



Mike Braun, Governor
State of Indiana

Division of Disability and Rehabilitative Services
First Steps

402 W. WASHINGTON STREET, P.O. BOX 7083
INDIANAPOLIS, IN 46207-7083
800-545-7763

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Lily Osborn
Cluster B - 1st Kids
500 N. Nappanee Street Suite 11B
Elkhart, IN 46514

Dear Lily,

The Bureau of Child Development Services (BCDS) and the Quality Review (QR) Team would like to share the data from the 2024 monitoring visit. Data reviewed during this monitoring visit were for activities expected to have occurred by July 2024. This letter serves as your performance on compliance indicators as well as a finding if noncompliance was not met during our visit. This data will be shared in the FFY2024 State Performance Plan/Annual Performance Report (SPP/APR) submitted to the federal Office of Special Education Programs (OSEP) in February 2026.

Summary Chart:

| Federal and State Compliance Indicators | FFY2024 Cluster B Data | FFY2023 Cluster B Data | Target | FFY2024 State Data |
|---|------------------------|------------------------|--------|---------------------|
| 1. Timely Start (30 day Initial and Annual) | 69.4% (50/72) | 78.8% (52/66) | 100% | 81.8% (881/1077) |
| 7. Timely IFSPs (45-Day) | 100% (38/38) | 100% (40/40) | 100% | 98.8% (640/648) |
| 8A. Transition Steps and Services | 100% (56/56) | 100% (55/55) | 100% | 100% (651/651) |
| 8B. Notification to LEA of Potential Toddlers | 100% (64/64) | 96.4% (53/55) | 100% | 100% (777/777) |
| 8C. Timely Transition Meeting | 100% (56/56) | 100% (55/55) | 100% | 97.5% (635/651) |
| Annual IFSP Written Prior to Expiration | 100% (34/34) | 100% (26/26) | 100% | 99.5% (427/429) |

Federal Compliance Measures:

Below is the breakdown of the cluster's data by indicator. As a reminder, each finding must be corrected as soon as possible, and in no case later than one year from the date of this notification. BCDS must verify the cluster has corrected each finding of noncompliance by verifying the following:



- The cluster has corrected each individual case of child specific noncompliance unless the child is no longer within the jurisdiction of the program, and.
- The cluster is correctly implementing the specific regulatory requirements by achieving 100% compliance with the relevant IDEA requirement as based upon review of subsequent data which may be collected from subsequent desk reviews, onsite-monitoring, or a data base.

Federal Indicator #1 – Timely Service Delivery

The target for this indicator is 100%. For FFY2024, BCDS found the cluster in **noncompliance** for this indicator. The requirement as referenced in **34CFR303.344(f)(1)** – Content of an IFSP- “The projected dates for initiation of the services in paragraph (d)(1) of this section as soon as possible after the IFSP meetings described in 303.342 . . .”

Cluster B’s performance was at 69.4% due to 22 children not receiving their services within a timely manner (30 days) and a finding is issued through this letter. Additionally, as a result of this substantial non-compliance (less than 75%) Cluster B as part of its corrective action is required to complete the following: a root cause analysis that will inform the development of a corrective action plan around federal compliance indicator 1 (Timely Service Delivery). Cluster B must submit a root cause analysis using the Local Contributing Factors Tool to the BCDS by June 1, 2025. Once BCDS has received Cluster B’s Root Cause Analysis, the cluster will develop a Corrective Action Plan. The Corrective Action Plan should be submitted no later than July 1,2025 to be approved by BCDS and then implemented by Cluster B. Quarterly updates are required until the non-compliance is corrected.

BCDS has already verified that the 22 children received services although late or exited the program. Subsequent data will be run to determine if compliance has been met for this indicator. BCDS has full confidence Cluster B will be able to correct the deficiency. Technical assistance is available to assist the cluster in reaching this goal.

Federal Indicator #7 – 45 days from Referral to IFSP

The target for this indicator is 100%. For FFY2024, BCDS found the cluster **met compliance** for this indicator. The requirement as referenced in **34CFR30.310(a)** - the initial IFSP meeting under §303.342 must be completed within 45 days from the date the lead agency or EIS provider receives the referral of the child.

Federal Indicator #8A – Transition Steps and Services

The target for this indicator is 100%. For FFY2024, BCDS found the cluster **met compliance** for this indicator. The requirement as referenced in **34 CFR 303.344(h)(i)(ii)(iii)(2)(i)(ii)** - (h)Transition from Part C services. (1) The IFSP must include the steps and services to be taken to support the smooth transition of the child, in accordance with §§303.209 and 303.211(b)(6), from Part C services to-(i)Preschool services under Part B of the Act, to the extent that those services are appropriate; (ii)Part C services under §303.211; or (iii)Other appropriate services...”

Federal Indicator #8B – Notification to the LEA of potential toddler

The target for this indicator is 100% For FFY2024, BCDS found the cluster **met compliance** for this indicator due to monthly electronic transmission. The requirement as referenced in **34 CFR 303.344(h)(iii)(e)**- “Confirmation that child find information about the child has been transmitted to the LEA or other relevant agency, in accordance with §303.209(b)(and any policy adopted by the State under §303.401(e)) and, with parental consent if required under §303.414,

transmission of additional information needed by the LEA to ensure continuity of services from the Part C program to the Part B program, including a copy of the most recent evaluation and assessments of the child and the family and most recent IFSP...”

Federal Indicator #8C – Timely Transition Meeting

The target is 100% for this indicator. For FFY2024, BCDS found the cluster **met compliance** for this indicator. The requirement as referenced in **34 CFR 303.209(c)(1)**- “If a toddler with a disability may be eligible for preschool services under Part B of the Act, the lead agency, with the approval of the family of the toddler, convenes a conference, among the lead agency, the family, and the LEA not fewer than 90 days--and, at the discretion of all parties, not more than 9 months--before the toddler’s third birthday to discuss any services the toddler may receive under Part B of the Act...”

State Indicator – Annual IFSP Written Prior to Expiration

The target for this indicator is 100%. For FFY2024, BCDS found the cluster **met compliance** for this indicator. The requirement as referenced in 34 CFR 303.342(c)- “Annual meeting to evaluate the IFSP. A meeting must be conducted on at least an annual basis to evaluate and revise, as appropriate, the IFSP for a child and the child’s family. The results of any current evaluations and other information available from the assessments of the child and family conducted under §303.321 must be used in determining the early intervention services that are needed and will be provided.”

Additional Data Reviewed - Insurance Correctly Documented in Child File and EIHub

The expectation for this data is 100%. For FFY2024, BCDS found the cluster did **not meet expectation** for this data. The requirement is for all insurance information listed in the EIHub data system be up to date and match what is collected in the child’s file maintained in the cluster’s file repository.

Cluster B’s performance was at 98.6% due to 1 child not having up to date insurance or no insurance information in EIHub.

BCDS is committed to supporting the cluster’s efforts to improve outcomes for infants and toddlers with disabilities and their families, and we look forward to working with staff over the next year. Please contact me or the Quality Review Leader with any questions that you may have.

Sincerely,

Danielle Ruffino
Director of Quality Assurance
Bureau of Child Development Services
Division of Disability and Rehabilitative Services
Office: 317-489-3456

Cc: Christina Commons (BCDS Director)
Janet Ballard (Quality Review Leader)
Clare Mann (1st Kids)
Brigette Fairchild Leazenby (1st Kids)