

## Program Root Cause Questions for Developing Meaningful Corrective Action Plans

Many states are using a desk audit to conduct off-site monitoring of certain compliance indicators. The desk audit can include review of data from a variety of sources including the state data system, self-assessments, previous monitoring reports, previous corrective action plans, tracking logs for timely and accurate submission of data/reports, including submission of required CAP data, etc. As a result of these data analyses, noncompliance may be identified by the state agency. In these instances, local programs are required to develop and implement meaningful corrective action plans (CAPs). This process of developing meaningful CAPs to ensure correction should involve investigating the underlying factors contributing to the program's noncompliance.

Through technical assistance work in a number of states, this tool has been developed to assist local programs/district in collecting valid and reliable data to determine contributing factors of noncompliance. A local program would only complete analysis on the indicator(s) for which the program/district have been found noncompliant. It is recommended that local programs use a team of parents, providers and administrators to collect and analyze data to use in the development of meaningful improvement activities based upon the contributing factors to the noncompliance. Data collection can include review of local program data, review of local policies and procedures, review of child records, and interviews with providers. The depth or scope of the analysis would be determined based upon the degree of noncompliance. Local programs/districts may need state technical assistance to develop meaningful CAPs and this tool may assist in that process.

The purpose of this document is to provide ideas for the types of questions a local program team would consider in investigating contributing factors of noncompliance. Suggested questions are categorized into factors that either relate to *Systems/Infrastructure* or to *Providers/Practice*. These are not meant to be an exhaustive list of questions. Data collected from this investigation can be used to identify contributing factors that relate to program infrastructure, policies and procedures, funding, training and technical assistance, supervision, data, personnel and provider practices. These factors, once identified, can lead to meaningful strategies for correction.

The tool is organized by and includes suggested questions for Indicator C-1, C-7, C-8A, C-8B, C-8C, and C-9. While a local program would only be completing sections on the indicators for which the program has been issued a finding of noncompliance, throughout the investigation, it is recommended that a program consider that many of the factors and solutions identified for one indicator may in fact impact on performance in other indicators as well.

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

Systems/Infrastructure	Providers/Practice
<p>How do we ensure that services are provided in a timely manner?</p> <p>Do we have clear policies and procedures in place on this requirement?</p> <p>What opportunities do we make available for providers to receive training and TA on this requirement?</p> <p>Is our monitoring and supervision for this requirement adequate? Did we know that this area was a problem for us before the state identified it?</p> <p>Do we have valid and reliable data available on this indicator?</p> <p>Do we have adequate numbers of personnel to provide services?</p> <p>Are providers assigned in a way that results in provision of timely service?</p>	<p>Do our providers understand policies and procedures related to providing timely IFSP services?</p> <p>Based on a review of child records, including those where there is noncompliance with timely services, and/or the local data available:</p> <ul style="list-style-type: none"> <li>• What types of services are not timely? All? Or just some types (e.g. OT, Speech)?</li> <li>• What percent of delays are related to services included in the initial IFSP? What are the reasons for those delays?</li> <li>• What percent of delays are related to new services added throughout the year? What are the reasons for those delays?</li> <li>• What is the range of delays for specific services? How many days?</li> <li>• In looking at disaggregated data, is there a difference in timeliness based on specific service coordinator? Or based on specific provider? Or based on some other variable in our program?</li> </ul> <p>Based on provider interviews:</p> <ul style="list-style-type: none"> <li>• Why do our providers think we have delays in this area?</li> <li>• What do they think are the barriers to timely services?</li> </ul>

Systems/Infrastructure	Providers/Practice
	<ul style="list-style-type: none"> <li>What solutions do they think will address this issue?</li> </ul>

**Summary From Indicator C-1 Analysis**

- Based on the data/ information identified above, what categories of factors/reasons (e.g. procedures, infrastructure, practice, training, technical assistance, data and supervision) relate to our current noncompliance?
  
- What strategies related to these categories of factors/reasons should we include in our CAP? For each strategy, include who is responsible and the timeline for completing the strategy.

Contributing Factor Area	Strategies	Who is responsible?	Timeline
Development/ Revisions to Agency's Policies and Procedure			
Changes to Use of Funds			

<b>Contributing Factor Area</b>	<b>Strategies</b>	<b>Who is responsible?</b>	<b>Timeline</b>
Provision of Training and TA			
Changes in Supervision			
Changes in Personnel			
Changes in Provider Practices			

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**SPP/APR Indicator C-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.

Systems/Infrastructure	Providers/Practice
<p>How do we ensure that initial IFSP meetings are conducted within 45 days?</p> <p>Do we have clear policies and procedures in place regarding assigning a service coordinator in a timely manner and steps and timelines for completing the initial evaluation and assessment and holding the IFSP meeting within 45 days?</p> <p>How many days do our procedures permit for each activity within the process of referral to the IFSP meeting?</p> <p>Do the number of days allowed between each activity ensure that the 45 day requirement can be met?</p> <p>Do we provide opportunities for providers to receive training and TA?</p> <p>Do we have adequate numbers of personnel to conduct evaluations?</p>	<p>Do our providers have the necessary knowledge and skills to implement policies and procedures related to completing all required activities from referral through the initial IFSP meeting?</p> <p>Based on a review of child records, including those where there is noncompliance with timely services, and/or the local data available:</p> <ul style="list-style-type: none"> <li>• How many days following referral was the service coordinator assigned (e.g., regulations require as soon as possible after receiving the referral)?</li> <li>• Did the family identify its resources, priorities and concerns related to enhancing their child's development through a family-directed assessment? If yes, How many days from referral was this family assessment completed?</li> <li>• What percent of the delay is related to the intake process? What are the reasons?</li> <li>• What percent of delays are related to the process of scheduling and conducting the evaluation of the child? What are the reasons?</li> <li>• What percent of the delays are related to the process of completing evaluation reports and scheduling the IFSP meeting? What are the reasons for those delays?</li> <li>• In looking at disaggregated data, is there a difference in timeliness based on specific service coordinators? Or based on specific</li> </ul>

Systems/Infrastructure	Providers/Practice
<p>Do we have adequate numbers of service coordinators?</p> <p>Is our monitoring and supervision adequate for this requirement? Did we know we had a problem in this area?</p> <p>Do we have valid and reliable data available to address this indicator?</p>	<p>evaluators? Or based on some other variable in our program? What were the reasons?</p> <p>Based on provider interviews:</p> <ul style="list-style-type: none"> <li>• Why do our providers think we have delays in this area?</li> <li>• What solutions do they think will address this issue?</li> <li>▪ Do providers know how to fully include families in the IFSP process, information sharing and team decisions?</li> <li>▪ Do providers know how to adapt the IFSP process for culturally or linguistically diverse families?</li> </ul>

**Summary From Indicator C-7 Analysis**

- Based on the data/ information identified above, what categories of factors/reasons (e.g. procedures, infrastructure, practice, training, technical assistance, data and supervision) relate to our current noncompliance?
  
- What strategies related to these categories of factors/reasons should we include in our CAP? For each strategy, include who is responsible and the timeline for completing the strategy.

<b>Contributing Factor Area</b>	<b>Strategies</b>	<b>Who is responsible?</b>	<b>Timeline</b>
Development/ Revisions to Agency's Policies and Procedure			
Changes to Use of Funds			
Provision of Training and TA			
Changes in Supervision			
Changes in Personnel			
Changes in Provider Practices			

**SPP/APR Indicator C-8A:** 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 IFSPs with transition steps and services.

Systems/Infrastructure	Providers/Practice
<p>How does our agency coordinate with other agencies to support children and families during transition?</p> <p>Do we have clear policies and procedures in place regarding sharing information with families about potential service options for their children when they exit early intervention, including transition steps in the IFSP, and expectations about what quality transition steps should include?</p> <p>Do we provide sufficient opportunities for providers to receive training and TA on developing meaningful IFSP transition steps?</p> <p>Do we have adequate numbers of personnel to provide transition services?</p> <p>Is our monitoring and supervision adequate to ensure that transition steps are included on the IFSP and that the transition steps are appropriate? Did we know we had a problem in this area?</p>	<p>Do providers have the necessary knowledge and skills to develop meaningful IFSP transition steps? Do providers understand:</p> <ul style="list-style-type: none"> <li>• The related policies and procedures related to content of the IFSP, including what kinds of steps to put on the IFSP to prepare children and families for transition?</li> <li>• What information and resources to share with families to help them make decisions about potential service options when their child ages out of early intervention?</li> <li>• How to coordinate with other programs or agencies and otherwise support children and families to ensure smooth transition to various settings or next steps?</li> </ul> <p>Looking at files where children have recently transitioned:</p> <ul style="list-style-type: none"> <li>• Do the files include transition plans with appropriate steps to be taken to support the transition of the child, (e.g. discussions with and training of parents regarding future placements and other matters related to the child’s transition; procedures to prepare the child for changes in service delivery, including steps to help the child adjust to, and function in, a new setting?</li> <li>• Is there evidence that the family provided consent for the transmission of information about the child to the LEA?</li> </ul>

Systems/Infrastructure	Providers/Practice
	<ul style="list-style-type: none"> <li>In looking at disaggregated data, including files where transition steps are not included, is there a pattern as to whether or not transition steps are included in the IFSP based upon the service coordinator? Or based on some other variable in our program?</li> </ul> <p>Based on provider interviews:</p> <ul style="list-style-type: none"> <li>Why do our providers think we have delays in this area?</li> <li>What solutions do they think will address this issue?</li> </ul>

**Summary From Indicator 8A Analysis**

- Based on the data/ information identified above, what categories of factors/reasons (e.g. procedures, infrastructure, practice, training, technical assistance, data and supervision) relate to our current noncompliance?
- What strategies related to these categories of factors/reasons should we include in our CAP? For each strategy, include who is responsible and the timeline for completing the strategy.

Contributing Factor Area	Strategies	Who is responsible?	Timeline
Development/ Revisions to Agency's Policies and Procedure			

<b>Contributing Factor Area</b>	<b>Strategies</b>	<b>Who is responsible?</b>	<b>Timeline</b>
Changes to Use of Funds			
Provision of Training and TA			
Changes in Supervision			
Changes in Personnel			
Changes in Provider Practices			

**SPP/APR Indicator C-8B:** 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 notification to LEA if child potentially eligible for Part B.

Systems/Infrastructure	Providers/Practice
<p>How does our agency coordinate with the Part B system to ensure that LEAs are notified of potentially eligible children?</p> <p>Are there clear policies and procedures in place regarding steps to take in notifying the LEAs of potentially eligible children including an opt-out policy if consistent with state policy?</p> <p>Do we provide sufficient opportunities for providers to receive training and TA around notification, if applicable?</p> <p>Do we have a process in place and procedures to ensure that notification is provided to LEAs in a timely manner?</p> <p>Is our monitoring and supervision adequate to ensure that notification is provided to LEAs of all potentially eligible children including implementing opt-out provisions if appropriate? Did we know we had a problem in this area?</p>	<p>Do providers have the necessary knowledge and skills? e.g. Do providers understand:</p> <ul style="list-style-type: none"> <li>• Policies and procedures related to notifying the LEA of potentially eligible children including the opt-out provision if appropriate?</li> <li>• What information to share with families about their right to decline notification to the LEA (if the state has an opt-out provision in state policy)?</li> <li>• What information is shared with the LEA to fulfill the notification requirement and under what conditions?</li> <li>• How to coordinate with the LEA in the sharing of data for notification?</li> </ul> <p>Based upon review of child records, including those where notification was not provided to Part B::</p> <ul style="list-style-type: none"> <li>• If there is no opt-out policy, is there evidence in the record the LEA was notified (without parent consent) that the child is potentially eligible for Part B?</li> <li>• Is there evidence in the record that the parent provided consent for the transmission of confidential information (other than notification information) about the child to the LEA before it was transmitted?</li> </ul>

Systems/Infrastructure	Providers/Practice
	<ul style="list-style-type: none"> <li>If there is an opt-out policy, is there evidence in the record that the family was given the opportunity to request their child's name and contact information not be sent to the LEA? If so, was the parent's preference followed?</li> </ul> <p>Based on provider interviews:</p> <ul style="list-style-type: none"> <li>Why do our providers think we have delays in this area?</li> <li>What solutions do they think will address this issue?</li> </ul>

**Summary From Indicator C-8B Analysis**

- Based on the data/ information identified above, what categories of factors/reasons (e.g. procedures, infrastructure, practice, training, technical assistance, data and supervision) relate to our current noncompliance?
- What strategies related to these categories of factors/reasons should we include in our CAP? For each strategy, include who is responsible and the timeline for completing the strategy.

<b>Contributing Factor Area</b>	<b>Strategies</b>	<b>Who is responsible?</b>	<b>Timeline</b>
Development/ Revisions to Agency's Policies and Procedure			
Changes to Use of Funds			
Provision of Training and TA			
Changes in Supervision			
Changes in Personnel			
Changes in Provider Practices			

**SPP/APR Indicator C-8C:** 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 conducting a transition conference, if child potentially eligible for Part B.

Systems/Infrastructure	Providers/Practice
<p>How does our agency coordinate with other agencies to support children and families preparing for and during the transition conference?</p> <p>Are there procedures in place with the LEA to ensure that timely scheduling occurs so that the conference can occur in a timely manner and all participants can attend?</p> <p>Based on the above agreements, do we have clear policies and procedures in place regarding timely transition conferences, including sharing information with families about potential service options for their children when they exit early intervention and the transition conference, when and how to invite participants to the transition conference, and what needs to occur at the transition conference?</p> <p>Do we provide sufficient opportunities for providers to receive training and TA about sharing information with families about potential service options and the transition conference?</p> <p>Do we have adequate numbers of personnel to plan and conduct transition conferences for children transitioning to Part B or other services?</p> <p>Is our monitoring and supervision adequate to ensure that transition conferences are carried out in a timely manner? Did we know we had a problem in this area?</p>	<p>Do providers have the necessary knowledge and skills related to carrying out a meaningful and timely transition conference?</p> <p>Do providers understand:</p> <ul style="list-style-type: none"> <li>▪ The related policies and procedures related to timely transition conferences?</li> <li>▪ What information and resources to share with families to help them make decisions about services options when their child ages out of early intervention?</li> <li>▪ How to coordinate with the LEA and other programs or agencies in planning and conducting the transition conference?</li> <li>▪ How to support and prepare families for the transition conference?</li> </ul> <p>In looking at files where children have recently transitioned, including those where transition conferences are not timely:</p> <ul style="list-style-type: none"> <li>• Is there documentation that the LEA was invited to the transition planning conference? Were they invited early enough to allow them to attend?</li> </ul>

Systems/Infrastructure	Providers/Practice
	<ul style="list-style-type: none"> <li>• Is there documentation as to who attended the transition planning conference? If so, who typically participates? Who does not?</li> <li>• Is there documentation that the child's program options for the period from the child's third birthday through the remainder of the school year were reviewed?</li> <li>• Is there evidence that the parent declined the transition conference if applicable.</li> <li>• Looking at files where the transition planning conference was not held or not held within the required timeline, what were the reasons?</li> </ul> <p>Based on provider interviews:</p> <ul style="list-style-type: none"> <li>• Why do our providers think we have delays in this area?</li> <li>• What solutions do they think will address this issue?</li> </ul>

**Summary From Indicator C-8c Analysis**

- Based on the data/ information identified above, what categories of factors/reasons (e.g. procedures, infrastructure, practice, training, technical assistance, data and supervision) relate to our current noncompliance?

- What strategies related to these categories of factors/reasons should we include in our CAP? For each strategy, include who is responsible and the timeline for completing the strategy.

<b>Contributing Factor Area</b>	<b>Strategies</b>	<b>Who is responsible?</b>	<b>Timeline</b>
Development/ Revisions to Agency's Policies and Procedure			
Changes to Use of Funds			
Provision of Training and TA			
Changes in Supervision			
Changes in Personnel			
Changes in Provider Practices			

**SPP/APR Indicator C-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.

Systems/Infrastructure	Providers/Practice
<p>How does our agency supervise/monitor (including data entry and checks, reviewing data reports, conducting self-assessment and record reviews, observation, etc) our own performance to identify potential emerging issues and correct them before noncompliance is identified.</p> <p>How does our agency ensure that we correct noncompliance in a timely manner?</p> <p>Do we have clear policies and procedures in place regarding timely correction of noncompliance?</p> <p>Do we provide sufficient opportunities for providers to receive training and TA to support correction of noncompliance?</p> <p>Do we have adequate numbers of personnel?</p> <p>Do we have adequate monitoring and supervision in place to ensure that noncompliance is corrected in a timely manner?</p> <p>How do we share the monitoring data and information with staff? How have you used data to improve your program?</p>	<p>Do providers have the necessary knowledge and skills? e.g. Do providers understand:</p> <ul style="list-style-type: none"> <li>▪ Early intervention requirements and best practices?</li> <li>▪ The importance of and their role in the monitoring process? Their role related to the CAP process?</li> <li>▪ The appropriate steps to take when they receive a complaint? How to track formal and informal complaints?</li> <li>▪ How to use data to learn about their performance through local monitoring? How to use data to improve their work?</li> <li>▪ In looking at disaggregated data, are there certain characteristics that correlate with noncompliance (specific providers, regions, program structure, staff turnover, populations served, etc.)?</li> </ul> <p>Based on provider interviews:</p> <ul style="list-style-type: none"> <li>• Why do our providers think we are not able to correct noncompliance in a timely manner?</li> <li>• What solutions do they think will address this issue?</li> </ul>

**Summary From Indicator C-9 Analysis**

- Based on the data/ information identified above, what categories of factors/reasons (e.g. procedures, infrastructure, practice, training, technical assistance, data and supervision) relate to our current noncompliance?
- What strategies related to these categories of factors/reasons should we include in our CAP? For each strategy, include who is responsible and the timeline for completing the strategy.

<b>Contributing Factor Area</b>	<b>Strategies</b>	<b>Who is responsible?</b>	<b>Timeline</b>
Development/ Revisions to Agency's Policies and Procedure			
Changes to Use of Funds			
Provision of Training and TA			
Changes in Supervision			
Changes in Personnel			
Changes in Provider Practices			