

Synthesis of *Early On*® June System Update Comments

1. What is the impact of the recommended changes?

- a. Eligibility Determination/Redetermination Process
 - i. Concern for financing, as more steps are not involved in eligibility determination & redetermination process, which will mean increased personnel needs.
 - ii. Concern for more involved/complicated process for parents.
 - iii. Clarify who needs hearing and vision evaluations annually, certainly not all, if not concern of family or participants and certainly if not compliance occurred initial year, attempt should be made.
 - iv. Very little.
 - v. Ability to track referrals that do not become eligible for enrollment.
 - vi. Please consider the economic impact of every new requirement, piece of additional paperwork and extra required meeting.
 - vii. Impact is limited. The changes are conceptual in the process piece. In practice, few have all info for eligibility. Furthermore, evaluation not assessment is needed to determine eligibility for Developmental Delay (Established Condition and Developmental Delay). Not differentiated in process. Federal rules and regulations can be fulfilled without process – why outline process?
 - viii. I think process is still too complicated and bulky. The states that have larger percentage of kids – is their process as complicated?
 - ix. Potentially more paperwork! But also an ability to ‘see’ how many children are referred and hopefully be able to spend more time with service rather than doing paperwork.
 - x. EETRK not friendly/usable for referrals. Data can be tracked in other ways and in more usable systems. This will be large increase of work and time. Data is being gathered. EETRK is not the best system. The system needs much more flexibility than EETRK offers. We need to be able to run and look at 0-5 and run many more reports and be able to create reports.
- b. Eligibility Criteria
 - i. Should decrease number of children eligible for *Early On*, or very likely.
 - ii. Need more gradations. 2 months - 36 months is too broad, need at least 3 gradations.
 - iii. Changes remain too complicated for parents and provider agencies. May be better to totally separate special ed and non special ed would be easier.
 - iv. Seems the state *Early On* and CSHCS could work better together especially with all the Established Condition kiddos.
 - v. I don't think there will be much impact on numbers from this.
 - vi. There will be issues with children who have speech delays. For example: It is significant to have a 30 month old child who has a 5

month delay in language and under these guidelines we would not be finding this child eligible and would not provide services – very frightening!

- vii. The up to 2 months – any delay, with use of clinical opinion evaluation, evaluation later – great idea!
- viii. Need more tools that are acceptable for determining eligibility.
- ix. My guess is that the proposed changes will not drastically change the eligibility population in our service area. We have always tried to use our community partners as a primary source for serving children who only have slight delays before we implement an IFSP. We rely on our partners to do continuous monitoring of their development and trigger a new evaluation.

2. Advantages of proposed eligibility criteria:

- a. Would allow service providers/coordinators more time to work with families and children. Currently a lot of time is spent processing initial referrals. Early On is time and paper intensive. Direct service providers and families are concerned about the time spent in eval/IFSP process vs. service.
- b. Limiting eligibility may mean increased services and ultimately improved child outcomes to children and families. *Early On* cannot be all things to all 0-3 children.
- c. Anxiously await a tracking system that all can access. It's valuable information.
- d. Clear guidelines helpful.
- e. 25% delay seems like it will be easier to measure and show progress over time.
- f. We need to drop 'any' delay. It is too broad, impossible to measure.
- g. Will help folks provide similar services throughout the state.
- h. Criteria more meaningful than the process.
- i. Hopefully less kids to spread the few dollars.
- j. More specification, allows for more finite determination.
- k. Our speech therapists wouldn't be overloaded.
- l. More consistency across state.
- m. Possibly lower numbers.
- n. Compliance with federal law.
- o. More definable to outside providers.
- p. Can help focus valuable resources to those who need it most.
- q. Will help meet federal expectation to increase percentage of MI children who are being served – will make Michigan look better

3. Disadvantages of the proposed eligibility criteria:

- a. More training will be needed so that evaluation teams know how to correctly determine the delays and to know what 'standard deviation' means.
- b. Be very careful about the financial impact of every decision.
- c. Reliability of tests used with percentage is at what level? Have 'experts' with sophisticated test knowledge reviewed criteria?
- d. ____ for special ed not *Early On*.

- e. As a parent, knowing all this process and gathering of all this info, I would choose not to participate, especially if what I wanted for my child was PT or speech which insurance won't pay.
- f. If eligibility is determined yearly and the 25% delay is not met, then the child will be ineligible – how does this fit in with the ECO and SPP outcomes for progress? What does this mean for a child who goes from 25% to 20%, have they really progressed enough to be considered 'not delayed'?
- g. There would be language impaired children would fall through the cracks and not be prepared for kindergarten.
- h. What about children who have oral/motor issues or other issues that don't have to do with test but other subtle forms of development?
- i. Concern that children that may need help get excluded from help.
- j. Increased negative feedback to parents – once you quantify the delay we give parents a cause for feeling that their child is 'really bad'. Sometimes information can be more 'harsh' when it is presented as black and white.

4. Do the proposed eligibility criteria ensure that the most vulnerable children will still be served?

- a. YES! The broader early childhood system should pick up children who appear to have milder delays/conditions.
- b. Nancy made a good point about the range of normalcy. W___ to determine delay from the mean, not from the range.
- c. Yes, with some reservation. SLT (speech language) qualifying for special education and not *Early On* is an issue.
- d. Yes, resources will be going to those with most need.
- e. Adjust for prematurity until age 1.
- f. Yes.
- g. No it is not clear at this time.
- h. Still too open to great, great variation between counties – especially between small and large counties as related to services actually available.
- i. I am worried about those children who make minimal progress but don't qualify at re-eligibility determination – you're going to get them back eventually.
- j. Unknown. It was stated that only 70% of kids with language delay graduate from High School. We really need to keep catching children early with language delays.
- k. Yes, most vulnerable – not all with risk factors. That needs to be emphasized that it is supposed to be the most vulnerable.
- l. Of course – otherwise you would not have written this as you did.

5. Should a tracking system be established to follow the development of those children who are referred but do not meet the proposed criteria?

- a. At the state level through broader early childhood system, NOT the responsibility of Early On. *Early On* is spread too thin and has been the universal system. It is time for some of the responsibility to shift to the broader

- system. If we are going to do a good job with ongoing process, we need staff to be able to provide direct service, not another task to add on to all of the process work.
- b. No, not by *Early On*. Good idea but Great Start responsibility.
 - c. No, it is not feasible with our limited resources.
 - d. This is an issue that needs to be addressed with early childhood and schools: LEAs and ISD. Many are entering data in 2 or more systems!
 - e. Theoretically sounds good – however, seems like what not happened well in a large county due to funds available.
 - f. If done, it should be in the state computer where referrals go in: you'll know from box 1. Then you could match those who didn't have an IFSP with other programs later i.e. special education services in elementary. Federal funders ask this type of question.
 - g. Not the responsibility of *Early On* – should be included in the more general Early Childhood population and programming.
 - h. Yes, to determine if our new criteria actually was/is adequate.
 - i. Good idea, financial is an issue to support.
 - j. Yes, if there is funding attached to implement it!
 - k. Only if it does not become an unfunded mandate – if you want *Early On* providers to provide another service you should purchase it.
- 6. Should a tracking system be established to follow the development of those children that are no longer eligible (development looks good) but there is still a concern and desire to continue monitoring?**
- a. Ditto from above (At the state level through broader early childhood system, NOT the responsibility of *Early On*. *Early On* is spread too thin and has been the universal system. It is time for some of the responsibility to shift to the broader system. If we are going to do a good job with ongoing process, we need staff to be able to provide direct service, not another task to add on to all of the process work.
 - b. Not *Early On* responsibility.
 - c. No, it is not feasible with our limited resources.
 - d. Same as above (This is an issue that needs to be addressed with early childhood and schools: LEAs and ISD. Many are entering data in 2 or more systems!)
 - e. No, families will call us if they have concerns.
 - f. Good idea – financial support for effort. ASQ with activities and suggestion.
 - g. Yes, if there is funding attached to implement it!
 - h. If you purchase the service – fund it if you want it to be done right.