

Michigan *EarlyOn* Redesign Public Comment

Twenty comments were received from stakeholders during the public comment period. Eight reviewers concurred with the findings. Twelve reviewers provided detailed comments that are summarized below. The comments were sorted by general comments and specific issue comments. Each bullet represents comments from a specific reviewer.

General Comments:

- I agree with the items you have identified as effecting Early On. I think the biggest effect is that initially it was expected that all agencies would provide service coordination when in reality the Early On Coordinator must use the biggest portion of the budget to pay for service coordination. A second impact is the lack of service providers willing to perform services in the natural environment.
- The results of the Causes and Forces meeting are comprehensive albeit overwhelming.
- I believe that this document is very thorough and accurate as it relates to our state overall.
- Nothing is missing per se; however the major causes were too generalized. Keying in on one aspect of each group to be a problem would have been more effective. I also believe that so MANY issues were presented that it makes it feel like it's too overwhelming a process, thus almost setting the system up for failure.
- The process and outcomes were great to read.
- I am impressed with the amount of thinking that obviously went into this first meeting. It seems all was covered.
- I have reviewed the workgroup report and agree that the major forces/causes were identified.
- This was a very impressive list of causes and forces that reflected the diversity of the group. One item I would like to add is the issue of redesign being a done deal. I know that perception is floating around and it's important that this notion be debunked.
- It's heartening to see that stakeholder input from a variety of perspectives is valued. This inclusive, transparent process gives me great hope that the end result will be a system that is vibrant and effective.
- The overall design process seems oriented toward allocating resources, funding, purchasing, plan/budget, but does little so far to address the actions that can be taken (without resources, funding, purchasing, budgeting) to make our system more effective in working with children and families. Identifying unhelpful behaviors/actions and initiating more helpful actions should be included in this redesign process. Although the stakeholders at the April 22 meeting had a wealth of knowledge and opinions, we should not presume to have asked all the questions and not presume that this group has all the knowledge and answers. Broad input especially from the community level is very important throughout the redesign process. I feel strongly that we should state guiding principles for Early On and for the redesign.

- Redesign should use the same approach for our system as we use with Early On families: Identify our system's strengths and needs; name system concerns and priorities; state goals/outcomes for our system that will help us support our families to flourish; and refer to those as we choose actions to take.

Specific Issue Comments:

- The things that I feel are missing as forces are the education and medical systems. Maybe systems philosophy needs to be clarified and this fits there.
- I feel Professional development is a top ten. If providers are properly educated (and kept updated) then some of the other issues will fall away such as actually providing pertinent resource information and family support on all levels needed: financial, educational, medical and emotional.
- One of the structural items that has frustrated me is the disconnect between EarlyOn and child care especially in the realm of identification. I think that working with child care could benefit Early On's identification process if child care providers were more aware of Early On and had a few tips on identifying infants and toddlers who they thought might be eligible for Early On services
- I think that Family-centeredness should be included with parent involvement and leadership.
 - We cannot afford to spend the limited resources that we have filling out forms and having meetings to learn how to fill out the forms.
 - If we teach our staff to follow best practice and empower them to do so, we will be able to demonstrate progress and document it briefly.
 - Let's develop a system that maximizes the talents and resources within our families and communities, rather than a system that focuses on correction plans and filling in forms to prove things that may not really happen if funds run out.
 - Our leadership is becoming deficit based while we are asked to be family-centered and strengths based.
- Is there a way to have more LICCs involved in the process? We need locals to buy into the redesign process as well. I also feel there should have been more local agency staff involved.
- Here is what struck me the most:
 - Process driven system vs. results driven system: Whether we are getting the results we want from the process we are using should be the determiner for whether it is a good process or one that should be looked at further;
 - Outcomes emphasis vs. documentation of gains: We do spend a lot of time in the formation of well written outcomes - - we should spend a significant amount of effort as well to ensure these outcomes are actually working towards progress and that we are able to document these gains; and
 - System of communication disjointed/ineffective: Many desire a single point of information distribution.
- Examples that are predominant from my area are:
 - Policy: Early On is not a primary priority for our partner agencies -it is extra work, if they have time which is much too precious these days;

- Parent Involvement: Parents must be a part of this redesign process for it to work;
 - Funding: A concern with all programs affecting early childhood: Mental health, Health Department, Education, as well as early On. This is a big issue for collaboration since Early On is not meant to fund all the services the children receive, but rather coordinate them. Often there is just no service to offer a family, so we piece a few things together, but not enough to make a difference.
 - Systems Philosophy: I worry about making Early On meet guidelines for delay closer to special ed or making it another program through Special Ed.
- The following are a few points that I believe need clarifying:
 - Policy: If everything is truly on the table, it seems that a reasonable way to redesign Early On would be to start with the Federal regulations from Part C as the foundation. The process and paperwork has become so burdensome that it is actually getting in the way of providing meaningful services to families;
 - Accountability: While Michigan has no control over the federal regulations and their enforcement, it does have control over additional layers of bureaucracy and regulations it chooses to add to Part C;
 - Systems Philosophy: The paperwork is taking the service provider away from the very important work of relationship building with the family;
 - Communication/Information: It seems as though every edict, form and policy from the State is quickly followed by an addendum or correction. It could be that too many people are interpreting regulations;
 - Legislation: CAPTA is a perfect example of mandated legislation that Early On must implement that is problematic at all levels;
 - Cultural Issues: The lack of trust is evident at all levels in the system. The state is feeling the effects of a federal government that is becoming increasingly punitive. The Early On Coordinators are distrustful of the new policies, etc. coming down from the state that have little bearing on improving services for families and the families are unable to develop trusting relationships with their service providers because of the increase in case loads and paperwork.
- I suggest that the forces and causes may be inherently structural or may have become structural through the way our system incorporates them into our work. If we respond the same way repeatedly, that issue and its response become structural.
- Comments on participant identified examples:
 - Policy: Many of these issues are our own creation. We can act to make them better.
 - Parent Involvement/Leadership: We need to ask why we aren't doing these things more/better. We also need to acknowledge that issues of parent involvement are tied to the other categories.
 - Partnership: This category needs to acknowledge that the partnership experience at the community level varies greatly from region to region.

- Systems Philosophy: I believe that our system's philosophy/principles/key concepts/etc. should be stated; it could be a unifying force and help a consistent standard for all that we do.
- Coordination and collaboration: We must honor county or community level strengths and abilities even if they are unusual and allow local EO the flexibility to continue with activities that work.
- Communication/Information: If there are too many inputs, the system should reduce the confusing inputs and foster unifying information.
- Legislation: The tie between legislation and philosophy is an important force – the legislation includes key concepts of the Early On approach.
- Leadership: Much is being done by these various leadership groups but it is in many cases not coordinated.
- I believe the issues can be grouped around four major headings:
 - Legislation/Policy:
 - Alignment of State mandate with IDEA Part C;
 - Current State plan;
 - Funding Issues;
 - SICC – clarity of roles and function.
 - Structure of a System:
 - Philosophy – family-centered, interagency collaboration, cultural competence, coordination of services, partnership;
 - Resource identification;
 - Systems communication;
 - Leadership: professional training, parent training;
 - Implementation – structure of a system in place:
 - Service coordination model used;
 - Level of collaboration – state and local
 - Public awareness
 - Urban vs. rural settings
 - Child Find
 - Content of Intervention:
 - Research based
 - Methodology implementation – eligibility, developmental status, determination of functional needs, service requirements, natural environments, etc.
 - Approach – intensity of service
 - Accountability:
 - Federal – child find, natural environments, etc.
 - State monitoring
 - Self assessment, monitoring and verification
 - Progress towards outcomes – family, child
 - Data collection

Additional causes and forces identified by reviewers that could be added:

- Over-Bureaucratization: The bureaucratic process puts time burdens on the system at every level and compounds concerns in other categories

- Too little community level involvement in system revisions: We must include community level input from parents, Early On Coordinators and service providers in the development of any new procedures, forms etc.
- Frequent Change: Changes in processes/procedures burden the system in many ways. Changes and lack of training have contributed to the decline in our region of partners doing service coordination, attending IFSPs etc.
- Negativity: Early On has much strength. We must acknowledge and maintain what is being done well.
- Unifying principles: Principles and goals for our system can help us make decisions. We should re-establish a systems wide orientation in which our activities, processes and any changes to them are based on the needs of families, parents and those working with them.

Additional comments:

- Complexity of IFSP forms, planning process and keeping up with procedural safeguards
- In these times of funding cutbacks and hiring freezes, partner agencies in our area often do not have staff who can participate in Early On.
- Because partner agencies are doing less service coordination, Early On coordinators are spending more time working directly with families and less time for public awareness, outreach to physicians, attending community functions and meetings and arranging local trainings.