

UTAH DEPARTMENT OF HEALTH AND HUMAN SERVICES POLICY AND PROCEDURES		
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GENERAL SUPERVISION SYSTEM FOR MONITORING IMPLEMENTATION OF PART C		
<p>RATIONALE: To educate and support local early intervention (EI) programs in complying with federal Part C regulations and Baby Watch policy</p> <p><i>Related Policies, Applicable Standards, Statutes:</i> 34 CFR § 303.101: State eligibility 34 CFR § 303.120: Lead agency Baby Watch Policy 1.A.5: Topical Monitoring</p>		
Original Effective: 7/01/2013	Revision: February 2023	Next Review Due: 3 years after

I. DESCRIPTION

How Baby Watch oversees and monitors the services provided by local EI programs, including procedures for identifying and correcting instances of noncompliance

This policy supersedes any previous department policy governing this subject matter. It does not supplant any existing federal, state, or department laws/policies to which the department shall adhere.

II. DEFINITIONS

Baby & Toddler Online Tracking System (BTOTS): The secure database used by Utah EI programs and providers to record service information. BTOTS is designed to track EI activities, encourage compliance with state and federal regulations, and support compliance and monitoring with statewide child information.

Compliance Indicators: SPP/APR results indicators set by OSEP that assess compliance at 100%, and measure early intervention activities compared to state-determined targets.

Correction of Noncompliance: A formal verification by Baby Watch that an EI program has successfully addressed all instances of noncompliance including: a) Data review to confirm correction of each instance of noncompliance; b) Data review to confirm that time-sensitive corrective actions took place; c) Subsequent data review to confirm 100% compliance.

Corrective Action Plan: Formal written documentation developed by an EI program to outline activities and timelines to correct instances of noncompliance identified by Baby Watch.

Data Check: A validation method to ensure that information (i.e., data) gathered is complete and accurate.

DHHS or department: Utah Department of Health and Human Services and collectively all its operational units.

Dispute Resolution System: The formal process established by IDEA to resolve disagreements, which include: 1) Mediation, 2) Written complaint, and 3) Due process hearing.

Finding: A problem identified by Baby Watch in a written notification of noncompliance.

Improvement Plan: A document which identifies the actions taken throughout the EI program to increase the effectiveness of activities and processes to provide added benefits to the EI program and the families served. Quality improvement is anything which causes a beneficial change in quality performance. A Quality Rating and Improvement System (QRIS) is a systemic approach to assess, improve, and communicate the level of quality and includes the following components: 1) quality standards for programs and providers, 2) supports and infrastructure to meet such standards, 3) monitoring and accountability systems to ensure compliance with quality standards, 4) ongoing financial assistance linked to meeting quality standards, and 5) engagement and outreach strategies.

Noncompliance: When a local EI program does not meet compliance indicator targets, as determined through on- or off-site monitoring.

Off-site Monitoring: Any Baby Watch oversight activities of EI programs that do not happen at local EI program site(s).

On-site Monitoring: Any Baby Watch oversight activities that happen at local EI program site(s).

Programmatic Risk Assessment: An examination of the risk of direct or indirect loss due to inadequate or failed internal processes, procedures, people, management systems or from external events.

OU: Operational units within DHHS, including divisions, offices, or standalone operations whose director reports to the executive director, a deputy director, an assistant deputy director, or a division director.

Performance Measures: Evaluation measures used to promote understanding and to manage and improve local EI program performance, including system, child, and family outcomes.

Practice Change: An increase or decrease in the number, frequency, precision, or quality of practices a provider implements across at least two points in time.

Programmatic Data: The cumulative BTOTS data generated by a local EI program (e.g., referral source, number of referrals, child count, or services).

Quality Indicators: A measure or gauge of an agreed upon part of something larger; put together, a group of indicators measure the quality of a system. Indicators assist to define and measure the components.

Reports: Documents that provide information about a particular subject, including data tables, written monitoring or evaluation reports and annual performance reports.

Root Cause Analysis: A process to systematically detect and analyze the possible causes of a problem.

Sanctions: Consequences imposed on EI programs by Baby Watch when performance has not improved or noncompliance is not corrected in a timely manner.

Stakeholders: A group of individuals with vested interest in the success or welfare of an organization in fulfilling its mission by delivering intended results and maintaining the viability of its services and outcomes over time.

State Performance Plan (SPP)/Annual Performance Report (APR) Results: Results indicators that measures early intervention activities against the state determined targets. The SPP/APR indicators and other measures are used to evaluate EI subgrantee program performance.

Topical Monitoring: A review of selected focus areas in local EI programs as part of the State General Supervision System. The purpose of topical monitoring is to identify noncompliance, low performance, training and technical assistance needs, improvement strategies and incentives or sanctions.

Training and Technical Assistance (T/TA): As described in the 2011 National Association for the Education of Young Children (NAEYC) Training and Technical Assistance Glossary, the provision of targeted and customized supports by a professional(s) with subject matter and adult learning knowledge and skills to develop or strengthen processes, knowledge application, or implementation of services by recipients.

III. POLICY

A. General Supervision System

1. The General Supervision System includes general, focused, and intensive activities to monitor compliance and quality, as well as to improve early intervention results and outcomes for infants and toddlers.

a) General Activities: The Baby Watch Early Intervention Program shall conduct annual monitoring activities for each local EI program to assess compliance with Special Provisions in local EI program contracts, the implementation of IDEA, and identify possible areas of noncompliance and low performance. General activities include:

- 1) Collection, verification, and public reporting of SPP/APR compliance and results indicators
- 2) Program Determinations

- 3) Program data accountability plan
 - 4) Exiting and Dispute Resolution
 - 5) Child demographics
 - 6) Fiscal management
 - 7) Verification of data
 - 8) Training and technical assistance
 - 9) Program risk assessments
- b) Focused Activities: Baby Watch shall conduct focused monitoring activities with local EI programs. Focus areas are determined based on state aggregated data, individual program data, and other information. Local EI programs, the ICC, and stakeholders may be included in determining priority areas, indicators, and measures to be addressed at each local EI program. Focused monitoring activities may include:
- 1) Off-site monitoring activities to include in-depth review of data entered in BTOTS
 - 2) On-site monitoring activities to include interviews, observation of service provisions, and follow-up monitoring visits
 - 3) Additional topical monitoring activities as determined necessary by Baby Watch
- c) Intensive Activities: Baby Watch shall conduct intensive monitoring activities to provide individualized support and monitor noncompliance or low performance in local EI programs, as needed. Intensive activities may be necessary based on issues identified through general or focused monitoring activities, dispute resolution, or other means. Intensive activities include:
- 1) On- or off-site monitoring activities, including an in-depth review of BTOTS data
 - 2) Service provider and administrator interviews
 - 3) Follow-up monitoring visits
 - 4) Additional activities determined necessary by the Baby Watch Early Intervention Program

IV. PROCEDURES

- A. Identification of Noncompliance
1. Noncompliance may be identified at all levels of the General Supervision System through general, focused, and intensive monitoring activities.
 2. If Baby Watch finds that a local EI program is in noncompliance with any compliance indicator, it shall issue a written notification of the finding of noncompliance and require a Corrective Action (CA) of correction of all noncompliance from the respective local EI program.

B. Correction of Noncompliance

1. All noncompliance, once it is identified and a written notification is issued to the local EI program, shall be corrected as soon as possible, but no more than one year from the date of the written notification of noncompliance.
2. Baby Watch shall require corrective action to address all noncompliance.
3. The corrective action and reporting required of the local EI program may vary based on the level of noncompliance.
4. If noncompliance is not corrected by the local EI program within one year of the written notification of noncompliance, Baby Watch may impose sanctions, such as:
 - a) Additional corrective activities
 - b) Additional reporting
 - c) Site visits to determine root causes of noncompliance
 - d) Training and technical assistance
5. Baby Watch may also require that the local EI program provide a detailed written plan of how they will revise necessary policies, procedures or practices that contributed to noncompliance.

C. Statewide Monitoring

1. Baby Watch conducts on- and off-site monitoring of all local EI programs to assess the application of recommended and evidence-based practices, compliance with Part C of IDEA, Baby Watch policy, and quality BTOTS documentation. Statewide monitoring activities include:
 - a) Observation of service provisions
 - b) Interviews with local EI program staff and administrators
 - c) Family surveys
 - d) Child record reviews
 - e) Written reports identifying findings of noncompliance with Part C of IDEA, Baby Watch policy, and low-quality performance

D. Improvement Plan

1. Each identification of noncompliance must be corrected by the local EI program as soon as possible, and no later than one year from the date of the written notification of noncompliance.
2. The identification of low-quality performance also requires the development of a written improvement plan that must be approved by Baby Watch and that includes:
 - a) Identified goals or objectives
 - b) Root causes of low performance
 - c) Changes to systems and practices
 - d) Staff training and technical assistance
 - e) Evidence of change

E. Training and Technical Assistance

1. Baby Watch may provide training and technical assistance related to the SPP/APR and state monitoring activities to assist local EI programs in:
 - a) Understanding the requirements related to these indicators
 - b) Developing and implementing meaningful improvement plans to correct any noncompliance
 - c) Enhancing local EI program performance
 - d) Improving outcomes for children and families within their program

V. EXCEPTIONS

Baby Watch may make exceptions to this policy as necessary.