



Examining Part C Exiting Data Variation

White Paper

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Examining Part C Exiting Data Variation

Purpose

The purpose of this white paper is to explore variation among exiting categories as reported by the 50 states and Washington, DC.¹ Examining factors that may contribute to variation can lead to improved exiting data quality within and across states. One might ask, “What is the relevance of this examination for individual states? Because state systems vary, won’t variation naturally occur in the exiting categories?” There are two major reasons for this examination:

- State differences (e.g., policies, size) may not fully explain the variation found in the Part C exiting categories.
- Understanding factors that influence data variation among states may also lead to understanding of variation within states, which may contribute to improved quality of exiting data.

During the development of the *Part C Exiting Data Toolkit*, it became apparent that data for many of the exiting categories varied greatly from state to state. For example, for Category 2 (Part B eligible, exiting Part C), one state reported 27 percent of children exited in this category, yet another state reported 69 percent of children did so. This white paper examines factors that may influence large variation among states for exiting categories. Understanding the factors may lead to more accurate and consistent exiting data.

Method for Examination of Variation

Examination of the Part C exiting data showed 8 of the 10 categories had wide variation among states. Root cause analyses focused on the 12 states that reported the lowest and highest percentage of children in each of those eight categories. We identified state characteristics that may have influenced the exiting data variation, including percentage of children served, eligibility criteria classification (as identified by the IDEA Infant & Toddler Coordinators Association), total number of exiting children, and total number of children served in Part C. Using these characteristics, we created a profile for each of the 12 states. After examining these characteristics, we gathered more information to examine variables in states with low or high variation. We invited the data managers and Part C coordinators from the 12 states to participate in a focus group meeting during the Office of Special Education Programs (OSEP) Leadership Conference in July 2015. For each category with low or high variation, state data personnel discussed the factors they believed might have contributed to the variation. When questions remained, we did further follow-up via phone and email with data personnel of the 12 states. The findings allowed us to identify a number of factors that may influence exiting variation based on case study illustrations of factors within selected states. The results do not constitute a definitive or scientific study of all variables; however, they may help state data personnel examine their data in comparison to other states, examine variation across local entities, and provide strategies for improving data quality.

¹ Variation for the U.S. territories and outlying areas are not included in this analysis, as services in those areas are unique to their populations.

This white paper includes four parts:

- Part 1 summarizes Part C exiting definitions (as described in *EMAPS 2.0* <http://www2.ed.gov/about/inits/ed/edfacts/emaps-IDEA-part-c-exiting-collection-user-guide-v3.pdf>).
- Part 2 reviews broad, general trends in exiting data variation.
- Part 3 examines potential reasons for variation, with possible strategies to improve exiting data quality.
- Part 4 summarizes the findings of examination of exiting data variation and highlights key findings for state data personnel.

Findings are based on data from 2012–13 (FFY 2013); the eight exiting categories with large differences in variation include 1, 2, 4, 5, 6, 8, 9, and 10. Categories 3 (Part B eligible, continuing in Part C) and 7 (Deceased) had little variation. Category 3 applied to only a few states, and Category 7 only infrequently applied.

Part 1: EMAPS 2.0 Definitions for Exiting Categories

As stated in the EMAPS 2.0 Glossary of Data Elements, each exiting category title and definition are included in the table below; the eight categories with large variation examined in this white paper include 1, 2, 4, 5, 6, 8, 9, and 10. The wording below is stated verbatim from EMAPS.

Table: Glossary of Data Elements

<p>Category 1: No longer eligible for Part C prior to reaching age three. Include all children who, within this 12-month reporting period, have exited Part C before age three because they are no longer eligible under IDEA, Part C. (Note: Formerly called Completion of IFSP prior to reaching age three).</p>
<p>Category 2: Part B eligible, exiting Part C. Include all children determined to be eligible for Part B during the reporting period and who exited (or will soon exit) Part C. This includes children who receive Part B services in conjunction with Head Start.</p>
<p>Category 3: Part B eligible, continuing in Part C. This category may ONLY be used by a state whose application for IDEA Part C funds includes a policy under which parents of children with disabilities who were eligible for services under IDEA Section 619 and previously received services under Part C may continue to receive early intervention services under Part C beyond age three.</p>
<p>Category 4: Not eligible for Part B, exit with referrals to other programs. Include all children who reached age three, were evaluated and determined not eligible for Part B, and were referred to other programs, which may include preschool learning centers, Head Start (but not receiving Part B services), and child care centers, and/or were referred for other services, which may include health and nutrition services, such as WIC.</p>
<p>Category 5: Not eligible for Part B, exit with no referrals. Include all children who reached age three, were evaluated and determined not eligible for Part B, but were not referred to other programs.</p>
<p>Category 6: Part B eligibility not determined. Include all children who reached their third birthday, and their Part B eligibility was not determined during this reporting period. This category includes children who were referred for Part B evaluation, but for whom the eligibility determination has not yet been made or reported, or children for whom parents did not consent to transition planning. Include in this category any child who reached age three, and who has not been reported in categories 2–5.</p>
<p>Category 7: Deceased. Include all children who died during the reporting period before their third birthday, including those who died at the age of exit.</p>
<p>Category 8: Moved out of state. Include all children who moved out of state before their third birthday. Include only children who moved during the reporting period. Do not report a child who moved within state (i.e., from one program to another) if services are known to be continuing.</p>
<p>Category 9: Withdrawal by parent (or guardian). Include all children under the age of three whose parents declined all services (including service coordination services) after an IFSP was in place, or declined to consent to Part C services on the IFSP and provided written or verbal indication of withdrawal from Part C services.</p>
<p>Category 10: Attempts to contact the parent and/or child were unsuccessful. Include all children under the age of three who had an active IFSP, and for whom Part C personnel have been unable to provide early intervention services either due to lack of response from the parent or family, or inability to contact or locate the family or child after repeated, documented attempts. Include in this category any child who was no longer receiving services under Part C before reaching age three and who has not been reported in categories 7–9.</p>

Part 2: General Findings Regarding Variation in Exiting Data

Across the exiting data reviewed, variation existed in the **implementation, interpretation, and documentation** of Part C regulations.

Implementation

State personnel have some flexibility in the implementation of Part C regulations. All states are required to meet federal requirements, but they have choices regarding eligibility criteria, identification and role of lead agencies, and procedural operationalization of the regulations. For example, state eligibility criteria differ substantially, thus influencing the numbers of children entering and exiting the system and, in some cases, the exiting categories chosen. State policies related to copayment for Part C families also varied. Several state data personnel reported that the institution of a fee policy within the state influenced the number of children exiting the system, despite all efforts to prevent attrition. State policies and procedures related to local implementation also influenced reporting of Part C exiting data variation, particularly when local programs implemented procedures differently.

Interpretation

Differing interpretations of federal requirements, state policies, and procedures were major factors that may have accounted for exiting data variation. A state with substantial local control of Part C services may have deferred implementation of specific policies to local agencies providing services and, therefore, experienced data variation within the state.

Documentation

It was reported, both within and across states, that differences existed in the amount and nature of documentation required for each of the exiting categories. For example, a state that requires less documentation for attempts to contact parents may have greater numbers in Category 10 (Attempts to contact the parent and/or child were unsuccessful) than would a state that required more documentation, thus leading to inconsistent data.

Part 3: Specific Factors That May Influence Variation Within Categories

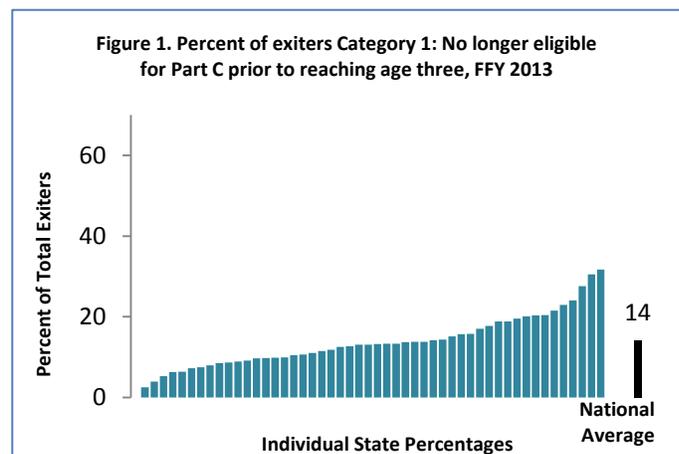
Part 3 presents the results of analyses of the 12 states with the lowest and highest variation for each of the eight categories examined. For each category, findings include a figure illustrating national results, state-identified and potential reasons for variation, and strategies that may improve data quality.

Category 1: No longer eligible for Part C prior to reaching age three.

Figure 1 shows the variation in Category 1 for 2012–13 (FFY 2013) data. The data reflect the lowest to highest percentages, with each bar representing one state’s percentage of children in this category. The data range from 0 percent to 32 percent, with a national average of 14 percent.

Potential Reasons for Variation

- Eligibility criteria:** States with broad eligibility criteria are expected to have high numbers; whereas states with strict eligibility criteria are expected to have low numbers in this category. If state analyses indicate that numbers in this category are not as expected, there is cause for further examination of the data.
- Review of eligibility:** If a state requires annual reassessments, children may be found ineligible for continued services at the time of the reassessment and exited from services, thereby increasing the numbers of children in this category. In contrast, states that do not reassess children annually may place children in this category less often.



Note: Retrieved from <http://www2.ed.gov/programs/osepidea/618-data/state-level-data-files/index.html>

Strategies to Improve Data Quality

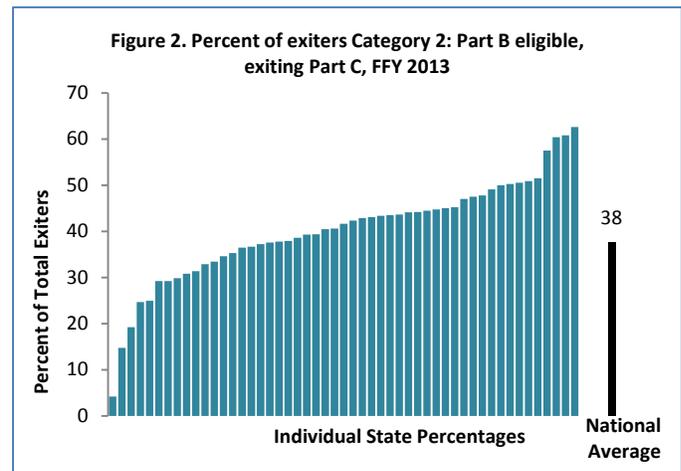
- Develop guidance documents:** Develop state guidance documents that clearly specify when to use this category, with examples that illustrate eligibility criteria, review of eligibility, and circumstances under which children may exit prior to age three.
- Clearly indicate category definition:** As indicated in the Toolkit, the definition for this category has changed from “completion of IFSP prior to reaching age three” to “no longer eligible for Part C prior to reaching age three” under IDEA, Part C. Children who continue eligibility for services in Part C until the age of three should not be counted in this category.

Category 2: Part B eligible, exiting Part C.

Figure 2 shows the variation in Category 2 for 2012–13 (FFY 2013). The data range from 4 percent to 63 percent, with a national average of 38 percent.

Potential Reasons for Variation

- Eligibility criteria:** Among the states, eligibility criteria for Parts C and B may vary greatly. Several state data personnel explained that these factors influenced the percentage of children exiting Part C who were eligible for Part B. First, Part C programs may use broad or strict established risk factors for eligibility. The percentages will differ greatly in those states that have broad established risk criteria for Part C, as fewer of those children will be eligible for Part B. Second, states with broad developmental delay criteria in Part C are likely to have smaller numbers of children who are eligible for Part B. These differences may cause variation in numbers of children exiting in this category.
- Potentially eligible:** A number of state data personnel reported transition policies that indicated all children were potentially eligible to transition from Part C to B. Interpreting the policy of “potential eligibility” as indicating that children were automatically eligible for Part B may have resulted in children being counted erroneously in this category. Transition policy requires Part C programs to determine whether the child may be eligible for Part B. This decision is not a determination of eligibility.
- Determination of eligibility:** Several state data personnel indicated confusion about the documentation required to determine eligibility for Part B. The EMAPS definition for inclusion in this category requires that the Part B program make the determination of Part B eligibility. The documentation required for determination of Part B eligibility varied across states.



Note: Retrieved from <http://www2.ed.gov/programs/osepidea/618-data/state-level-data-files/index.html>

Strategies to Improve Data Quality

- Clarify policies:** Having a clear and consistent understanding of procedures for determining Part B eligibility can lead to more accurate implementation of state and federal policy.
- Develop training:** Clear training materials on the policies for Part B eligibility can facilitate more accurate implementation of policy.
- Choose a consistent 12-month exiting timeframe:** Because regulations allow for inclusion of children in this category who will soon exit Part C during the 12-month reporting period, data personnel must take care not to include these children in multiple reporting years. Because the phrase “will soon exit Part C” may confuse determination of the reporting period, clearly identify a 12-month timeframe for each reporting year.
- Clarify potential eligibility:** Potential eligibility is not the same as actual eligibility for Part B. Actual eligibility for Part B, as determined by Part B state criteria, is required for inclusion of children in this category.

- **Develop procedures for data checks:** Developing and using specific data checks (such as in the Toolkit mentioned previously) contribute to the collection of higher quality exiting data.

Category 3: Part B eligible, continuing in Part C.

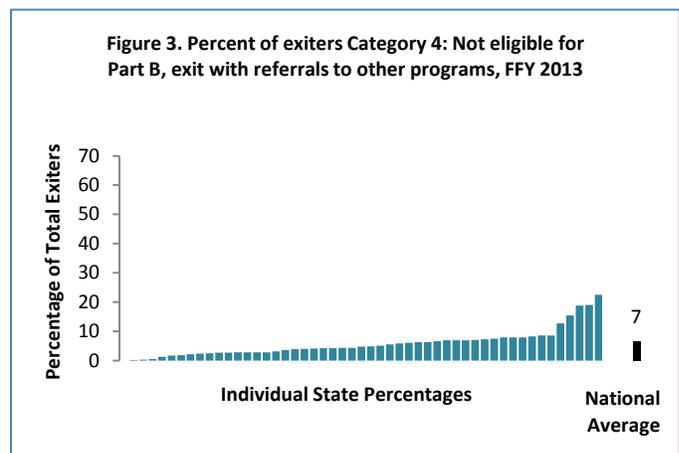
We did not find wide variation across states in this category.

Category 4: Not eligible for Part B, exit with referrals to other programs.

Figure 3 shows the variation within this category for 2012–13 (FFY 2013). The data range from 0 percent to 23 percent, with a national average of 7 percent.

Identified Reasons for Variation

- **Eligibility criteria:** State data personnel indicated that broader eligibility for Part C than for Part B influenced numbers of children in this category. States that have broad Part C eligibility may have a higher percentage of children who exited Part C and who were not eligible for Part B and received referrals to other programs at exit.
- **Interpretation of “at-risk”:** State data personnel reported different interpretations of “at-risk” factors that may have led to variation in exiting data in this category.
- **Availability of services:** Several state data personnel reported that the number of available/potential referral options in a given community influenced the percentage of children in this exiting category. This situation was especially present in rural areas; therefore, variation may have existed between rural and urban programs within a state.
- **Colocated services:** States with a high percentage of children in this category suggested that the presence of other programs colocated with Part C services was an influencing factor. Specifically, several state data personnel indicated that when Part C services were delivered in settings with multiple other programs (e.g., Head Start and childcare), there was often an informal, seamless system for referral. The state data personnel reported an increased likelihood that children exited Part C with referrals to other programs and were included in this category.
- **Referral method:** State data personnel suggested that methods for referrals were defined differently in local entities. For example, some local data personnel considered a phone call to be sufficient for a referral, yet others required documentation of written referral. If state policy and procedures did not clearly define referral methods, local data personnel may have assigned children inconsistently to this exiting category.
- **Family reasons:** On occasion, without direct involvement from Part C providers, family members selected and arranged non-Part B services for their children at age 3. State data personnel reported that interpretations varied as to whether to count this situation as exit with referrals.



Note: Retrieved from <http://www2.ed.gov/programs/osepidea/618-data/state-level-data-files/index.html>

Strategies to Improve Data Quality

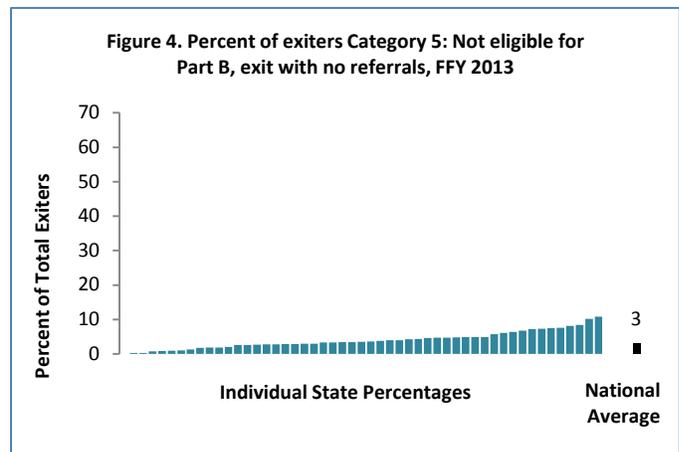
- **Increase awareness of community resources:** Improve Part C staff’s knowledge about available referral resources and increase community awareness of Part C services.
- **Increase number of community resources:** When possible, identify and develop additional referral resources in communities where they are inadequate.
- **Clarify referral policy:** Clarify policies and procedures for referrals to facilitate accurate reporting in this category, including how to document informal and formal referrals.
- **Improve training documents:** Ensure that training materials provide a comprehensive overview of state policies, procedures, and methods for documenting referrals.
- **Verify correct implementation of referral policy:** Examine patterns of referrals within the state, including referral sources in local communities, to verify consistent implementation of state policy.

Category 5: Not eligible for Part B, exit with no referrals.

Figure 4 shows the variation within this category for 2012–13 (FFY 2013). The data range from 0 percent to 11 percent, with a national average of 3 percent. Note that the potential reasons for variation and strategies for improvement are very similar to those for Category 4 (Not eligible for Part B, exit with referrals to other programs).

Potential Reasons for Variation

- **Availability of services:** Several state data personnel reported that the availability of other programs in a community influenced the percentage of children in this category. This situation is especially true in rural areas; therefore, variation may exist between rural and urban programs within a state. Some state data personnel in states with fewer available resources reported fewer referrals at exit.
- **Colocated services:** State data personnel who reported a high percentage of children in this category suggested that colocated Part C services were an influencing factor. Several state data personnel indicated that when Part C services were delivered in settings with multiple other services (e.g., Head Start and childcare), there was often an informal, seamless system for referral. In cases where referrals were informal and not written, data personnel may have counted children erroneously in this category.
- **Referral method:** State data personnel suggested that the process (written or other) for referrals might have been different across local programs. If state policy and procedures did not clearly define referral methods, local programs may have reported children in this category differently.



Note: Retrieved from <http://www2.ed.gov/programs/osepidea/618-data/state-level-data-files/index.html>

Strategies to Improve Data Quality

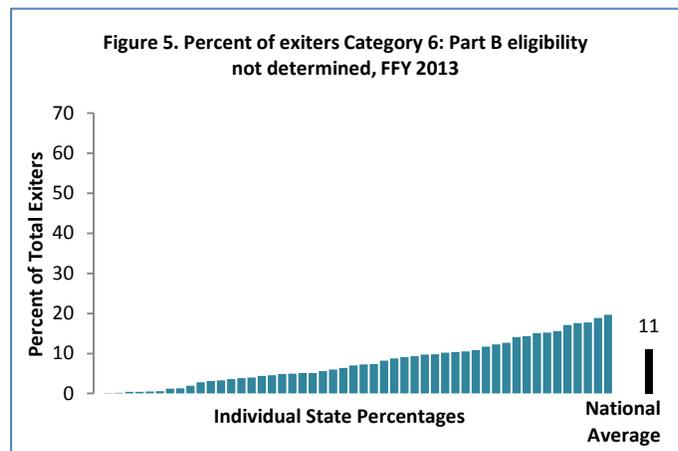
- **Increase awareness of community resources:** Communicate effectively to Part C staff all new and existing community resources for preschool-age children.
- **Clarify policy:** Clarify specific criteria for the referral process and expectations for documentation to facilitate accurate reporting in this category. It is important that local programs, with and without seamless referral systems, consistently document informal and formal referrals to improve the accuracy of these data.
- **Develop training documents:** Incorporate referral procedures and expectations for documentation into training documents for increased consistency of implementation.

Category 6: Part B eligibility not determined.

Figure 5 shows the variation within this category for 2012–13 (FFY 2013). The data range from 0 percent to 20 percent in this category, with a national average of 11 percent.

Potential Reasons for Variation

- **Inadequate communication between Part B and C:** Several state data personnel described inadequate communication between Parts C and B as a factor in variation for this category. If Part B staff did not verify eligibility, Part C staff may have counted children in this category due to a lack of information.
- **Nonverification policy:** State data personnel reported some confusion about the requirement to verify eligibility for Part B. Some state personnel reported that they had a clear policy on confirming eligibility for Part B, yet others did not, thus influencing data reliability in this category.
- **Data system not linked:** Several state data personnel suggested that methods for collecting exiting data were a factor. If Part C and Part B data systems were not linked, verification was less likely to be accurate.



Note: Retrieved from <http://www2.ed.gov/programs/osepidea/618-data/state-level-data-files/index.html>

Strategies to Improve Data Quality

- **Improve communication:** Expand and enhance communication between Part C and Part B programs regarding eligibility criteria, transition processes and protocols, and Part B eligibility determination.
- **Share data:** Develop linkages between data systems or processes for more accurate data sharing.
- **Clarify policy:** Develop policy and training documents to ensure that Part C staff members have clearly articulated processes for verifying Part B eligibility.

Category 7: Deceased.

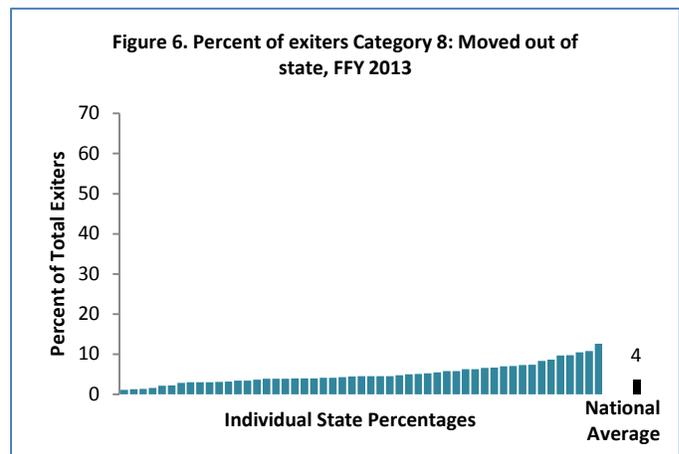
We did not find wide variation across states in this category.

Category 8: Moved out of state.

Figure 6 shows the variation within this category for 2012–13 (FFY 2013). The data range from 1 percent to 13 percent in this category, with a national average of 4 percent.

Potential Reasons for Variation

- **Confusion about category definition:** State data personnel reported being unsure about how to categorize a family that moved within the state but was no longer in communication with Part C staff.
- **High incidence of family mobility:** Several state data personnel suggested that high numbers in this category indicated greater family mobility in a particular locale.
- **Inability to track children’s movement with state data system:** If a state could not clearly track children’s movement within the state (i.e., no unique child identification number), reporting in this category may have been compromised, especially if there was no clear process to differentiate movement within from movement out of the state.



Note: Retrieved from <http://www2.ed.gov/programs/osepidea/618-data/state-level-data-files/index.html>

Strategies to Improve Data Quality

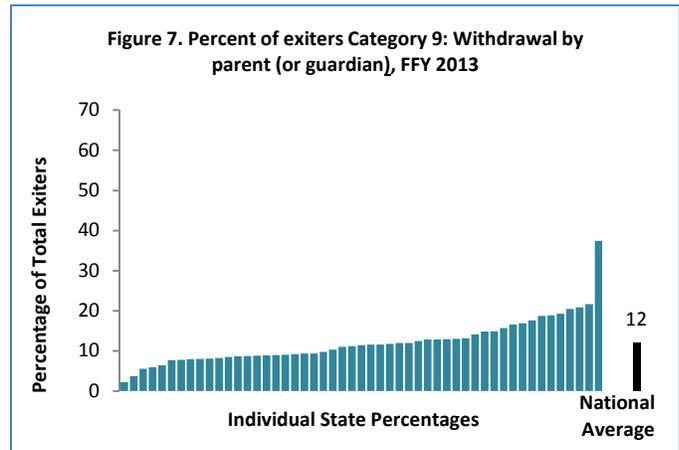
- **Develop policy documents:** Specify clear responsibility, as outlined in policy and guidance documents, for local data personnel to report child movement within or out of state.
- **Improve child-tracking system:** Implement a unique child identifier, common across the state, to improve tracking of children who move within Part C programs while remaining in the state.
- **Clarify use of this category:** Specify in training documents that children who move within the state and withdraw from services by parental choice during the reporting period should be included in Category 9 (Withdrawal by parent and/or guardian) and not in this exiting category.

Category 9: Withdrawal by parent (or guardian).

Figure 7 shows the variation within this category for 2012–13 (FFY 2013). The data range from 2 percent to 37 percent in this category, with a national average of 12 percent.

Potential Reasons for Variation

- Annual eligibility reviews:** Some state data personnel indicated that annual Part C eligibility reviews increased parent withdrawal rates. Not all states require an annual review of eligibility. For those states that do require annual eligibility review, when parents go through the review process, they may reconsider the needs of their child and their family and decide that Part C services do not address their needs. For those states without a formal annual eligibility review, parents might not reconsider needs in a deliberate manner and will continue their ongoing Part C services.
- Changes in eligibility:** In at least one instance, a change in state policy to restrict eligibility resulted in an increased number of parent withdrawals. This change may have resulted from parent confusion over continued child eligibility for Part C services.
- Confusion regarding category definition:** State data personnel reported confusion between this category and Category 10 (Attempts to contact parent and/or child were unsuccessful).
- Enforcement of fee system:** The requirement of copayments, insurance billing, and other fees reportedly influenced parent withdrawal.
- Varying parent satisfaction:** A high percentage in this category indicated parental dissatisfaction with services, and a low percentage may have indicated parental satisfaction with Part C services.



Note: Retrieved from <http://www2.ed.gov/programs/osepidea/618-data/state-level-data-files/index.html>

Strategies to Improve Data Quality

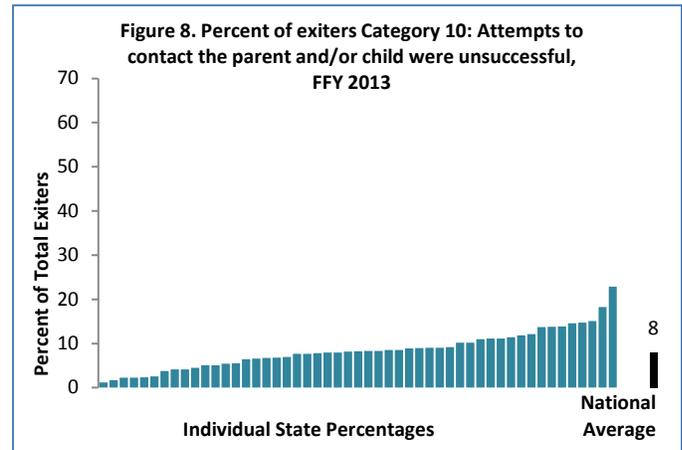
- Maintain clear and consistent eligibility criteria:** Develop clear policies regarding annual review of eligibility, if applicable, and communicate those policies so that families and providers know eligibility criteria for the duration of a child’s time in Part C.
- Develop policy and training documents:** Develop explicit state policies for withdrawal by parent (or guardian), with training materials to communicate these policies to personnel who report exiting data.
- Maintain and communicate consistent policies:** When state policies are clear and transparent (including fee policies) and are shared with families during the intake process, families may be less likely to withdraw after services begin.

Category 10: Attempts to contact the parent and/or child were unsuccessful.

Figure 8 shows the variation within this category for 2012–13 (FFY 2013). The data range from 1 percent to 23 percent in this category, with a national average of 8 percent.

Potential Reasons for Variation

- Closing cases to meet 45-day timeline:** State data personnel indicated that pressure to meet the 45-day timeline per Part C regulation 20 U.S.C. §§ 1416(a)(3)(B) and 1442 contributed to reporting in this category.
- Confusion about categories 8, 9, and 10:** Confusion about whether to assign Category 8 (Moved out of state) or Category 9 (Withdrawal by parent or guardian), rather than Category 10 (Attempts to contact the parent and/or child were unsuccessful) may have led to variation within and across states, with children placed in the assigned category incorrectly.
- Unclear policies regarding attempts to contact prior to termination:** High numbers in this category indicated inconsistent policies for maintaining family contact or a low number of attempts required. Low numbers may have indicated clear and frequent communication with families.



Note: Retrieved from <http://www2.ed.gov/programs/osepidea/618-data/state-level-data-files/index.html>

Strategies to Improve Data Quality

- Develop policy:** Specify policies for maintaining contact with families and the processes for documenting the frequency of family contact and communication. For example, Medicaid required one state to document a reason for this category and subsequently develop guidance/procedures for no family contact after 30 days. A policy or guidance document defining the number and methods for documenting parent contacts can lead to greater consistency within and across states.
- Clarify category definitions:** Specify clearly the differences between Category 8 (Moved out of state), Category 9 (Withdrawal by parent or guardian), and Category 10 (Attempts to contact the parent and/or child were unsuccessful).

Part 4: Summary and Conclusions

The purposes of this white paper are to examine variation in the reported exiting data, to increase understanding of potential factors influencing variation, and to facilitate ways to improve the accuracy of exiting data. An examination of data variation trends has revealed state differences in policies, procedures, and implementation that may explain variation in Part C exiting data, as, for example, with eligibility and referral policies. Understanding these differences within and across states may contribute to improved accuracy of exiting data.

One of the key take-away messages from this examination is for state data personnel to observe trends in their exiting data results and variation. State personnel can compare data from state and local programs and identify areas that have considerable variation. Continued examination of variation may confirm identified factors or uncover new reasons for variation and indicate the need to develop or clarify policies and procedures.

This white paper describes several important strategies for improving Part C exiting data reporting, including clarifying policies and definitions, documenting procedures for implementation of policies, and developing training materials related to reporting exiting data. Clear and transparent policies and procedures are paramount to accurate reporting. All state data personnel need to understand key terms such as referral, contact, and eligibility for consistent implementation of state policy and procedures. Examining and understanding exiting data, including variation, can inform efforts to understand the transition of children out of the Part C program.