



CUMBERLAND • 50 Depot Road, Falmouth, Maine 04105 • (207) 781-8881 Fax 781-8855

## Corrective Action Plan

*\* Progress from the 4/14/2008 monitoring visit will be indicated in italics within the document*

12/14/2007

Debra Hannigan, CDS State Director  
Erica Thompson, Distinguished Educator  
Child Development Services  
Maine Department of Education  
146 State House Station  
Augusta, Maine 04333

Dear Ms. Hannigan and Ms. Thompson,

I am writing to present the proposed corrective action plan for CDS/Cumberland based on the Department of Education's program monitoring. I have reviewed my initial findings, my first report on progress and Ms. Thompson's very thorough review of all aspects of the monitoring process. The following are the initial and new proposed goals and measurements necessary to bring the site into compliance in all areas:

### GOAL #1:

WHAT IS YOUR GOAL?	Provide Training to All New Staff to Increase Timeline Compliance to 95% for all factors not related to parents not making children available for evaluation by June 2008.
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<p>WHY WAS THIS CHOSEN AS A GOAL?</p>	<p>Timeline Compliance was at 67% in Part B and 59% in Part C at the time of the self-audit. There were internal administrative factors that were related to reduce compliance.</p>
<p>EFFORTS/ACTIVITIES TO ACHIEVE GOAL</p>	<ul style="list-style-type: none"> <li>• Site director provided training for case management and administrative staff to ensure they understand the timeline requirements for Part B and Part C and the importance to paperwork and data entry to occur promptly so compliance reports accurately reflect our efforts.</li> <li>• Site director worked with clinical team leader and community providers to increase the number of evaluators in Part B and Part C.</li> </ul>
<p>TIME LINE FOR GOAL COMPLETION</p>	<p>Completed internal training in August and September 2007. Recruited additional evaluators through December 2007 and will continue efforts to increase capacity through the year.</p>
<p>PERSONNEL RESPONSIBLE</p>	<ul style="list-style-type: none"> <li>• Site Director</li> <li>• Clinical Team Leader</li> <li>• Case management, administrative and clinical staff and contracted providers</li> </ul>
<p>EVIDENCE OF CHANGE</p>	<p>Increase Timeline Compliance to 100% for all factors not related to parents not making children available for evaluation as evidence by monthly compliance reports submitted to DOE.</p>

	<p>Site director will meet with each case manager to review timeline compliance in February 2008 and update the DOE. Based on recent data reports, we are achieving greater than 100% timeline compliance.</p> <p><b><i>4/14/08 – During the file review compliance with meeting this goal was measured as follows:</i></b></p> <p><b><i>Part C – 9 files – 100% compliance with meeting the 45 day timeline from referral to eligibility for services. Excellent progress!</i></b></p> <p><b><i>Part B – 9 files – 78% compliance with meeting the 60 day timeline from receipt of consent to evaluate to eligibility determination. The site was found to be at 60% in August of 2007. The site is showing progress in meeting 100% compliance.</i></b></p>
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Revised 4/30/07

## GOAL # 2

<p>WHAT IS YOUR GOAL?</p>	<p>Provide Prior Written Notice of Initial Referral at greater than 95% compliance.</p>
<p>WHY WAS THIS CHOSEN AS A GOAL?</p>	<p>Since this process was only recently implemented at our site at the time of the</p>

	<p>monitoring visit, our percentage of compliance was 22% for Part C and 11% for Part B.</p>
<p>EFFORTS/ACTIVITIES TO ACHIEVE GOAL</p>	<ul style="list-style-type: none"> <li>• Erica Thompson, Distinguished Educator, provided training on the requirements for written notice.</li> <li>• Site Director provided follow-up training with case managers to ensure understanding of requirements.</li> <li>• Site Director and team leaders will review files to ensure compliance.</li> </ul>
<p>TIME LINE FOR GOAL COMPLETION</p>	<p>Training to occur through September 2007. File review to occur on an ongoing basis.</p>
<p>PERSONNEL RESPONSIBLE</p>	<p>Site Director, Part B and Part C Team Leaders and case management staff.</p>
<p>EVIDENCE OF CHANGE</p>	<p>Greater than 95% Compliance in providing Prior Written Notice of Initial Referral as evidenced by file review. <b>Goal Met-Update-</b> Based on File Review and Case Manager interviews, we are confident that Written Notice of Initial Referral is close to 100%!!</p> <p><i>4/14/08 – Goal met. 100% compliance found during the file review. The site has provided model forms for the state to utilize during training.</i></p>

### GOAL # 3

<p>WHAT IS YOUR GOAL?</p>	<p>Revise all problematic forms.</p>
<p>WHY WAS THIS CHOSEN AS A GOAL?</p>	<p>Form issues resulted in reduced compliance with requirements of child audit form. (Meeting Notice, PWN, and initial referral form, New IEP and IFSP)</p>
<p>EFFORTS/ACTIVITIES TO ACHIEVE GOAL</p>	<p>Site director identified form issues related to child audit compliance and asked the DOE monitoring staff to review current forms, answer site questions and provide technical assistance in bringing the forms in compliance.</p>
<p>TIME LINE FOR GOAL COMPLETION</p>	<p>The DOE provided on September 7<sup>th</sup>, 2007 related to forms. All forms have been reviewed, revised as necessary. Cumberland is using all required state forms.</p>
<p>PERSONNEL RESPONSIBLE</p>	<ul style="list-style-type: none"> <li>• Site Director</li> <li>• DOE Monitoring Staff</li> </ul>
<p>EVIDENCE OF CHANGE</p>	<p><b>Goal Met-</b> All forms are compliant with state and federal regulations.</p> <p><b><i>4/14/08- Goal met-</i></b></p>

	<i>The site has demonstrated exemplar performance in the adoption and utilization of the new state required special education forms. Their work is frequently used as a model state wide.</i>
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#### GOAL # 4

WHAT IS YOUR GOAL?	Provide training on the requirements of transition from Part C to Part B, including timeline, notice requirements and required participants to increase compliance to 100% by April 1 <sup>st</sup> , 2008.
WHY WAS THIS CHOSEN AS A GOAL?	Compliance was at 55% base on self-audit.
EFFORTS/ACTIVITIES TO ACHIEVE GOAL	<ul style="list-style-type: none"> <li>• Site Director and Part C Team Leader provided a full day of training on the Part C and specifically the transition process on October 24<sup>th</sup>, 2007, focus that transition is a process and not a single event.</li> <li>• Report was developed in Case-E so Part C case managers will be aware of all children who are between 2.3 years and 2.9 years.</li> <li>• Gain approval from DOE for waiver to parents right to receive evaluation</li> </ul>

	<p>report prior to team meeting when it is a same day meeting.</p> <ul style="list-style-type: none"> <li>• New advanced written notice is compliant.</li> </ul>
<p>TIME LINE FOR GOAL COMPLETION</p>	<ul style="list-style-type: none"> <li>• Training has been provided.</li> <li>• Forms are compliant.</li> <li>• DOE staff has answered follow up questions.</li> <li>• New process in which Part B and Part C individual teams related to geographical areas meet weekly to review upcoming transitions and to coordinate requirements and schedules.</li> </ul>
<p>PERSONNEL RESPONSIBLE</p>	<p>Site Director, DOE Monitoring Staff, Part C Team Leader, Part B Case Management Staff</p>
<p>EVIDENCE OF CHANGE</p>	<p>All eligible children will transition to Part B within required timelines with required participants. Parents will understand their rights related to the transition process.</p> <p>Update- It has taken longer than I would have liked to develop specific processes related to ensuring all required information is obtained and all required participants are present in a timely manner. The processes are not in place, though the timeline is still not where it needs to be. Site director will review timelines for transition with each case manager in February 2008 and submit an update to the DOE.</p>

	<p><i>4/14/08 – Of the 9 files reviewed during the on-site visit, 2 of the files were applicable for transition services. Both files met compliance in all Transition requirements. This area will be reviewed again in August of 2008 to confirm 100% compliance. The site has a process in place to identify the children in need of transition services in order to meet the required timelines.</i></p>
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GOAL # 5

<p>WHAT IS YOUR GOAL?</p>	<p>Increase compliance for public school transition to 95% by June 30<sup>th</sup>, 2008.</p>
<p>WHY WAS THIS CHOSEN AS A GOAL?</p>	<p>Compliance is currently at 62%.</p>
<p>EFFORTS/ACTIVITIES TO ACHIEVE GOAL</p>	<ul style="list-style-type: none"> <li>• Determine our responsibility in transition to public school if school does not wish to hold a transition meeting until fall or does not invite CDS or current providers to the spring transition. <b>Update- DOE staff provided training at the fall conference in October 2007 regarding the requirements of transition.</b></li> </ul>

	<ul style="list-style-type: none"> <li>• Work with Part B case management staff to streamline ESY/transition process. <b>Update- Training was provided by DOE staff and AAG Sarah Forster related to ESY eligibility.</b></li> <li>• State Director will review ESY regulations with special education directors through their representative board in early 2008.</li> </ul>
<p>TIME LINE FOR GOAL COMPLETION</p>	<ul style="list-style-type: none"> <li>• Site Director and all case managers attended the fall conference to obtain training on the transition from CDS to public school in October 2007. Part B case managers are currently working with the district reps. To review high needs children and to schedule transition meetings.</li> <li>• Transition meetings will occur for every school aged child by June 15<sup>th</sup>, 2008.</li> </ul>
<p>PERSONNEL RESPONSIBLE</p>	<p>Site director, special education directors, Part B team leader, case management staff, DOE monitoring staff</p>
<p>EVIDENCE OF CHANGE</p>	<p>All eligible children will transition to public school within required timelines with required participants. Parents will understand their rights related to the transition process. An update on compliance will be provided in July 2008.</p> <p><i>4/14/08 – This area was not reviewed during the on-site monitoring visit. This</i></p>

*area will be reviewed in August of 2008*

## GOAL # 6

WHAT IS YOUR GOAL?	Improve implementation of seven-day notice requirement for meeting for all required participants to 95% or greater by March 2008. Ensure waivers are in place if parent chooses to have a meeting with a seven day written notice. Revise form to ensure that parents understand they have the right to invite others and include case managers as members of the team.
WHY WAS THIS CHOSEN AS A GOAL?	Some audited files did not contain meeting notices or waivers if the meeting occurred with a seven-day notice. Part C was at 80% and Part C was at 90%.
EFFORTS/ACTIVITIES TO ACHIEVE GOAL	Review protocol for meeting notice with all case management staff and ensure compliance through file review and staff interview.
TIME LINE FOR GOAL COMPLETION	Site director reviewed protocol with all case managers in August/September 2007.
PERSONNEL RESPONSIBLE	Site Director, Team Leaders and case management staff

EVIDENCE OF CHANGE	<p>All parents receive seven-day notice of team meeting or have waived their right to said notice as evidenced by file review and staff interview.</p> <p>Update- The use of state written notice has resolved the issue related to required members and parents ability to invite others. <b>Based on file review, we have met this goal.</b></p> <p><i>4/14/08- Goal met – The site demonstrated the use of the new required state special education meeting notice form that includes the 7-day waiver consent.</i></p>
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GOAL # 7

WHAT IS YOUR GOAL?	<p>Case management staff will understand how complete model IEP so that each document is compliant with state and federal regulations by November 2007. (Specifically to items related to modification, aides/supports and accommodations and LRE)</p>
WHY WAS THIS CHOSEN AS A GOAL?	<p>All children in Cumberland County currently have IFSPs. Model forms and training on the completion of an IEP have not been available. Since all children eligible for Part B will now have an IEP, staff need training to ensure compliance. <b>Update- DOE provided a full day of</b></p>

	<p><b>training on September 7<sup>th</sup>, 2007. Site director has provided subsequent training and individual support to case managers by reviewing IEPs.</b></p>
<p>EFFORTS/ACTIVITIES TO ACHIEVE GOAL</p>	<p>Consult with DOE monitoring staff to determine when DOE can provide technical assistance.</p> <p><b>See above.</b></p>
<p>TIME LINE FOR GOAL COMPLETION</p>	<p>November 1<sup>st</sup>, 2007.</p>
<p>PERSONNEL RESPONSIBLE</p>	<p>DOE staff, Site Director and case management staff.</p>
<p>EVIDENCE OF CHANGE</p>	<p>Staff will understand how to facilitate the development of an IEP. Each IEP will be compliant with state and federal regulations as evidenced by file review.</p> <p><b>Goal Met!!!- We are very proud of the comprehensive, compliant IEP's that are being developed for all children eligible for Part B services.</b></p> <p><i>4/18/08 – Goal Met – The site has demonstrated the adoption and utilization of IEPs for children 3-5. They have provided model forms for parents, providers and CDS staff to be used during trainings.</i></p>

## GOAL # 8

WHAT IS YOUR GOAL?	To become more connected to REACH School during the 2007-2008 school year.
WHY WAS THIS CHOSEN AS A GOAL?	Due to administrative offices and school being in different towns, Site Director is not consistently visible to teaching staff.
EFFORTS/ACTIVITIES TO ACHIEVE GOAL	Site Director will spend 3-4 morning per month in classrooms at the REACH School.
TIME LINE FOR GOAL COMPLETION	To begin September 9th, 2007.
PERSONNEL RESPONSIBLE	Site Director
EVIDENCE OF CHANGE	Site director will get to know teaching staff and be able to provide specific feedback on the quality of the program based on consistent participation in the classrooms. <b>Update- Though visits were reduced</b>

	<p><b>through November and December 2007 due to Child Count, the site director has spent increased time at the REACH School, generally three mornings per month.</b></p> <p><i>4/18/08 – This goal will be reviewed in August of 2008.</i></p>
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## GOAL # 9

WHAT IS YOUR GOAL?	To understand and implement the requirements for a comprehensive evaluation for eligibility under Part B by June 2008.
WHY WAS THIS CHOSEN AS A GOAL?	We do not have clear understand of what specific tools are appropriate and if evaluations (Such as OT or PT) can stand alone for eligibility under developmental delay in the new regulations.
EFFORTS/ACTIVITIES TO ACHIEVE GOAL	<ul style="list-style-type: none"> <li>• Review of new Chapter 101</li> <li>• Obtain suggested evaluation tools from the DOE once final draft is available.</li> </ul>
TIME LINE FOR GOAL COMPLETION	June 2008.
PERSONNEL RESPONSIBLE	DOE personnel, site staff

EVIDENCE OF CHANGE	<p>Site will implement a comprehensive evaluation process under Part B that is equity for al children.</p> <p><b>Update- We have incorporated new evaluation protocols for eligibility under Part B. All children receive classroom observations are part of the eligibility process.</b></p> <p><i>4/14/08 – This goal was not reviewed during this on-site visit. This goal will be evaluated in August of 2008. The site has demonstrated the use of the speech and language eligibility forms as well as the incorporation of observations into the Part B eligibility process.</i></p>

**GOAL # 10**

WHAT IS YOUR GOAL?	Eliminate barrier to provide evaluations and services in the natural and least restrictive environments related to provider travel reimbursement by March 2008.
WHY WAS THIS CHOSEN AS A GOAL?	Wait lists for services develop related to a lack of providers who will travel. Providers have asked for a reimbursement so they can increase availability to travel.

EFFORTS/ACTIVITIES TO ACHIEVE GOAL	Site director requested that the DOE authorize a travel reimbursement for providers.
TIME LINE FOR GOAL COMPLETION	March 2008
PERSONNEL RESPONSIBLE	Site Director State Director State Business Manager
EVIDENCE OF CHANGE	<p>A provider travel reimbursement will be established.</p> <p><b>Goal Met- Travel reimbursement of 40 cents per mile has been authorized effective February 1<sup>st</sup>, 2008.</b></p> <p><i>4/14/08 – This goal will be reviewed in August of 2008. Further corrective action may be determined as a result of the letter of findings including the chart of unmet needs of 4/29/08.</i></p>

The following is a review of recommendations made by Ms. Thompson at the exit interview of August 23, 2007:

- CDS staff are now listed on Meeting notices.
- The organizational protocol in files is being followed.
- A list of acronyms was developed to assist the reading in interpreting coordination notes and is located on each coordination page. Service coordination note are done on a different color of paper than the placement notes.
- Services for children entering public school end on September 1<sup>st</sup>.

- Letters re: children eligible under Chapter 676 have been sent with a written notice. A copy of the parents' response will be kept in the child's file and a copy will be given to the Part B team leader so they can be submitted to the DOE.
- Natural environment and LRE statements are being customized for each child.
- Written notice has replaced meeting minutes and accurately reflects the determinations made at the meeting.
- Separate release of information forms are obtained for individuals who are not contracted providers.
- Consent for evaluation is obtained only when necessary and implemented within the required time lines.

***4/14/08 – The Cumberland County Child Development Services has demonstrated tremendous progress in working towards meeting the goals of their corrective action plan. The use of the new state required forms is outstanding. The site director has increased the general supervision of her case managers with reviews of all IFSPs and IEPs generated by the site to ensure compliance. She meets with her staff on a periodic basis to review progress in meeting the goals of the corrective action plan. Her leadership is recognized and commended.***

I appreciate the opportunity to develop this plan and review the progress we have already made in meeting our goals. I look forward to receiving suggestions related to any additional areas that you feel need to be addressed.

Thank you again for providing such a comprehensive review of our program and technical assistance to ensure that we are providing appropriate services in a timely, compliant manner to young children and their families in Cumberland County.

Sincerely,

Lori Whittemore, M.Ed.  
Site Director