

Puerto Rico Part C

March 14-17, 2017

DMS Area: Results

DMS Designation: Intensive

Background:

On October 31, 2016, OSEP issued Puerto Rico (PR) a Differentiated Monitoring and Support (DMS) document that specified engagement activities that OSEP would conduct with the State across five areas: results, compliance, State Systemic Improvement Plan (SSIP), child find, and fiscal. Under Results, OSEP gave PR a designation of intensive engagement for data completeness due to PR's FFY 2014 APR data for the percentage of children exiting Part C included in outcome data. OSEP staff last conducted a site visit to PR in September, 2015 shortly after the current Part C coordinator was hired. In April, 2016 PR submitted significant changes to the SSIP phase II submission including revisions to the SiMR focus, refining the SSIP's theory of action, expanding the role of the State Interagency Coordination Council (SICC) in SSIP activities, and including improvement to data quality and data completeness as an infrastructure improvement strategy. The Part C coordinator and OSEP state lead speak monthly via telephone but due in part to recent changes in leadership within the Puerto Rico Department of Health (PRDH) and Puerto Rico Department of Education (PRDE), OSEP leadership determined that a site visit would be an effective engagement activity to support the efforts of the early intervention program to improve child outcomes for infants and toddlers with disabilities and their families.

Visit Summary

OSEP engaged with representatives of the Commonwealth to discuss the strategies and activities of the Part C program to improve data completeness and data quality. The PRDH officials that responded to questions from OSEP included staff from PRDH Early Intervention Services Program Child and Family Services Division (PRDH-EI). In addition, staff from the Early Childhood Technical Assistance Center (ECTA TA) and National Center for Systemic Improvement (NCSI) participated in the visit.

Data Reviewed

Data submitted for FFY 2015 could not be discussed during the site visit because the SPP/APR was under review by OSEP staff. However, the Part C coordinator and data manager indicated that the percentage of children exiting Part C that was included in child outcomes has increased since the FFY 2014 SPP/APR. OSEP reviewed a draft of the SSIP Phase III, Year 1 submission due on April 3, 2017. The SSIP included updates on PR's infrastructure improvement activities specific to data collection and analysis for the three child outcome areas reported on in the SPP/APR.

Topics Discussed:

Data Quality/Data Completeness

In the FFY 2014 APR, PR reported that 62% of children exiting Part C were included in child outcomes data. In 2016, the PR Part C coordinator, early intervention program evaluator and data manager initiated new procedures to improve both the collection of data on children exiting the Part C program and the quality of data submitted for analysis. The Part C State office requires each region to provide COS data on a monthly basis. The Part C coordinator and support staff review each region's monthly data for accuracy and completeness. If issues are identified in the data collected, Dr. Jorge Arzola, a training and curriculum specialist within PRDH offers support to the region and discusses how to best resolve issues. One need identified by the Part C program was to improve the Child Outcome Summary (COS) process used by early intervention staff (usually nurses) to collect data reported in the APR. Part C nurses responsible for collecting and submitting COS

data to the state office were trained on the COS process. As a result of the COS training, nurses now participate in the Part C assessment and eligibility process.

The process of reviewing COS data on a monthly basis by the State office has been implemented for approximately one year and as a result:

- Entry data is collected following eligibility determination by the evaluation team
- Exit data is collected by the service provider in consultation with the family
- Monthly meetings with Part C supervisors have enabled the staff to provide support and clarify issues as they arise

SSIP- Phase III, Year 1 Draft Report

OSEP reviewed the Phase III SSIP submission and provided feedback during the monitoring and engagement visit. PR has implemented several of the coherent improvement identified during Phases I and II necessary to achieve the State-Identified Measurable Result (SiMR). Specifically, PR has finalized an interagency agreement with the University Center for Excellence on Developmental Disabilities (UCEED) and the University of San Juan. The purpose of this agreement is to coordinate professional development courses and on-line modules for early childhood teachers and practitioners. The focus of these courses is to enhance teacher and provider understanding of child development, evidence-based practices and assessment – including but not limited to the child outcomes summary process. OSEP staff provided verbal feedback to the Part C program on the organization of the SSIP and the justification and evidence provided to support changes as well as on-going implementation of improvement efforts. The Part C coordinator was also reminded to include FFY 2015 data for the SiMR in either the SSIP report or the GRADS 360 data field for indicator C-11. The coherent improvement strategies implemented and evaluated for Phase III, Year 1 were developed with significant input of the State Interagency Coordinating Council (SICC). The SICC is dedicated to supporting infants, toddlers, and young children with and without developmental disabilities and their families. OSEP participated in an SICC meeting during the site visit and fielded questions from attendees about the DMS purpose and process. Community representatives provided updates on the joint activities of agency across Puerto Rico to support the professional development of early childhood personnel, child find and public awareness and transition to preschool services available through PRDE.

Challenges and Barriers

Although the data completeness and data quality activities implemented by the Part C program have yielded improvements in data quality and greater consistency in the data collected by the early intervention providers, the availability of a high-quality electronic data system remains a barrier. The Part C program provides services across nine (9) regions. Several regions have limited access to technology such as the Internet. Data is collected via pencil and paper and often submitted in this format to the State office. In addition, staff turnover and availability of well-prepared early intervention providers to work with children and families and participate in the child outcomes rating process remains an on-going challenge for the early intervention program. Fiscal constraints and the economic needs of PR are on-going barriers to implementing the SSIP's improvement strategies, scaling-up across the nine service regions and sustaining efforts over time.

Outcome of Engagement Activity

The Governor of PR has an information technology initiative that the Part C office may use to leverage resources with other departments within PRDH to potentially develop an integrated data system. PRDH was given track change comments to review and incorporate as needed into the final SSIP report for Phase III, Year 1. PRDH submitted its final SSIP on April 3, 2017, and OSEP is currently reviewing it. OSEP will provide specific feedback after APR determinations are issued. Additional follow-up activities will take place once the FFY 2015 SPP/APR PR determination letter is issued.

Use of Technical Assistance and Professional Development Resources

ECTA, NCSI and IDEA Data Center (IDC) technical assistance providers work regularly with the Part C program to support PR's data quality improvement efforts, analyze and report data and improve the Part C progress assessment process and procedures. The Part C Coordinator has participated in NCSI-hosted cross-state learning collaboratives as well as leadership conferences with the Early Childhood Personnel Center (ECPC).

Next Steps

During FFY 2016, OSEP and PR will continue to use regular TA calls to discuss resources for improving child and family outcomes and support PR's infrastructure improvement strategies implemented for the SSIP. OSEP will review the recently submitted data and coordinate any follow-up activities specific to data completeness. OSEP will also review the SSIP, Phase III, Year 1 report and identify any concerns or technical assistance needs specific to data quality, evidence-based practices, evaluation or stakeholder engagement to be discussed with the Part C State office. In addition, OSEP will share TA resources and materials with PR that may be most helpful for addressing data quality, data completeness and evaluation of system improvement efforts outlined in the SSIP.