

**CNMI Part C FFY 2009 SPP/APR Response Table**

<b>Monitoring Priorities and Indicators</b>	<b>Status of APR Data/SPP Revision Issues</b>	<b>OSEP Analysis/Next Steps</b>																
<p>1. Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.</p> <p>[Compliance Indicator]</p>	<p>The Commonwealth of the Northern Mariana Islands (CNMI) provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. CNMI revised the improvement activities for FFY 2010 for this indicator, and OSEP accepts those revisions.</p> <p>CNMI's FFY 2009 reported data for this indicator are 100%. These data represent progress from the FFY 2008 data of 98%. CNMI met its FFY 2009 target of 100%.</p> <p>CNMI reported that the one finding of noncompliance identified in FFY 2008 for this indicator was corrected in a timely manner.</p>	<p>OSEP appreciates CNMI's efforts in achieving compliance with the timely service provision requirements in 34 CFR §§303.340(c), 303.342(e), and 303.344(f)(1).</p>																
<p>2. Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or community-based settings.</p> <p>[Results Indicator]</p>	<p>CNMI provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. CNMI revised the target and improvement activities for FFY 2010 for this indicator, and OSEP accepts those revisions. CNMI indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2010, FFY 2011, and FFY 2012.</p> <p>CNMI's FFY 2009 reported data for this indicator are 94%. These data represent slippage from the FFY 2008 data of 96.3%. CNMI did not meet its FFY 2009 target of 97.5%.</p>	<p>OSEP looks forward to CNMI's data demonstrating improvement in performance in the FFY 2010 APR, due February 1, 2012.</p>																
<p>3. Percent of infants and toddlers with IFSPs who demonstrate improved:</p> <p>A. Positive social-emotional skills (including social relationship);</p> <p>B. Acquisition and use of knowledge and skills (including early language/communication); and</p> <p>C. Use of appropriate behaviors to meet their needs.</p> <p>[Results Indicator]</p>	<p>CNMI provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. CNMI indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2011 and FFY 2012.</p> <p>CNMI's FFY 2009 reported data for this indicator are:</p> <table border="1" data-bbox="548 1060 1558 1497"> <thead> <tr> <th><u>Summary Statement 1</u></th> <th><u>FFY 2008 Data</u></th> <th><u>FFY 2009 Data</u></th> <th><u>FFY 2009 Target</u></th> </tr> </thead> <tbody> <tr> <td><b>Outcome A:</b> Positive social-emotional skills (including social relationships) (%)</td> <td align="center">75</td> <td align="center">44</td> <td align="center">76</td> </tr> <tr> <td><b>Outcome B:</b> Acquisition and use of knowledge and skills (including early language/communication) (%)</td> <td align="center">54.2</td> <td align="center">61</td> <td align="center">54</td> </tr> <tr> <td><b>Outcome C:</b></td> <td align="center">81.8</td> <td align="center">83</td> <td align="center">82</td> </tr> </tbody> </table>	<u>Summary Statement 1</u>	<u>FFY 2008 Data</u>	<u>FFY 2009 Data</u>	<u>FFY 2009 Target</u>	<b>Outcome A:</b> Positive social-emotional skills (including social relationships) (%)	75	44	76	<b>Outcome B:</b> Acquisition and use of knowledge and skills (including early language/communication) (%)	54.2	61	54	<b>Outcome C:</b>	81.8	83	82	<p>OSEP appreciates CNMI's efforts to improve performance and looks forward to CNMI's data demonstrating improvement in performance in the FFY 2010 APR, due February 1, 2012.</p> <p>CNMI must report progress data and actual target data for FFY 2010 with the FFY 2010 APR.</p>
<u>Summary Statement 1</u>	<u>FFY 2008 Data</u>	<u>FFY 2009 Data</u>	<u>FFY 2009 Target</u>															
<b>Outcome A:</b> Positive social-emotional skills (including social relationships) (%)	75	44	76															
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Monitoring Priorities and Indicators	Status of APR Data/SPP Revision Issues				OSEP Analysis/Next Steps																				
	Use of appropriate behaviors to meet their needs (%)																								
	<b><u>Summary Statement 2</u></b>	<b><u>FFY 2008 Data</u></b>	<b><u>FFY 2009 Data</u></b>	<b><u>FFY 2009 Target</u></b>																					
	<b>Outcome A:</b> Positive social-emotional skills (including social relationships) (%)	64	52	64																					
	<b>Outcome B:</b> Acquisition and use of knowledge and skills (including early language/communication) (%)	32	40	32																					
	<b>Outcome C:</b> Use of appropriate behaviors to meet their needs (%)	76	68	76																					
	These data represent progress and slippage from the FFY 2008 data. CNMI met part of its FFY 2009 targets for this indicator.																								
<p>4. Percent of families participating in Part C who report that early intervention services have helped the family:</p> <p>A. Know their rights; B. Effectively communicate their children's needs; and C. Help their children develop and learn.</p> <p>[Results Indicator]</p>	<p>CNMI submitted targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. CNMI indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2011 and FFY 2012.</p> <table border="1" data-bbox="548 1036 1556 1409"> <thead> <tr> <th data-bbox="548 1036 968 1138">CNMI's FFY 2009 reported data for this indicator are:</th> <th data-bbox="968 1036 1140 1138"><u>FFY 2008 Data</u></th> <th data-bbox="1140 1036 1291 1138"><u>FFY 2009 Data</u></th> <th data-bbox="1291 1036 1442 1138"><u>FFY 2009 Target</u></th> <th data-bbox="1442 1036 1556 1138"><u>Progress</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="548 1138 968 1208">A. Know their rights (%)</td> <td data-bbox="968 1138 1140 1208">77</td> <td data-bbox="1140 1138 1291 1208">100</td> <td data-bbox="1291 1138 1442 1208">91</td> <td data-bbox="1442 1138 1556 1208">23.00%</td> </tr> <tr> <td data-bbox="548 1208 968 1310">B. Effectively communicate their children's needs (%)</td> <td data-bbox="968 1208 1140 1310">80</td> <td data-bbox="1140 1208 1291 1310">96</td> <td data-bbox="1291 1208 1442 1310">91</td> <td data-bbox="1442 1208 1556 1310">16.00%</td> </tr> <tr> <td data-bbox="548 1310 968 1409">C. Help their children develop and learn (%)</td> <td data-bbox="968 1310 1140 1409">77</td> <td data-bbox="1140 1310 1291 1409">96</td> <td data-bbox="1291 1310 1442 1409">90</td> <td data-bbox="1442 1310 1556 1409">19.00%</td> </tr> </tbody> </table> <p>These data represent progress from the FFY 2008 data. CNMI met all of its FFY 2009 targets for this indicator.</p>				CNMI's FFY 2009 reported data for this indicator are:	<u>FFY 2008 Data</u>	<u>FFY 2009 Data</u>	<u>FFY 2009 Target</u>	<u>Progress</u>	A. Know their rights (%)	77	100	91	23.00%	B. Effectively communicate their children's needs (%)	80	96	91	16.00%	C. Help their children develop and learn (%)	77	96	90	19.00%	<p>OSEP appreciates CNMI's efforts to improve performance.</p>
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<b>Monitoring Priorities and Indicators</b>	<b>Status of APR Data/SPP Revision Issues</b>	<b>OSEP Analysis/Next Steps</b>
<p>5. Percent of infants and toddlers birth to 1 with IFSPs compared to national data.</p> <p>[Results Indicator]</p>	<p>CNMI provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. CNMI indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2011 and FFY 2012. CNMI revised the improvement activities for FFY 2010 for this indicator, and OSEP accepts those revisions.</p> <p>CNMI's FFY 2009 reported data for this indicator are .77%. These data represent progress from the FFY 2008 data of .31%. CNMI did not meet its FFY 2009 target of .89%.</p>	<p>OSEP looks forward to CNMI's data demonstrating improvement in performance in the FFY 2010 APR, due February 1, 2012.</p>
<p>6. Percent of infants and toddlers birth to 3 with IFSPs compared to national data.</p> <p>[Results Indicator]</p>	<p>CNMI provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions. CNMI indicated that stakeholders were provided an opportunity to comment on the targets for FFY 2011 and FFY 2012. CNMI revised the improvement activities for FFY 2010 for this indicator, and OSEP accepts those revisions.</p> <p>CNMI's FFY 2009 reported data for this indicator are 1.39%. These data represent slippage from the FFY 2008 reported data for this indicator of 1.5%. CNMI did not meet its FFY 2009 target of 1.8%.</p>	<p>OSEP looks forward to CNMI's data demonstrating improvement in performance in the FFY 2010 APR, due February 1, 2012.</p>
<p>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.</p> <p>[Compliance Indicator]</p>	<p>CNMI provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions.</p> <p>CNMI's FFY 2009 reported data for this indicator are 100%. These data remain unchanged from the FFY 2008 data of 100%. CNMI met its FFY 2009 target of 100%.</p>	<p>OSEP appreciates CNMI's efforts in achieving compliance with the 45-day timeline requirements in 34 CFR §§303.321(e)(2), 303.322(e)(1), and 303.342(a).</p>
<p>8. 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:</p> <p>A. IFSPs with transition steps and services;</p> <p>[Compliance Indicator]</p>	<p>CNMI provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions.</p> <p>CNMI's FFY 2009 reported data for this indicator are 100%. These data remain unchanged from the FFY 2008 data of 100%. CNMI met its FFY 2009 target of 100%.</p>	<p>OSEP appreciates CNMI's efforts in achieving compliance with the IFSP transition content requirements in 34 CFR §§303.148(b)(4) and 303.344(h).</p>

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<b>Monitoring Priorities and Indicators</b>	<b>Status of APR Data/SPP Revision Issues</b>	<b>OSEP Analysis/Next Steps</b>
<p>8. 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:</p> <p>B. Notification to LEA, if child potentially eligible for Part B; and</p> <p>[Compliance Indicator]</p>	<p>CNMI provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions.</p> <p>CNMI's FFY 2009 reported data for this indicator are 100%. These data remain unchanged from the FFY 2008 data of 100%. CNMI met its FFY 2009 target of 100%.</p>	<p>OSEP appreciates CNMI's efforts in achieving compliance with the notification requirements in 34 CFR §303.148(b)(1).</p>
<p>8. 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:</p> <p>C. Transition conference, if child potentially eligible for Part B.</p> <p>[Compliance Indicator]</p>	<p>CNMI provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions.</p> <p>CNMI's FFY 2009 reported data for this indicator are 100%. These data remain unchanged from the FFY 2008 data of 100%. CNMI met its FFY 2009 target of 100%.</p>	<p>OSEP appreciates CNMI's efforts in achieving compliance with the timely transition conference requirements in 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9)(A)(ii)(II)).</p>
<p>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.</p> <p>[Compliance Indicator]</p>	<p>CNMI provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions.</p> <p>CNMI's FFY 2009 reported data for this indicator are 100%. These data remain unchanged from the FFY 2008 data of 100%. CNMI met its FFY 2009 target of 100%.</p> <p>CNMI reported that the one finding of noncompliance identified in FFY 2008 was corrected in a timely manner.</p> <p>OSEP's February 8, 2011 verification letter required CNMI to submit within 90 days of the date of that letter: (1) CNMI's revised monitoring procedures for verifying correction of noncompliance prior to issuance of a finding, consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02); and (2) an assurance that CNMI has trained its staff about monitoring findings regarding IFSP content. CNMI's May 6, 2011 response provided the required monitoring procedures</p>	<p>OSEP appreciates CNMI's efforts in timely correcting findings of noncompliance identified in FFY 2008.</p> <p>In reporting on correction of findings of noncompliance in the FFY 2010 APR, due February 1, 2012, CNMI must report that for each finding of noncompliance identified in FFY 2009, CNMI verified that is: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based</p>

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<b>Monitoring Priorities and Indicators</b>	<b>Status of APR Data/SPP Revision Issues</b>	<b>OSEP Analysis/Next Steps</b>
	<p>and assurance confirming completion of the training. OSEP’s analysis of these issues is reflected in the chart at the end of this response table.</p>	<p>on a review of updated data such as data subsequently collected through on-site monitoring or the CNMI data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of CNMI, consistent with OSEP Memorandum 09-02, dated October 17, 2008 (OSEP Memo 09-02). In the FFY 2010 APR, CNMI must describe the specific actions that were taken to verify the correction.</p> <p>In addition, in reporting on Indicator 9 in the FFY 2010 APR, CNMI must use the Indicator 9 Worksheet.</p>
<p>10. Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint. [Compliance Indicator]</p>	<p>CNMI provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions.</p> <p>CMNI reported that it did not receive any signed written complaints during the reporting period.</p>	<p>OSEP looks forward to reviewing CNMI’s data in the FFY 2010 APR, due February 1, 2012.</p>
<p>11. Percent of fully adjudicated due process hearing requests that were fully adjudicated within the applicable timeline. [Compliance Indicator]</p>	<p>CNMI provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions.</p> <p>CNMI reported that it did not receive any requests for due process hearings during the reporting period.</p>	<p>OSEP looks forward to reviewing CNMI’s data in the FFY 2010 APR, due February 1, 2012.</p>
<p>12. Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements (applicable if Part B due process</p>	<p>CNMI reported that no resolution sessions were held during the reporting period.</p> <p>CNMI reported fewer than ten resolution sessions held in FFY 2009. CNMI is not required to provide targets or improvement activities until any fiscal year in which ten or more resolution sessions were held.</p>	<p>OSEP looks forward to reviewing CNMI’s data in the FFY 2010 APR, due February 1, 2012.</p>

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<b>Monitoring Priorities and Indicators</b>	<b>Status of APR Data/SPP Revision Issues</b>	<b>OSEP Analysis/Next Steps</b>
procedures are adopted). [Results Indicator]		
13. Percent of mediations held that resulted in mediation agreements. [Results Indicator]	CNMI reported that no mediations were held during the reporting period.  CNMI reported fewer than ten mediations held in FFY 2009. CNMI is not required to provide targets or improvement activities except in any fiscal year in which ten or more mediations were held.	OSEP looks forward to reviewing CNMI's data in the FFY 2010 APR, due February 1, 2012.
14. State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate. [Compliance Indicator]	CNMI provided targets for FFY 2011 and FFY 2012, and improvement activities through FFY 2012, and OSEP accepts those revisions.  CNMI's FFY 2009 reported data for this indicator are 100%. These data remain unchanged from the FFY 2008 data of 100%. CNMI met its FFY 2009 target of 100%.	OSEP appreciates CNMI's efforts in achieving compliance with the timely and accurate data reporting requirements in IDEA sections 616, 618, and 642 and 34 CFR §§76.720 and 303.540. In reporting on Indicator 14 in the FFY 2010 APR, due February 1, 2012, CNMI must use the Indicator 14 Data Rubric.

<b>Verification Issues</b>		
<b>Critical Element</b>	<b>Issue/Response/Analysis</b>	<b>Action Required</b>
GS-1: Identification of Noncompliance	<p>OSEP's February 8, 2011 Verification Visit Letter required CNMI to resubmit its revised monitoring procedures for identifying noncompliance or issuing findings of noncompliance when data reviewed through its internal file reviews and external monitoring reflect noncompliance. Specifically, OSEP's Verification Visit Letter required CNMI to describe in its revised monitoring procedures how CNMI PSS documents the correction of noncompliance when CNMI corrects noncompliance immediately and chooses not to make a finding to ensure that CNMI is correcting noncompliance consistent with OSEP Memo 09-02. In addition, OSEP's Verification Letter required CNMI to include the results of its latest internal file review and external monitoring under relevant SPP/APR compliance indicators and Indicator 9 in the February 1, 2012 APR.</p> <p>On May 6, 2011, CNMI submitted its revised monitoring procedures for requiring that a written finding is issued whenever noncompliance is identified through their internal file review and external monitoring procedures. CNMI also included monitoring procedures that require the timely correction of all noncompliance</p>	<p><u>No further action is required</u> regarding revisions to CNMI's monitoring procedures.</p> <p><u>Further action required:</u> CNMI must include the results of its latest internal file review and external monitoring under relevant SPP/APR compliance indicators and Indicator 9 in the FFY 2010 APR, due February 1, 2012.</p>

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<b>Verification Issues</b>		
<b>Critical Element</b>	<b>Issue/Response/Analysis</b>	<b>Action Required</b>
	identified, consistent with OSEP Memo 09-02.	
GS-1: Identification of Noncompliance	<p>OSEP’s February 8, 2011 Verification Visit Letter required CNMI to provide a written assurance that it has provided training to all providers and monitors to ensure that IFSPs include all of the content required under 34 CFR §303.344, including, but not limited to: 34 CFR §§303.344(a)(1); 303.344(d)(1) and (1)(i); and 34 CFR §303.344(f)(1)).</p> <p>On May 6, 2011, CNMI provided the required written assurance as well as a description of the training activities.</p>	<u>No further action is required.</u>