



**child  
development  
services**

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June 10, 2008

Cindy Foreman  
Board Chairperson  
Knox County Child Development Services  
Five Towns CSD  
7 Lions lane  
Camden, ME 04843

Dear Ms. Foreman:

The Knox County Child Development Services has recently undergone an on-site monitoring process including an internal record audit and an on-site record audit.

First I would like to express my sincere appreciation to the site director, the staff and providers for the effort that was extended to accommodate this process. The involvement of staff in this process is beneficial to all. Please express my gratitude to all of the staff for helping with the review, and answering our questions.

As I shared with the site director and staff during the on-site visit, this process is designed to promote continuous improvement in compliance and service provision to children in your service area.

### **1. The Process:**

During the month of March 2008, program monitoring was conducted through an on-site visit to assess the Knox County CDS site's current status in meeting regulatory requirements. This letter will outline the base line data gathered during this review.

The collection of base line data and information regarding the provision of special education services at the Knox County CDS site was based on the following activities:

- Review of State Entitlement plan
- Review of interviews received from staff, related service providers and the board of directors
- Review of parent questionnaires
- Review of:
  - 7 Part C files
  - 14 Part B files
- Review of Knox County CDS self-review plan
- Review of Internal Audit of:
  - 10 part C files
  - 13 Part B files

- Review of Unmet needs data from state wide data submitted by the site on a monthly basis.

## **2. Interviews:**

### **Board of Directors:**

The Board of Directors that responded to the interview questionnaire indicated they feel training needs to occur once new members are brought on board to understand the role of the board and provide some guidance as to the expectation of board members either on a regional level or on a state wide level. They reported that the leadership of the site director is positive and that she is knowledgeable, positive and approachable.

### **Staff:**

The staff interviewed indicated that the following areas were of concerns for them as employees of the Knox County Child Development site:

- Least Restrictive Environment placements in the area- both in determination of appropriateness and lack of availability
- Dynamic status quo of salaries due to state wide negotiations
- Limited availability of providers in the area that are able to provide services to children B-5 in LRE settings and in the Natural Environment resulting in unmet needs at times for children. \*

The staff described the leadership of the site as supportive, knowledgeable, approachable and very involved with all aspects of the site and staff.

\* In review of the unmet needs data reported to the Child Development Services Office at the Department of Education the following chart outlines the unmet needs of children B-5 at the Knox CDS site from December 2007 to April 2008

Specific service	Total Number of Unmet Services					
	December 2007		January 2008		February 2008	
	B-2	3-5	B-2	3-5	B-2	3-5
Occupational Therapy	2	0	1	2	2	13
Physical Therapy	0	0	0	0	0	0
Speech Language Therapy	2	3	0	2	0	1
Development Therapy	1	0	0	1	0	1
<b>TOTAL percentage of Unmet needs</b>	6%	2%	1%	3%	2%	7%

Specific service	Total Number of Unmet Services					
	March 2008		April 2008			
	B-2	3-5	B-2	3-5		
Occupational Therapy	2	10	2	12		
Physical Therapy	0	0	0	0		
Speech Language Therapy	1	0	0	0		
Development Therapy	0	0	0	1		
<b>TOTAL percentage of Unmet needs</b>	3%	4%	5%	9%		

In order to meet compliance in this area, the Knox County CDS must submit goal within the corrective action plan to meet 100% compliance in the timeliness of the provision of services for children ages Birth through 5 years of age.

#### **Contracted Related Service Providers:**

The related services providers who took part in the interview process indicated that overall, the communication and collaboration with the site is good. There are concerns with the changes in the regulations particularly in the provision of occupational therapy and physical therapy as stand alone services to children ages 3-5. They also indicated the provision of services within the natural environment and LRE settings can be a barrier to meeting the needs of the children in the Knox County area.

#### **4. Record Audit:**

An integral part of this process involved the participation of the Knox County site staff in the auditing of children's records. Thank you for the effort and time extended to allow for this participation.

During our on site visit, the program monitoring team examined the following areas of both Part C and Part B:

- Referral, screening procedures and timelines;
- Parent notices and consents;
- Procedures involving evaluations and Individual Family Service Plan (IFSP Meetings);
- Individual Family Service Plans (IFSP) and Individual Education Plans (IEP);
- Communication with Parents

These areas were reviewed in a comprehensive audit of the children's records.

**Attached are the compiled results of the record audit. Any section not meeting compliance is identified as an area of concern and in Need of Corrective Action. Identified areas of concern on the record audit are followed by comments as to why the item did not meet the regulation standard.**

**In reviewing 7 files on-site (a minimum of 10% of the part C files based on child-count) and 10 files internally, the following areas in Part C met compliance**

**In reviewing the compiled data, the following areas in Part C met compliance:**

- Initial referral forms completed and on-file in each child's record
- Prior written notice of the initial referral, initial placement and if the IFSP team proposes or refuses to initiate or change identification, evaluation, educational program and or placements was not documented
- Documentation of providing Parents with Procedural Rights and Safeguards
- Input from the IFSP team to determine evaluation needs
- Documentation of appropriate referrals for evaluations
- Development of the initial IFSP/IEP at the Early Childhood meeting and attaining parental voluntary consent for initial placement and provision of services.
- Documentation of IFSP meeting notices on file
- Team meeting notices sent out to parents at least seven days prior to the meeting.
- Documentation that copies of the evaluation reports were provided to the parent within reasonable time prior to the IFSP meeting at which the evaluation was discussed.
- Documentation of required members of the IFSP team present at Meetings.
- The use of the State Required IFSP as of 9/1/07
- The following areas of the IFSP met compliance:
  - Family Routines and Priorities
  - Supports and services needed to achieve Outcomes including:
    - Specific supports and services
    - Setting
    - Method
    - Frequency
    - Intensity
    - Funding Source
  - IFSP signature page with consent from parents for Early Intervention Services
  - Documentation of periodic review of the IFSP
  - Financial Resources listed on the IFSP
  - Primary Health Care Provider Approval

**The following areas did not meet compliance:**

- Receipt of Consent for Initial Evaluation and any further evaluations determined necessary by the IFSP team. The forms were not dated by staff as well as the date of when the Parent signed was missing.
- Use of a State approved evaluation tool as part of the initial evaluation process
- Completion of evaluations and the Initial Early Childhood Team meeting held to determine eligibility for services within 45 days from the receipt of referral to the site.
- Transition from Part C Early intervention services to Part B services special educations services
- Documentation of copy of the IFSP provided to the parent within 21 days of the meeting

- The use of the Child Outcome Summary form upon entry into services (within 30 days of identification) and upon exit from program if the child has been in services for 6 months or longer.
- The following areas of the IFSP did not meet compliance:
  - Documentation of:
    - Present Abilities, strengths and needs:
      - Summary of relevant health status
      - Using Hand and Moving Body ( gross and fine motor)
      - Playing, Thinking, Exploring (cognitive skills)
      - Expressing and Responding to feelings and interacting with others ( Social and Emotional)
      - Eating, Dressing, and Toileting ( Self-Help or Adaptive skills)
      - Evaluator's name, credentials, role/organization, signature and date
      - Team summary chart of five domains
  - Eligibility for Maine Part C Services with determination of eligibility
  - Documentation of Child / Family Outcomes including:
    - Outcome statement
    - Short term objectives
    - Strategies
    - Progress
    - Start and end dates
    - Other services( other services needed by the child but not entitled under Part C)
- Natural Environment Justification and documentation
- Early Intervention Services being provided in the child's natural environment
- All areas of the Transition Plan on the IFSP including:
  - For children entering Part B at least 90 days before the child's third birthday
  - Documenting steps to be taken to support transition to Part B or Kindergarten on the IFSP.
- Listing of Qualified Enrolled Provider or Licensed Contracted Provider on the services page instead of listing the specific discipline of the person responsible for the delivery of the service.

**In reviewing 23 files on-site, the following areas in Part B met compliance:**

**\* It is very important to note the Part B files reviewed were very well organized and easy to read. The file management process of the case managers should be considered a strength for the site.**

- Documentation of Initial Referral
- Documentation of providing Parents with Procedural Rights and Safeguards
- Evidence of completion of screening
- Prior Written notice of Initial referral for evaluations
- Prior Written Notice sent to the parents documenting the determinations of eligibility meeting with parental consent for placement into Special Education Services
- Documentation of Appropriate Referrals for evaluations
- Evidence of input for the IEP team to determine the evaluation needs of the child

- suspected of having a disability
- Receipt of Consent for Initial Evaluation and consent for any further evaluations determined by the IEP team.
- Parental Notice of the IEP team meeting
- Documentation of informed written consent to release information
- Use of a variety of assessment tools and strategies as part of the evaluation process
- The following areas of the IEP met compliance:
  - Consideration of the child's strengths
  - Consideration of the results of the most recent evaluations,
  - Consideration of assistive technology needs
  - Consideration of the academic, developmental and functional needs of the child.
  - Consideration of the concerns of the parents for enhancing their child's education
  - Consideration of the communication needs of the child
  - Consideration of Special factors including behavioral needs, special instruction for the blind or visually impaired, and children with limited English Proficiency
  - Statement of the child's present level of performance
  - A statement of measurable annual goals
  - How progress toward the annual goals will be measured
  - Specific special education services and location of service delivery
  - Documentation of special education transportation needs

**The following areas did not meet compliance:**

- Meeting the 60 day time line from the receipt of consent to evaluate to a meeting being held to determine eligibility for special education services.
- Development of the initial IEP within 30 days of the eligibility determination. **The site has modified the state required special education IEP. The site must remove all modifications to the IEP.**
- Documentation of providing copies of evaluation reports to the parent within a reasonable time prior to the meeting in which the evaluation is to be discussed.
- Documentation of copies of the minutes and IEP provided to the parent within 21 days of the meeting
- Providing at least seven days notice to the parent of an IEP team meeting.
- Written Notice if the IEPU proposes or refuses to initiate or change identification, evaluation, educational program or placement.
- The following areas of the IEP did not meet compliance:
  - Statement of how the child's parents will be regularly informed of their child's progress toward their annual goals.
  - Specific special education services including frequency
  - Specific discipline of the person responsible for the delivery of special education services
  - Date of initiation/ duration of services
  - An explanation of the extent, if any, to which the child will not participate with non-disabled children in a educational program

- Documentation of the need for supplemental aids and services and modifications or supports to the educational environment

## **5. Corrective Action Plan Development:**

### **In summary:**

- 1.) **The Site will have one year from the date of this report to correct all areas of non-compliance that did not meet compliance during the record audit which were noted in Section 4. A corrective action plan must be submitted to the Department of Education, Child Development Services Department within 45 days of the receipt of this report.**
- 2.) **The site must submit a plan to correct the finding of Non-Compliance in the area of Unmet Needs of services for the children identified in need of early intervention services and special education services within one year of this report. The corrective action plan must be submitted within 45 days of the receipt of this report to the Department of Education, Child Development Services Department.**

Assistance in the development of the site's corrective action plan can be arranged through my office at the State Child Development office upon request.

In accordance with the Freedom of Access Act, all letters related to the Special Education Program Monitoring are public record and shall be made available to parents and other members of the public upon request.

On behalf of the CDS monitoring team, I would like to thank you, the site Director, the staff and all other persons that took part in this review, for the thoughtful courtesy extended to my team and the flexibility and cooperation afforded us during the visit.

Sincerely,

Erica Thompson, Distinguished Educator  
Child Development Services Program Monitoring and Technical Assistance

Copies sent to:  
Susan A Gendron, Commissioner  
David Noble Stockford, Policy and Team Leader  
Debra Hannigan, State Director, Child Development Services  
Jude Thomas, Knox County CDS Site Director

Enclosures:

Part C Child Record Audit Form Summary  
Part B Child Record Audit Form Summary  
Parent survey results