

MASSACHUSETTS EARLY INTERVENTION

TRANSITION REQUIREMENTS AND DATA GUIDANCE

Massachusetts
Department of Public Health



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CLINICAL & DATA POPULATION REQUIREMENTS FOR TRANSITION ACTIVITIES

Required Transition Activities - Clinical and Data Populations for IFSP children by eligibility:

Transition Activity	At Risk/ Clinical Judgment		Developmental Delay		Established Delay	
	Clinical	Data	Clinical	Data	Clinical	Data
Transition Plan	Yes	Yes	Yes	Yes	Yes	Yes
TP Discussion Date	Yes	No	Yes	If 27+ months at discharge & recommended referral to the LEA	Yes	If 27+ months at discharge & recommended referral to the LEA
LEA Referral to Part B SPED ^{1,2}	If appropriate	If appropriate	If appropriate	If appropriate	If appropriate	If appropriate
Transition Planning Conference	Yes	No	Yes	If referred to LEA	Yes	If referred to LEA

¹ *Special Education*

² *A toddler may be eligible for EI services under risk only, but may still have a potentially eligible condition (or something of a delay) under Part B SPED)*

Although clinically, transition activities are required to be completed for most IFSP children, the data requirements vary depending on the age of the child and/or if the child is eligible for Part B SPED services.

RECOMMENDED REFERRALS TO THE PUBLIC SCHOOL-LEA/SPED

If program staff had a discussion with a family receiving IFSP services about a referral or potential referral to an LEA, regardless of the age of the child at the time of this discussion, then this child is considered to be potentially eligible for Part B SPED services. “Potentially eligible” means that the child is considered to have a perceived delay/concern/issue that impacts educational and functional performance and it is believed that the child would benefit from services through the school system at the age of 3 years. “Public School-LEA/SPED” should be checked off under the “Referrals Recommended” question on the EIIS Discharge form. This question attempts to capture all recommended referrals at the time of discharge regardless of referral outcome. If a referral to an LEA is recommended to the family but the family opts out or a formal referral to the LEA does not occur the EI program should still check off “Public School –LEA/SPED” on the EIIS Discharge form.

All IFSP children who have a recommended referral to the “Public School-LEA/SPED” will NOT be included in the Transition Survey System (TSS). Only children whose families had a formal referral to the LEA or opted out will be included under the TSS database.

TRANSITION PLAN & TRANSITION PLAN DISCUSSION DATE

Clinical and Data Populations:

Transition Activity	Transition Requirements	
	Clinical	Data
Transition Plan	All IFSP children	All IFSP children
Transition Plan Discussion Date	All IFSP children	IFSP child 27+ months of age or older at the time of discharge having a recommended referral to the Public School-LEA/SPED

TRANSITION PLAN

Data System Application:

The EIIS Discharge form

Population:

→ Clinical requirement: All IFSP children should have a transition plan.

→ Data requirement: The transition plan question on the EIIS Discharge form should be answered for all IFSP children.

Definition:

Transition Plan question on EIIS Discharge form states: Was this child's Transition Plan completed to include the necessary transition steps and services as documented on the IFSP? Answer "Yes" if:

- Child is under 2 years and appropriate transition discussions have occurred and been documented
- Child is 2+ years and transition activities and timelines have occurred and been documented
- Program was unable to complete all of the steps and activities in the transition plan due to family situation/transferred/no shows, etc.
- Family not interested in a transition plan and it is documented that EI specialist offered all resources as described on the IFSP transition page

Reasons for no Transition Plan

If the child did not have a Transition Plan according to the above statements then one of the following reasons must be selected:

- EI staff schedule/lack of staff
- Late referral (*33+ months of age at referral*)
- Other (*explanation needed*)

Reports:

- DPH provides a monthly report of a program's Transition Plan status. Any child whose transition plan or transition plan discussion date is not compliant is listed in this report. EI programs should review this report and make corrections where appropriate.

- Transition plan information is reported to OSEP as part of the state's annual performance report (*Indicator 8a, Percent of children exiting Part C who have a completed transition plan*).
- DPH uses Transition Plan information as part of a program's Local Determination report. A corrective action plan is required for programs whose percent of Transition Plan compliancy is less than 100%.

TRANSITION PLAN DISCUSSION DATE

All IFSP children should have a Transition Plan Discussion Date. EI programs are required to answer this question only for IFSP children who were 27 months of age or older at the time of discharge and who had a recommended referral to the Public School -LEA/SPED.

Data System Application:

The EIIS Discharge form

Population:

- Clinical requirement: All IFSP children should have a transition plan discussion date. The definition of the transition plan discussion date below provides additional guidance for completing this question for those situations when a family leaves EI services abruptly and there has not been a formal face-to-face transition plan discussion date.
- Data requirement: The transition plan discussion date question on the EIIS Discharge form should be answered for IFSP children who had a recommended referral to the Public School -LEA/SPED. Although most EI programs will have a discussion about an LEA referral when the child is around 24 months of age the only children in need of having the transition plan discussion date completed are those children who are 27 months of age or older at the time of discharge .

Definition:

Transition Plan Discussion Date:

The date when the transition steps and services to support the child's transition have been identified and discussed with the parents (*including review of options, resources, information sharing, etc.*)

The date for when the Transition Plan Discussion Date occurs may vary between programs due to their clinical practice of when this discussion would have met the above criteria. Some possible discussion dates may include the following:

- The Transition Planning Conference date: many programs discuss the transition steps and services at this point in time
- Programs may typically be identifying resources in the community, making parents aware of supports available and sharing information over a long period of time. If the EI program is discussing only one or two transition steps on the IFSP Transition plan then these discussions would not meet the above criteria. The Transition Plan Discussion Date should occur closer to the 90 day TPC date when all steps and services have been fully discussed.
- Programs may have met the above criteria at the time of the LEA referral when the child turns 2.6 (or 30 months)
- The Transition Plan Discussion Date may be the most recent date when staff had a discussion with the parents about transition activities and/or recommended referrals (*which may be the last IFSP meeting where discussion regarding eligibility and transition occurred*). This would be true for the following children:
 - The family notifies the program that they are not interested in services

- The family leaves EI services abruptly (*e.g., moving, transferring to another EI program*)
- The EI program is unable to contact the family or the family is unresponsive
- The family is considered inactive

Note: This may not have been a face-to-face meeting with the family. This could have entailed a phone call, an email or a text message exchange.

Compliance Requirement:

- The new federal regulations require that the Transition Plan Discussion Date occur prior to 90 days and no more than 9 months before the child’s third birth date.
- A compliancy timeframe is calculated in EIIS and a reason is required if the date does not fall within this timeframe.
- The EIIS Discharge form will request a reason if the Transition Plan Discussion Date occurs outside of the compliant timeframe.

Reasons for Transition Plan Discussion Date being Outside of Compliancy Timeframe:

If the Transition Plan Discussion Date did not occur within the compliancy timeframe then one of the following reasons must be selected:

- EI staff schedule/lack of staff
- Late referral (*33+ months of age at referral*)
- Other (*explanation needed*)

Note: The list of reasons for the Transition Plan Discussion Date being outside of the compliancy timeframe is limited and will be updated at a later point in time. Use “Other” to provide a clear explanation for the reason. DPH will also be reviewing the Discharge Reason for additional information on children who may be out of compliance with the Transition Plan Discussion Date.

Note: If a child is referred prior to 33 months of age but eligibility is not determined and/or the IFSP is not signed and the LEA Referral date occurs after the age of 33 months then do the following.

- ▶ If the referred child did not receive a Transition Plan then select “Other” and state “Eligibility was not determined until after 33 months” or “IFSP was not signed until after 33 months”.
- ▶ If the child received a Transition Plan and the TP Discussion Date was not compliant then select “Other” and state “Eligibility was not determined until after 33 months” or “IFSP was not signed until after 33 months”.

Note: If the referral to EI was less than 45 days from the child’s third birthday then the EI program is not required to provide a completed transition plan.

Reports:

- Reports that entail the Transition Plan Discussion Date are incorporated as part of the transition plan reports described under the Transition Plan section.

TRANSITION SURVEY SYSTEM – GENERAL INFORMATION

Population not to be entered into TSS:

The population of children to be entered into the TSS has changed due to the new federal regulations for what needs to be captured for transition. As a result there will be certain children who will not get entered into either the fiscal year 2012 or 2013 Transition Survey System. Children not be entered into either system are children referred to the LEA prior to 7/1/12 who will not be discharged until 7/1/2012 or later. DPH is not expecting programs to notify us of the LEA referral or Transition Planning Conference dates for these children.

Clinical and Data Populations for Children entered into TSS:

Transition Activity	Transition Requirements	
	Clinical	Data
Opt Out Families	IFSP children potentially eligible for Part B SPED services but who formally opted out of being referred to the LEA as recorded on the EI program's Opt Out document (<i>e.g., Universal IFSP, or Information about the LEA/SEA Notification and Opt-Out form</i>)	Same
LEA Referral	IFSP children potentially eligible for Part B SPED services and who were referred to an LEA	Same
Transition Planning Conference	IFSP children potentially eligible for Part B SPED services and who were referred to an LEA.	Same

Transition Forms:

Two transition forms are available for program use in order to complete data entry into the Transition Survey System:

- Client and primary contact information, LEA Referral
- TPC question

The two transition forms should reflect the different processes that programs implement at the time of the LEA referral and then after the completion of the TPC.

Transition Survey Functions:

The three main functions of the TSS include:

- Add New Client (*also allows LEA Referral data entry*)
- Search Client (*for TPC entry*)
- Reports

Submission of Transition Survey System Data:

- *Entering data into the TSS:*
Data entered into the TSS should be timely or as close to the LEA referral and Transition Planning Conference (TPC) as possible. The Last Service or Discharge Date is not included in the TSS so do not wait until the child has been discharged to enter the TPC data.

Each EI program should decide how often data should be entered into the TSS and submitted to DPH. If data is entered into the TSS weekly then the recommendation is that the TSS be sent weekly. If data is entered into the TSS monthly then the TSS should be sent to DPH at least monthly. There should not be the need to email the TSS more often than once a week.

IMPORTANT: EI programs must be aware of any children who have been referred at around 31 and 32 months of age and referred to an LEA prior to 90 days of the child's third birth date. Timely submission of the TSS to DPH is critical in order for the program to also meet the SEA Notification compliancy timeframe for these children.

- *TSS Export File:*
The TSS export file is created after records have been entered and at the time of exiting the TSS (*the export file has a file extension of .csv*). This file includes all the data in the TSS database (*not just newly entered data*) and is automatically saved in the same folder as the TSS. Each time a user exits the TSS a newly created export file replaces any existing export file.
- *Submitting the TSS Export File to DPH:*
Email the TSS export file to DPH via SFED. Please make sure to use the correct SFED address of eiis@cohhs-sfed.state.ma.us.
- *DPH Submission of TSS Data to DESE:*
The TSS data that is submitted from EI programs will then be submitted to the Department of Elementary and Secondary Education (DESE) by DPH in order to comply with the new federal State Educational Agency (SEA) Notification requirement. Programs that do not meet this requirement will need to provide a reason for the delay, as part of a follow-up process, regarding their submission of the TSS to DPH.

FAMILIES THAT OPT OUT OF AN LEA REFERRAL FOR PART B SPED SERVICES

Data System Application:

The Transition Survey System

Population:

- Clinical requirement: IFSP children who were potentially eligible for Part B SPED services but who formally opted out of being referred to the LEA as recorded on the EI program's Opt Out document (*e.g., Universal IFSP, or Information about the LEA/SEA Notification and Opt -Out form*). "Potentially eligible" means that the child is considered to have a perceived delay/concern/issue that impacts educational and functional performance and it is believed that the child would benefit from services through the school system at the age of 3 years.
- Data requirement: All families that have opted out of being referred to Part B SPED services must be entered into the TSS.

Required Information:

If the "Opt Out" question on the TSS is answered "Yes" then the only information required is the following:

- Child's name
- Child's birth date

The Transition Planning Conference question on the TSS is not required to be answered for families that have opted out.

Reports:

- The TSS provides a report of all children whose family opted out of the LEA referral for Part B SPED services. At the TSS Main Menu select “Reports” and then select “Opt Out Children”.
- Children where the family has opted out of an LEA referral will not be reported to DESE as part of the SEA Notification file.
- Opt out counts are provided as part of transition information in the state’s annual performance report to OSEP.

LEA REFERRAL

Data System Application:

The Transition Survey System

Population:

- Clinical requirement: IFSP children potentially eligible for Part B SPED services and who were referred to an LEA. “Potentially eligible” means that the child is considered to have a perceived delay/concern/issue that impacts educational and functional performance and it is believed that the child would benefit from services through the school system at the age of 3 years.
- Data requirement: Same as clinical requirement

Note: Parents who have consented to be referred to an LEA for Part B SPED services cannot opt out of the SEA Notification to the Department of Elementary and Secondary Education (*DESE*).

Definitions:

Date of Referral to the LEA/SPED: The date the EI program sends referral information to the LEA after acquiring parental consent to be referred for Part B SPED services. The LEA referral should occur for most children at the age of 2.6 years (*or 30 months*). For children referred to EI who are older than 30 months of age the LEA referral should occur as soon as possible.

Reasons for LEA Referral Date being Outside of Compliance Timeframe:

If the LEA Referral Date did not occur within the compliance timeframe then one of the following reasons must be selected:

- Parent consent not provided within timeframe
- Parent initiated referral
- Other (*explanation needed*)

Compliance Requirement:

- The new federal regulations require that the LEA Referral Date occur prior to 90 days and no more than 9 months before the child’s third birth date. A compliance timeframe is calculated in the TSS and a reason is required if the date did not fall within this timeframe.
- The TSS will calculate the compliant timeframe for the LEA Referral date.
- The TSS will request a reason if the LEA Referral date did not fall within the compliance timeframe.

Reports:

- The TSS provides a report of all children and their LEA referral to Part B SPED services information. At the TSS Main Menu select “Reports” and then select “Transition Survey - All”. The TSS also provides a list of children who do not have LEA Referral data entered as well as children who have a reason of “Other”.
- At the end of the fiscal year DPH creates a preliminary report for EI programs for reviewing purposes before DPH finalizes this information prior to federal reporting. If an EI program does not agree with a non-compliant decision as reported on this report then they should discuss this with their EI Regional Specialist.
- LEA Referral information is reported to OSEP as part of the state’s annual performance report (*Indicator 8b, Percent of children exiting Part C who have an LEA/SEA Notification/Referral to Part B SPED services*).
- DPH uses LEA Referral information as part of a program’s Local Determination report. A corrective action plan is required for programs whose percent of LEA Referral compliancy is less than 100%.

Scenarios:

Scenario #1: Child was referred to an EI program within 90 days of their third birthday.

- ▶ Enter the LEA Referral Date.
- ▶ The TSS will determine these children as compliant based on a calculation between the EI Referral and LEA Referral dates. Note: a better term for these kids may have been “Justified non-compliant” and DPH may update the term for these children in the future.

Scenario #2: A child receives an LEA referral within the compliancy timeframe. The family later moves to another town within the program’s catchment area. The program makes another referral to the LEA in the family’s new town. This second LEA referral does not meet the compliancy timeframe.

- ▶ It is important to capture the most recent LEA referral since this will be the valid referral to Part B SPED services.
- ▶ Update this child’s LEA record in the TSS with the new address information and LEA referral date.
- ▶ If the LEA referral date occurs within 90 days of the child’s third birth date then a reason must be completed. The program should select “Other” for the reason and then enter something like “*Family initially referred to LEA on xx/xx/xx but moved to XXXXX on xx/xx/xx*”. This will be clear to the EI Regional Specialist who will be reviewing all potentially non-compliant entries.
- ▶ The program may want to notify their EI Regional Specialist about this child. The EI Regional Specialist will keep this note for a future reference at the time when compliancy for “Other” responses need to be determined by them as being either compliant or not (*this occurs at the end of the fiscal year*).

Scenario #3: A family initially opts out but then later wants to be referred to the LEA. The EI program should do the following:

- ▶ If the family opts out before 7/1/12 and they later decide to be referred after 7/1/12 then they should be included in the TSS.
- ▶ If the LEA referral occurred after 7/1/12 then enter these children as opt outs. If they decide to be referred to the LEA later then you will need to delete their record from the TSS as an opt-out and re-enter them with the LEA-referral information.

→ If the above cases do not meet the compliancy timeframe of the LEA Referral Date occurring within 90 days of the child's third birthday then select "Parental consent not provided within timeframe" for the reason under the drop-down box.

Scenario #4: The family opts out of being referred to an LEA for Part B SPED services. Later the family self-refers to the LEA.

- ▶ The EI program is not required to do anything else either clinically or for data reporting.
- ▶ At the family's request EI programs may want to participate in meetings with the LEA to ensure a smooth transition.

SEA NOTIFICATION

Data System Application:
The Transition Survey System

Population:

- Clinical requirement: IFSP children potentially eligible for Part B SPED services and who were referred to an LEA. "Potentially eligible" means that the child is considered to have a perceived delay/concern/issue that impacts educational and functional performance and it is believed that the child would benefit from services through the school system at the age of 3 years.
- Data requirement: Same as clinical requirement. Families that opt out of the LEA referral for Part B SPED services will not be included as part of the SEA Notification.

No Opt Out of SEA Notification:

Parents who have consented to be referred to an LEA cannot opt out of the SEA Notification to the Department of Elementary and Secondary Education (DESE).

Definitions:

SEA:

The SEA in Massachusetts is the Department of Elementary and Secondary Education (DESE).

SEA Notification Date:

EI programs will not be transmitting data regarding LEA-referred children to the SEA (DESE) directly. Instead, EI programs will transmit data via the TSS to DPH and DPH will then submit required client level data to DESE. DPH will assign the SEA Notification date to each TSS record submitted according to the earliest submission of any given record.

IMPORTANT: In order for programs and DPH to meet the SEA Notification compliancy timeframe, data entry of LEA-referred children into the TSS must occur as soon as possible after the LEA referral. This is a new requirement and programs should discuss how to best implement a process that will meet this compliancy timeframe.

Compliance Requirement:

The new federal regulations require that the SEA Notification Date occur prior to 90 days and no more than 9 months before the child's third birth date. A compliancy timeframe is calculated by DPH after receipt of a program's TSS export file. DPH will follow-up with programs to acquire a reason if the SEA Notification Date (*which is the date the export file is submitted to DPH*) did not fall within the compliant timeframe.

Data sent to DESE:

The following data is submitted to DESE:

- Child's name
- Child's birth date
- Child's primary contact name, address and phone number

DPH Follow-Up

DPH will be monitoring children whose referral to the LEA occurs within the compliance timeframe but where the SEA Notification does not. Further follow-up by DPH may result requesting a reason if the TSS was submitted to DPH outside the compliance timeframe. Programs will not be penalized for children who were included on a file and met the SEA Notification compliance timeframe at the time of submission to DPH but who were not sent to DESE by DPH within the compliance timeframe.

Note: Notification of children in need of follow-up should provide EI programs with information about how to better process and submit TSS information more efficiently.

TRANSITION PLANNING CONFERENCE (TPC)

Data System Application:

The Transition Survey System

Population:

- Clinical requirement: IFSP children potentially eligible for Part B SPED services and who were referred to an LEA. "Potentially eligible" means that the child is considered to have a perceived delay/concern/issue that impacts educational and functional performance and it is believed that the child would benefit from services through the school system at the age of 3 years.
- Data requirement: Same as clinical requirement. This question does not get answered for children whose families opted out of the LEA referral for Part B SPED services.

IMPORTANT: All children should receive a Transition Planning Conference. EI programs are required to answer this question only for children who have been referred to an LEA for Part B SPED services.

Note: In the future this question will be included on the EIIS Discharge form where it is expected that the Transition Planning Conference questions be completed for all IFSP children.

Definition:

Transition Planning Conference Date:

The date that a planning conference was held to review the child's services, discuss possible options and establish transition activities. The EI program is required to invite the LEA and the LEA is required to participate in the transition planning conference under IDEA. However, if the LEA does not participate in the conference, the EIP must still hold a transition conference within the compliance timeframe. A separate meeting with the LEA can occur at a later time for the family.

Occasionally, a parent may request that the transition planning conference be postponed or rescheduled until the LEA representative can attend. To comply with IDEA, EI programs must hold the transition planning conference within the compliancy timeframe and therefore are discouraged from scheduling transition planning conferences outside of the timelines. If a last minute circumstance occurs and the LEA cannot attend the conference and the parent chooses to postpone or cancel the meeting then the program may report this as “Family request to delay TPC meeting” on the drop down menu of the Transition Survey. However, this should not be a routine response as the EI program and the LEA had up to 9 months in which to hold the conference within the timelines.

A parent may decline the transition planning conference. The IFSP team must document this decision on the IFSP “Family declined TPC” should be provided in the drop-down box on the Transition Survey.

Reasons for no TPC Date or TPC Date is Outside of Compliancy Timeframe:

If the family did not have a Transition Planning Conference or if the Transition Planning Conference Date did not occur within the compliancy timeframe then one of the following reasons must be selected:

- Cancelled due to extreme weather conditions
- Child or family member hospitalized
- EI staff schedule/Lack of staff (NON-COMPLIANT)
- Family cancelled TPC
- Family declined TPC
- Family discontinued services abruptly
- Family initially declined TPC
- Family moved abruptly
- Family no show for TPC
- Family request to delay TPC meeting (incl. vacation, sickness)
- Initial IFSP signed at 33+ months of age
- Program unable to locate the family
- Other (explanation needed)

Compliance Requirement:

- The Transition Plan Discussion Date is required to occur prior to 90 days and no more than 9 months before the child’s third birth date. This is not a new requirement.
- The TSS will calculate the compliant timeframe for the TPC date.
- The TSS will request a reason if the TPC date did not fall within the compliancy timeframe..

Reports:

- The TSS provides a report of all children and their TPC information. At the TSS Main Menu select “Reports” and then select “Transition Survey - All”. You will need to hit your right arrow on your keyboard (→) to move over to the TPC information. The TSS also provides a list of children who do not have TPC data entered as well as children who have a reason of “Other”.
- At the end of the fiscal year DPH creates a preliminary report for EI programs for reviewing purposes before DPH finalizes this information prior to federal reporting. If an EI program does not agree with a non-compliant decision as reported on this report then they should discuss this with their EI Regional Specialist.
- Transition Planning Conference information is reported to OSEP as part of the state’s annual report (*Indicator 8c, Percent of children exiting Part C who received a transition planning conference*).
- DPH uses Transition Planning Conference information as part of a program’s Local Determination report. A corrective action plan is required for programs whose percent of Transition Planning Conference compliancy is less than 100%.

FUTURE TRANSITION DATA ENHANCEMENTS

Transition Survey System

A new version of the Transition Survey System is available and will be distributed to EI programs individually over the next few weeks. The enhancements included on this version are:

- Allows TPC date to occur prior to the LEA Referral date
- Updates the Warning message and Birth date/LEA Referral date report to include children who were less than 24 months of age at the time of the LEA Referral (*currently looks at children less than 30 months of age*)
- Eliminates the requirement of the LEA Referral date to occur prior to today's date
- Adds a Compliancy Timeframe worksheet to enable a user to calculate a compliant timeframe based on a birthday
- Renamed reports to be clearer
- Main Menu color has been changed from Green to Pink/Mauve

Transition Plan

The Transition Plan and Transition Plan Discussion Date will continue to be reviewed with possible enhancements to the drop-down categories to occur in the future.

LEA Referral

The LEA Referral information may be moved into EIIS as a new form.

Transition Planning Conference

The Transition Planning Conference questions may be moved into the EIIS Discharge form with the expectation that this question be answered for all IFSP children.

DPH has been discussing many of the new transition federal requirements and state implementations of data collection with EI providers in order to enhance systems, system processes and provide better guidance to EI programs. DPH is appreciative of these communications and encourages all EI programs to provide feedback and comments as we move forward with system and data improvements for all transition activities.

DPH CONTACT INFORMATION

If you have any questions or concerns regarding transition activities or transition in general then contact your EI Regional Specialist. If you have any questions regarding EIIS and Transition Survey System then contact Jean Shimer at (617) 624-5526 or jean.shimer@state.ma.us.