



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES

Honorable Alice Seagren
Commissioner
Minnesota Department of Education
1500 Highway 36 West
Roseville, Minnesota 55113-4266

MAR -7 2005

Dear Commissioner Seagren:

The purpose of this letter is to respond to the Minnesota Department of Education's (MDE's) April 1, 2004 submission of its Federal Fiscal Year (FFY) 2002 Annual Performance Report (APR) for the Individuals with Disabilities Education Act (IDEA) Part C funds used during the grant period July 1, 2002 through June 30, 2003. The APR reflects actual accomplishments made by the State during the reporting period, compared to established objectives. The APR for IDEA is designed to provide uniform reporting from States and result in high-quality information across States.

The APR is a significant data source utilized in the Continuous Improvement and Focused Monitoring System (CIFMS) implemented by the Office of Special Education Programs (OSEP), within the U.S. Department of Education. The APR falls within the third component of OSEP's four-part accountability strategy (i.e., supporting States in assessing their performance and compliance, and in planning, implementing, and evaluating improvement strategies) and consolidates the self-assessing and improvement planning functions of the CIFMS into one document. OSEP's Memorandum regarding the submission of Part C APRs directed States to address: General Supervision; Comprehensive Public Awareness and Child Find System; Family Centered Services; Early Intervention Services in Natural Environments; and Early Childhood Transition.

Background

The State did not identify any areas of noncompliance in its Self-Assessment or Improvement Plan (IP). In its March 24, 2003 response to the IP, OSEP suggested that Minnesota enhance its improvement planning process by: (1) including benchmarks to assess, at appropriate intervals, the effectiveness of the improvement strategies in achieving the desired outcomes; (2) doing further analysis to determine the effectiveness of the State's monitoring procedures in identifying and correcting areas of noncompliance; and (3) using Part C monitoring data to further determine the issues on which the State should focus improvement efforts and systemic change.

During OSEP's verification visit to the State during the week of August 23, 2004, OSEP

identified the following areas of noncompliance which are addressed in OSEP's verification letter regarding the visit (issued separately): (1) not monitoring for compliance with regard to all Part C requirements; (2) not implementing eligibility criteria that are consistent with the State's approved Part C application and the requirements of 34 CFR §§303.16(a) and 303.300, and not monitoring for compliance with those requirements in a way that is consistent with Part C; (3) not ensuring the correction of all identified noncompliance; and (4) not ensuring the timely correction of all identified noncompliance (i.e., within one year from identification of identified noncompliance). In addition, OSEP also identified during its verification visit two areas of concern pertaining to: (1) a very limited number of Part C children's records reviewed as part of State-monitoring visits; and (2) data collection and reporting regarding Part C personnel and services and Part C exiting data pertaining to children determined to be Part B eligible. Each of these findings is discussed further in the general supervision section and in greater detail in OSEP's verification letter.

The State's APR should reflect the collection, analysis and reporting of relevant data, and document data-based determinations regarding performance and compliance in each of the cluster areas (as well as any other areas identified by the State to ensure improvement). OSEP's comments regarding the State's FFY 2002 APR and findings from OSEP's verification visit are listed by cluster area.

General Supervision

As noted above, OSEP's letter reporting on the verification visit included the following findings related to general supervision under Part C: (1) MDE was not monitoring for compliance with regard to all Part C requirements; (2) MDE was not implementing eligibility criteria that are consistent with the State's approved Part C application and the requirements of 34 CFR §303.16(a) and §303.300, and not monitoring for compliance with those requirements in a way that is consistent with Part C; (3) MDE was not ensuring the correction of all identified noncompliance; and (4) MDE was not ensuring the timely correction of all identified noncompliance (i.e., within one year from identification of identified noncompliance).

At 34 CFR §303.501, Part C requires that MDE monitor providers of early intervention services to ensure compliance with all Part C requirements. On page 6 of the APR, MDE stated that, "Respite care for infants and toddlers is not monitored through existing accountability systems." OSEP's April 16, 2004 letter responding to the State's FFY 2001 APR identified this as an area of noncompliance and directed the State to submit, within 60 days, either: (1) documentation that MDE monitors to ensure that if the participants in the individualized family service plan (IFSP) meeting determine that the family needs respite care in order to participate in early intervention services, such respite care is included in the IFSP and provided; or (2) its plan (including strategies, benchmarks, evidence of change, and timelines) for correcting a failure to monitor regarding this requirement, within a reasonable period of time, not to exceed one year from the date on which OSEP accepts the State's plan for correcting the noncompliance.

In its June 16, 2004 response to OSEP's April 2004 letter, MDE stated:

“MDE requests that [the above-quoted statement from the State's FFY 2001 APR] be removed from the APR. In the October 2001 Addendum to Minnesota's Self-Assessment Process, MDE provided OSEP documentation of Minnesota's Continuous Improvement Monitoring Process (CIMP). Both the traditional and self-review monitoring processes determine compliance with IDEA, birth to 21, which includes Part C. In reviewing CIMP in relation to OSEP's concern about monitoring respite care when included on a child's IFSP, questions about the effectiveness of the monitoring practices have been raised. An improvement strategy will be developed in the 2003 Part C APR which will improve the traditional and self-review models to assure consistent monitoring of respite care across all aspects of Minnesota's Continuous Improvement Monitoring Process.”

The State's response indicated that it uses self-review and “traditional monitoring” to address Part C requirements, but the State did not provide any documentation that it was implementing any monitoring process to determine whether, if the participants in the IFSP meeting determine that the family needs respite care in order to participate in early intervention services, such respite care was included in the IFSP and provided. Therefore, the State must, in the FFY 2003 APR, submit either: (1) documentation that the State is monitoring to make that determination; or (2) its plan (including strategies, proposed evidence of change, targets and timelines) for correcting the failure to monitor for compliance with the Part C requirements related to respite care, within a reasonable period of time, not to exceed one year from the date on which OSEP accepts the State's plan for correcting the noncompliance.

OSEP's April 2004 letter noted that the State's FFY 2001 APR included an analysis of the Interagency Early Intervention Committees' (IEICs') self-assessments showing that 64% of the IEICs were at or above the compliance standard and 34% of IEICs were in partial compliance. OSEP's letter directed the State to submit, within 60 days of the date of the letter, either: (1) documentation of how the State ensures correction of such State-identified noncompliance; or (2) its plan (including improvement strategies, proposed evidence of change, benchmarks, targets, and timelines) for correcting any remaining noncompliance within a reasonable period of time, not to exceed one year from the date that OSEP accepts the plan. In its June 2004 response, MDE explained that “the use of this instrument in assessing compliance was incorrectly reported and the information gathered from the instrument does not represent compliance or noncompliance with the Federal Part C program,” and requested that all references to the local IEICs' self-assessment instrument as a compliance measure be removed from the State's FFY 2001 APR.

On pages 1-13 of the FFY 2002 APR, the State described its monitoring and dispute resolution systems. Although, as noted above, OSEP's March 2003 letter suggested that Minnesota could enhance its improvement planning process through an analysis of its Part C monitoring data and the effectiveness of its monitoring procedures in identifying and correcting areas of noncompliance, the State did not include such an analysis in either its FFY 2001 or FFY 2002 Part C APR. In responding to the probe regarding the collection

and reporting of accurate and timely data, the State described, on pages 11-13 of the FFY 2002 APR, its systems for data collection and reporting. The State concluded that those systems were effective in ensuring the accuracy of the State's data.

OSEP could not, based on the information in the APR, make a determination regarding the effectiveness of the State's monitoring and data collection systems. Beyond the four identified areas of noncompliance noted above and described in detail in the verification letter, OSEP found concerns with the State's data system that: (1) it did not require districts to provide data regarding children exiting Part C who have been determined to be eligible for Part B services; and (2) the State acknowledged that it did not have an electronic system for collecting Part C services and personnel data and its manual method for collecting these data was not an effective method for ensuring the reporting of accurate data. Accordingly, in its FFY 2003 APR, the State must report on its progress in ensuring that its Part C personnel and services data and its Part C exiting data regarding Part B-eligible, required under Section 618 of IDEA, are reported accurately.

On pages 7-8 of the APR, the State reported that MDE: (1) received one formal Part C complaint during the FFY 2002 reporting period; (2) made no findings of noncompliance in resolving that complaint; and (3) issued its decision beyond the 60-day timeline due to the complexity of the issues involved. The State further reported that MDE received two requests for mediation (neither of which resulted in a mediation agreement) and no requests for a due process hearing during the reporting period. On page 8, the State commented that, due to the extremely small number of Part C disputes during the reporting period, it was difficult to draw conclusions. OSEP suggests that the State include, in its FFY 2003 APR, an analysis of the underlying reasons for the minimal use of the State's complaint, mediation and hearing systems.

Comprehensive Child Find System

In its FFY 2001 APR, the State included goals to serve: (1) at least 1.00% of its birth-to-one population; (2) at least 2.00% of its birth-to-three population; and (3) percentages of infants and toddlers, from birth to three years of age, disaggregated by race and ethnicity, that are proportional to the general population in the State. On page 14 of its FFY 2002 APR, the State included the following performance indicators: (1) at least 2% of infants and toddlers, age birth to three, will receive early intervention services through an IFSP; and (2) at least 1% of infants under the age of one will receive early intervention services through an IFSP. As OSEP stated in its April 2004 letter responding to the State's FFY 2001 APR, it is not inconsistent with Part C to include a numerical goal to increase the percentages of infants and toddlers with disabilities determined eligible for services, but the State must continue to monitor to ensure that eligibility decisions for all infants and toddlers are made in conformity with the Part C individual evaluation and assessment requirements at 34 CFR §§303.320-.323 and not based upon a numerical goal. In its FFY

2003 APR, the State must provide the specific methods it will use to monitor to ensure that decisions are made on an individualized basis, in accordance with applicable regulations.¹

In its June 2004 response, MDE clarified that, “Minnesota had included the OSEP Part C benchmarks as evidence statements in its Child Find Self Improvement Plan,” and that, “These were not meant to represent quotas but merely guidelines with which to measure our progress in appropriately serving all eligible young children with disabilities, including those from diverse racial and ethnic backgrounds.” The State assured that it would, by December 31, 2004: (1) work with its Steering Committee to revise the evidence statements in order to clarify and redefine the evidence measures; and (2) revise its IP to include references that ensure children are appropriately identified, evaluated and served in an unbiased manner in accordance with IDEA. In the FFY 2003 APR, the State must include the procedures to ensure that: (1) all Part C-eligible infants and toddlers are identified and evaluated for early intervention services; (2) Part C eligibility determinations for infants and toddlers are made on an individualized basis, consistent with Part C requirements; and (3) Part C funds are not used to serve ineligible children or families.

The FFY 2002 APR included a table on page 15 that showed that Minnesota was serving 1.72% of the State’s birth through two population in its Part C system on December 1, 2002. (The national average for the same period was 2.10%.) A chart on page 16 showed that on December 1, 2002: (1) one of the State’s eleven regions was serving in excess of 1.00% of the birth-to-one population; (2) two regions were serving at or above 0.80%; and (3) the remaining eight regions were serving approximately 0.50% to 0.70%. The State’s FFY 2001 APR reported that the State served 0.61% of its birth-to-one population on December 1, 2001, but the FFY 2002 APR did not provide State-wide data for the percentage of children under the age of one served during the FFY 2002 reporting period.

On page 17 of the APR, the State indicated it was making measurable progress in identifying infants and toddlers with disabilities as a result of: (1) heightened awareness of child find practices within the State; (2) information and training for primary referral sources including physicians and early childhood educators; (3) training for members of multidisciplinary evaluation teams on appropriate, comprehensive, non-discriminatory evaluation practices and on the components of Minnesota’s eligibility criteria for ECSE services; and (4) revision and redistribution of the State’s “developmental wheel” public awareness materials.

The APR did not provide: (1) data that the State or OSEP could compare with the State’s target for children under the age of one to determine progress or slippage; and (2) any data-based conclusion regarding the adequacy of the State’s performance in identifying children under the age of one and under the age of three. OSEP cannot determine if the State’s public awareness and child find system is effective in ensuring that all eligible infants and toddlers are identified, located and evaluated for early intervention services. Accordingly,

¹ The State had also included racially specific goals in its FFY 2001 APR. OSEP explained in the April 16, 2004 letter that the use of a specific numerical goal for a racial or ethnic subgroup is inconsistent with Federal law. The State did not include racially specific goals in the FFY 2002 APR.

the State, in its FFY 2003 Part C APR, must analyze its Part C child count data and evaluate whether the implementation of the State's public awareness and child find systems are ensuring that the State is identifying, locating, and evaluating all eligible infants and toddlers in the State.

Further, as set forth in OSEP's verification letter and summarized above in the Background and General Supervision sections of this letter, OSEP found that MDE has not implemented eligibility criteria consistent with the State's approved Part C application and the requirements of 34 CFR §§303.16(a) and 303.300, and was not monitoring for compliance with those requirements in a way that was consistent with Part C. As part of its FFY 2003 APR, the State must report on the impact of this noncompliance on its compliance with these child find eligibility requirements of Part C.

Family Centered Services

The FFY 2002 APR included a chart on page 18 showing that between 20% and 25% of IFSPs reflected family training as an early intervention service, and that this percentage had remained fairly constant over the past five years. On page 19, the State cited the results from a parent satisfaction survey that reflected a high degree of satisfaction with services they received, but acknowledged that its parent survey did not ask parents to rate the extent to which their family capacity to enhance the developmental outcomes for their infant or toddler was increased through the provision of family supports and services. On page 19 of the APR, the State provided a list of future activities, including: (1) developing and piloting another parent survey, as part of Minnesota's continuous improvement self-review monitoring process, that will be used to evaluate the extent to which families' capacities to enhance the developmental outcomes of their infants and toddlers are increased through the provision of family supports and services; (2) raising awareness among stakeholder groups within the early intervention system about the importance of measuring increased family capacity; (3) continuing planning for an enhancement of Minnesota's Part C data collection efforts; and (4) conducting a survey to determine the effectiveness of targeted family support activities provided through local IEICs.

Beyond the survey results discussed above, the APR did not include any performance or compliance data regarding the effectiveness of the State in providing family-centered services. From the data and information in the APR, OSEP cannot determine whether family supports, services and resources provided to families in Minnesota are effective in increasing family capacity to enhance the developmental outcomes for their infants and toddlers participating in the State's early intervention system. OSEP looks forward to reviewing, in the next APR, the State's efforts to improve performance and ensure compliance in this area.

Early Intervention Services in Natural Environments

The State reported in its FFY 2002 APR on: (1) service coordination; (2) the 45-day timeline (3) evaluation and assessment; (4) IFSP content and implementation; (5) natural environments; and (6) early childhood outcome data.

1. Service Coordination

On page 20 of the APR, the State reported that MDE found a failure to include all required members as part of an IFSP team in only one of 130 files it reviewed. MDE also reported, based on family survey responses from 82 parents, that: (1) 79% believed there was "... one person (for example, a service coordinator or case manager) who [worked with them] to coordinate all of the services and agencies used by [their] child;" (2) 96% described their ability to get needed services, once connected to the early intervention system, as very easy or somewhat easy, while 4% of parents described this process as somewhat difficult; and (3) 99% reported good or very good coordination among the child's service providers. On page 20, the State concluded that the existence of only one finding related to service coordination over the past two years indicated that this is an area of strength regarding Minnesota's interagency service delivery system. The APR also included future activities that the State would undertake to further enhance service coordination as part of the State's efforts to provide coordinated interagency services for children with disabilities, birth through age 21, and their families. The APR included no analysis regarding the extent to which service coordinators were fulfilling all of their required roles and responsibilities, pursuant to 34 CFR §303.23(a)(2) and (b), and did not include sufficient data to enable OSEP to make such a determination. The State must include data and analysis in its FFY 2003 APR, regarding the extent to which service coordinators across the State are fulfilling all their responsibilities.

2. 45-Day Timeline

The State reported, on page 21 of the APR, that it had reviewed 130 files as part of its monitoring during the FFY 2002 reporting period, and no citations were issued for failure to complete the *evaluation* within the 45-day timeline. The APR did not, however, address the extent to which the State was ensuring that, in addition to completing the initial evaluation and assessment, the public agency *convened an initial IFSP meeting* within the same 45-day time period, as required by 34 CFR §§303.342(a) and 303.321(e). Accordingly, the State must include data and analysis, in the FFY 2003 APR, regarding the extent to which it is ensuring that, in addition to completing the initial evaluation and assessment process, public agencies are convening initial IFSP meetings within 45 days of referral. If the State determines that it is not meeting its responsibility, set forth under the above-mentioned regulations, the FFY 2003 APR must include the State's plan to correct noncompliance related to meeting the 45-day timeline within a reasonable period of time, not to exceed one year from the date on which OSEP accepts the State's plan.

3. Evaluation and Assessment

MDE noted that it issued no citations during the preceeding year for violations in the evaluation and assessment area. On page 21, the State cited results from the family survey indicating that 98% of families rated the Part C evaluation process, used to determine their child's service plan, as good or very good. On page 21, the State reported that existing data in this area reflecting quality and compliance indicated that timely, multidisciplinary,

comprehensive evaluations took place. The APR included a list of future activities the State would undertake in this area that would enhance the State's capacity to implement quality evaluation practices.

4. *IFSP Content and Implementation*

On page 22, the State indicated that, based on its review of 130 files during the reporting period, it issued eight citations for failure of IFSP teams to address all required components of the IFSP. The State also reported that during the FFY 2002 reporting period, it received no complaints or mediation or hearing requests alleging a failure by a service provider to implement IFSPs as written. On page 22, the APR also included results from the family survey, which indicated that: (1) 79% of families reported that their child received all or most needed services; (2) 17% reported that their child received some needed services; (3) 4% reported that their child received a few needed services; (4) 99% reported being very or somewhat satisfied with services received; and (5) most parents reported that there were no barriers to their child receiving needed services. On page 23, the State concluded that, as a birth-mandate State, Minnesota provided a free appropriate public education to eligible infants and toddlers, including special instruction and all related services deemed appropriate by a child's IFSP team, and that Minnesota's comprehensive service delivery system was a strength. The State included projected targets for the next reporting period, stating that "All IFSPs address child and family needs as identified and prioritized by IFSP teams" and that "early intervention services will be provided as agreed to through the IFSP team process." The State indicated that future activities will include training parents, service coordinators, and agency personnel regarding coordination of health care benefits or other resources throughout the State and providing ongoing technical assistance to IEICs and LEAs on aspects of IFSP development that will lead to comprehensive service plans and service delivery.

5. *Natural Environments*

The State reported, on page 23 of the APR, that it reviewed 130 files, but issued no citations during the reporting period for failure to adequately justify the provision of early intervention services in environments other than natural environments. The APR included settings charts on page 24 indicating that, over the past three years, the primary setting for: (1) approximately 80% of infants and toddlers who received early intervention services was in the home; (2) approximately 10 to 15% were served in programs for children with disabilities; (3) approximately 5% were served in programs for typically developing children; and (4) 1 to 2% were served in provider-based locations. The State concluded, on page 25, that: (1) IFSP teams in Minnesota used natural environments almost exclusively for infants and young toddlers, and an analysis of this information over time supported this conclusion; and (2) while IFSP teams were significantly more likely to use a program designed for children with disabilities for a child aged two, an analysis of the data over the past three years showed that proportionately fewer toddlers received services in such placements during the reporting period than in prior years. The State included projected targets for the next reporting period for infants and toddlers with disabilities and their families to receive services in natural environments, unless the IFSP team was able to

appropriately justify the provision of services in other non-natural environments. OSEP looks forward to reviewing, in the FFY 2003 APR, the State's efforts to improve performance and ensure compliance in this area.

6. Early Childhood Outcome Data

The Part C FFY 2001 and FFY 2002 APRs requested data on the percentage of children participating in the Part C program that demonstrated improved and sustained functional abilities (in the developmental areas listed in 34 CFR §303.322(c)(3)(ii)). On page 25 of the APR, the State included: (1) a performance indicator for the FFY 2002 reporting period that "Infants and toddlers with disabilities that receive early childhood special education services demonstrate improved and sustained functional abilities"; (2) family survey data indicating that 97% of parents of infants and toddlers responding to the survey reported that their child made very good or good progress as a result of early intervention services provided; and (3) data indicating that 168 children exited the Part C system based on a determination that they no longer needed services due to significant and measurable progress on their IFSP goals and objectives. The State noted that the percentage of children exiting the Part C system due to completion of the IFSP goals remained constant over time, and concluded on page 26 that neither progress nor slippage was indicated by existing data. These general data did not support a conclusion regarding the percentage of children participating in the Part C program that demonstrated improved and sustained functional abilities in the developmental areas listed in 34 CFR §303.322(c)(3)(ii). On page 26, the State included a projected target for the FFY 2003 reporting period stating that, "All infants and toddlers served through the early intervention system will demonstrate a level of progress appropriate to their individual disabilities as authentically measured by their IFSP teams" and noted that future activities, pertaining to Part C outcome data, would include: (1) revising and disseminating Indicators of Progress, aligned with the education standards newly developed and adopted by the Minnesota State Legislature, as benchmarks of typical development in multiple domains beginning at birth; (2) promoting effective data collection strategies around outcomes for use by IFSP teams; and (3) conducting file reviews and longitudinal reviews, checking for child progress as part of the State's traditional monitoring and self-review processes. In the FFY 2003 APR, the State must submit either data (whether collected through sampling, monitoring, or other methods), targets for improved performance and strategies to achieve those targets for this area, or a plan to collect the data for the FFY 2004 APR, including a detailed timeline of the activities necessary to implement that plan.

Early Childhood Transition

On pages 26-27 of the APR, the State reported that it: (1) reviewed 130 Part C files as part of its monitoring during the FFY 2002 reporting period and issued no citations for failure to document transition planning for children transitioning from Part C into a Part B service delivery system; (2) issued no such citations during the FFY 2001 reporting period; (3) reviewed data from the data system that revealed that no children who exited the State's Part C system were deemed ineligible for Part B services; and (4) had consistently met its target to ensure that 100% of IFSPs in place for children between two years nine months

and three years of age would provide evidence of transition planning.

OSEP looks forward to reviewing, in the FFY 2003 APR, MDE's efforts to ensure compliance and improve performance in this cluster area.

Conclusion

OSEP is extending the due-date for the State to submit its FFY 2003 APR to 60 days from the date of this letter. As noted above, the State, in this APR, must submit either: (1) documentation that the State is monitoring to determine whether respite care is included in the IFSP and provided, if the participants in the IFSP meeting determine that the family needs respite care in order to participate in early intervention services; or (2) its plan (including strategies, evidence of change, targets and timelines) for correcting the failure to monitor for compliance with the Part C requirements related to respite care, within a reasonable period of time, not to exceed one year from the date on which OSEP accepts the State's plan for correcting the noncompliance.

Also, in this FFY 2003 APR, the State must provide the specific methods it will use to monitor procedures to ensure that: (1) all Part C-eligible infants and toddlers are identified and evaluated for early intervention services; (2) Part C eligibility determinations for infants and toddlers are made on an individualized basis, consistent with Part C requirements; and (3) Part C funds are not used to serve ineligible children or families.

This APR must also include the State's data and analysis regarding the extent to which: (1) service coordinators across the State are fulfilling all required roles and responsibilities (34 CFR §303.23); and (2) it is ensuring that, in addition to completing the initial evaluation and assessment process, public agencies are convening initial IFSP meetings within 45 days of referral (34 CFR §§303.342(a), 303.321(e), and 303.322(e)). In addition, the FFY 2003 APR must include either data on the percentage of children participating in the Part C program that demonstrated improved and sustained functional abilities in the developmental areas listed in 34 CFR §303.322(c)(3)(ii), targets for improved performance and strategies to achieve those targets for this area, or a plan to collect the data for the FFY 2004 APR, including a detailed timeline of the activities necessary to implement that plan.

As noted in the verification letter, MDE must also submit to OSEP within 60 days of the date of this letter, its plan (including its strategies, proposed evidence of change, targets and timelines) that will ensure correction of this noncompliance within a reasonable period of time not to exceed one year from the date when OSEP accepts the plan for correcting each of the following areas of noncompliance:

1. Not monitoring for compliance with all Part C requirements;
2. Not implementing eligibility criteria that are consistent with the State's approved Part C application and the requirements of 34 CFR

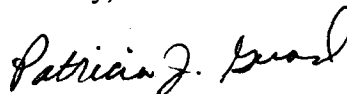
§§303.16(a) and 303.300, and not monitoring for compliance with those requirements in a way that is consistent with Part C;

3. Not ensuring the correction of all identified noncompliance; and
4. Not ensuring the timely correction of all identified noncompliance (i.e., within one year from identification of identified noncompliance).

OSEP will be happy to work with the State in developing the plan. The State, in its FFY 2003 APR, must include data and analysis demonstrating progress toward compliance in these areas of noncompliance. Subsequently, as set forth in the verification letter, the State must provide a final report to OSEP with data and analysis demonstrating compliance, as soon as possible, but no later than 30 days following the end of the one-year timeline.

OSEP recognizes that the APR and its related activities represent only a portion of the work in your State and we look forward to collaborating with you as you continue to improve results for infants and toddlers with disabilities and their families. If you have further questions, please contact John Edwards at (202) 245-7333.

Sincerely,



Patricia J. Guard
Acting Director
Office of Special Education Programs

cc: Karen Carlson,
Norena Hale