

**Part C State Annual Performance Report (APR) for FFY 2010****Overview of the Annual Performance Report Development:**

In accordance with 20 U. S. C. 1416(b)(1) of the Individuals with Disabilities Education Act (IDEA) amendments of 2004 and 20 U. S. C. 1442, this is the United States (US) Virgin Islands Department of Health's, Infants and Toddlers Program, Part C of the Individuals with Disabilities Education Act (IDEA), Annual Performance Report (APR). An APR is submitted to the US Department of Education (US DE) by all states and jurisdictions receiving Part C of IDEA funds. The Federal Fiscal Year (FFY) for this reporting period is July 1, 2010 - June 30, 2011.

The FFY 2010 Annual Performance Report contains information on the performance on early intervention services (EIS) programs located in both districts of the US Virgin Islands, *which is considered one EIS program*. Part C programs are required to report on 14 performance and/or compliance indicators. In order to prepare this report, we used data from our data base, the child's files, parent comments and family survey.

The APR will be disseminated to the public through various means to meet the public reporting requirement. We plan to disseminate a summary of the APR on a 1 pager to summarize the performance and revised SPP. We will post the full report in each health district but also issue the summary to the VI ICC members, the local PTI, providers and parents. Each Interagency Coordinating Council (ICC) member will be issued this report for input on the enhancement of the State Performance Plan and improvement activities. ICC members are parents with children with developmental delays and/or disabilities, heads of public and private programs/organizations serving families of children with developmental delays and/or disabilities that support and assist the Infants and Toddlers Program in the implementation of an early intervention system.

The FFY 2010 Annual Performance Report (APR) and the State Performance Plan (SPP) will be posted to the US Virgin Islands Department of Health's website at <http://www.healthvi.org/programs/family-health/infants-toddlers/index.html> and notices of the report's availability placed in the local print media. The reports are also available to the public in each Infants and Toddlers Program district office.

**Resources and Technical Assistance Accessed:**

The Virgin Islands Infants and Toddlers Program accessed various TA resources during 2010-2011.

Technical assistance from the National Early Technical Assistance Center (NECTAC) and the Southeast Regional Resource Center (SERRC) experienced in IDEA requirements and compliance to develop this report, as well as technical assistance to the VI Part C program with other consultants, such as Early Childhood Outcomes Center (ECO), were used. Additionally, broad input was utilized to

develop this APR as data submitted by personnel rendering early intervention services (EIS) via COSF and self assessment monthly report forms and comments from families of children enrolled in the Infants and Toddlers Program through family survey responses, were utilized to analyze the performance of the Infants and Toddlers Program during this report period.

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

**Indicator 1:** Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.

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

**Measurement:**

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

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

FFY	Measurable and Rigorous Target
FFY 2010	100%

**Actual Target Data for FFY 2010: 91%**

The Virgin Islands Infants and Toddlers Program calculated all the IFSPs developed during the period of July 1, 2010 and June 30, 2011 then examined information regarding the commencement of services listed in the IFSP. According to the Virgin Islands Infants and Toddlers Program’s policy, timely services means services that commence within thirty (30) days of the parent’s written consent of the implementation of the IFSP. During this reporting period, 129 IFSPs were developed. Of that number, 118 infants and toddlers with IFSPs (including those with exceptional family circumstances) received timely services (118/129) for a total of **91%**.

Timely Services July 1, 2010- June 30, 2011 N=129	Number of Children	Percent
Number of children receiving timely services	106	82%
Number of children with untimely services due to <i>family reason</i>	12	9%
<b>Compliant</b>	<b>118</b>	<b>91%</b>
Number of children who did not receive timely services due to <b>program reasons</b>	11	9%
<b>Total number of records reviewed</b>	<b>129</b>	<b>100%</b>

The table immediately below is broken out by district for local monitoring purposes.

<p><b>St Thomas/St.John/WaterIsland District= 45</b></p>	<p><b>St. Croix District = 84</b></p>
<p><b>N = total number of children in time period = 45</b>  <b>Timely =33</b>  <b>Parent Reasons = 6</b>  <b>Total Compliant = 33 +6 =39/45 = 87 %</b>  <b>Program Reasons Noncompliant =6/45 = 13%</b></p>	<p><b>N = total number of children in time period = 84</b>  <b>Timely = 73</b>  <b>Parent Reasons = 6</b>  <b>Total Compliant = 73 + 6 = 79/84 = 94%</b>  <b>Program Reasons Noncompliant = 5/84 = 6%</b></p>

**Explanation of Progress or Slippage that occurred for FFY 2010:**

IFSPs were developed for 129 children. The overall percentage of timely services is 91% compliance which represents slippage from FFY 2009 (97% compliance). Reviewing the data by each district provides a clear picture that St Thomas is experiencing more difficulty in providing timely services with 87% of the children receiving services in a timely manner compared to St Croix at 94%. In the St. Thomas district from July 1, 2010 until December 2010, a new service coordinator was in place. However, in December 2010, the service coordinator went on medical leave. From December 2010 until June 30, 2011, those duties were performed by other personnel. The loss of someone in this position performing these duties on a regular basis affected compliance in the district.

The St. Croix district also did not a regular service coordinator from July 1, 2010 until December 2010 because that person had relocated earlier in the year to the mainland USA. EIS personnel (already limited in numbers) did functioned as interim service coordinators during that time period.

Also, having adequate number of personnel available continues to be a challenge because the VI Infants and Toddlers Program mostly employs part time EIS personnel in both districts. Given that most early intervention personnel provide services on a part-time basis as well as the limited local pool of persons qualified to provide early intervention services to children less than three years of age in the Territory means that this program struggles to meet this performance requirement. Additionally, recruiting for such specialized personnel, like Physical Therapist, has proven to be very difficult given the limited Part C of IDEA funding issued to the VI Infants and Toddlers Program. The program is unable to offer high salaries comparable to the continental USA and is unable to attract such qualified personnel or maintain these personnel. Without the adequate number of personnel, or availability of full-time specialized early intervention personnel for the program providing services under Part C of IDEA, this program will constantly be in danger of not attaining 100% compliance. Since Part C of IDEA funding is based on a formula which is tied to the

number of children reported in US Census for the Territory and the VI has shown that it identifies and enrolls a significant number of infants and toddlers as compared to other jurisdictions, in addition to using very broad eligibility criteria consideration must be made to possibly change that criteria to more restrictive levels. The VI Infants and Toddlers Program is studying ways to modify service delivery in the districts in order to maximize existing personnel and better serve infants and toddlers and their families. Please see additional Improvement Activities for FFY 2011.

**Discussion of Improvement Activities Completed**

- Continue monitoring activities according to monitoring schedule. Ongoing
- Continue data collection currently in place. Ongoing
- Monitor in conjunction with regular Child Record review monitoring. Analyze data to determine need for training. June 2011. Resources: Territory Staff.
- A checklist developed by ITP Director, based on the record review process, will be used by Service Coordinators as a new improvement and monitoring strategy. March 2010 Implemented.

**Correction of Previous Noncompliance**

As required in the FFY 2009 OSEP SPP/APR Response Table based on reporting less than 100% compliance, VI Infants and Toddlers Program was required to report on the status of correction of non-compliance for Indicator 1 based on FFY 2009 and FFY 2008. In accordance with OSEP memo 09-02, the VI Infants and Toddlers Program will describe the efforts taken to correct and verify correction of previous non-compliance.

**CHART FROM FFY 2009**

<b>Timely Services (July 1, 2009- June 30, 2010) N=149</b>	<b>Number of children</b>	<b>%</b>
Number of children receiving timely services	112	84%
Number of children with untimely services due to family reason	17	13%
Compliant	129	97%
Number of children who did not receive timely services due to program reasons	5	3%
Total	149	100.00%

**CHART FROM FFY 2008**

<b>Timely Services (July 1, 2008- June 30, 2009)</b>	<b>Number of children</b>	<b>%</b>
Number of children receiving timely services	128	96%
Number of children with untimely services due to family reason	5	3%
Compliant	133	99%
Number of children who did not receive timely services due to program reasons	1	1%
<b>Total</b>	<b>134</b>	<b>100.00%</b>

**Correction of noncompliance for individual instances**

Infants and Toddlers Program EIS personnel, by district, were advised of the performance of the program and the need to make improvements and correct non-compliance. Further, a summary of the performance results in indicators #1, 2, 3, 4, 5, 6, 7, and 8 was shared and discussed with personnel. VI ITP director informed the service coordinators and personnel in each district of the non-compliance regarding timely IFSP services and the policy and requirement that IFSP services must begin no later than 30 days after the parent signs the IFSP. The VI ITP director required each district to correct the non-compliance. Subsequent monitoring of the individual children who did not receive their services in a timely manner showed that all of these children received the services on their IFSP although they were late.

**Correction of noncompliance for systemic issues**

Additionally, the VI ITP reviewed updated early intervention records in each district (St. Thomas/St. John/Water Island – 5 additional records; St. Croix – 15 additional records). These indicate that all IFSP services were delivered within the required timeline. Thus the Part C program is correctly implementing 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) (i.e., achieved 100% compliance) based on a review of data subsequently collected through on-site monitoring. It was determined that the districts had demonstrated that they were implementing the requirements consistent with providing services within 30 days after the parents signs the IFSP at the initial IFSP meeting..

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010**  
*[If applicable]*

- Acquire additional contract personnel to support the both districts in meeting timelines and improving performance. December 2011 Program management/VIDH Human Resource personnel.
- Transdisciplinary model of services will be explored and training developed for all ei personnel which will be incorporated with the new Part C regulation training. December – June 2012. VI ITP/NECTAC/SERRC

The SPP has been revised to include targets and improvement activities for FFY 2012.

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

**Indicator 2:** Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings.

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

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

FFY	Measurable and Rigorous Target
<i>FFY 2010</i>	90% of infants and toddlers with IFSPs receive their early intervention services primarily in the home or programs for typically developing children.

**Actual Target Data for FFY 2010: 96%**

For this performance indicator the VI ITP is using the 618 December 2010 Table # 2, reported in February 2011. A natural environment means settings that are natural or typical for same aged infant or toddler without a disability and may include the home or community based settings.

The ITP surpassed the performance target for this indicator since the actual performance is 96%, and target is 90%. ITP will continue to utilize the measures which are in place to ensure that services are rendered in a child’s natural environment, to the maximum extent appropriate. EIS personnel have attained adequate training on and adhere to this requirement.

140 = number of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings / 147 (total # of infants and toddlers with IFSPs X 100 = 96%

Of the 147 children only 7 infants and toddlers with IFSPs primarily received early intervention services in other settings. Therefore, only 4% of children were served in a setting other than a home or community-based setting. In December 2010, an individual child complaint was received from a parent concerning early intervention services in the natural environment. The VI ITP director initiated the due process complaint procedures,

offered mediation to the family, and also investigated the nature of the complaint and the circumstances related to receiving the early intervention service in a setting other than a natural environment. The individual child complaint was successfully mediated in a timely manner in January 2010. The VI ITP director determined that the child received early intervention services in an environment that was not a natural environment and there was *not appropriate justification*. A finding of non-compliance was issued to the district. Strategies were implemented to correct the non-compliance. Further monitoring of the IFSPs that were delivered in environments that are not natural environments (home or community based settings) had appropriate justifications.

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

The actual performance in FFY 2010 equaled the percentage from previous period. The St. Croix district has been successful in delivering early intervention services in natural environments (i.e. serving 100% of the infants and toddlers in a home or community based setting). In the St. Croix district there are more available specialized personnel to deliver services. The MCH full-time physical therapist (PT) primarily provides coverage for the physical therapy services. But the VI ITP additionally uses a part-time PT for the balance of services provided in the natural environments. The VI ITP has on-going difficulty in recruiting and retaining specialized therapists in the St. Thomas/St. John district; mainly additional full-time physical therapists and occupational therapists to provide services in natural environments. This creates difficulties when there are few providers who are willing or able to provide services in natural environments at the hourly rate that the program is able to pay. The VI ITP director provided to universities advertisements of the open position; however, it did not result in successful recruitment. Additional funding may be necessary to provide a higher salary for a PT than VI ITP has available. This program functions solely on the federal funds issued under Part C of IDEA and does not receive funding from the local government or other sources.

**Improvement Activities Status:**

Partner with the Governor's Early Childhood Advisory Committee (ECAC) to improve the early childhood system and family supports. The VI ITP is one of the partners involved in this committee and will continue to work to implement the June 2010 strategic plan. In regard to professional development, the strategic plan includes objectives for a cross-sector collaboration to continue the commitment of the University of the Virgin Islands associate and BA certificate degree program in inclusive early childhood education which will promote the development of "home-grown" professionals to work in early childhood development including the Infants and Toddlers Program. On-going.

Refresher training and issuance of policy reminders memorandums for early intervention personnel on IFSP process and delivering services in natural environments, including the documentation of appropriate justification of services in environments other than the home or community based settings. March 2011 and on-going. Resources NECTAC, VI ITP

Review progress, adjust targets and plan for future activities to ensure compliance.  
Resource: Territory staff. September 2010 Status: Completed and ongoing.

A checklist based on the record review process, used by ITP management, will be used by Service Coordinators as a new improvement and monitoring strategy. Status: Implemented and ongoing.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010**

- Transdisciplinary model of services will be explored and training developed for all ei personnel on this model, along with natural environments and appropriate justification, and it will be incorporated within the new Part C regulation training. December – June 2012. VI ITP/NECTAC/SERRC

<b>Monitoring Priority: Early Intervention Services In Natural Environments</b>
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**Indicator 3:** Percent of infants and toddlers with IFSPs who demonstrate improved:

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

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

**Measurement:**

Outcomes:

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

Progress categories for A, B and C:

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

**Summary Statements for Each of the Three Outcomes (use for FFY 2009-2010 reporting):**

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

**Measurement for Summary Statement 1:**

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

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

**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.

FFY 2010	Measurable and Rigorous Target See Below
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**Target Data and Actual Target Data for FFY 2010:**

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

Summary Statements	Actual FFY 2009 (% and # children)	Actual FFY 2010 (% and # children)	Target FFY 2010 (% of children)
<b>Outcome A: Positive social-emotional skills (including social relationships)</b>			
1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they exited the program. Formula: $c+d / a+b+c+d$	83.3%  (n-15)	92.3%  (n=36)	85%
2. The percent of children who were functioning within age expectations in Outcome A by the time they exited the program. Formula: $d+e / a+b+c+d+e$	63.6%  (n=14)	52.4%  (n=22)	53%
<b>Outcome B: Acquisition and use of knowledge and skills (including early language/communication and early literacy)</b>			
1 Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they exited the program. Formula: $c+d / a+b+c+d$	95%  (n=19 )	97.4%  (n= 38)	85%

<p>2. The percent of children who were functioning within age expectations in Outcome B by the time they exited the program.</p> <p>Formula: <math>d+e / a+b+c+d+e</math></p>	<p>68.2%</p> <p>(n=15 )</p>	<p>55.0%</p> <p>(n=22 )</p>	<p>41%</p>
<p><b>Outcome C: Use of appropriate behaviors to meet their needs</b></p>			
<p>1 Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they exited the program. Formula: <math>c+d / a+b+c+d</math></p>	<p>100%</p> <p>(n= 18)</p>	<p>81.3%</p> <p>(n=26 )</p>	<p>84.5%</p>
<p>2. The percent of children who were functioning within age expectations in Outcome C by the time they exited the program.</p> <p>Formula: <math>d+e / a+b+c+d+e</math></p>	<p>90.9%</p> <p>(n=20 )</p>	<p>71.4%</p> <p>(n= 30)</p>	<p>69.5%</p>

Progress Data for Part C Children FFY 2010

A. Positive social-emotional skills (including social relationships):	Number of children	% of children
a. Percent of children who did not improve functioning	0	0.0%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	3	7.1%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	17	40.5
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	19	45.2%
e. Percent of children who maintained functioning at a level comparable to same-aged peers	3	7.1%
<b>Total</b>	<b>N=42</b>	<b>100%</b>
B. Acquisition and use of knowledge and skills (including early language/communication and early literacy):	Number of children	% of children
a. Percent of children who did not improve functioning	0	0%
b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	1	2.5%
c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach	17	42.5%
d. Percent of children who improved functioning to reach a level comparable to same-aged peers	21	52.5%

<b>e. Percent of children who maintained functioning at a level comparable to same-aged peers</b>	<b>1</b>	<b>2.5%</b>
<b>Total</b>	<b>N=40</b>	<b>100%</b>
<b>C. Use of appropriate behaviors to meet their needs:</b>	<b>Number of children</b>	<b>% of children</b>
<b>a. Percent of children who did not improve functioning</b>	<b>0</b>	<b>0%</b>
<b>b. Percent of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers</b>	<b>6</b>	<b>14.3%</b>
<b>c. Percent of children who improved functioning to a level nearer to same-aged peers but did not reach</b>	<b>6</b>	<b>14.3%</b>
<b>d. Percent of children who improved functioning to reach a level comparable to same-aged peers</b>	<b>20</b>	<b>47.6%</b>
<b>e. Percent of children who maintained functioning at a level comparable to same-aged peers</b>	<b>10</b>	<b>23.8%</b>
<b>Total</b>	<b>N=42</b>	<b>100%</b>

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

**Progress and Slippage**

Outcome A- Social-emotional --

1. Summary Statement #1. Of those children who entered or exited the program below age expectations in Outcome A, and substantially increased their rate of growth by the

time they exited the program showed progress from FY 2009 83.3% to 92.3 percent. The target of 85% was met.

2. Summary Statement #2. The percentage of children who were functioning within age expectations by the time they exited the program was lower than the previous year from 63.6 % down to 52.4% and the target of 53% was not met, however it was very close.

#### Outcome B- Acquisition of Knowledge and skills –

1. Summary Statement #1. Of those children who entered or exited the program below age expectations in Outcome B, and substantially increased their rate of growth showed progress from 95% in FY 2009 to 97.4% for FY 2010. The target of 85% was met.
2. Summary Statement #2. The percentage of children who were functioning within age expectations by the time they exited the program was lower than the previous year from 68.2% to 55.0%, however the target of 41% was met.

#### Outcome C-Appropriate behaviors to meet their needs—

3. Summary Statement #1. Of those children who entered or exited the program below age expectations in Outcome C, and substantially increased their rate of growth showed slippage from 100% in FY 2009 to 81.3% for FY 2010. The target of 84.5 % **was not met**.
4. Summary Statement #2. The percentage of children who were functioning within age expectations by the time they exited the program was lower than the previous year from 90.9% to 71.4%, however the target of 69.5% was met.

#### **Explaining the numbers:**

There are a lot of children who maintained functioning relative to same age peers. This can be explained by the type of children being served. Currently, the children being served are less involved developmentally. Several of the more severe children have transitioned out of the program. The data being reported this year is more representative than last year as there are more children in the data set.

#### **Improvement Activities -Training and support: ongoing**

Over the last year, the VI has made concerted efforts to offer more training (on outcomes, the COSF, and quality) and assistance and increased oversight so that the providers understand the importance of collecting entry and exit ratings for child outcomes. The result of this work is that even though our numbers are still small, the VI is reporting almost twice the number of children for FFY2010 compared to FY2009 42 versus 22. The data for

this year are much more representative of the children being served by the VI. We will continue to provide this type of support to increase the amount and quality of data that we are able to report.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010**

*[If applicable]*

*Not applicable*

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

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

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

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

**Measurement:**

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

FFY	Measurable and Rigorous Target
FFY 2010	A. 92.5%, B. 83.5%, C. 92.5%

**Actual Target Data for FFY 2010:**

4A.	Rating of 5 or above (good or excellent job)	46/47	98%
4B.	Rating of 5 or above (good or excellent job)	46/47	98%
4C.	Rating of 5 or above (good or excellent job)	43/46*	93%

*\*In the St. Thomas district, one respondent marked “did not understand the question” for item #3, which is reflected in the N for 4C.*

The Virgin Islands Infants and Toddlers Program exceeded the targets for 4A, 4B and 4C of this performance indicator. The return rate for completion of the survey was lower in this reporting period (FFY 2008 = 63%; FFY 2009 = 85%; FFY 2010 = 66% 47/71). While this is a lower return rate than last year, we believe this data to be representative of the enrolled families. Surveys are to be given to each family for whom a transition meeting was held during this report period. This data therefore represents each category of children with developmental delay and/or disability, race, etc. Each family is asked to complete this short survey at the conclusion of their child's individual transition meeting. Parents typically complete the survey while waiting for copies of the meeting notes and/or other documents, thereby wisely using their time and providing a more convenient method for the family to respond. Families were selected to respond to the family survey at the time of their transition meeting solely based on the child's date of birth, as transition meetings begin at least six months prior to an enrolled child's third birthday, therefore data represents all families enrolled. The lower return rate is potentially a reflection of the absence of a full-time service coordinator for significant periods of time in both districts. We may have missed collecting surveys when transition meetings are held in the family home or child's natural environment. We hope to improve this return rate in the next reporting period.

The Virgin Islands Infants and Toddlers Program (Part C of IDEA), uses a modified Early Childhood Outcomes Center (ECO) Family Survey. This change to the survey was discussed with and approved by an ECO representative prior to VI implementation. Families whose children are exiting during this report period are asked to respond to just three (3) key questions on this VI ECO Family Survey; therefore it is representative of the population served. When the survey was initially mailed out to families who were exiting, we received very low return responses. So it was decided that we would ask each family to complete this short survey at the conclusion of their child's individual transition meeting. Parents typically complete the survey while waiting for copies of the meeting notes and/or other documents, thereby wisely using their time and providing a more convenient method for the family to respond. The survey can be read to the parent, and any clarification needed could be provided at that time. Either clerical staff persons or the ITP Director ask the parents to complete the survey.

There were a total of 47 respondents for the Virgin Islands, 25 in St. Croix and 22 in St. Thomas. Each question has a 7 point rating scale with an additional 8<sup>th</sup> point for the family to indicate if they do not understand the question. A rating of 5 (has done a good job) up to a rating of 7 (has done an excellent job) means that the program has helped the family in those areas. A copy of the survey is included in this report in the attachment section to the end of the APR document.

The following tables indicate each rating by district and total for each of the three questions, from the VI ECO Family Survey.

To what level has early intervention helped your family know and understand your rights?		Island		Total
		St. Croix	St. Thomas	
Has not helped	Count % within island	0	0	
Has done a few things	Count % within island		1	1 1/47 = 2%
Has done a good job	Count % within island	7	6	13 13/47 = 28%
Has done an excellent job	Count % within island	18	15	33 33/47 = 70%
Total		25	22	47

Rating of 5 or above = 46/47 = 98%

To what level has early intervention helped be able to talk about your child's needs to others?		Island		Total
		St. Croix	St. Thomas	
Has not helped	Count % within island	0	0	
Has done a few things	Count % within island		1	1 1/47 = 2%
Has done a good job	Count % within island	8	6	14 14/47 = 30%
Has done an excellent job	Count % within island	17	15	32 32/47 = 68%
Total		25	22	47

Rating of 5 or above = 46/47 = 98%

To what level has early intervention helped your family be able to help your child grow and learn?		Island		Total
		St. Croix	St. Thomas	
Has not helped	Count % within island	0	2	2 2/46 = 4%
Has done a few things	Count % within island	0	1	1 1/46 = 2%
Has done a good job	Count % within island	9	6	15 15/46 = 33%
Has done an excellent job	Count % within island	16	12	28 28/46 = 61%
Total		25	21	46

Rating of 5 or above = 43/46 = 93%

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

The VI Infants and Toddlers Program exceeded the targets set for FFY 2010.

- Utilize methods for helping families complete the survey including strategies to follow-up with families who did not complete the survey. Ongoing Resources: VI ITP staff
- Disseminate information to provide families with information about the purpose and use of a Family Survey. Status: A standard letter has been developed so we can advise parents on the purpose and use of the data collected. The staff continues to explain the survey at the point it is given to the families and answers any questions that they may have. Ongoing Resources: VI ITP staff
- Provide targeted training for personnel based on an analysis of most family survey results. October 2007 and ongoing Resources: VI ITP and NECTAC
- Develop an interview to use with families as part of the quality assurance and monitoring system in order to verify survey results. Status: In 2011, VI ITP will explore a partnership with VI Inter-Island Parent Coalition for Change (VI IIPC) and the possibility of working with them on this improvement activity. Continuing. Resources: VI ITP, VI IIPCC and NECTAC
- Explore working the VI IIPC to develop a follow-up interview with parents as part of a quality assurance plan. Continuing
- Partner with the Governor's Early Childhood Advisory Committee (ECAC) to improve the early childhood system and family supports. The VI ITP is one of the partners involved in this committee and will continue to work to implement the June 2010 strategic plan. Ongoing.
- Collaborate with VI Inter-Island Parent Coalition for Change to support families in understanding their rights and helping their child grow and learn through offering workshops and/support groups for families. Continuing Resources: VI ITP and VI Inter-Island Parent Coalition for Change
- Analyze survey data by district for trends in relationship to quality practices. Ongoing Resources: VI ITP, and NECTAC

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010**

*[If applicable]*

The SPP has been revised to include targets and improvement activities for FFY 2012.

Collaborate with the VI Inter-Island Parent Coalition for Change and the ICC to develop training for families on the new Part C regulations with emphasis on the VI ITP program and early intervention services, referral, eligibility, IFSPs, procedural safeguards and family protections. March – June 2012. VI ITP, VI Inter-Island Parent Coalition for Change, NECTAC, SERRC

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

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

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

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

FFY	Measurable and Rigorous Target
FFY 2010	VI will meet or exceed the National percent of infants and toddlers birth to one with IFSPs

**Actual Target Data for FFY 2010: 1.07%**

VI percent:  $18/1,672 \times 100 = 1.07\%$  exceeds the National percent (1.03 %)

Performance FFY 2008	Performance FFY 2009	Performance FFY 2010
<p>Using 618 Data from 2008, the VI served 30 infants birth to 1 out of a population of 1,672 (30/1672); VI percent of infants and toddlers birth to 1 with IFSPs = <b>1.79%</b></p> <p>The National percent of infants and toddlers birth to 1 with IFSPs = 1.04% The difference between the Virgin Islands percent and the National percent of infants and toddlers birth to 1 with IFSPs was +.75%</p>	<p>Using 618 Data from 2009, the VI served 39 infants birth to 1 out of a population of 1,672 (39/1672); VI percent of infants and toddlers birth to 1 with IFSPs = <b>2.33%</b></p> <p>The National percent of infants and toddlers birth to 1 with IFSPs = 1.03% The difference between the Virgin Islands percent and the National percent of infants and toddlers birth to 1 with IFSPs was +1.30%</p>	<p>Using 618 Data from 2010, the VI served 18 infants birth to 1 out of a population of 1,672 (18/1672); VI percent of infants and toddlers birth to 1 with IFSPs = <b>1.07 %</b></p> <p>The National percent of infants and toddlers birth to 1 with IFSPs = 1.03% The difference between the Virgin Islands percent and the National percent of infants and toddlers birth to 1 with IFSPs was .04 %</p>

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

The number of infants with IFSPs birth to one has dropped (from 39 in FFY 2009 to 18 in FFY 2010). The VI Infants and Toddlers Program noted that in joint child find activities conducted with Dept. of Education, a fewer number of infants and their families attended these events or were identified at these joint child find events. In January 2012, the 2009 Kids Count Data report for the VI was released. One of the trends reported was that the number of children decreased in the last decade from 32% to 23.8% of the total population and the low birth weight rate lowered to approximately 8.1%. These trends, along with the high unemployment rate in the Territory and the accompanying movement of families to other locations outside of the Territory, may account for the lower number of infants and toddlers identified.

The MCH clinics in the Territory have experienced shortages of pediatricians. Currently, pediatricians are available on a part-time basis to staff the MCH clinics and may account for lower number of children being identified. While the VI Infants and Toddlers Program furnishes brochures and materials to physicians' offices on a periodic basis, the materials have not been recently updated. Child find activities are conducted at Agricultural Fairs and other community-based events. More outreach to the other collaborating partners (i.e. new Home Visiting program, Early Head Start, community based and faith-based organizations) may provide more opportunities to reach families.

Improvement strategies will be explored, at the suggestion of ICC members, to identify potential gaps in referrals and to strengthen child find efforts.

**Improvement Strategies Status:**

- Review strategies to promote public awareness activities for all children with all community resources, public and private. Resources: VI ITP and referral resources. On going.
- Continue training to ensure identification of children who are involved in substantiated cases of abuse and neglect or are identified as affected by illegal substance abuse, or withdrawal symptoms resulting from prenatal drug exposure. Resources: VI ITP staff. On going.
- Continue current efforts to maintain a comprehensive child find system and continue monitoring referral sources and current outreach efforts. Resources: VI ITP Territory and local staff. On going.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010**

*[If applicable]*

The SPP has been revised to include targets and improvement activities for FFY 2012..

- Review referral sources and identify gaps in referrals from those sources. February 2012 – March 2012. VI ITP

- Review, revise and distribute public awareness materials and strategies based on the review and on the new Part C regulations. March 2012 – June 2012. VI ITP, VI ICC, VI Inter-Island Parent Coalition for Change, NECTAC and SERRC
- Work with the ICC to strengthen collaboration on child find efforts with the VI Dept. of Special Education (Part B), the new MCH Home Visiting program, Early Head Start and Head Start program, the Department of Human Resources, child care programs, programs that provide services under the Family Violence Prevention and Services Act, Early Hearing and Detection and Intervention (EDHI), Children's Health Insurance Program (CHIP). March 2012 – June 2012 VI ITP, VI ICC
- Identify and explore partnerships with community and faith based groups to promote child find efforts. March 2012 – June 2012 VI ITP, VI ICC
- A transdisciplinary model of services will be explored and training developed for all ei personnel which will be incorporated with the new Part C regulation training. August 2011 – June 2012. VI ITP/NECTAC/SERRC

Part C State Annual Performance Report (APR) for FFY 2010

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

**Indicator 6:** Percent of infants and toddlers birth to 3 with IFSPs compared to national data.  
(20 U.S.C. 1416(a)(3)(B) and 1442)

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

FFY	Measurable and Rigorous Target
FFY 2010	VI will meet or exceed the National percent of infants and toddlers birth to 3 with IFSPs

**Actual Target Data for FFY 2010:** VI ITP percent =  $147/5,087 \times 100 = 2.89\%$  which exceeds the

National percent = 2.82%

Performance FFY 2008	Performance FFY 2009	Performance FFY 2010
<p>Using 618 Data from 2008, the VI served 143 infants/toddlers, birth to three, out of 5,087 children birth to three (143/5,087); VI percent of infants and toddlers birth to 3 with IFSPs = <b>2.81%</b></p> <p>The VI served <b>2.81%</b> of infants and toddlers birth to 3 is above the national percent of infants and toddlers birth to 3 (2.66%). The difference between the Virgin Islands percent and</p>	<p>Using 618 Data from 2009, the VI served 151 infants/toddlers, birth to three, out of 5,087 children birth to three (143/5,087); VI percent of infants and toddlers birth to 3 with IFSPs = <b>2.97%</b></p> <p>The VI served <b>2.97%</b> of infants and toddlers birth to 3 is above the national percent of infants and toddlers birth to 3 (2.67%). The difference between the Virgin Islands percent and</p>	<p>Using 618 Data from 2010, the VI served 147 infants/toddlers, birth to three, out of 5,087 children birth to three (143/5,087); VI percent of infants and toddlers birth to 3 with IFSPs = <b>2.89%</b></p> <p>The VI served <b>2.89%</b> of infants and toddlers birth to 3 and is above the national percent of infants and toddlers birth to 3 (2.82%). The difference between the Virgin Islands percent and</p>

the National percent was <b>+.15%.</b>	the National percent was <b>+.30%.</b>	the National percent was <b>.07%.</b>
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**Discussion of Improvement Activities Completed and Explanation of Progress or Slippage that occurred for FFY 2010:**

VI continues to serve more infants and toddlers than the National percent. While there has been a slight drop in the numbers served birth to three, the number of the birth to one infants with IFSPs probably accounts for that drop.

In January 2012, the 2009 Kids Count Data report for the VI was released. One of the trends reported was that the number of children decreased in the last decade from 32% to 23.8% of the total population and the low birth weight rate lowered to approximately 8.1%. These trends, along with the high unemployment rate in the Territory and the accompanying movement of families to other locations outside of the Territory, may account for the lower number of infants and toddlers identified.

The MCH clinics in the Territory have experienced shortages of pediatricians. Currently, pediatricians are available on a part-time basis to staff the MCH clinics and may account for lower number of children being identified. While the VI Infants and Toddlers Program furnishes brochures and materials to physicians’ officers on a periodic basis, the materials have not been recently updated. Child find activities are conducted at Agricultural Fairs and other community-based events. More outreach to the other collaborating partners (i.e. new Home Visiting program, Early Head Start, community based and faith-based organizations) may provide more opportunities to reach families.

Improvement strategies will be explored, at the suggestion of ICC members, to identify potential gaps in referrals and to strengthen child find efforts.

**Improvement Strategies Status:**

- Review strategies to promote public awareness activities for all children with all community resources, public and private. Resources: VI ITP and referral resources. On going.
- Continue training to ensure identification of children who are involved in substantiated cases of abuse and neglect or are identified as affected by illegal substance abuse, or withdrawal symptoms resulting from prenatal drug exposure. Resources: VI ITP staff. On going.
- Continue current efforts to maintain a comprehensive child find system and continue monitoring referral sources and current outreach efforts. Resources: VI ITP Territory and local staff. On going.

**Revisions, with Justification, to Proposed Targets / Improvement Activities /  
Timelines / Resources for FFY 2010**

*[If applicable]*

The SPP has been revised to include targets and improvement activities for FFY 2012..

- Review referral sources and identify gaps in referrals from those sources. February 2012 – March 2012. VI ITP
- Review, revise and distribute public awareness materials and strategies based on the review and on the new Part C regulations. March 2012 – June 2012. VI ITP, VI ICC, VI Inter-Island Parent Coalition for Change, NECTAC and SERRC
- Work with the ICC to strengthen collaboration on child find efforts with the VI Dept. of Special Education (Part B), the new MCH Home Visiting program, Early Head Start and Head Start program, the Department of Human Resources, child care programs, programs that provide services under the Family Violence Prevention and Services Act, Early Hearing and Detection and Intervention (EDHI), Children's Health Insurance Program (CHIP). March 2012 – June 2012 VI ITP, VI ICC
- Identify and explore partnerships with community and faith based groups to promote child find efforts. March 2012 – June 2012 VI ITP, VI ICC
- A transdisciplinary model of services will be explored and training developed for all ei personnel which will be incorporated with the new Part C regulation training. August 2011 – June 2012. VI ITP/NECTAC/SERRC

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

**Indicator 7:** Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C’s 45-day timeline.

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

**Measurement:**

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

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

FFY	Measurable and Rigorous Target
FFY 2010	100% of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C’s 45-day timeline.

**Actual Target Data for FFY 2010: 94%**

The Virgin Islands Infants and Toddlers Program’s (Part C of IDEA) looked at all children with IFSPs during the period of July 1, 2010 - June 30, 2011 (or FFY 2010) to determine if an evaluation and assessment and an initial IFSP meeting were conducted within Part C’s 45-day timeline. Although still not meeting the compliance target of 100%, the VI Part C program’s FFY 2010 performance is 94%, which is an improvement over the FFY 2009 performance of 92%.

45 day timeline July 1, 2010- June 30, 2011 N= 129	Number of Children	Percent
Number of children receiving timely evaluation and initial IFSP within 45 day timeline	107	83%
Number of children with untimely evaluation and initial IFSP within 45 day timeline due to <i>family reason</i>	14	11%
<b>Compliant</b>	<b>121</b>	<b>94%</b>

Number of children who did not receive timely evaluations and an initial IFSP with 45 day time line due to program reasons	8	6%
Total number of records reviewed		100%

The table immediately below is broken out by district for local monitoring purposes.

St. Thomas/St. John/Water Island District = 45	St. Croix District = 84
Total number of children in time period = 45 (check total number) Timely evaluation and initial IFSP = 31 Family Reasons = 10 Total Compliant = 31 + 10 = 41/45 = 91% Program Reasons Noncompliant = 4/41 = 9%	Total number of children in time period = 84 Timely = 76/84 Family Reasons = 4 Total Compliant = 76 + 4 = 80/84 = 95% Program Reasons Noncompliant = 4/84 = 5%

**Explanation of Progress or Slippage that occurred for FFY 2010:**

Of the children with IFSPs in this reporting period who did not receive a timely evaluation and initial IFSP within the 45 day time period due to program reasons, there were eight (8) instances of program non-compliance, four in each district. All children whose evaluation and assessment and initial IFSP was held beyond the 45 day timeline did subsequently receive an evaluation and assessment and had an initial IFSP, although late. With the exception of one child and family, the delays were from 1 to 7 days when program reasons were the reason for delay.

Additionally, it continues to be challenging for the Part C program in both districts to connect with families in order to meet the 45-day timeline. Families referred to this program are often hard to reach because phone numbers are not working consistently or at all. A number of families do not always have a working phone themselves so that program staff must rely on leaving messages with other family members. A number of families are homeless and move from home to home or other locations (i.e. homeless shelter) frequently. While there was progress in the indicator, the VI ITP did not meet the target of 100%. Reasons for not meeting the target are described below.

In the St. Thomas district from July 1, 2010 until December 2010, a new service coordinator was in place. However, in December 2010, the service coordinator went on medical leave. From December 2010 until June 30, 2011, those duties were performed by other personnel. The loss of someone in this position performing these duties on a regular basis affected compliance in the district. The St. Croix district also did not have a regular service coordinator from July 1, 2010 until December 2010 because that person had relocated

earlier in the year to the mainland USA. EIS personnel (already limited in numbers) functioned as interim service coordinators during that time period.

Given that most early intervention personnel provide services, including intake, evaluation, assessment, service coordination and scheduling of the initial IFSP meeting, on a part-time basis with only a few full-time personnel available means that this program continues to struggle to meet this compliance requirement. Additionally, recruiting for such qualified personnel or contracting with qualified personnel (ex. Physical Therapist) has proven to be very difficult given the limited Part C of IDEA funding issued to the VI Infants and Toddlers Program. The program is unable to offer high salaries comparable to the continental USA and is unable to attract such qualified personnel or maintain these personnel. Without the adequate number of personnel, or availability of full-time specialized early intervention personnel for the program providing services under Part C of IDEA, this program will constantly be in danger of not attaining 100% compliance. Since Part C of IDEA funding is based on a formula which is tied to the number of children reported in US Census for the Territory and the VI has shown that it identifies and enrolls a significant number of infants and toddlers as compared to other jurisdictions, in addition to using very broad eligibility criteria consideration must be made to possibly change that criteria to more restrictive levels. The VI Infants and Toddlers Program is studying ways to streamline post-referral to initial IFSP processes in the districts in order to maximize existing personnel and better serve infants and toddlers and their families. Please see additional Improvement Activities for FFY 2011.

#### **Discussion and Status of Improvement Activities Completed:**

- Both the MCH and ITP contracted part-time Physical Therapist and other EIS personnel travel to the St. Thomas/ST. John/Water Island district to conduct evaluations and assessments in an attempt to meet 45-day timeline. On-going. ITP program.
- Continue monitoring activities according to monitoring schedule. Ongoing
- Continue data collection currently in place. Ongoing.
- Monitor in conjunction with regular Child Record review monitoring. Analyze data to determine need for training. June 2011. Resources: Territory Staff.
- A checklist developed by ITP Director, based on the record review process, will be used by Service Coordinators as a new improvement and monitoring strategy. March 2010 Implemented and ongoing.
- Policy reminders are issued to in writing Service Coordinators and other EIS personnel regarding the 45 day timeline requirement. Ongoing
- Monthly reviews of data are conducted and timelines and coordination steps are discussed with the Service Coordinator. Ongoing

- A checklist was developed by ITP director to provide a quick reference for the Service Coordinators of steps to be in place and timelines to meet.

**Correction of Previous Noncompliance**

As required in the FFY 2009 OSEP SPP/APR Response Table based on reporting less than 100% compliance, VI Infants and Toddlers Program was required to report on the status of correction of non-compliance for Indicator 7 based on FFY 2009 and FFY 2008. In accordance with OSEP memo 09-02, the VI Infants and Toddlers Program will describe the efforts taken to correct and verify correction of previous non-compliance.

<b>45 day timeline July 1, 2009 - June 30, 2010 N=149</b>	<b>Number of Children</b>	<b>Percent</b>
Number of children receiving timely evaluation and initial IFSP within 45 day timeline	116	78%
Number of children with untimely evaluation and initial IFSP within 45 day timeline due to <i>family reason</i>	21	14%
<b>Compliant</b>	<b>137</b>	<b>92%</b>
Number of children who did not receive timely evaluations and an initial IFSP with 45 day time line due to program reasons	12	8%
Total number of records reviewed	149	100%

Infants and Toddlers Program EIS personnel, by district, were advised of the performance of the program and the need to make improvements and correct non-compliance. Further, a summary of the performance results in indicators #1, 2, 3, 4, 5, 6, 7, and 8 was shared and discussed with personnel. Infants and Toddlers Program EIS personnel, by district, were advised of the performance of the program and the need to make improvements and correct non-compliance. Further, a summary of the performance results in indicators #1, 2, 3, 4, 5, 6, 7, and 8 was shared and discussed with personnel. VI ITP director informed (in writing) the service coordinators and personnel in each district of the non-compliance regarding the 45-day timeline and the policy regarding completing the evaluation, assessment and initial IFSP meeting within 45 days of referral. The VI ITP director required each district to correct the non-compliance. Subsequent monitoring of the individual children (12) who did not receive an evaluation, assessment and initial IFSP meeting in a timely manner showed that all of these children and their families did received these services although late. Additionally, the VI ITP reviewed updated early intervention records in each district (St. Thomas/St. John/Water Island – 5 additional records; St. Croix – 15 additional records) after informing each district of the non-compliance. The monitoring of these records indicated that evaluations and assessments and the initial IFSP meetings were held within the required timeline. Thus the Part C program is correctly implementing 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1) (i.e., achieved 100% compliance)

based on a review of data subsequently collected through on-site monitoring. It was determined that the districts had demonstrated that they were implementing the requirements consistent with meeting.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010**

*[If applicable]*

The SPP has been revised to include targets and improvement activities for FFY 2012.

- Acquire additional contract personnel to support the both districts in meeting timelines and improving performance. December 2011 Program management/VIDH Human Resource personnel.
- The VI ITP will review evaluation and assessment processes and develop training to streamline evaluation and assessment, along with providing training on the new Part C regulations. December – June 2012. VI ITP/NECTAC/SERRC

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

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

- A. IFSPs with transition steps and services;
- B. Notification to LEA, if child potentially eligible for Part B; and
- C. Transition conference, if child potentially eligible for Part B.

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

**Measurement:**

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

Account for untimely transition conferences, including reasons for delays.

FFY	Measurable and Rigorous Target
FFY 20010	100% of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including:  A. 100% of all children with IFSPs with transition steps and services; B. 100% of all children potentially eligible for Part B, notification will be given to LEA; and C. 100% of all children potentially eligible for Part B will have a timely transition conference)

**Actual Target Data for FFY 2010:**

**8a: IFSP with Transition Steps and Services:** N = 71/71 Percent = 100%

(71 of the children exiting Part C who have an IFSP with transition steps and services divided by of children exiting Part C times 100); STT number of children exiting with IFSP transition steps & services/children exiting Part C = 25; STX number of children exiting with IFSP transition steps & services/children exiting Part C = 46.

**8b: Notification to LEA, if child potentially eligible for Part B:** N =71; Percent = 100%

(71 children exiting Part C and potentially eligible for Part B where notification to the LEA occurred divided by the 71 children exiting Part C who were potentially eligible for Part B times 100)

**8c: Transition conference, if child potentially eligible for Part B:** 71 =N Percent = 87%

(62 children exiting Part C and potentially eligible for Part B where the transition conference occurred in a timely manner divided by the 71 of children exiting Part C who were potentially eligible for Part B times 100)

<b>Transition conference occurred at least 90 days prior to the child’s 3<sup>rd</sup> birthday for those children potentially eligible for Part B (July 1, 2010-June 30, 2011)</b>	<b>Number of Children</b>	<b>Percent</b>
Number of children potentially eligible for Part B and transition conference occurred at least 90 days prior to the 3 <sup>rd</sup> birthday	60	85%
Number of children potentially eligible for Part B and transition conference did not occur at least 90 days prior to 3 <sup>rd</sup> birthday because of family reasons	2	3%
<b>Compliant</b>	<b>62</b>	<b>87%</b>
Number of children potentially eligible for Part B and transition conference did not occur at least 90 days prior to 3 <sup>rd</sup> birthday because of program reasons.*	9	13%
<b>Noncompliant</b>	<b>9</b>	<b>13%</b>
Total	71	100%

STX total N = 46 exiting; late = 7; 5 out of 7 are late referrals (Range of days from 2 to 45 days: **Program reasons**).

STT total N = 25; late = 3 - late referrals (Range of days from 5 to 20 days); 1 program reason.

The VI infants and toddlers program held transition conferences for 71 children. Of the number that was late, 8 out of 11 were late referrals to the Part C program –children were already nearing their third birthday. The VI is doing a good job of getting these children evaluated and IFSP meetings held in a timely manner in order for the transition conference to happen.

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

The VI Infants and Toddlers Program reviewed data for children who turned 3 during the period July 1, 2010 - June 30, 2011. Records were reviewed to determine if transition steps and services were in place.

The VI Infants and Toddlers Program provides notification to LEA, if child potentially eligible for Part B was made, and if the transition conference, if child potentially eligible for Part B, was held at least 90 days prior to the child's third birthday.

The Virgin Island Infants and Toddlers Program's (Part C of IDEA) performance in this indicator showed maintenance of compliance in #8a and 8b at 100%, however, there was slight slippage from 90% to 87% for 8c since FFY 2009.

- Continue monitoring activities according to monitoring schedule. Resources: VI ITP staff, local staff, NECTAC. (Continuing each year)
- A checklist based on the record review process, used by ITP management, will be used by Service Coordinators as a new improvement and monitoring strategy. March 2010 Implemented and ongoing.
- In the St. Thomas district from July 1, 2010 until December 2010, a new service coordinator was in place. However, in December 2010, the service coordinator went on medical leave. From December 2010 until June 30, 2011, those duties were performed by other personnel. The loss of someone in this position performing these duties on a regular basis affected compliance in the district.
- The St. Croix district also did not a regular service coordinator from July 1, 2010 until December 2010 because that person had relocated earlier in the year to the mainland USA. EIS personnel (already limited in numbers) did functioned as interim service coordinators during that time period.

### **Correction or Previous Non-Compliance**

As required in the FFY 2009 OSEP SPP/APR Response Table based on reporting less than 100% compliance, VI Infants and Toddlers Program was required to report on the status of correction of non-compliance for Indicator 8 based on FFY 2009 and FFY 2008. In accordance with OSEP memo 09-02, the VI Infants and Toddlers Program will describe the efforts taken to correct and verify correction of previous non-compliance.

Infants and Toddlers Program EIS personnel, by district, were advised of the performance of the program and the need to make improvements and correct non-compliance.

VI ITP director informed the service coordinators and personnel in each district of the non-compliance regarding transition planning requirements, including transition steps and services, LEA notification and transition conferences as least 90 days before each child's third birthday. The VI ITP director required each district to correct the non-compliance. Subsequent monitoring of the individual children who did not have timely transition conferences showed that transition conferences were held for 7 children reported in FFY 2009 and for 4 children reported in FFY 2008, although late.

Additionally, consistent with the requirements of OSEP Memo 09-02 and APR Response tables, the VI ITP reviewed updated early intervention records in each district (St. Thomas/St. John/Water Island and St. Croix). These reviews indicated that transition conferences were held for subsequent children exiting the program at least 90 days before their third birthdays and were within the required timeline. Thus the Part C program is correctly implementing 34 CFR §303.148(b)(2)(i) as modified by IDEA section 637(a)(9)(A)(ii)(II).

### **Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010**

Training on new Part C regulations related to transition requirements –February 2012 – June 2013, NECTAC, SERRC

- Clarification on transition responsibilities of Part C and Part B
- What to do for late referrals
- Appropriate documentation
- Develop TA materials to support transition

Begin development of new transition agreement in line with new Part C regulatory requirements.

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

**Indicator 9:** General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification.

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

**Measurement:**

Percent of noncompliance corrected within one year of identification:

- a. # of findings of noncompliance.
  - b. # of corrections completed as soon as possible but in no case later than one year from identification.
- Percent = [(b) divided by (a)] times 100.

States are required to use the "Indicator 9 Worksheet" to report data for this indicator (see Attachment A).

FFY	Measurable and Rigorous Target
2010	100%

**Actual Target Data for FFY 2010: 100%**

**INDICATOR C-9 WORKSHEET**

Indicator/Indicator Clusters	General Supervision System Components	# of EIS Programs Issued Findings in FFY 2009 (7/1/09 through 6/30/10)	(a) # of Findings of noncompliance identified in FFY 2009 (7/1/09 through 6/30/10)	(b) # of Findings of noncompliance from (a) for which correction was verified no later than one year from identification
1. Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	1	5	5
	Dispute Resolution: Complaints, Hearings			
2. Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings			
3. Percent of infants and toddlers with IFSPs who demonstrate improved outcomes	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			

	Dispute Resolution: Complaints, Hearings			
4. Percent of families participating in Part C who report that early intervention services have helped the family	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings			
5. Percent of infants and toddlers birth to 1 with IFSPs	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
6. Percent of infants and toddlers birth to 3 with IFSPs	Dispute Resolution: Complaints, Hearings			
7. Percent of eligible infants and toddlers with IFSPs for whom an initial evaluation and initial assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other	2	12	12
	Dispute Resolution: Complaints, Hearings			
8. The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			

<p>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;</p>	<p>Dispute Resolution: Complaints, Hearings</p>			
<p>8. The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:</p>	<p>Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other</p>			
<p>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</p>	<p>Dispute Resolution: Complaints, Hearings</p>			
<p>8. The percentage of toddlers with disabilities exiting Part C with timely transition planning for whom the Lead Agency has:</p>	<p>Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other</p>			

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.	Dispute Resolution: Complaints, Hearings	2	7	7
OTHER AREAS OF NONCOMPLIANCE:	Monitoring Activities: Self-Assessment/ Local APR, Data Review, Desk Audit, On-Site Visits, or Other			
	Dispute Resolution: Complaints, Hearings			
<b>Sum the numbers down Column a and Column b</b>			24	24
<b>Percent of noncompliance corrected within one year of identification = (column (b) sum divided by column (a) sum) times 100.</b>			<b>(b) / (a) X 100 =</b>	<b>100.00%</b>

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

**Verification of Correction of Noncompliance:**

**FFY 2008**

The VI ITP issued 6 findings of noncompliance in FFY 2008. As required in the OSEP Response Table, based on a review of data, each instance of noncompliance has been corrected (i.e. children received services, and IFSP and transition planning although late) and based on a review of updated data collected through subsequent monitoring, VI has

verified that the programs are correctly implementing the regulatory requirements. The VIITP reviewed individual child records in each case.

### **Correction for Individual Instances of Noncompliance**

The VIDH issued 24 findings of noncompliance in FFY 2009 as shown in the worksheet above. All of these findings of noncompliance were corrected in a timely manner. In order to verify correction of noncompliance, the VI reviewed the records for each child to ensure that the noncompliance has been corrected. For the timeline requirements, the program has verified that although late, the individual children received their services, the IFSP was completed or the transition requirements were met (i.e. steps and services were on the IFSP, the LEA was notified or the program conducted a transition conference).

### **Correction of noncompliance for systemic issues**

In addition, the VI ITP has reviewed updated data for subsequent children to ensure that future records were at 100% compliance, in accordance with the OSEP 09-02 Memo. The program has looked at each record to verify correction of the noncompliance. The VI ITP is confident that the districts are correctly implementing the regulatory requirements as specified.

The VI ITP is continuing the regular monitoring schedule, using child record reviews, and other monitoring procedures to meet all requirements. Resources: VI ITP, Ongoing.

### **Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010**

*[If applicable]*

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

**Indicator 10:** Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.

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

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

FFY	Measurable and Rigorous Target
<i>(FFY 2010)</i>	100%

**Actual Target Data for (FFY 2010):**

The VI Infants and Toddlers Program received one complaint during the reporting period. Mediation was offered and was accepted. The complaint was withdrawn given that a mediation agreement was reached.

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

- Continue Child record review monitoring to collect data on parents receiving notice of parent rights and all requirements related to parent rights. Resources: VI ITP, local staff. Ongoing.
- Review and revise Targets and Improvement activities, as needed. Resources: VI ITP. January 2011

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for (FFY)**

*[If applicable]*

**Part C State Annual Performance Report (APR) for FFY 2010**

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

**Indicator 11:** Percent of fully adjudicated due process hearing requests that were fully adjudicated within the applicable timeline.

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

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

FFY	Measurable and Rigorous Target
<i>FFY 2010</i>	<i>100%</i>

**Actual Target Data for FFY 2010:**

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

- Continue Child record review monitoring to collect data on parents receiving notice of parent rights and all requirements related to parent rights. Resources: VI ITP, local staff. Ongoing.
- Review and revise targets and Improvement activities, as needed. Resources: VI ITP. January 2012

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for (Insert FFY)**  
*[If applicable]*

Part C State Annual Performance Report (APR) for FFY 2010

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

**Indicator 12:** Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements (applicable if Part B due process procedures are adopted).

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

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

FFY	Measurable and Rigorous Target
FFY 2010	NA

**Actual Target Data for FFY 2010:**

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

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010**  
*[If applicable]*

Part C State Annual Performance Report (APR) for FFY 2010

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

**Indicator 13:** Percent of mediations held that resulted in mediation agreements.

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

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

FFY	Measurable and Rigorous Target
<i>FFY 2010</i>	<i>No Targets are Necessary at This Time.</i>

**Actual Target Data for FFY 2010:**

One request for mediation occurred during this period and resulted in a mediation agreement.

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

- Continue Child record review monitoring to collect data on parents receiving notice of parent rights and all requirements related to parent rights. Resources: VI ITP, local staff. Ongoing.
- Review and revise Targets and Improvement activities, as needed. Resources: VI ITP. January 2011

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for FFY 2010:**

*[If applicable]*

**Part C State Annual Performance Report (APR) for FFY 2010**

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

**Indicator 14:** State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.

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

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

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

States are required to use the “Indicator 14 Data Rubric” for reporting data for this indicator (see Attachment B).

FFY	Measurable and Rigorous Target
<i>FFY 2010</i>	<i>100%</i>

**Actual Target Data for FFY 2010: 100%**

In order to report 618 data, the State Performance Plan and the Annual Performance Report, data is gathered from our electronic data base, individual child records, parent survey results and parent comments.

2010 SPP/APR Data - Indicator 14			
APR Indicator	Valid and Reliable	Correct Calculation	Total
1	1	1	2
2	1	1	2
3	1	1	2
4	1	1	2
5	1	1	2
6	1	1	2
7	1	1	2
8a	1	1	2
8b	1	1	2
8c	1	1	2
9	1	1	2
10	1	1	2
11	1	1	2
12	1	1	2
13	1	1	2
		<b>Subtotal</b>	30
<b>APR Score Calculation</b>	<b>Timely Submission Points</b> - If the FFY 2010 APR was submitted on-time, place the number 5 in the cell on the right.		5
	<b>Grand Total</b> - (Sum of subtotal and Timely Submission Points) =		35

618 Data - Indicator 14					
Table	Timely	Complete Data	Passed Edit Check	Responded to Data Note Requests	Total
<b>Table 1 - Child Count</b> Due Date: 2/2/11	1	1	1	1	4
<b>Table 2 - Program Settings</b> Due Date: 2/2/11	1	1	1	1	4

<b>Table 3 - Exiting Due Date: 11/2/11</b>	1	1	1	N/A	3
<b>Table 4 - Dispute Resolution Due Date: 11/2/11</b>	1	1	1	N/A	3
				<b>Subtotal</b>	14
<b>618 Score Calculation</b>	<b>Grand Total (Subtotal X 2.5)</b> =				35

<b>Indicator #14 Calculation</b>	
A. APR Grand Total	35.00
B. 618 Grand Total	35.00
C. APR Grand Total (A) + 618 Grand Total (B) =	70.00
Total NA in APR	0.00
Total NA in 618	0.00
<b>Base</b>	<b>70.00</b>
D. Subtotal (C divided by Base*) =	1.000
E. Indicator Score (Subtotal D x 100) =	100.0

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

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

- Review and revise targets and indicators as needed. Resources: VI ITP January 2011
- Utilize DAC and NECTAC training. With service coordinator positions unfilled, the decision to postpone utilizing training until later. The VI ITP was unable to procure a contract with a vendor to improve the data system using ARRA money. The ARRA money was re-allocated.

**Revisions, with Justification, to Proposed Targets / Improvement Activities / Timelines / Resources for (Insert FFY)  
[If applicable]**