

STATE OF COLORADO



Colorado Department of Human Services

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Bill Ritter
Governor

Karen L. Beye
Executive Director

February 27, 2007

Mary Lu Walton
P. O. Box 200069
Evans, CO 80620

Dear Mary Lu,

The purpose of this correspondence is to provide you with a written report of the results of the Division for Developmental Disabilities (DDD) survey conducted December 5-6, 2006 of the Early Intervention program, which includes early intervention services, federal requirements under Part C of Individuals with Disabilities Education Act and service coordination provided by Envision. Christy Scott (DDD), along with other DDD staff and volunteers from a nearby CCB, conducted the survey utilizing a pilot survey tool.

As noted in the survey report, many strengths in the CCB's provision of early intervention services were identified. CCB practices met the majority of the requirements, although some compliance issues were identified and require submission of a plan of correction.

Please find with this correspondence the survey narrative report and the statement of areas of non-compliance. A plan of correction is due by March 30, 2007 to DDD for the areas of non-compliance.

Thank you and your staff for the time and assistance offered during this process. Should you or your staff have any questions, please call me at (303) 866-7270 or email christy.scott@state.co.us.

Sincerely,

Christy Scott
Early Childhood Connections
Program Quality Coordinator

cc: ECC file

Attachment

**ENVISION
EARLY INTERVENTION SURVEY
December 5-6, 2006
(pilot)**

OVERVIEW AND OBSERVATIONS

Envision is located in Evans, Colorado and serves families living in Weld County. At the time of the survey 164 children were enrolled in early intervention services. During the entrance conference, Envision provided public awareness materials and early intervention files for review. The surveyor explained that a pilot tool was being used for the survey and Envision had volunteered to be the fourth and final agency for which the tool was being used before it was finalized.

The survey team consisted of five members including three from the Division for Developmental Disabilities/Early Childhood Connections (DDD/ECC) and two service coordinators or early intervention staff from a nearby Community Centered Board (CCB). Additionally, a physician who is contracted by the DDD/ECC conducted interviews with primary referral sources in the medical field. The results of these interviews will be discussed in a separate report called Technical Assistance Report: Community Outreach and Public Awareness, which is a pilot process intended to create a scorecard to be utilized in assessing individual community's outreach activities. The survey process included record review of early intervention and case management files for 28 children; 22 children actively enrolled in early intervention and service coordination, 4 children who had transitioned out of early intervention services and 2 referrals in the process for eligibility determination. Telephone or written interviews were attempted with 20 families, with 5 responding. "Program Quality Standards for On-Site Surveys" for Early Intervention (Pilot Tool September 2006) were applied. Additionally, written surveys were sent to members of the LICC to garner feedback after the survey. The surveyor reviewed the Part C child count database to verify data integrity and interviewed staff.

An exit conference was held on December 6 with the Executive Director, Director of Support Services, Children's Program Coordinator, Case Manager Director, Director of Administration Operations, Part C Coordinator and other staff to discuss the results of the survey.

PUBLIC PARTNERSHIPS

In general, Envision is commended for its efforts in pulling together community partners to create a cohesive, collaborative system of early intervention supports and services.

Envision took over complete responsibility for early intervention, including Part C funding and requirements, in July of 2006, after funding was transferred from the previous Early Childhood Connections office. The transition was difficult and all early intervention staff, including the Part C Coordinator, were new.

- Public Awareness – Envision has a public awareness plan in place. Ongoing meetings with a variety of groups take place throughout the community. Regular mailings go out to physicians and a system for feedback to referral sources is in place. Envision works collaboratively with the various school districts and BOCES to share responsibility for public awareness with Child Find. Referrals are made in a variety of ways and referral sources ensure that families are connected with Envision. While public awareness materials are available, Envision's website is not current or accurate and there is no link to the state Early Childhood Connections website ensuring access to the state's central directory of information.
- Child Find – There are five Child Find teams in the service area for Envision (four school districts and one BOCES). Envision works collaboratively with all of the Child Find teams to ensure that multidisciplinary assessments are completed. Several Child Find teams conduct "family fairs" and/or community screenings.

- Local Interagency Coordinating Council (LICC) – Commitment from key community partners has been secured for participation on the LICC. Feedback received showed that overall impressions by LICC members is that the LICC is coming together as a working group and not just a “figure-head” and that all members have a real interest in making things work for children and families. There is very good two-way communication between Envision and their community partners.

SERVICES TO CHILDREN AND FAMILIES

Five families were interviewed or responded to a written survey. In general, families reported that they were very satisfied with the services they received through Envision. They knew who their service coordinator was and felt that they could call for help at any time. They were happy with their providers and felt that they had been included in the choice of provider. Families felt that early intervention has helped them communicate their child’s needs and help their child develop and learn. Three of the five families stated that they were aware that they had rights, but were not sure exactly what they were.

- Eligibility – Most evaluations were completed in time to establish eligibility within 45 days of referral and hearing and vision screenings were evident in almost every case. The results and justification of eligibility determinations were appropriately documented in the IFSP. Prior written consent for evaluation form was not comprehensive enough, but a new form has been developed which includes a description of the assessment process for each area and meets the criteria nicely. While documentation of eligibility was provided by the assessment teams, separate letters were sent out after the IFSP notifying the families of eligibility for state-funded services, which was confusing.
- Individualized Family Service Plans – IFSPs were completed for every child and family, in their native language, but a multidisciplinary assessment was not provided in some instances when a categorical eligibility was determined. Written consent for services was not available for a couple of IFSPs. In several instances, the parent signatures were dated prior to the eligibility/IFSP date. Outcomes were not always functional and several times one outcome was written for multiple areas of need. There was no justification for several late IFSPs.
- Services - Services designated in the IFSP were generally appropriate and provided in the child’s natural environment. In instances where center-based services were initially provided, the child was moved back into services in the natural environment at the IFSP review. Several IFSPs reflected a change in service with no justification. Funding for services was frequently identified “as and if available”.
- Service Coordination – In general service coordinators were assigned within three days, but the actual date assigned was hard to discern. There was evidence in the files of notification when the service coordinator changed. It was difficult to determine how often service coordinators were in contact with families because no contact notes were in files for all but one service coordinator. When surveyors asked service coordinators for contact notes, not all service coordinators could produce them.
- Transition – Most transition plans reviewed were timely, the local education agency was notified and appropriate participants attended in all but one case. In this one case, it is believed that representatives were all in attendance, but a signature was missed. No case notes were on file reflecting who participated in the meeting. During an interview with a service coordinator, it was evident that there was confusion on the part of the service coordinator about their role in the transition process.
- Procedural Safeguards – There was documentation in the files that families were given their procedural safeguard. Written prior notice was missing from the majority of files.

DOCUMENTATION AND DATA

File Reviews - File reviews showed that much effort is being taken to ensure that files are complete and many changes have been implemented to improve consistency of information in each file. Standard releases and forms have been developed and are in the process of being implemented and included in the children's files. Most noticeable was the lack of case notes from service coordinators in the files.

Data Analysis and Integrity – A review of the Part C child count database showed that, in general, data is updated regularly and is current. Data submission to the state has been timely. Information in the database matched what was found in individual files.

Results Matter – Envision has moved forward with the implementation of Results Matter and has gained the cooperation of the providers that work with the children and families they serve. A system has been put in place to ensure that providers enter data into the online system monthly.

GENERAL SUMMARY AND RECOMMENDATIONS

Overall, Envision is in compliance with state and federal regulations and is doing a good job ensuring implementation of a system of early intervention supports and services to families. They are complemented on their willingness to volunteer for this survey process. Envision took on the responsibility of Part C implementation enthusiastically and has concentrated on putting procedures in place that meet more than just the minimum requirements. Some of the noted strengths include: family satisfaction with services, transition, membership and facilitation of the LICC, communication with interagency partners and good working relationships with child find teams. Timelines are generally good. Envision should consider the following recommendations:

- o Eligibility is determined by the initial assessment team. The date of eligibility is documented on the IFSP and is the date the child is deemed eligible for early intervention services. A separate letter of eligibility for state-funded services is unnecessary and confusing for families. If a separate eligibility process is necessary to meet the needs of Envision, this should be an internal document only.
- o The Services and Support page of the IFSP should document the service needs of the child, who will provide the service, the method and location of the service and the funding source. The funding source “as and if needed” is not adequate. Each service on an IFSP needs to have a specific funding source identified and if the funding source changes, this should be documented when the change occurs.
- o Several issues discussed in this report reflect technical assistance needs around ongoing training for service coordinators. It would be beneficial for service coordinators to attend the state Service Coordinator Core Competencies training again.
- o The new Part C Coordinator will be required to attend the Service Coordination Core Competencies training and the IFSP Training. It is recommended that service coordinators and other early intervention staff at Envision, along with early intervention providers and Child Find teams attend the state IFSP training along with the Part C Coordinator in order to facilitate team discussions and further support their working relationships. Envision should Contact Laura Merrill, the DDD/ECC Training Coordinator at 303-866-7473 to arrange a training time in their area.

PLAN OF CORRECTION

There were several areas identified during the survey that, while they were not significant problems and do not require a plan of correction, they do warrant attention on the part of Envision in order to see improvement.

- o Envision must update their website and provide a link to the Early Childhood Connections website to ensure access for families and others to the state's central directory of information.
- o Justification for untimely IFSP, initiation of services or transition must be documented clearly in the child's file.
- o A multidisciplinary assessment, which includes representatives from at least two disciplines and assesses all areas of development, must be provided for every child.

Additionally:

- o It is the service coordinator's responsibility to ensure that services are being provided and are effective. Without contact notes there is no way to tell whether families are being contacted on a regular basis to ensure that they are satisfied with the services their child is receiving. In addition, families have the right to review the contents of their child's file at any time. Without contact notes there is not way to record if a complaint is filed by a family or to document that efforts have been made to address the family's concerns. Without contact notes, it seems unlikely that service coordinators could be adequately supervised to ensure that they are fulfilling their responsibilities. Envision must have procedures in place to ensure that service coordinators keep case notes for every family and regularly put them in the child and family's file (See Plan of Correction).

Additional areas of non-compliance identified in this report require a response in the form of a Plan of Correction (POC) from the agency. These are noted in the attached POC document.

To the extent that the Local Interagency Coordinating Council may have an impact on the identified items of non-compliance, Envision should discuss its plan of action to resolve these issues with the LICC. Technical assistance is available to help with the planning process. Please call the state Community Coordinator, Colleen Head at 303-866-7262 if you would like support in these areas.

The Plan of Correction is due to Christy Scott by March 30, 2007.