Meet Target	Slippage
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)	93.01%	92.00%	90.29%	Did Not Meet Target	Slippage
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)	89.80%	92.00%	89.08%	Did Not Meet Target	No Slippage

**Provide reasons for part A slippage, if applicable**

In FFY2018, the MSFSEIP had a continued increase in the number of referrals and active cases while simultaneously experiencing increased rates of turnover among Service Coordinators resulting in significant increases in caseloads. As a result, families experienced less frequent contacts and shorter visits with Service Coordinators and/or were reassigned Service Coordinators during the year. Therefore, fewer families reported early intervention helped them know their rights.

**Provide reasons for part B slippage, if applicable**

In FFY2018, the MSFSEIP had a continued increase in the number of referrals and active cases while simultaneously experiencing increased rates of turnover among Service Coordinators resulting in significant increases in caseloads. As a result, families experienced less frequent contacts and shorter visits with Service Coordinators and/or were reassigned Service Coordinators during the year. Therefore, fewer families reported early intervention helped them communicate their children's needs.

**Provide reasons for part C slippage, if applicable**

XXX

	Yes / No
Was sampling used?	NO
If yes, has your previously-approved sampling plan changed?	
If the plan has changed, please provide the sampling plan.	

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

	Yes / No
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	XXX
The demographics of the families responding are representative of the demographics of infants, toddlers, and families enrolled in the Part C program.	NO

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

The State over the past several years has attempted to revise the method that the surveys are distributed and time frame that they are collected. The State is in the process of developing a new data system which will be active July 1, 2020, this new data system will allow the State to send out surveys twice a year instead of a once a year. The new process will allow the State to survey more families through out the fiscal year.

**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.**

See Mississippi Family Survey chart

**Provide additional information about this indicator (optional)**

#### **4 - Prior FFY Required Actions**

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

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

The State FFY 2018 response rate is not representative of the population. The State is in the process of developing a new data system which will be active July 1, 2020, this new data system will allow the State to send out surveys twice a year instead of a once a year. The new process will allow the State to survey more families.

#### **4 - OSEP Response**

The State provided targets for FFY 2019 for this indicator, and OSEP accepts those targets.

The State did not provide verification that the attachment it included in its FFY 2018 SPP/APR submission is in compliance with Section 508 of the Rehabilitation Act of 1973, as amended (Section 508), as required by Section 508 and noted in the FFY 2018 SPP/APR User Guides and technical webinar.

#### **4 - Required Actions**

## 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 ED Facts Metadata and Process System (EMAPS)) and Census (for the denominator).

### Measurement

Percent = [(# of infants and toddlers birth to 1 with IFSPs) divided by the (population of infants and toddlers birth to 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 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

<b>Baseline</b>	2005	0.53%			
<b>FFY</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Target >=	0.60%	0.61%	0.62%	0.63%	0.64%
Data	0.64%	0.62%	0.57%	0.65%	0.85%

### Targets

<b>FFY</b>	<b>2018</b>	<b>2019</b>
Target >=	0.65%	0.66%

### Targets: Description of Stakeholder Input

The MSFSEIP has multiple avenues to engage stakeholders in advising the program. The State Interagency Coordinating Council (SICC), including SSIP Stakeholders, meets quarterly for a public meeting and more frequently for workgroup activities. The SICC is comprised of parents, service providers, state agency representatives from Health, Education, Human Services, Child Protective Services, Medicaid, and Insurance, representatives from Head Start, the Institute of Higher Learning (IHL), University programs, and advocacy groups, and other community leaders.

On November 14, 2014, the SICC assisted the MSFSEIP in setting the FFY2014-FFY2018 APR targets for Indicators 2, 3, and 4:

Indicator 2: Natural Environment target to set to remain at 95% for FFY2014-FFY2018.

Indicator 3: Child Outcomes:

Summary Statement 1 for Outcomes A - C targets were set to remain at 85% for FFY2014-FFY2018.

Summary Statement 2 for Outcomes A - C targets were set as follow:

A2 – 65% for FFY2014-FFY2018

B2 – 63% for FFY2014-FFY2015

B2 – 64% for FFY2016  
B2 – 64.5% for FFY2017  
B2 – 65% for FFY2018  
C2 – 63% for FFY2014-FFY2015  
C2 – 63.5% for FFY2016  
C2 – 64% for FFY2017-FFY2018  
Indicator 4: Family Survey targets were set at 92% for FFY2014-FFY2018.

On February 13, 2015, the SICC assisted the MSFSEIP in setting APR targets for Indicators 5 and 6:

Indicator 5: Child Find 0-1 target was set as follows:

For FFY2014, the target was set at 0.61%  
For FFY2015, the target was set at 0.62%  
For FFY2016, the target was set at 0.63%  
For FFY2017, the target was set at 0.64%  
For FFY2018, the target was set at 0.65%

Indicator 6: Child Find 0-3 target was as follows:

For FFY2014, the target was set at 1.72%  
For FFY2015, the target was set at 1.74%  
For FFY2016, the target was set at 1.76%  
For FFY2017, the target was set at 1.78%  
For FFY2018, the target was set at 1.80%

In both meetings, the SICC reviewed historical targets and performance data trends for Mississippi and national averages. The Stakeholders discussed emerging issues in the MSFSEIP and assisted in setting "ambitious but realistic" targets for the MSFSEIP for the next six-year grant cycle.

On October 25, 2019 the SICC assisted the MSFSEIP in setting the FFY2018-FFY2019 APR targets for Indicators 2, 3, 4 5, and 6:

Indicator 2: Natural Environment target to set to 95%.

Indicator 3: Child Outcomes:

Summary Statement 1 targets were set as follows:

A (positive social-emotional skills) - 85%  
B (acquisition and use of knowledge and skills) - 85%  
C (use of appropriate behaviors to meet their needs) - 85%

Summary Statement 2 targets were set as follows:

A (positive social-emotional skills) - 65%  
B (acquisition and use of knowledge and skills) - 65%  
C (use of appropriate behaviors to meet their needs) - 64%

Indicator 4: Family Survey targets were set to remain at 92%.

Indicator 5: Child Find 0-1 target was set at 0.68%.

Indicator 6: Child Find 0-3 target was set at 1.84%.

In addition at the October 25, 2019 meeting, the SSIP Stakeholders reviewed the overall SSIP Theory of Action and planned activities to improve infrastructure and implement evidence-based practices. The Stakeholders evaluated the current progress and determined the planned activities for the coming year should be continued, specifically focusing on new infrastructure, i.e., data system and professional development system, and continued implementation of evidence-based practices, until fidelity is met.

Indicator 5 data was not available to present to stakeholders during the November 14, 2014, meeting; therefore, State Staff adjusted targets to reflect the change made to the eligibility criteria in 2011. (i.e., changed from 25% in one or more area to a 33% delay in one area and 25% delay in two or more areas). These targets were presented to the SICC the next meeting held on February 13, 2015. Based on the input provided by the

stakeholders, these targets were accepted. Targets for 2019 were presented to stakeholders on October 25, 2019 and were set at .66%.

**Prepopulated Data**

Source	Date	Description	Data
SY 2018-19 Child Count/Educational Environment Data Groups	07/10/2019	Number of infants and toddlers birth to 1 with IFSPs	330
Annual State Resident Population Estimates for 6 Race Groups (5 Race Alone Groups and Two or More Races) by Age, Sex, and Hispanic Origin	06/20/2019	Population of infants and toddlers birth to 1	35,878

**FFY 2018 SPP/APR Data**

Number of infants and toddlers birth to 1 with IFSPs	Population of infants and toddlers birth to 1	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
330	35,878	0.85%	0.65%	0.92%	Met Target	No Slippage

**Provide reasons for slippage, if applicable**

XXX

**Compare your results to the national data**

State Number served birth to 1 year ----- Number birth to 1 year in the population Percentage birth to 1 year population (%)

Mississippi ---- 330 ----- 35,878-----  
 --- 0.92  
 National ----- 47,949 ----- 3,848,208-----  
 ----- 1.25

**Provide additional information about this indicator (optional)**

**5 - Prior FFY Required Actions**

None

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

**5 - OSEP Response**

The State provided a target for FFY 2019 for this indicator, and OSEP accepts that target.

**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 ED Facts Metadata and Process System (*EMAPS*)) and Census (for the denominator).

### Measurement

Percent = [(# of infants and toddlers birth to 3 with IFSPs) divided by the (population of infants and toddlers birth to 3)] 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.

## 6 - Indicator Data

<b>Baseline</b>	2005	1.36%			
<b>FFY</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Target >=	1.70%	1.72%	1.74%	1.76%	1.78%
Data	1.73%	1.69%	1.72%	1.73%	1.85%

### Targets

<b>FFY</b>	<b>2018</b>	<b>2019</b>
Target >=	1.80%	1.82%

### Targets: Description of Stakeholder Input

The MSFSEIP has multiple avenues to engage stakeholders in advising the program. The State Interagency Coordinating Council (SICC), including SSIP Stakeholders, meets quarterly for a public meeting and more frequently for workgroup activities. The SICC is comprised of parents, service providers, state agency representatives from Health, Education, Human Services, Child Protective Services, Medicaid, and Insurance, representatives from Head Start, the Institute of Higher Learning (IHL), University programs, and advocacy groups, and other community leaders.

On November 14, 2014, the SICC assisted the MSFSEIP in setting the FFY2014-FFY2018 APR targets for Indicators 2, 3, and 4:

Indicator 2: Natural Environment target to set to remain at 95% for FFY2014-FFY2018.

Indicator 3: Child Outcomes:

Summary Statement 1 for Outcomes A - C targets were set to remain at 85% for FFY2014-FFY2018.

Summary Statement 2 for Outcomes A - C targets were set as follow:

A2 – 65% for FFY2014-FFY2018

B2 – 63% for FFY2014-FFY2015

B2 – 64% for FFY2016

B2 – 64.5% for FFY2017

B2 – 65% for FFY2018

C2 – 63% for FFY2014-FFY2015

C2 – 63.5% for FFY2016

C2 – 64% for FFY2017-FFY2018

Indicator 4: Family Survey targets were set at 92% for FFY2014-FFY2018.

On February 13, 2015, the SICC assisted the MSFSEIP in setting APR targets for Indicators 5 and 6:

Indicator 5: Child Find 0-1 target was set as follows:

For FFY2014, the target was set at 0.61%

For FFY2015, the target was set at 0.62%

For FFY2016, the target was set at 0.63%

For FFY2017, the target was set at 0.64%

For FFY2018, the target was set at 0.65%

Indicator 6: Child Find 0-3 target was as follows:

For FFY2014, the target was set at 1.72%

For FFY2015, the target was set at 1.74%

For FFY2016, the target was set at 1.76%

For FFY2017, the target was set at 1.78%

For FFY2018, the target was set at 1.80%

In both meetings, the SICC reviewed historical targets and performance data trends for Mississippi and national averages. The Stakeholders discussed emerging issues in the MSFSEIP and assisted in setting "ambitious but realistic" targets for the MSFSEIP for the next six-year grant cycle.

On October 25, 2019 the SICC assisted the MSFSEIP in setting the FFY2018-FFY2019 APR targets for Indicators 2, 3, 4 5, and 6:

Indicator 2: Natural Environment target to set to 95%.

Indicator 3: Child Outcomes:

Summary Statement 1 targets were set as follows:

A (positive social-emotional skills) - 85%

B (acquisition and use of knowledge and skills) - 85%

C (use of appropriate behaviors to meet their needs) - 85%

Summary Statement 2 targets were set as follows:

A (positive social-emotional skills) - 65%

B (acquisition and use of knowledge and skills) - 65%

C (use of appropriate behaviors to meet their needs) - 64%

Indicator 4: Family Survey targets were set to remain at 92%.

Indicator 5: Child Find 0-1 target was set at 0.68%.

Indicator 6: Child Find 0-3 target was set at 1.84%.

In addition at the October 25, 2019 meeting, the SSIP Stakeholders reviewed the overall SSIP Theory of Action and planned activities to improve infrastructure and implement evidence-based practices. The Stakeholders evaluated the current progress and determined the planned activities for the coming year should be continued, specifically focusing on new infrastructure, i.e., data system and professional development system, and continued implementation of evidence-based practices, until fidelity is met.

Indicator 6 data was not available to present to stakeholders during the November 14, 2014, meeting; therefore, State Staff adjusted targets to reflect the change made to the eligibility criteria in 2011. (i.e., changed from 25% in one or more area to a 33% delay in one area and 25% delay in two or more areas). These targets were presented to the SICC the next meeting held on February 13, 2015. Based on the input provided by the

stakeholders, these targets were accepted. Targets for 2019 was presented to stakeholders on October 25, 2019 and was set at 1.82%.

**Prepopulated Data**

Source	Date	Description	Data
SY 2018-19 Child Count/Educational Environment Data Groups	07/10/2019	Number of infants and toddlers birth to 3 with IFSPs	2,150
Annual State Resident Population Estimates for 6 Race Groups (5 Race Alone Groups and Two or More Races) by Age, Sex, and Hispanic Origin	06/20/2019	Population of infants and toddlers birth to 3	110,134

**FFY 2018 SPP/APR Data**

Number of infants and toddlers birth to 3 with IFSPs	Population of infants and toddlers birth to 3	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
2,150	110,134	1.85%	1.80%	1.95%	Met Target	No Slippage

**Provide reasons for slippage, if applicable**

XXX

**Compare your results to the national data**

State -----# served birth through age ----# birth through age 2 in the population ----% birth through age 2 population (%)  
 Mississippi -----2,150 -----110,134 -----  
 -----1.95  
 National ----- 409,315 -----11,752,545 -----  
 -----3.48

**Provide additional information about this indicator (optional)**

**6 - Prior FFY Required Actions**

None

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

**6 - OSEP Response**

The State provided a target for FFY 2019 for this indicator, and OSEP accepts that target.

**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

<b>Baseline</b>	2005	88.00%			
<b>FFY</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Target	100%	100%	100%	100%	100%
Data	96.81%	95.65%	94.78%	95.80%	96.18%

**Targets**

FFY	2018	2019
Target	100%	100%

**FFY 2018 SPP/APR Data**

Number of eligible infants and toddlers with IFSPs for whom an initial evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline	Number of eligible infants and toddlers evaluated and assessed for whom an initial IFSP meeting was required to be conducted	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
1,444	2,064	96.18%	100%	89.73%	Did Not Meet Target	Slippage

**Provide reasons for slippage, if applicable**

The program had a delay in getting contracts with providers done and approved by July 1, 2018. This delay resulted in a delay in evaluation being completed within the 45 day timeline.

**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.

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

State database

**Describe the method used to select EIS programs for monitoring.**

XXX

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

July 1, 2018 - June 30, 2019

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

This report includes the complete data for infants and toddlers with IFSPs covering the entire reporting period from July 1, 2018 - June 30, 2019.

**Provide additional information about this indicator (optional)**

The State had 212 instances of missed timelines due to system-based issues. Most delays in Local FSEIP 5, 8, and 9 were related to significant provider shortages. Other Local FSEIPs, which also have some provider shortages, mainly experienced delays early in the fiscal year related to the failure to implement contracts with providers by July 1, 2018 (see Introduction).

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

<b>Findings of Noncompliance Identified</b>	<b>Findings of Noncompliance Verified as Corrected Within One Year</b>	<b>Findings of Noncompliance Subsequently Corrected</b>	<b>Findings Not Yet Verified as Corrected</b>
7			7

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

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

All cases that caused the non compliance have been addressed and fixed. Programs had to submit a new Correction of Action Plan to address continued noncompliance.

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

<b>Year Findings of Noncompliance Were Identified</b>	<b>Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2017 APR</b>	<b>Findings of Noncompliance Verified as Corrected</b>	<b>Findings Not Yet Verified as Corrected</b>

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

XXX

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

XXX

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

XXX

**7 - Prior FFY Required Actions**

None

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

**7 - OSEP Response**

The State did not provide the reasons for delay, as required by the measurement table.

**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**

<b>Baseline</b>	2005	83.00%			
<b>FFY</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Target	100%	100%	100%	100%	100%
Data	98.20%	98.49%	93.58%	97.32%	96.73%

**Targets**

<b>FFY</b>	<b>2018</b>	<b>2019</b>
Target	100%	100%

**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.**

Number of children exiting Part C who have an IFSP with transition steps and services	Number of toddlers with disabilities exiting Part C	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
1,030	1,103	96.73%	100%	96.01%	Did Not Meet Target	No Slippage

**Provide reasons for slippage, if applicable**

XXX

**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.

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

State database

**Describe the method used to select EIS programs for monitoring.**

XXX

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

July 1, 2018 - June 30, 2019

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

This report includes the complete data for infants and toddlers with IFSPs covering the entire reporting period from July 1, 2018 - June 30, 2019.

**Provide additional information about this indicator (optional)**

Local FSEIP 5 was significantly understaffed and FSEIP 8 and 9 experienced high Service Coordinator turnover. Inadequate staffing resulted in delays in the development of timely transition plans with steps and services.

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

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
4			4

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

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

All children for whom their cases were identified for noncompliance have aged out of the EIP. Local FSEIPs with findings were required to review root causes of noncompliance and to submit/update a Correction Action Plan to address issues leading to noncompliance.

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

<b>Year Findings of Noncompliance Were Identified</b>	<b>Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2017 APR</b>	<b>Findings of Noncompliance Verified as Corrected</b>	<b>Findings Not Yet Verified as Corrected</b>

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

XXX

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

XXX

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

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

## **Actions taken if noncompliance not corrected**

XXX

### **8A - Prior FFY Required Actions**

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

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

In FFY2016, the MSFSEIP did identify and make findings of noncompliance in Local FSEIP 7 related to Indicator 8A (Steps and Services). Based on an analysis of local contributing factors and the extent of noncompliance, the FSEIP 7 was issued a state-developed Correction Action Plan (CAP) to address transition plans. This corrective action plan focused on ensuring correction of all instances of identified noncompliance (Prong I) and activities to address root causes of noncompliance, mostly related to a personnel/supervision issue. The FSEIP 7 submitted to the State evidence of correction of all instances of noncompliance (Prong I) and documentation of completion of all CAP activities to address root causes of noncompliance. This evidence was reviewed and verified by the MSFSEIP. Subsequently, the MSFSEIP pulled and reviewed one month of data for FSEIP 7, including all records with transition steps and services due (N=10). The MSFSEIP verified all transition plans (100%) reviewed, after the CAP activities were completed, met the timeline for timely steps and services (Prong II). Based on follow-up record reviews, Local FSEIP 7 was found in compliance with providing timely transition plans, less than one year from the date of findings.

### **8A - OSEP Response**

OSEP's response to the State's FFY 2017 SPP/APR required the State to include in the FFY 2018 SPP/APR an explanation of why it did not identify any findings of noncompliance in FFY 2016. The State noted that it issued a finding of noncompliance for FFY 2016 and that it cleared the findings within one year. However, the State did not demonstrate that the EIS program or provider corrected the findings of noncompliance identified in FFY 2016 because it did not report that it verified correction of those findings, consistent with the requirements in OSEP Memo 09-02. Specifically, the State did not report that that it verified that each EIS program or provider with noncompliance identified in FFY 2016: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider.

The State did not provide the reasons for delay, as required by the measurement table.

### **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)(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.

**8B - Indicator Data**

**Historical Data**

<b>Baseline</b>	2005	66.00%			
<b>FFY</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Target	100%	100%	100%	100%	100%
Data	99.83%	99.33%	97.62%	99.81%	99.65%

**Targets**

<b>FFY</b>	<b>2018</b>	<b>2019</b>
Target	100%	100%

**FFY 2018 SPP/APR Data**

**Data include notification to both the SEA and LEA**

YES

**If no, please explain.**

<b>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</b>	<b>Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B</b>	<b>FFY 2017 Data</b>	<b>FFY 2018 Target</b>	<b>FFY 2018 Data</b>	<b>Status</b>	<b>Slippage</b>
1,093	1,103	99.65%	100%	99.09%	Did Not Meet Target	No Slippage

**Provide reasons for slippage, if applicable**

XXX

**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**

This report includes the complete data for infants and toddlers with IFSPs covering the entire reporting period from July 1, 2018 - June 30, 2019.

**Do you have a written opt-out policy? (yes/no)**

NO

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

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

State database

**Describe the method used to select EIS programs for monitoring.**

XXX

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

July 1, 2018 -June 30, 2019

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

This report includes the complete data for infants and toddlers with IFSPs covering the entire reporting period from July 1, 2018 - June 30, 2019.

**Provide additional information about this indicator (optional)**

Local FSEIP 5 was significantly understaffed and FSEIP 6, 7, 8 and 9 experienced Service Coordinator turnover. Inadequate staffing resulted in delays in the timely notification to the Local Education Agency.

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

<b>Findings of Noncompliance Identified</b>	<b>Findings of Noncompliance Verified as Corrected Within One Year</b>	<b>Findings of Noncompliance Subsequently Corrected</b>	<b>Findings Not Yet Verified as Corrected</b>
4	0		4

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

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

All cases that caused the finding have aged out. Programs were required to resubmit Correction Action Plans to address continued noncompliance.

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

<b>Year Findings of Noncompliance Were Identified</b>	<b>Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2017 APR</b>	<b>Findings of Noncompliance Verified as Corrected</b>	<b>Findings Not Yet Verified as Corrected</b>

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

XXX

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

XXX

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

XXX

### **8B - Prior FFY Required Actions**

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

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

The state issued Program 7 a finding for noncompliance for FFY 2016. Program 7 did clear finding within one year.

### **8B - OSEP Response**

OSEP's response to the State's FFY 2017 SPP/APR required the State to include in the FFY 2018 SPP/APR an explanation of why it did not identify any findings of noncompliance in FFY 2016. The State noted that it issued a finding of noncompliance for FFY 2016 and that it cleared the findings within one year. However, the State did not demonstrate that the EIS program or provider corrected the findings of noncompliance identified in FFY 2016 because it did not report that it verified correction of those findings, consistent with the requirements in OSEP Memo 09-02. Specifically, the State did not report that that it verified that each EIS program or provider with noncompliance identified in FFY 2016: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the EIS program or provider.

### **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 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.

**8C - Indicator Data**

**Historical Data**

<b>Baseline</b>	2005	45.00%			
<b>FFY</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Target	100%	100%	100%	100%	100%
Data	94.42%	96.14%	91.29%	97.32%	91.24%

**Targets**

<b>FFY</b>	<b>2018</b>	<b>2019</b>
Target	100%	100%

**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.**

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	Number of toddlers with disabilities exiting Part C who were potentially eligible for Part B	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
988	1,103	91.24%	100%	93.93%	Did Not Meet Target	No Slippage

**Provide reasons for slippage, if applicable**

XXX

**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.

48

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

State database

**Describe the method used to select EIS programs for monitoring.**

XXX

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

July 1, 2018 through June 30, 2019

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

This report includes the complete data for infants and toddlers with IFSPs covering the entire reporting period from July 1, 2018 - June 30, 2019.

**Provide additional information about this indicator (optional)**

There were 67 instances of system-based issues that led to delays in transition conferences, mainly caused by staff shortages. Local FSEIP 2 and 5 was significantly understaffed and FSEIP 6 and 9 experienced Service Coordinator turnover. Inadequate staffing resulted in delays in the scheduling and conducting of timely transition conferences.

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

<b>Findings of Noncompliance Identified</b>	<b>Findings of Noncompliance Verified as Corrected Within One Year</b>	<b>Findings of Noncompliance Subsequently Corrected</b>	<b>Findings Not Yet Verified as Corrected</b>
5			5

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

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

All cases that caused the finding have aged out. Programs were required to resubmit Correction Action Plans to address continued noncompliance.

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

<b>Year Findings of Noncompliance Were Identified</b>	<b>Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2017 APR</b>	<b>Findings of Noncompliance Verified as Corrected</b>	<b>Findings Not Yet Verified as Corrected</b>

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

XXX

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

XXX

**Findings of Noncompliance Verified as Corrected**

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

XXX

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

XXX

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

**Actions taken if noncompliance not corrected**

XXX

**8C - Prior FFY Required Actions**

The State did not, as required by the OSEP Response to the State's FFY 2016 SPP/APR, provide an explanation of slippage. In its FFY 2018 SPP/APR, the State must provide the required information.

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

Mississippi reported data for Indicator 8C (Transition Conference) of 97.32% for FFY2016 and 91.24% for FFY 2017, indicating slippage. During this time frame many Local FSEIPs experienced increased turnover rates in Service Coordinator positions from a combination of retirements and changes in leadership. In particular, the largest Local FSEIP (9) experienced a turnover rate of more than 50% during one 6-month period. The resulting staffing shortages lead to delays in scheduling and holding transition conferences.

**8C - OSEP Response**

OSEP's response to the State's FFY 2017 SPP/APR required the State to include in the FFY 2018 SPP/APR provide an explanation of slippage in the FFY 2017 APR. The State provided none of the required information.

The State did not provide the reasons for delay, as required by the measurement table.

**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.**

Mississippi Part C does not include Resolution Sessions in its dispute resolution procedures.

**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**

Source	Date	Description	Data
SY 2018-19 EMAPS IDEA Part C Dispute Resolution Survey; Section C: Due Process Complaints	11/11/2019	3.1 Number of resolution sessions	NA

Source	Date	Description	Data
SY 2018-19 EMAPS IDEA Part C Dispute Resolution Survey; Section C: Due Process Complaints	11/11/2019	3.1(a) Number resolution sessions resolved through settlement agreements	NA

**Targets: Description of Stakeholder Input**

The MSFSEIP has multiple avenues to engage stakeholders in advising the program. The State Interagency Coordinating Council (SICC), including SSIP Stakeholders, meets quarterly for a public meeting and more frequently for workgroup activities. The SICC is comprised of parents, service providers, state agency representatives from Health, Education, Human Services, Child Protective Services, Medicaid, and Insurance, representatives from Head Start, the Institute of Higher Learning (IHL), University programs, and advocacy groups, and other community leaders.

On November 14, 2014, the SICC assisted the MSFSEIP in setting the FFY2014-FFY2018 APR targets for Indicators 2, 3, and 4:

Indicator 2: Natural Environment target to set to remain at 95% for FFY2014-FFY2018.

Indicator 3: Child Outcomes:

Summary Statement 1 for Outcomes A - C targets were set to remain at 85% for FFY2014-FFY2018.

Summary Statement 2 for Outcomes A - C targets were set as follow:

A2 – 65% for FFY2014-FFY2018

B2 – 63% for FFY2014-FFY2015

B2 – 64% for FFY2016

B2 – 64.5% for FFY2017

B2 – 65% for FFY2018

C2 – 63% for FFY2014-FFY2015

C2 – 63.5% for FFY2016

C2 – 64% for FFY2017-FFY2018

Indicator 4: Family Survey targets were set at 92% for FFY2014-FFY2018.

On February 13, 2015, the SICC assisted the MSFSEIP in setting APR targets for Indicators 5 and 6:

Indicator 5: Child Find 0-1 target was set as follows:

For FFY2014, the target was set at 0.61%

For FFY2015, the target was set at 0.62%

For FFY2016, the target was set at 0.63%

For FFY2017, the target was set at 0.64%

For FFY2018, the target was set at 0.65%

Indicator 6: Child Find 0-3 target was as follows:

For FFY2014, the target was set at 1.72%

For FFY2015, the target was set at 1.74%

For FFY2016, the target was set at 1.76%

For FFY2017, the target was set at 1.78%

For FFY2018, the target was set at 1.80%

In both meetings, the SICC reviewed historical targets and performance data trends for Mississippi and national averages. The Stakeholders discussed emerging issues in the MSFSEIP and assisted in setting "ambitious but realistic" targets for the MSFSEIP for the next six-year grant cycle.

On October 25, 2019 the SICC assisted the MSFSEIP in setting the FFY2018-FFY2019 APR targets for Indicators 2, 3, 4 5, and 6:

Indicator 2: Natural Environment target to set to 95%.

Indicator 3: Child Outcomes:

Summary Statement 1 targets were set as follows:

A (positive social-emotional skills) - 85%

B (acquisition and use of knowledge and skills) - 85%

C (use of appropriate behaviors to meet their needs) - 85%

Summary Statement 2 targets were set as follows:

A (positive social-emotional skills) - 65%

B (acquisition and use of knowledge and skills) - 65%

C (use of appropriate behaviors to meet their needs) - 64%

Indicator 4: Family Survey targets were set to remain at 92%.

Indicator 5: Child Find 0-1 target was set at 0.68%.

Indicator 6: Child Find 0-3 target was set at 1.84%.

In addition at the October 25, 2019 meeting, the SSIP Stakeholders reviewed the overall SSIP Theory of Action and planned activities to improve infrastructure and implement evidence-based practices. The Stakeholders evaluated the current progress and determined the planned activities for the coming year should be continued, specifically focusing on new infrastructure, i.e., data system and professional development system, and continued implementation of evidence-based practices, until fidelity is met.

NA

**Historical Data**

Baseline	NA	NA			
FFY	2013	2014	2015	2016	2017
Target>=	NA	NA	NA	NA	NA
Data	NA	NA	NA	NA	NA

**Targets**

FFY	2018	2019
Target>=	NA	NA

**FFY 2018 SPP/APR Data**

3.1(a) Number resolutions sessions resolved through settlement agreements	3.1 Number of resolutions sessions	FFY 2017 Data	FFY 2018 Target	FFY 2018 Data	Status	Slippage
NA	NA	NA	NA	NA	NA	NA

**Targets**

FFY	2018 (low)	2018 (high)	2019 (low)	2019 (high)
Target	NA	NA	NA	NA

**FFY 2018 SPP/APR Data**

<b>3.1(a) Number resolutions sessions resolved through settlement agreements</b>	<b>3.1 Number of resolutions sessions</b>	<b>FFY 2017 Data</b>	<b>FFY 2018 Target (low)</b>	<b>FFY 2018 Target (high)</b>	<b>FFY 2018 Data</b>	<b>Status</b>	<b>Slippage</b>
NA	NA	NA	NA	NA	NA	NA	NA

**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)) 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

Source	Date	Description	Data
SY 2018-19 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/11/2019	2.1 Mediations held	0
SY 2018-19 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/11/2019	2.1.a.i Mediations agreements related to due process complaints	0
SY 2018-19 EMAPS IDEA Part C Dispute Resolution Survey; Section B: Mediation Requests	11/11/2019	2.1.b.i Mediations agreements not related to due process complaints	0

### Targets: Description of Stakeholder Input

The MSFSEIP has multiple avenues to engage stakeholders in advising the program. The State Interagency Coordinating Council (SICC), including SSIP Stakeholders, meets quarterly for a public meeting and more

frequently for workgroup activities. The SICC is comprised of parents, service providers, state agency representatives from Health, Education, Human Services, Child Protective Services, Medicaid, and Insurance, representatives from Head Start, the Institute of Higher Learning (IHL), University programs, and advocacy groups, and other community leaders.

On November 14, 2014, the SICC assisted the MSFSEIP in setting the FFY2014-FFY2018 APR targets for Indicators 2, 3, and 4:

Indicator 2: Natural Environment target to set to remain at 95% for FFY2014-FFY2018.

Indicator 3: Child Outcomes:

Summary Statement 1 for Outcomes A - C targets were set to remain at 85% for FFY2014-FFY2018.

Summary Statement 2 for Outcomes A - C targets were set as follow:

A2 – 65% for FFY2014-FFY2018

B2 – 63% for FFY2014-FFY2015

B2 – 64% for FFY2016

B2 – 64.5% for FFY2017

B2 – 65% for FFY2018

C2 – 63% for FFY2014-FFY2015

C2 – 63.5% for FFY2016

C2 – 64% for FFY2017-FFY2018

Indicator 4: Family Survey targets were set at 92% for FFY2014-FFY2018.

On February 13, 2015, the SICC assisted the MSFSEIP in setting APR targets for Indicators 5 and 6:

Indicator 5: Child Find 0-1 target was set as follows:

For FFY2014, the target was set at 0.61%

For FFY2015, the target was set at 0.62%

For FFY2016, the target was set at 0.63%

For FFY2017, the target was set at 0.64%

For FFY2018, the target was set at 0.65%

Indicator 6: Child Find 0-3 target was as follows:

For FFY2014, the target was set at 1.72%

For FFY2015, the target was set at 1.74%

For FFY2016, the target was set at 1.76%

For FFY2017, the target was set at 1.78%

For FFY2018, the target was set at 1.80%

In both meetings, the SICC reviewed historical targets and performance data trends for Mississippi and national averages. The Stakeholders discussed emerging issues in the MSFSEIP and assisted in setting "ambitious but realistic" targets for the MSFSEIP for the next six-year grant cycle.

On October 25, 2019 the SICC assisted the MSFSEIP in setting the FFY2018-FFY2019 APR targets for Indicators 2, 3, 4 5, and 6:

Indicator 2: Natural Environment target to set to 95%.

Indicator 3: Child Outcomes:

Summary Statement 1 targets were set as follows:

A (positive social-emotional skills) - 85%

B (acquisition and use of knowledge and skills) - 85%

C (use of appropriate behaviors to meet their needs) - 85%

Summary Statement 2 targets were set as follows:

A (positive social-emotional skills) - 65%

B (acquisition and use of knowledge and skills) - 65%

C (use of appropriate behaviors to meet their needs) - 64%

Indicator 4: Family Survey targets were set to remain at 92%.

Indicator 5: Child Find 0-1 target was set at 0.68%.

Indicator 6: Child Find 0-3 target was set at 1.84%.

In addition at the October 25, 2019 meeting, the SSIP Stakeholders reviewed the overall SSIP Theory of Action and planned activities to improve infrastructure and implement evidence-based practices. The Stakeholders evaluated the current progress and determined the planned activities for the coming year should be continued, specifically focusing on new infrastructure, i.e., data system and professional development system, and continued implementation of evidence-based practices, until fidelity is met.

### Historical Data

<b>Baseline</b>	2005				
<b>FFY</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Target>=					
Data					

### Targets

<b>FFY</b>	<b>2018</b>	<b>2019</b>
Target>=		

### FFY 2018 SPP/APR Data

<b>2.1.a.i Mediation agreements related to due process complaints</b>	<b>2.1.b.i Mediation agreements not related to due process complaints</b>	<b>2.1 Number of mediations held</b>	<b>FFY 2017 Data</b>	<b>FFY 2018 Target</b>	<b>FFY 2018 Data</b>	<b>Status</b>	<b>Slippage</b>
0	0	0				N/A	N/A

### Targets

<b>FFY</b>	2018 (low)	2018 (high)	2019 (low)	2019 (high)
Target	XXX	XXX	XXX	XXX

### FFY 2018 SPP/APR Data

<b>2.1.a.i Mediation agreements related to due process complaints</b>	<b>2.1.b.i Mediation agreements not related to due process complaints</b>	<b>2.1 Number of mediations held</b>	<b>FFY 2017 Data</b>	<b>FFY 2018 Target (low)</b>	<b>FFY 2018 Target (high)</b>	<b>FFY 2018 Data</b>	<b>Status</b>	<b>Slippage</b>
XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX

**Provide reasons for slippage, if applicable**

XXX

**Provide additional information about this indicator (optional)**

**10 - Prior FFY Required Actions**

None

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

**10 - OSEP Response**

The State reported fewer than ten mediations held in FFY 2018. The State is not required to provide targets until any fiscal year in which ten or more mediations were held.

**10 - Required Actions**