DaSy Spotlight

Data Linkages Between Part C and Part B – Transition Notification

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The IDEA Part C regulations published in 2011 contained additional requirements for the disclosure of personally identifiable information (PII) provided within the transition notification for toddlers potentially eligible for Part B services. Part C lead agencies are now required to notify the state education agency (SEA) in addition to the local education agency (LEA) of residence. This regulatory change required that states adjust their data systems and data notification processes.

❋ This spotlight describes how Kansas and Wisconsin implemented changes to their data systems and program practices to meet the new notification requirements for the transition from Part C to Part B.

❋ It also provides implications for other states' consideration to promote effective and responsive transition for children with disabilities and their families.

Reporting Requirements

Transition notification data are reported and used for

❋ documenting the referral of infants and toddlers served by Part C and potentially eligible for Part B for the determination of eligibility and to support a smooth continuum of services;

❋ aligning data about the numbers of toddlers exiting Part C with the number of referrals of toddlers to the Part B Section 619 program; and

❋ helping states identify and monitor the quality and effectiveness of referral and transition practices at local and state levels.

From the Law

Not fewer than 90 days before a toddler's third birthday, the lead agency must notify the SEA and the LEA (where the toddler receiving Part C services resides) that a toddler who is receiving Part C services may be eligible for services under the Part B of the Act and will shortly turn three years old and exit the program. (34 CFR §303.209(b)(i))

Potentially eligible for Part B has the same meaning as children who may be eligible for Part B under IDEA section 637(a)(9)(A)(ii)(II).

The State must ensure that the notification is consistent with any "Opt-Out" policy adopted by the State, under §303.401(e), permitting a parent to object to disclosure of personally identifiable information. §303.209(b)(2)

If the State lead agency does not have an opt-out policy, the lead agency must disclose to the SEA and the LEA where the child resides, in accordance with §303.209(b)(1)(i) and (b)(1)(ii) the personally identifiable information under the Act of child name, date or birth and parent contact information. (§303.401(d))

Notification constitutes a referral to the SEA and LEA of residence from the early intervention program; it is required for all children served by Part C who are potentially eligible for Part B unless the state has an **opt-out** policy approved by the Office of Special Education. The regulations provide an option for states to develop a policy allowing parents to object to the disclosure of PII. Not all states have an opt-out policy, but for states that do, parents may decline to have the basic referral information (their child's name, date of birth, and their contact information) sent to the SEA and LEA of residence.

Lead agencies and SEAs also must report on notification and the disposition of the referral of children as part of their Annual Performance Report (APR) requirements (U.S. Department of Education, Office of

Special Education Programs [OSEP], 2014a, 2014b). In recent years, performance for the APR transition compliance indicators Part C (C8b) and Part B (B12) has been relatively high (U.S. Department of Education, OSEP, 2015a, 2015b), but analyses revealed potential data capacity issues for some states.

✳ Although a majority of Part C programs reported using a data system or a data system with monitoring processes, some states reported not using a data system (U.S. Department of Education, OSEP, 2013a).

✳ Some states use more than one system or method of collecting data to provide all required data (U.S. Department of Education, OSEP, 2013b).

✳ Only 64% of Part C programs in Federal Fiscal Year (FFY) 2011 (Bernstein et al., 2015) and 86% of Part B programs in FFY 2010 (U.S. Department of Education, OSEP, 2013b) used a census approach for collecting and reporting these data.

Effective Transition Notification Approaches and Practices

Personnel from the Kansas Department of Health and Environment, Bureau of Family Health, Kansas Infant-Toddler Services (ITS), Kansas Department of Education (KSDE), Wisconsin Department of Public Instruction (DPI), and the Wisconsin Department of Health Services (DHS), Birth to 3 Program provided overviews of their transition notification systems and practices. Effective transition notification approaches and practices are categorized in four key areas:

✳ data use between state and local programs;

✳ communication, collaboration, and coordination;

✳ use and alignment of Part C exiting data with APR reporting requirements; and

✳ technical considerations.

Highlights of the Kansas ITS and the Wisconsin Birth to 3 Program data system features are described in each of the four areas.

Data Use Between State and Local Programs

Data use includes sharing and using notification data between state data systems and local programs. Access to accurate data provided by local early intervention programs and LEAs enables state staff to assess program compliance with state and federal transition requirements and identify issues. State agencies can use local data to better understand the timeliness and appropriateness of referral practices. State and local program access to data across both agencies allows for the tracking of children through the transition process, from notification through initial evaluation, determination of eligibility, and, if eligible, the IEP process. With this access, local early intervention programs and LEAs can coordinate more effectively and monitor the transition process independently, in addition to the state agencies' provision of oversight.

Kansas. ITS uses the C to B Electronic Referral System (CBER) to provide the LEA of residence and the SEA with transition notification information. CBER eliminated the need for multiple email notifications to the SEA from local Part C early intervention programs, called "tiny-k programs." SEA and LEA staff log in to CBER and see only the IDEA-required PII. A web-based Individualized Family Support Plan (IFSP) implemented in 2015 supports the integration of notification data from the IFSP application to CBER. The goal is for all transition notification data entry to occur in the new web-based IFSP and populate CBER. Currently, the ITS Part B Referral Form is still used as a source for data entered into CBER, as they transition to the new web-based IFSP.

ITS policy requires that data be entered into CBER within 15 business days. In addition, the state interagency agreement specifies that staff will continue to use local referral processes (phone call/email/letter) to contact LEAs. KSDE staff access CBER regularly to verify that referrals are sent and

entered by local Part C programs and check to determine whether LEAs receive and accept or reject child-level notifications. Rejections are acceptable only when the child's address was not within the notified LEA's area. KSDE directs LEAs to check for CBER data regularly—advising at least weekly checks for larger districts. Both state agencies want CBER enhanced in the future to auto generate and send emails to the LEAs informing them to check for new referrals.

Wisconsin. The Birth to 3 Program's statewide Program Participation System (PPS) houses notification data that all Birth to 3 Programs access and use. PPS also provides LEAs with a limited view of notification information based on the LEA staff-assigned permissions and parental agreement to access child information. Local Birth to 3 Program staff access PPS to enter and view child-level data. Sending a referral through PPS generates and sends an email notifying the LEA of a pending referral. No identifying PII is sent via the email notification. LEA staff must log in to PPS to view recent referrals. The Wisconsin DPI accesses LEA notification data in PPS through an "SEA view" that is updated nightly. Previously, referrals were electronic or manual, but the two agencies instituted a policy that Birth to 3 Programs would use only electronic notification in PPS for referrals, improving efficiency and accuracy. A manual process is used only when DHS must override data in the case of an incorrect LEA.

Wisconsin has an OSEP-approved opt-out policy allowing parents to object to the release of their child's information to the SEA and the LEA of residence. To opt out, a family must inform the Birth to 3 Program in writing before the child is 2 years, 3 months of age. The Birth to 3 Program allows parents to reverse this opt-out decision, and if it is reversed PII referral information is made available to the LEA through PPS if the child is potentially eligible for LEA services and thus requiring a referral be sent to the LEA.

Communication, Collaboration, and Coordination

Effective transition data linkage, sharing, and use are supported by the interpersonal relationships of state and local personnel from Part C and Part B programs. Regular communication, collaboration, and coordination are key to effective data use across and within the two programs. Formal interagency agreements, shared data dictionaries and process documents, joint trainings, and other technical assistance opportunities support agency-to-agency transition notification. It also is important to develop and maintain routine interpersonal relationships that support ongoing day-to-day communication, collaboration, and coordination between state and local Part C and Part B programs.

Kansas. The KSDE worked with ITS to design the CBER Part C to Part B transition data system. The two groups routinely coordinate and communicate about any issues that arise. Together, they developed a training guide and video to help local tiny k programs and LEAs familiarize themselves with the new CBER data system. The state interagency agreement formalized decisions and described efforts to share and use data. The agreement specifically addresses data sharing. use of unique identifiers, verification of Part C exiting data with Part B referral data, use of CBER, and the frequency of meetings to assess and enhance linked data systems processes and verification of APR data.

Wisconsin. DPI and the DHS Birth to 3 Program collaborated extensively on the design of the PPS. DPI allocated funds to assist in the development of the system, demonstrating a commitment to shared resources and beliefs. The rollout of the new system was conducted jointly, and leaders from both agencies stressed the importance of a strong collaborative relationship between the two programs. The state-level interagency agreement coupled with the use of local interagency agreements guide state and local procedures and practices for both agencies.

The notification data are downloaded as needed to a secure online site (data mart), allowing for joint agency review. Any potential concerns such as reasons for late referrals are addressed, and the data are used to inform monitoring and technical assistance. The two agencies meet routinely to review data and timeline requirements, which also inform program improvement efforts.

DPI and the DHS Birth to 3 Program coordinate the answers to questions related to family consent for the release of additional information. The agencies support both the importance of a school's ability to connect with families and parental privacy in data system design considerations. If a parent signs a release consenting to the provision of additional information to the LEA, information beyond the PII is shared with the LEA. This joint policy decision is formalized in the interagency agreement.

Use and Alignment of Part C Exiting Data with APR Reporting Requirements

The use of accurate Part C exiting data provides insight into referral and exiting patterns, informs the provision of services, and can indicate how well state or local transition policies are being implemented (Bernstein et al., 2015). Ideally, Part C and Part B staff should be able to coordinate and match specific coding categories in the Part C exiting data with the Part B APR data. The number of children referred to and determined eligible or not by Part B as reported in the APR Indicator B12 measurement should correspond with the data in the Part C APR Indicator C8b and the exiting at age 3 categories.

Kansas. Kansas has clearly articulated a detailed process in its interagency agreement for analyzing and reconciling Part B referral data as required by the B12 APR measurement requirements and Part C exiting data. KSDE and ITS staff meet routinely to review the data and timeline requirements which guide program improvement efforts. Their interagency agreement specifies that local tiny-k programs and LEAs must work together to reconcile any discrepancies in the data reports. KSDE provides a report to LEAs of any inconsistencies between LEA and local tiny-k program data.

Wisconsin. PI and the DHS Birth to 3 Program staff meet quarterly to discuss transition and examine transition notification data. For several years, they have been working on aligning Part B referral data with Part C exiting data and including exiting codes for children referred to Part B on the PPS transition/program exit page. The state has been examining exiting data longitudinally for many years and trends are consistent.

Technical Considerations

Key technical considerations support effective sharing and linking of notification data between Parts C and B.

Benefits of a Single Statewide Data System

The configuration of a single statewide data system supports accuracy and efficiency in transferring transition data and minimizes the need for manual processing of data and the opportunity for errors. Both Kansas and Wisconsin have single statewide transition notification data systems and therefore realize benefits including

* reduced potential for duplicate records;
* consistent business rules for local data entry, reducing errors;
* real-time local and state data access; and
* faster, efficient, and cost-effective data transfer and processing.

Some states have a statewide database, considered a system, but it is populated with data from multiple data files generated locally from different applications. When the files are combined into a single state-level database, the resulting data must still be checked and reconciled for duplicate records and potential errors.

> *"Building adequate State and local infrastructures to support and guide effective transition for children with disabilities and their families is a complex undertaking that requires collaboration among all agencies providing early childhood services to children and their families, collaborative leadership, and resource commitment."*
> —Küpper, 2014

Unique Identifiers

As of 2013, only 21% of states had reported having a common unique child identifier across both Part C and Part B 619 data systems (Derrington, Spiker, Hebbeler & Diefendorf, 2013). When Part C and Part B data systems use the same unique child identifier, it is easier to match within (e.g., find duplicates) and across data systems. Unique identifiers reduce the likelihood of having duplicate records for a child, reduce processing time and effort, and increase the accuracy of record transference.

Kansas. Kansas ITS uses a single agency unique child identifier and then links that identifier to the KSDE data system. Linking the unique identifier from Part C to the KSDE system requires parental permission affirming that parents (a) desire a transition conference, (b) allow sharing of their child's information with the LEA, and (c) allow sharing of information with KSDE to generate a unique identifier. Once established, the identifier is associated with the child and included in the state longitudinal data system (SLDS). Weekly batch files are sent from ITS to KSDE to generate the unique identifier. If parental permission is not granted, no KSDE unique identifier is created until the time the child is in school (regardless of eligibility for Part B services). In those cases where children do not receive a KSDE unique identifier until they enter school, this identifier will not be linked to their past participation in Part C.

Wisconsin. Like the majority of states, Wisconsin does not have a unique identifier spanning Parts C and B. They have one unique identifier for children in the Birth to 3 Program data system and another unique identifier from DPI that is created and assigned once the child is enrolled in preschool.

Data Elements

IDEA requires Part C programs to send the required PII information of child's name, birthdate, and parental contact information to both the SEA and LEA of residence no fewer than 90 days before a child's third birthday. For effective notification, both LEA and SEA data systems should contain these specific data elements. In addition, the source of the data and the date received should be captured in the Part B database.

Kansas. CBER contains all PII elements required for transition notification to the SEA and LEA. It also includes elements that support parental wishes regarding a child's PII relevant to obtaining a KSDE unique identifier before the child's exit from Part C. The KSDE Part B data system contains all data elements supporting the calculation of APR indicator B12 (date of IEP, reason for an untimely IEP, etc.).

Wisconsin. In addition to the required PII data elements, Wisconsin has data elements supporting its opt-out policy. These data elements include the timeline for the opt-out decision, deactivation to send PII notification, deactivation to send additional information, and information on late referrals caused by parental reversals.

Missing Data

To capture all required records, algorithms (the logic) that pull data from a data system must be carefully designed, built, and tested to confirm that all the records are being processed correctly. Both Kansas and Wisconsin operate transition notification systems in real time (or as soon thereafter as data are entered). Doing so eliminates many of the risks involved in sending scheduled record batches to LEAs as a notification process. States that provide scheduled uploads of Part C records to the SEA and LEAs need to be confident they are not missing records—especially the records of children who enter Part C late (i.e., less than 90 days before their third birthday). It is important to review business rules to confirm that every scenario of late entry children are being captured in states that submit batches to LEAs and the SEA.

Conclusion and Implications for States

Kansas and Wisconsin value the importance of accessible and reliable transition data that local programs can use as a tool for improvement and program management. Their goal is for local programs to use their data for decision making and monitoring of both required and desired practices. Most important, these two states demonstrate a shared philosophy for coordination and communication and processes that promote effective and responsive transition for children with disabilities and their families. Practices in these two states lead to the following recommendations for effective transition notification:

✳ Provide state and local Part C and Part B staff real-time access to the same data on transitioning children.

✳ Consider the feasibility and benefits of moving toward a statewide data system to support accurate and efficient transfer of transition data that will minimize manual processing and reduce errors.

✳ Consider the feasibility and benefits of creating and using a single unique child identifier across both Part C and Part B.

✳ Develop and disseminate transition interagency agreements that specifically address data sharing responsibilities and processes and provide training to affected Part C and Part B staff.

✳ Establish routine communication between state and local Part C and Part B staff regarding the coordination of transition notification data and to resolve discrepancies and issues.

✳ Establish routine communication between local Part C and Part B staff to ensure timely and effective access to services and supports for children and their families.

✳ Establish routine transition notification training and technical assistance for local Part C and Part B program staff to

– increase transition knowledge;

– use transition data to plan and monitor local programs for effective transition services; and

– build interagency relationships.

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Resources

ECTA Center Resource Collection on Transition from Part C
http://ectacenter.org/topics/transition/transition.asp

DaSy Center State of the State: Overview http://dasycenter.org/state-of-the-states/

IDEA Data Center Part C Exiting Data Toolkit
https://ideadata.org/resource-library/54e4fd19150ba0641b8b458e/

National Association of State Directors of Special Education (NASDSE) resource on Using Unique
Identifiers to Promote Data Sharing Between Part C and Part B
http://nasdse.org/DesktopModules/DNNspot-Store/ProductFiles/98_e04d24d6-74d0-4fe8-a651-
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The DaSy Center is a national technical assistance center funded by the U.S. Department of Education, Office of Special Education Programs. The DaSy Center works with states to support IDEA early intervention and early childhood special education state programs in the development or enhancement of coordinated early childhood longitudinal data systems.

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