

State Interagency Coordinating Council

February 10, 2025 Minutes

9:00 AM – 12:00 PM

American School for the Deaf, West Hartford

Cynthia Jackson

ICC Chair/Provider

Leona Adamczyk

ICC Vice Chair

John Lamb

Dept. of Public Health

Tiffanie Allain

Parent Representative

Donna Maitland-Ward

Dept. for Children and Families

Maris Pelkey

Creative Interventions, Provider

Elaine Balsley

Reachout, Provider

Nicole Cossette

Office of Early Childhood

Senator Ceci Maher

State Senator

Shonda Easley

Parent representative

Sharon Marie

Dept. of Aging & Disabilities Services

Ginny Mahoney

Dept. of Social Services

Anne Giordano

Education Connection, Provider

Louis Tallarita

SDE-Homeless Children

Renee Kleinman

SDE-619, Pending

Julie Hall

SARAH Inc, Provider

Enrique Pabon

Early Head Start

Ann Milanese, M.D.

American Academy of Pediatrics

Representative Liz Linehan

House of Representatives

Tammy Venenga

Dept. Of Developmental Services

Mary Beth Bruder

UCEDD

Lisa Opert

Parent Representative

Robb Dunn

Parent Representative

Caitlin McNamara

Parent representative

Joshua Vaughn

Parent Representative

Shakira Wade

Parent Representative

Jennifer Dowty

Department of Insurance

Kristina Gilbertie

Rehab Associates, Provider, Pending

ICC Members Present: Julie Hall, Sylvia Murray (on behalf of Tammy Venenga), Lisa Opert, Robb Dunn, Maris Pelkey, Caitlin McNamara, Cynthia Jackson, Elaine Balsley, Kristina Gilbertie, Nicole Cossette, Sharon Marie, Shakirah Wade, Renee Kleinman (pending appointment), Jennifer Dowty, Shanda Easley (remote), Jill Isenberg (on behalf of Dr. Mary Beth Bruder), Enrique Pabon.

ICC Members Absent: Ann Milanese, Ginny Mahoney, Donna Maitland-Ward, Ceci Maher, Liz Linehan, Louis Tallarita, Leona Adamczyk, Joshua Vaughn, Anne Giordano, John Lamb

Guest Present: Elena Trueworthy, Acting Commissioner Office of Early Childhood; Deb Flis, Acting Deputy Commissioner; Ashley McClain, Autism Safety Project; Jill Rigsby, PCG (remote); Maggie Adair, OEC legislative liaison.

Meeting called to order at 9:30 AM by Elaine Balsley, ICC member, at the request of Cindy Jackson, Chair, who was delayed.

Public Comment:

No public comment

Old Business:

Legislative/Fiscal: What is our new message now that we are in the Governor's budget.

System Support/Professional Development: Reported that they had no updates since last meeting.

Communication/Education & Outreach: Reported that they had no updates since last meeting

Lead Agency Report: Nicole Cossette, Part C Coordinator, reviewed the Lead Agency Report. See below.

OEC submitted the State Performance Plan/Annual Performance Report (SPP/APR) and the State Systemic Improvement Plan (SSIP) to the Office of Special Education on January 28, 2025. The report is posted on the Birth to Three Website under Annual Performance Reports.

Once OSEP sends the FFY2024 Part C Grant Application the Lead Agency will post the official draft. Nicole attached a preliminary budget to the Lead Agency Report as well as reference guides about the fiscal responsibilities and how they intersect with the ICC.

The updated visit note is available on the Birth to Three website and all programs will be required to use this beginning January 1, 2026.

Technical Assistance has been underway, and all corrective actions have been submitted for SPP/APR non-compliance.

New Business:

Governor's Budget

Acting Commissioner, Elena Trueworthy; Acting Deputy Commissioner, Deb Fliss; OEC Legislative Liaison, Maggie Adair presented on the proposed Governor's budget and Birth to Three increased funding of 15 million supporting a tiered rate. Discussion about the reduction, but no elimination of the General Administrative Payment (GAP). Concerns regarding no increases in the budget until FY 2027. Nicole stated that they were looking at ways to stabilize the programs before FY 2027. Commissioner Trueworthy also discussed no-cost efforts to reduce the burden on Birth to Three programs.

Autism Safety Project

Ashley McClain presented on the Autism Safety Project and the program's efforts to train and support emergency personnel in how to engage and interact with children/adults with special needs. <https://linkedasp.com/>

Family Connection/CPAC Report

Lisa Opert provided an update from CPAC. Please see the attached report.

Leadership Grant

Jill Isenberg, UConn UCEDD presented on the latest updates

PCG Billing

Jill Rigsby, PCG, presented on the latest updates in Birth to Three billing platform

Committee Report Out

Legislative/Fiscal:

Chairs: Elaine Balsley, Julie Hall, and Shanda Easley

Discussed upcoming advocacy at the Appropriations Committee in support of the Governor's budget and increases to Birth to Three. Legislative documents were developed and provided to programs and stakeholders, but we need updates to the message now that B23 is in the budget. Discussed concerns about the current tiered rate. Advocacy for provider and stakeholder input in determining tiers or keep current professional and non-professional non-tiered rates..

System Support/Professional Development:

Chairs: Anne Giordano and Robb Dunn

Discussion about undergraduate surveys about Birth to Three and looking at other state's credentials, how to collaborate with community colleges particularly for Social Workers. Charter Oak students requesting internships but are very limited in the hours they can provide to programs which doesn't match what their requirements are and the need to follow up with Charter Oak.

Communication/Education & Outreach:

Chairs: Lisa Opert and Maris Pelkey

Discussed how to recruit and prepare a variety of families to come and share their stories with the ICC to learn about what we are doing well and what can be done differently. Providers of families can reach out to Lori Opert at Lopert@cpac.org to help shape their story and practice before the Family Focus meeting in April. The committee will be writing up a summary of what the commitment is for families in a flyer.

December 2024 minutes approved before the meeting adjourned.

Meeting ended 12:00 PM

Next Meeting

Date:	Monday, April 28, 2025 – Family Focus
Time:	9:00 AM to 12:00 PM
Location:	TBD



State Systemic Improvement Plan (SSIP)

Parents will be able to describe their child's abilities and challenges more effectively as a result of their participation in Early Intervention.

FFY20-25 SPP / APR SSIP

- The Office of Early Childhood (OEC) submitted the State Performance Plan / Annual Performance Report (SPP/APR) and the State Systemic Improvement Plan (SSIP) to the Office of Special Education Programs (OSEP) on **January 28, 2025**.
 - The public reporting tables will be updated on the Birth to Three website in the next few weeks.
 - At the next ICC (**April 28, 2025**), each indicator will be reviewed.
 - The report is posted here: [Annual Performance Reports - Birth23.org](https://www.birthtothree.org/annual-performance-reports).
- What is next?
 - The department will review the states' data, and review the information provided in the FFY2023 SPP/APR, and other state-reported data.
 - During April, the OEC will have the opportunity to respond to any questions that OSEP has regarding the SPP/APR. This is called the week of clarification. The clarification period will open on **April 8, 2025**.
 - The OEC will resubmit the SPP/APR at the end of the clarification period, which is due by **April 22, 2025**.
 - Determinations will be issued over the summer. The OEC expects our federal determination to be issued by **June 15, 2025**.
- The state will begin discussions on the next SPP/APR package within the next year.
 - This will include updated system targets and discussions of the State identified Measurable Result (SiMR), SSIP, and other reporting requirements.
 - The current package runs through FFY2025 for reporting.

Fiscal Enhancements

- Once OSEP sends the FFY2024 Part C Grant Application the Lead Agency will post the official draft.
 - The application will be posted here: [Annual Part C Application - Birth23.org](https://www.birthtothree.org/annual-part-c-application).
 - A draft preliminary budget is attached to this report.
 - A quick reference guide is attached to this application on the fiscal responsibilities and how the responsibilities intersect with the ICC.
 - Quick Reference Guide on the Fiscal Responsibilities of Part C State Interagency Coordinating Councils provides a foundational understanding of the fiscal responsibilities of the state ICC under IDEA, enabling the state lead agency and ICC to have meaningful discussions about the state's Part C funding.
 - In addition, Engaging Part C State Interagency Coordinating Councils in Fiscal Discussions helps state lead agency staff build the Part C fiscal knowledge of ICC members and encourage their increased participation in budget discussions. Together, these invaluable resources ensure informed decision-making and strategic planning with the ICC as you move through the Part C Grant Application process.

Education Outreach

- The child find coordinator completed the following tabling events:
 - Submarine Task Force Holiday Event, Monroe Library Story Time, West Have Library Story Time, and New Haven Early Childhood Council Winterfest.
- The child find coordinator completed the following presentations:
 - Nurse-Family Partnership, Catholic Charities – Norwich Early Childhood Parent Group.
- The child find coordinator also provided information on referrals and programs to the HELLO Labs at UConn and Norwalk Community Health Center.

Leadership Grant

- Jill Isenberg will present on the latest updates.

Personnel Development

- Early Intervention Specialist (EIS) Credential:
 - Fifteen candidates sat for the proctored exam during 2024. Ten passed both portions of the exam and are eligible to begin the implementation observations.
 - Four candidates are currently working through the implementation portion of the Credential, which includes four observations. Another two candidates expressed interest in beginning the Implementation portion of the Credential; they have each been given the audio-visual (AV) kit to use for their observations.
 - Two candidates have successfully passed the first implementation observation (Service Coordination) and have moved on to the second observation (Evaluation and Assessment).
 - AV equipment packages to support the EIS observation portion of the credential have been assembled for use in the field. Arrangements can be made to share these materials on an as-needed basis.
- Public Consulting Group (PCG) has been retained through a PD contract to set up, manage, and process payments to programs that will streamline moving initiative monies directly to programs.
- The student placements initiative will continue in 2025 with a modified reimbursement chart. In 2024, 34 students were supported by 7 programs. The 2024 summer reimbursement documentation is at PCG, and program information is needed to be processed for payment. Fall 2024 will be submitted to PCG as soon as summer reimbursements clear.

General Supervision

- The updated visit note is on the website. The visit note can be found here: <https://www.birthe23.org/wp-content/uploads/2025/01/1-1-Visit-Form.pdf>.
 - All programs will be required to use this beginning January 1, 2026.
- The Central Billing Office (CBO) Request for Proposals (RFP) has been posted. The RFP can be found here: [Requests for Proposals \(RFPs\), Requests for Applications \(RFAs\), and Requests for Information \(RFIs\) - Connecticut Office of Early Childhood](#).
- Technical Assistance (TA) has been underway, all programs have had individual meetings, and all corrective action plans have been submitted for SPP/APR non-compliance
- A contract pending with the Connecticut Infant Mental Health Association which includes opportunities for training for Birth to Three providers. More information on a timeline will be reported; this is an interagency effort.

- An Updated Parent Rights and System of Payment (combined brochure) is in the final edits and will be sent to the OEC’s marketing firm. The OEC hopes to share the brochure within the next six months.

Data

- The enrollment and fiscal data requested by the ICC on a regular basis is attached.

Part C Grant Application:

Period of Availability				
Federal Fiscal Year	Forward Funding Period	Grant Award Period	Tydings Period	Liquidation Period
FFY2023	7/1/23-9/30/23	10/1/23-9/30/24	10/1/24-9/3-/25	10/1/25-1/28/26
FFY2024	7/1/24-9/30/24	10/1/24-9/30/25	10/1/25-9/3-/26	10/1/26-1/28/27
FFY2025	7/1/25-9/30/25	10/1/25-9/30/26	10/1/26-9/3-/27	10/1/27-1/28/28

Current year
Next FY *What we are building our budget off of

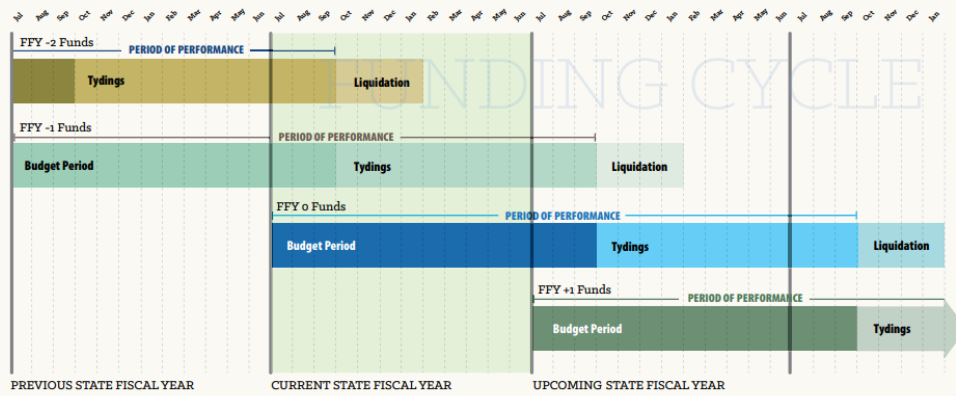
Below are some resources provided by the Center for IDEA Fiscal Reporting (CIFR) that outline the fiscal years and period of available funds.

The screenshot shows a document from the Center for IDEA Fiscal Reporting (CIFR). The title is "Life Cycle of an IDEA Part C State Grant Award". The document is divided into several sections:

- PLANNING**: Discusses state planning for IDEA Part C grants, mentioning OSEP and the U.S. Department of Education, and the timing of budget planning and application submission.
- BUDGET PERIOD**: Explains that Part C awards are forward funded, with the budget period for FFY 2022 funds starting in July 2022 and ending in September 2023.
- TYDINGS PERIOD**: Describes the Tydings period as a 12-month carry-over period for unobligated funds from one fiscal year to the next.
- PERIOD OF PERFORMANCE**: Defines the period of performance as the time from the start of the budget period to the end of the Tydings period, creating a 27-month period.
- LIQUIDATION PERIOD**: States that state grantees must liquidate all obligations within 120 days of the end of the period of performance, with a deadline of January 28, 2025.

 A footnote at the bottom indicates that the authority for forward funding comes from the Appropriations Act each year. The page number 2 is visible in the bottom right corner.

IDEA Part C State Grant Funding Cycle



SECTION III

A. Description of Use of Federal IDEA Part C Funds for Personnel of the State Lead Agency (LA) and the Interagency Coordinating Council (ICC)¹

When completing this section include:

- Totals for the number of lead agency and ICC administrative positions, salaries and fringe benefits funded either 100 percent and/or less than 100 percent with Federal IDEA Part C funds;
- A general description of the duties for each position;
- A distinction between lead agency and ICC roles: insert (LA) or (ICC) in the “Description of Duties;” after each position; and
- A subtotal of the amount.

Identify any administrative positions for which less than 100% of the time is spent on Part C and, for each such position, indicate the percentage of time spent on Part C and the total amount of salary and fringe benefits included in the Part C application budget.

Positions Funded	Number of Positions	% of Time Spent on Part C	Salaries & Fringe Benefits	Description of Duties
100% funded with Part C Funds	11	100%	\$1,879,804.33	Education and Outreach (child find and public awareness); Personnel Development (scale up of EBPs, training, technical assistance for EIS programs and staff, managing procedures); State ICC Support Staff; Clerical support; Monitoring and General Supervision; Family Liaison; Part C Data Manager (Federal Reporting) and Procedural Safeguards
< 100% funded with Part C Funds	2	85% 75%	273,475.02	Part C Coordinator (Federal Reporting) Procedural Safeguards and General Supervision. Leadership, long range planning, and interagency coordination.
Subtotal of amount under A:			\$2,153,279.35	

¹ Federal IDEA Part C funds used to support the SICCC must meet the requirements of 34 CFR §303.603.

B. Maintenance and Implementation Activities for the Lead Agency and the ICC

When completing this section include:

- A description of the nature and scope of each major activity to be carried out under Part C in maintaining and implementing the statewide system of early intervention services:
 - Lead Agency Activities could include enhancing the Comprehensive System of Personnel Development, implementing child find strategies, or ensuring a timely, comprehensive, multidisciplinary evaluation for each child;
 - ICC Activities could include coordinating child find identification efforts, ensuring the timely provision and payment of early intervention services to eligible children and their families, advising on early childhood transition, support for the ICC (travel), or other implementation and development activities of the ICC
- The approximate amount of Federal IDEA Part C funds to be spent for each activity; and
- A subtotal of the amount.

Special Note: Prior Approval

Some direct costs require prior approval. These items include using Federal IDEA Part C funds to pay for: (1) equipment; (2) participant support costs (such as training or travel costs); (3) construction or renovation of facilities; and (4) rent, occupancy or space maintenance costs.² States may find helpful [OSEP's Guidance for Common Prior Approval Requests under IDEA Parts B and C](#) issued on January 3, 2023. It provides a summary of the guidance and approval process for the most common prior approval cost categories. The October 2019 [Frequently Asked Questions \(2019 FAQs\) Prior Approval – OSEP and RSA Formula Grants](#)³ details prior approval flexibilities for **equipment and participant support costs** and describes the parameters under which OSEP has provided prior approval for a subset of these costs.

For any activity or expense listed under Section III of this application that is not covered by the 2023 guidance and 2019 FAQs and requires OSEP prior approval, mark an "X" in the chart below and submit supporting documentation.

Approval of the State's FFY 2024 application does not constitute OSEP's approval of these expenses unless specifically referenced. *(Add rows as needed)*

Major Activity/ Expense	Part C Funds to be Spent	Description of Activities/Expenses (include whether it is for the Lead Agency or SICC)	Prior Approval Needed
Operating Expenses	\$281,000	Third party billing contractor fees, Translation services; supplies; printing, postage, and delivery services; travel and mileage reimbursement for lead agency staff	

² IDEA and the Uniform Guidance require prior approval for the following expenses: (1) equipment (tangible personal property (including information technology systems) having a useful life of more than one year and a per unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the nonfederal entity for financial statement purposes, or \$5,000 (see 2 CFR §200.33)); (2) participant support costs (direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees), in connection with conferences or training projects 2CFR §200.75; (3) construction/renovation (see 2 CFR §200.12(b)); and (4) rent (see 2 CFR §200.465)).

³ Under the 2019 FAQs, OSERS granted prior approval for participant support costs under IDEA that: (1) are associated with required meetings for the SICC; (2) incurred as part of providing services identified on an IFSP under IDEA; (3) do not exceed \$5000 per individual participant per training/conference. In addition, the 2019 FAQs provide prior approval for equipment that is identified on or directly related to the implementation of the IFSP.

Major Activity/ Expense	Part C Funds to be Spent	Description of Activities/Expenses (include whether it is for the Lead Agency or SICC)	Prior Approval Needed
General Administrative Payment	\$1,065,958.65	An administrative per child for the program with an IFSP on the 1st of the billing month that plans for less than 9 hours of service per month and as long as at least one service was provided during the billing month. GAPs for children that transfer programs are paid to the program with the IFSP on the 1st of the month as long as a service was provided by the sending program before the transfer. Receiving programs will be paid the GAP in the following month, as long as all the requirements for a GAP are in place.	
Data Systems	\$24,500	Renewal of software & maintenance as well as server use and data consultant services.	
Procedural Safeguards	\$11,000	As needed for contracted mediators, hearing officers & court reporter expenses for hearings. Funding to pay surrogate parent fees through PTI when needed.	
Supervision and Monitoring	\$239,050	Payment for parent members of monitoring teams, training & materials for providers related to self-assessment focused monitoring, & improvement planning. Funding for family survey (C4/SSIP).	
Assistive Technology	\$193,800	Funding to a non-profit agency that inventories, refurbishes, & recycles Birth to Three assistive technology devices & provides training on assistive technology for providers as well as assistance in making AT purchases.	
Family Support and Leadership	\$88,000	Funding for one or more parent organizations to provide a parent voice in Part C activities including training & to assist families with IDEA issues and sponsor. Reflective Supervision Groups. Production of, parent rights and SOP brochures & family stories in various languages to inform them about the early intervention system, their rights, & the transition process.	
Technical Advisors	\$18,000	Funding for the availability of a Board-certified Developmental Pediatrician to advise the early intervention system on all medical & health issues, including eligibility for children with diagnosed conditions. The pediatrician consults with other sub specialists as needed.	

Major Activity/ Expense	Part C Funds to be Spent	Description of Activities/Expenses (include whether it is for the Lead Agency or SICC)	Prior Approval Needed
Training and Technology	\$475,000	Funding to scale up evidence supported practices as part of Personnel Development for the SSIP. Funding to address issues of recruitment & retention; credentialing of early intervention service providers; targeted technical assistance & in-service training for early intervention service providers & program directors. LMS and TWW	
Public Awareness	\$236,000	Funding to support Education and Outreach activities related to the SSIP. Costs for production of child find materials in various languages; outreach events & trainings to increase primary referral sources' awareness of early intervention services, referral mechanisms, & the eligibility criteria including central intake office's ability to offer ASQ development monitoring services. Website enhancements.	
ICC	\$15,000	Coordinating child find identification efforts, ensuring the timely provision and payment of early intervention services to eligible children and their families, advising on early childhood transition, support for the ICC (travel), or other implementation and development activities of the ICC	
Subtotal of amount under B:	\$2,647,308.65		

C. Direct Services (Funded by Federal IDEA Part C Funds)

When completing this section include:

- A description of any direct early intervention service that the State lead agency expects to provide to eligible children and their families with Federal IDEA Part C funds.
- The approximate amount for each direct service (States must disaggregate by service the approximate amount of Federal IDEA Part C funds expected to be expended for each direct service); and
- A subtotal of the amount.

Special Note: Amounts for Costs Other Than Direct Services

If contracts with EIS providers include amounts for costs other than direct services, the State should:

- report the amount and type of non-service expenses in Section III.B (along with all other maintenance and implementation activities for IDEA Part C incurred by the State lead agency and/or the SICC) **or**
- report the entire amount in Section III.C and insert a footnote in Section III.C to indicate the estimated amounts listed in that section that includes expenses for non-direct services. (Example: State contracts with EIS provider for occupational therapy (OT) services and training. Training amounts would be listed under Section III.B. and OT services under Section III.C or the entire amount would be placed in Section III.C and a footnote would specify that the estimated amount also includes training expenses. (This option may be helpful if the contractual amounts cannot be easily disaggregated.)

(Add rows as needed.)

Description of Each Direct Early Intervention Service	Approximate Amount of Federal IDEA Part C Funds to be Spent on Each Direct Service
Subtotal of amount under C:	\$0.00

D. Activities by Other State Agencies

If State agencies (other than the State lead agency) are to receive a portion of the Federal IDEA Part C funds and that amount is not already identified in Section III.C above, the State must include in this section:

- The name of each State public agency expected to receive funds.
- The approximate amount of funds each State public agency will receive; and
- A summary of the purposes for which the funds will be used.

Provide subtotal of amount. *(Add rows as needed.)*

State Agency Receiving Funds	Amount of Funds	Purpose
Subtotal of amount under D:	\$0.00	

E. Description of Optional Use of IDEA Part C Funds⁴

In addition to using Federal IDEA Part C funds to maintain and implement the statewide system of early intervention, States may use funds for:

- expanding and improving on services for infants and toddlers and their families that are otherwise available; and
- initiating, expanding, or improving collaborative efforts related to at-risk infants and toddlers in any State that does not provide services for at-risk infants and toddlers. The application must include:
 - The name of the major activity.
 - The approximate amount of funds to be spent; and
 - A description of the activities.

Provide subtotal of amount. *(Add rows as needed.)*

Major Activity	Part C Funds to be Spent	Description of Activities
Subtotal of amount under E:	\$0.00	

⁴ See IDEA section 638.

F. Totals

Enter the subtotal amounts for Sub Sections A-E found in Section III and any indirect costs charged as specified in Section IV.B. The subtotal amounts (Rows 1-6) should total the estimated grant application amount. (A State may apply for less than the full estimated allotted amount.)

Row No.	Section	Amount
Enter the subtotal amounts for Sub Sections A-E found in Section III of this application.		
1.	III.A.	\$2,153,279.35
2.	III.B.	\$2,647,308.65
3.	III.C.	\$0.00
4.	III.D.	\$0.00
5.	III.E.	\$0.00
Enter any Indirect Costs to be Charged (See Section IV.B of this application.)		
6.	IV.B	\$80,511.00
Total (Rows 1-6)		\$4,881,099.00

Will your lead agency use FFY 2024 federal IDEA Part C funds for subgrants? Yes: X No:

Engaging Part C State Interagency Coordinating Councils in Fiscal Discussions

CIFR *Practice Guides* help state staff understand how to implement the fiscal reporting requirements of the Individuals with Disabilities Education Act (IDEA). These guides are not an official interpretation of IDEA by the Office of Special Education Programs (OSEP) or the U.S. Department of Education.

Purpose

State Interagency Coordinating Councils (ICCs) advise state lead agencies (LAs) on IDEA Part C budgetary matters as detailed in 34 CFR §303.604. See CIFR's *Quick Reference Guide on the Fiscal Responsibilities of Part C State Interagency Coordinating Councils* for an overview of ICC roles. The strategies in this practice guide help Part C coordinators and other fiscal staff engage and support the ICC in meaningful ways on fiscal issues.

Considerations for Engaging Your ICC in Fiscal Discussions

Each year, the state LA completes Section III on the uses of Part C funds in its IDEA Part C grant application. As the state LA develops this section, the ICC can provide input on where those funds may best be allocated. When there are limited dollars, the ICC can also help determine how to use the available funds to preserve the integrity of services for the program's infants and toddlers with disabilities and their families and to ensure meaningful and productive use of funds. The following sections identify ways for the state LA to facilitate engagement with the ICC so it can better support these fiscal decisions.

Suggested Uses

- Share with your staff and ICC members to educate them on the ICC's role in supporting fiscal decisions.
- Examine your state's ICC activities and processes to determine if there are additional opportunities to engage your ICC.
- Use the data analysis questions provided in the guide to better understand your state's Part C fiscal system and service provision.



Build Fiscal Knowledge

To carry out duties related to advising and assisting the state LA on fiscal decisions, ICC members should have a general understanding of Part C fiscal requirements and how the Part C system in the state is funded. The state Part C coordinator and fiscal staff may provide an initial orientation for new ICC members, but educating the members on all aspects of the fiscal system and issues in the state is an ongoing process.

In particular, the state LA should inform ICC members of all possible funding sources that may be available to fund Part C services. A Part C coordinator should be knowledgeable of the funding sources used in their state to be able to fully explain the state’s Part C funding system to their ICC.

Table 1 shows examples of state and federal funding that may be available for the provision of services to infants and toddlers with disabilities and their families. These examples are not exhaustive, and each state LA should determine what pertains to their state’s particular situation.

Table 1. Examples of Funding for Part C Services

State funding	Federal funding
<ul style="list-style-type: none"> • Discretionary general funds allocated to the state LA • State funds earmarked specifically for the early intervention/Part C program (i.e., categorical funding) • Discretionary education funding used to provide services to infants and toddlers with disabilities and their families • State Medicaid match • State Child Welfare • State Temporary Assistance for Needy Families (TANF) • Special taxes or settlement funds (tobacco, marijuana, opioid, etc.) 	<ul style="list-style-type: none"> • IDEA Part C funds • Medicaid, State Children’s Health Insurance Program (SCHIP), Tricare • Block grants, including TANF, Child Care and Development Fund (CCDF), and Social Services Block Grant (SSBG) • Child Welfare • Maternal, Infant, and Early Childhood Home Visiting (MIECHV) • Early Head Start and Head Start • McKinney-Vento Education for Homeless Children and Youth (EHCY) Program and Title I Improving Basic Programs Operated by State and Local Educational Agencies, both part of the Every Child Succeeds Act (ESSA) • IDEA Part B funds set aside for administration of the Part C program¹

¹ Under certain circumstances, state educational agencies (SEAs) may set aside IDEA Part B funds for administration of the Part C program and support early intervention services. See 34 CFR 300.704 and 34 CFR 300.813-814.

Establish an ICC Fiscal Subcommittee

Due to the complexity of Part C funding, some states have found it beneficial to have an ICC subcommittee devoted specifically to reviewing fiscal matters. The members of such a subcommittee can delve more deeply into understanding how the Part C system in the state is financed and may determine whether all available funding sources are being utilized to their fullest. This subcommittee may then propose actions to the full ICC and state LA on possible ways to utilize the available funding more fully. In addition, the ICC fiscal subcommittee can make recommendations on how the ICC may spend the funds designated for council activities.

Fund ICC Activities

The state LA, in consultation with the ICC, should examine the amount of Part C funds set aside for ICC activities to maximize the supports available to the ICC and to ensure that the amount is allowable and adequate for ICC needs. Examples of allowable expenses for the ICC include reasonable and necessary expenses for attending council meetings and performing council duties, such as for child care and travel, and compensation to a member of the council if the member is not employed or must forfeit wages from other employment when performing official ICC business. Allowable meeting expenses include facility usage, professional services such as meeting facilitation, and food for working sessions. The Office of Management and Budget's (OMB's) *Uniform Guidance* has further information on allowable uses of funds (2 CFR §§200.432 and 200.475).

Opportunities to Engage Your ICC in Fiscal Discussions

There are opportunities for state LA staff to discuss the Part C budget with the ICC members throughout the year. Below are some examples of how state staff may engage their ICC members in discussions about fiscal matters.

Discussing Grant Budget

When Section III for the upcoming year's Part C grant application has been drafted, the state LA may provide a copy of the draft Section III to the ICC with the detailed categories prior to the public participation period. Understanding how IDEA funds are spent to support the early intervention system will enable the ICC to help the state LA make informed budget decisions and prepare for changes in funding levels from all sources. Input from ICC members may help the state identify and resolve potential concerns and anticipate the impact of proposed changes. When involving the ICC in fiscal discussions, it is important to consider how the information is presented and what input is most helpful to decision-making. Below are questions that the state LA may consider in how to present information or use with the ICC to prompt discussion on the budget.

Funding and Spending

- » How does Section III of the grant application fit into the overall budget for the early intervention system?
- » Is there sufficient funding to keep up with anticipated expenses?
- » Is the state LA proposing to make changes to how the funds are spent (e.g., is more needed for a new data system or for more professional development)?

Data

- » How are proposed changes presented, and what input is desired from the ICC? Possible questions to direct to ICC members include the following:
 - What impact will these changes potentially have on families and children?
 - Will the proposed changes impact other state agencies, and, if so, in what way(s)?
 - How will the proposed changes impact providers?
- » While the entirety of Section III of the Part C grant application must be available for public comment for 60 days, how much detail should be included about the data used to develop this section?

Changes to Policies and Procedures

- » Are there proposed changes to policies and procedures that will impact how Part C funds are used?

To support these discussions for the upcoming fiscal year, it might be useful for the state LA to prepare a data visualization that highlights the differences between the previous year's expenditures and year-to-date expenditures, as well as funding trends. Such an examination could illustrate

- » areas that are expected to be underspent or overspent in relation to the amounts submitted in the prior grant application and
- » whether the state received a smaller or larger allocation than in previous years and how those differences inform the upcoming fiscal year's budget.

Accessing Funding Sources

To ensure that each funding source is being fully utilized, the state LA may pose questions to the ICC to generate discussion on factors that may be influencing how well a given funding source is being accessed.

One example could be the use of funds from Medicaid, which is a common funding source for early intervention services. Under the payor of last resort requirement (34 CFR §303.510), Medicaid funds must be used prior to using any federal Part C funds. There may be situations in which Medicaid may not be fully utilized. Discussions with the ICC members may help to highlight potential barriers that need to be addressed to access Medicaid funding more fully and ensure that there are adequate resources to support the whole Part C system in the state.

These questions about using Medicaid funds to support Part C services may be helpful in an ICC discussion:

- » What percentage of children in the Part C program have Medicaid as a funding source?
- » What percentage of children's direct services in the Part C program are billed to Medicaid?
- » What are potential impacts when Medicaid is not maximized (e.g., impact on the number of service hours or outcomes)?

- » Does the percentage of direct services billed to Medicaid align with the percentage of children who have Medicaid listed as a funding source?
- » If there is a difference, what may be the cause(s)? Some possibilities may include:
 - families with private insurance in addition to Medicaid,
 - services that are not covered by Medicaid, or
 - providers who are not enrolled in or able to bill Medicaid.

Streamlining Services and Anticipating Need

The ICC, which includes many key funding partners, in collaboration with the state LA could examine additional funding sources and how those sources might be braided² with early intervention dollars for seamless and streamlined services while avoiding duplication of services. Examples of some of these funding sources include TANF, PDG, or Early Head Start/Head Start funds.

The following analyses may inform these discussions:

- » tracking the number of children in the Part C state program over time to identify changes in demand and needs
- » determining the average number and type of services on Individualized Family Service Plans (IFSPs) to assist with forecasting future expenditures
- » identifying funding sources to determine the amount of nonfederal funds used for the state Part C program and identifying the amount of federal funds needed to fully fund the program
- » determining the average rate or cost paid for different disciplines and services to allocate the correct amounts in Section III of the annual grant application

These analyses can support ICC members' understanding of funding needs for upcoming years and may support their ability to assist the state LA in planning for fiscal needs into the future. The data for such analyses can be displayed in several ways to encourage meaningful dialogue. The Center for IDEA Data Systems (DaSy) has a fiscal data use toolkit, called *Understanding and Using Fiscal Data: A Guide for Part C Staff* (see *Resources*), which includes examples of how fiscal data can be displayed.

² Braiding is when funds from multiple sources support a program and each dollar can be tracked by funding source.

Resources

- » IDEA Regulations Subpart G — State Interagency Coordinating Council
<https://sites.ed.gov/idea/regs/c/g>
- » OSERS Grantee Letter and FAQ on Prior Approval (October 29, 2019)
<https://www2.ed.gov/policy/speced/guid/faq-prior-approval-10-29-2019.pdf>
- » Quick Reference Guide on the Fiscal Responsibilities of Part C State Interagency Coordinating Councils
<https://cifr.wested.org/resource/qrg-icc/>
- » Quick Reference Guide on the Use of IDEA Part C Funds
<https://cifr.wested.org/resource/quick-reference-guide-on-the-use-of-idea-part-c-funds/>
- » Understanding and Using Fiscal Data: A Guide for Part C Staff
<http://olms.cte.jhu.edu/olms2/DaSyFinance>

For additional resources, please visit CIFR at <http://cifr.wested.org> or contact us at cifr_info@wested.org.

The Center for IDEA Fiscal Reporting (CIFR) is a partnership among WestEd, AEM Corporation, American Institutes for Research (AIR), Emerald Consulting, the Frank Porter Graham Child Development Institute at the University of North Carolina at Chapel Hill, the Center for Technical Assistance for Excellence in Special Education (TAESE) at Utah State University, and Westat. The Improve Group is CIFR's external evaluator.

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Project Officers: Jennifer Finch and Charles Kniseley. February 2023

Suggested Citation: Center for IDEA Fiscal Reporting. (2023). *Engaging Part C state Interagency Coordinating Councils in fiscal discussions*. WestEd.

AUGUST 2022

Quick Reference Guide on the Fiscal Responsibilities of Part C State Interagency Coordinating Councils

CIFR's quick reference guides help states and other stakeholders better understand the basics of fiscal reporting requirements in the Individuals with Disabilities Education Act (IDEA). These guides are not an official interpretation of IDEA by the Office of Special Education Programs (OSEP) or the U.S. Department of Education.

What is a state Interagency Coordinating Council?

Each state that receives IDEA Part C funds is required to have an Interagency Coordinating Council (ICC) appointed by the governor. The IDEA regulations in 34 CFR §303.601 detail the membership requirements of the ICC. The composition of the ICC must reasonably represent the state. Notably, at least 20 percent of the members must be parents, and at least 20 percent must be providers of early intervention services. Other required members include representatives from the state legislature and from state-level agencies responsible for Medicaid, the regulation of private insurance, and state child welfare. The diverse membership of the ICC is necessary to ensure that there are stakeholders who represent every facet of the early intervention system, including families. See 34 CFR §303.601 for a full list of required ICC members.

The ICC meets at least quarterly to advise and assist the state lead agency (LA) administering the Part C program in carrying out its responsibilities. This quick reference guide focuses only on the fiscal responsibilities of the ICC, which include advising and assisting the state LA in making fiscal decisions. See 34 CFR §303.604(b) and (c) for other responsibilities.

Why is the Interagency Coordinating Council important when discussing fiscal matters?

Under IDEA Part C, the state LA is required to “facilitate the coordination of payment for early intervention services from federal, state, local, and private sources” (including public and private insurance coverage) (34 CFR §303.1(b)). This is known as the “system of payments” for a Part C program. The members of the ICC are expected to advise the state LA in making financial and programmatic decisions that support a coordinated and effective early intervention system.

Functions of the Council

- (a) Advising and assisting the lead agency.** The Council must advise and assist the lead agency in the performance of its responsibilities in section 635(a)(10) of the Act, including—
- (1) Identification of sources of fiscal and other support for services for early intervention service programs under part C of the Act;
 - (2) Assignment of financial responsibility to the appropriate agency;
 - (3) Promotion of methods (including use of intra-agency and interagency agreements) for intra-agency and interagency collaboration regarding child find under §303.115 and 303.302, monitoring under §303.120 and §303.700 through 303.708, financial responsibility and provision of early intervention services under §303.202 and 303.511, and transition under §303.209; and
 - (4) Preparation of applications under this part and amendments to those applications.

34 CFR §303.604(a)(1-4)

What is the role of the Interagency Coordinating Council in relation to state lead agency fiscal responsibilities?

The state LA has a number of fiscal responsibilities as it administers the Part C grant, and the ICC advises the state LA in that work. Specifically, the ICC provides input on the available sources of revenue that may be used for early intervention. These sources may include state funds, local funds, insurance (public and/or private), and/or funds from federal programs. The ICC also has the responsibility of providing feedback and guidance to the state LA on the yearly grant budget. This is especially important when the state LA is experiencing either unanticipated additional funding or a funding shortfall. Finally, the state LA may use IDEA Part C funds to support the ICC's work, as described below.

How can Part C funds be used to support the Interagency Coordinating Council work?

ICC members are generally expected to serve without compensation. As described in 34 CFR §303.603(a), an ICC may use IDEA Part C funds to conduct hearings and forums to obtain stakeholder feedback on changes that may potentially impact the budget. The ICC may also reimburse members for reasonable and necessary expenses for attending ICC meetings and performing their duties. Reimbursements may include transportation, lodging, meals, and childcare for parent members. If an ICC member is not employed or must forfeit wages from other employment when performing official business, the ICC may pay compensation for the member's involvement using IDEA Part C funds. These provisions support the involvement of a wide variety of individuals, including families. An ICC may also use funds to hire staff or obtain the services of professional, technical, and clerical personnel as may be necessary to carry out the performance of its functions. These professional services may help the ICC to maintain a level of independence from the state LA, allowing for objectivity in its advisory and assisting roles (e.g., independent strategic planning meeting facilitator).

Questions for states to consider

What level of fiscal knowledge is important for an Interagency Coordinating Council member to have?

To fully participate in budget discussions, ICC members must have a basic understanding of the funding of IDEA Part C services. A state LA may provide this foundational information as part of the orientation of new ICC members and reinforce the information at regularly scheduled ICC meetings.

When should staff request input from the Interagency Coordinating Council on the state Part C budget?

When preparing the grant budget for broad stakeholder feedback, state LA staff should seek ICC members' input. Other opportunities for input may include when fiscal decisions need to be made about a funding surplus, a funding shortfall, or the movement of funds between line items. When extraneous factors, such as public health emergencies or natural disasters, impact funding, the ICC can help examine the actions the state LA might take to mitigate the effects. States with complex revenues and budgets may benefit from creating a fiscal subcommittee within the ICC to develop greater financial knowledge across stakeholders and to support compliance with federal requirements.

Use of Funds by the Council

- (a) Subject to the approval by the Governor, the Council may use funds under this part to—
- (1) Conduct hearings and forums;
 - (2) Reimburse members of the Council for reasonable and necessary expenses for attending Council meetings and performing Council duties (including childcare for parent representatives);
 - (3) Pay compensation to a member of the Council if the member is not employed or must forfeit wages from other employment when performing official Council business;
 - (4) Hire staff; and
 - (5) Obtain the services of professional, technical, and clerical personnel as may be necessary to carry out the performance of its functions under part C of the Act.

34 CFR §303.603(a)

How can the Interagency Coordinating Council provide input on equitable use of funds?

The ICC should be comprised of a diverse membership that represents every facet of the Part C system in the state. In their role, ICC members should provide input on whether and how funds are being used equitably across the state. If an area of the state is identified as being underserved, the state LA should work with the ICC to discuss possible solutions.

Resources

- ECTA's Part C Fiscal 101 Training Modules: Module #1 "Overview of Fiscal Requirements" (2018)
<https://ectacenter.org/~pdfs/topics/finance/fiscal101/Overviewslidesandnotes.pdf>
- IDEA Part C and its implementing regulations ([34 CFR part 303](#))
- OSEP State Advisory Panels (SAP) & State Interagency Coordinating Councils (SICC)
<https://osepideasthatwork.org/resources-grantees/sap-sicc>
- State Advisory Panel, State Interagency Coordinating Council: Capacity Building Webinar (2019)
<https://osepideasthatwork.org/find-a-resource/1-31-2019-webinar-building-capacity>

For additional resources, please visit CIFR at <http://cifr.wested.org> or contact us at cifr_info@wested.org.



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Project Officers: Jennifer Finch and Charles Kniseley. August 2022.

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OEC Birth to Three System Direct Service Expenditures¹

Invoice	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-24	Apr-25	May-25
Paid in	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-24	Feb-25	Mar-25	Apr-25	May-25	Jun-25
Escrow	1,953,978	1,839,067	1,977,228	1,597,731	1,889,396	1,648,775	1,943,020					
GAP	1,074,400	1,122,600	1,164,400	1,077,400.00	1,093,200.00	1,063,400.00	1,045,800.00					
Interpretation	54,872	105,894	107,569	68,591.60	172,844.68	101,485.23	123,384.50					
ATech + Other	23,852	34,041	30,109	33,000.00	39,261	50,952	55,298					
Total	3,107,102	3,101,601	3,279,307	2,776,722.40	3,194,701.67	2,864,612.00	3,167,502.14					

Commercial Insurance Payments²

	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25
Claims Paid	\$ 338,792.40	\$ 365,499.83	\$ 99,404.02	348,756	325,062	331,865	414,740					
Amount Billed	\$ 932,328.00	\$ 1,023,042.00	\$ 934,953.00	888,876	940,422	848,820	932,496					
%Paid/Billed	36%	36%	11%	39%	35%	39%	44%					
Billing Fees	-	88,317.43	-	22,849.91	28,671.36	52,887.98	-					

*Note: January will change - incomplete month at the time the data was pulled.

Birth to Three Funding:	
State Appropriation	33,293,626
Part B Evaluations	1,876,660
Part C for Direct Services	1,758,000
Total Funding	36,928,286
Surplus (Deficit)	(1,452,535)

Direct Service Hours						
FY	20 Act.	21 Act.	22 Act.	23 Act.	24 Act.	25 Est.
Jun	39,459	33,683	34,276	39,605	43,921	41,633
Jul	42,673	34,273	32,815	36,033	39,425	45,006
Aug	41,179	30,114	33,879	40,831	44,786	43,097
Sept	42,384	31,226	33,868	38,246	39,281	41,605
Oct	44,791	31,724	34,088	38,367	43,667	46,427
Nov	38,150	29,208	33,941	38,327	41,876	39,770
Dec	49,433	30,734	30,902	35,619	36,489	37,076
Jan	42,772	30,865	33,140	41,201	45,151	46,279
Feb	41,300	30,888	35,092	34,875	42,400	43,459
Mar	32,283	35,848	41,678	46,094	44,002	45,102
Apr	33,630	31,892	36,031	39,656	44,783	45,902
May	32,416	31,720	37,926	45,356	46,385	47,545
Total	480,470	382,171	417,634	474,209	512,165	523,369
% Chg	357.36%	-20.46%	9.28%	13.55%	8.00%	2.19%

Actual
Estimated

- 1) Based on Budget Tracking system as of February 2024
- 2) Based on data from PCG using date paid not date of service
Values in grey are being double checked with PCG.
- 3) Based on monthly estimates by the OEC including a list of assumptions and data that change frequently
- 4) Based on reconciled invoices (actual) and estimates using a list of assumptions using available information

Connecticut Office of Early Childhood Birth to Three System Monthly Enrollment Data - For Meeting 2/10/25*

	Jan 2024	Feb 2024	Mar 2024	April 2024	May 2024	June 2024	July 2024	Aug 2024	Sept 2024	Oct 2024	Nov 2024	Dec 2024
Calls to 211CDI	1315	1129	1160	1242	1663	1305	1259	1196	1156	1283	1160	1071
Percent compared to CY2019 average (1113)	118%	101%	104%	112%	149%	117%	113%	107%	104%	115%	104%	96%
<i>Families declining the referral to B23¹</i>	189	148	102	204	230	233	250	187	177	230	188	168
Percent compared to CY2019 average (199)	95%	74%	51%	103%	116%	117%	126%	94%	89%	116%	94%	84%
Percent of calls to 211CD (CY2019 average was 17%)	14%	13%	9%	16%	14%	18%	20%	16%	15%	18%	16%	16%
Referrals to Birth to Three	1112	919	947	1038	1432	1072	1009	1009	978	1052	972	885
Percent compared to CY2019 average (913)	122%	101%	104%	114%	157%	117%	111%	111%	107%	115%	106%	97%
<i>Families declining eligibility evaluations²</i>	73	68	60	61	90	79	110	85	87	100	78	92
Percent compared to CY2019 average (67)	109%	101%	90%	91%	134%	118%	164%	127%	130%	149%	116%	137%
Percent of B23 referrals (CY2019 average was 7%)	7%	7%	6%	6%	6%	7%	11%	8%	9%	10%	8%	10%
Initial Eligibility Determinations	947	915	961	916	1032	1075	1056	897	926	1027	777	854
Percent compared to CY2019 average (843)	111%	107%	112%	107%	121%	126%	124%	105%	108%	120%	91%	100%
Determined to be Eligible	658	634	622	639	694	728	694	627	653	730	526	592
Percent compared to CY2019 average (570)	115%	111%	109%	112%	122%	128%	122%	110%	115%	128%	92%	104%
Percent Eligible	69%	69%	65%	70%	67%	68%	66%	70%	71%	71%	68%	69%
Percent compared to CY2019 average (68%)	1%	1%	-3%	2%	-1%	0%	-2%	2%	3%	3%	0%	1%
<i>Families leaving Part C in the month before an initial IFSP meeting³</i>	22	33	28	31	36	23	40	25	21	34	24	15
Percent compared to CY2019 average (55)	40%	60%	51%	56%	65%	42%	73%	45%	38%	62%	44%	27%
Percent of B23 those eligible (CY2019 average was 10%)	3%	5%	5%	5%	5%	3%	6%	4%	3%	5%	5%	3%
Initial IFSP meeting held during the month	587	591	623	601	631	649	699	620	634	684	557	564
Percent compared to CY2019 average (516)	114%	115%	121%	116%	122%	126%	135%	120%	123%	133%	108%	109%
<i>Families leaving Part C after the initial IFSP meeting but before EITS³</i>	6	8	6	6	11	7	11	7	13	16	7	8
Percent compared to CY2019 average (15)	40%	53%	40%	40%	73%	47%	73%	47%	87%	107%	47%	53%
Percent of all Exits	1%	1%	1%	1%	2%	2%	3%	1%	2%	2%	1%	2%
Eligible children who received an EITS in the month	6771	6710	6885	6947	6967	7066	7375	7522	6949	7104	6890	6680
Percent compared to CY2019 average (5177)	131%	130%	133%	134%	135%	136%	142%	145%	134%	137%	133%	129%
Average hours per child per month	5.6	5.3	5.4	5.4	5.7	5.0	5.2	5.0	5.1	5.5	4.9	4.6
Percent compared to CY2019 average (7.3)	77%	73%	74%	74%	78%	68%	71%	68%	70%	75%	67%	63%
Eligible children with an ASD diagnosis who received an EITS in the month	836	867	906	894	898	947	887	931	816	829	820	787
Percent compared to CY2019 average (676)	124%	128%	134%	132%	133%	140%	131%	138%	121%	123%	121%	116%
Average hours per child per month	11.7	10.8	11.0	10.7	11.5	9.6	10.1	9.6	10.2	11.2	9.9	9.2
Percent compared to CY2019 average (24.9)	47%	43%	44%	43%	46%	39%	41%	39%	41%	45%	40%	37%
Eligible children without an ASD diagnosis who received an EITS in the month	6000	5906	6031	6108	6117	6155	6533	6629	6184	6342	6117	5935
Percent compared to CY2019 average (4529)	132%	130%	133%	135%	135%	136%	144%	146%	137%	140%	135%	131%
Average hours per child per month	4.7	4.4	4.5	4.6	4.8	4.2	4.6	4.3	4.3	4.7	4.2	4.0
Percent compared to CY2019 average (4.7)	100%	94%	96%	98%	102%	89%	98%	91%	91%	100%	89%	85%

Connecticut Office of Early Childhood Birth to Three System Monthly Enrollment Data - For Meeting 2/10/25*

	Jan 2024	Feb 2024	Mar 2024	April 2024	May 2024	June 2024	July 2024	Aug 2024	Sept 2024	Oct 2024	Nov 2024	Dec 2024
Children in families who exited before age 3³	202	175	187	189	245	234	217	255	194	218	163	151
Percent compared to CY2019 average (224)	90%	78%	83%	84%	109%	104%	97%	114%	87%	97%	73%	67%
Children in families who exited at age 3⁴	398	370	418	415	208	171	182	1073	523	464	405	355
Percent compared to CY2019 average (322)	124%	115%	130%	129%	65%	53%	57%	333%	162%	144%	126%	110%
Children in Families who exited at age 3 as eligible for Part B	247	242	270	257	76	59	70	947	351	282	248	240
Percent compared to CY2019 average (225)	110%	108%	120%	114%	34%	26%	31%	421%	156%	125%	110%	107%

data as of 1/27/25*

All counts are counts of cases and include may include referrals within 45 days of age 3.

- 1) includes parent declined, referred to LEA, DCF no concerns and unable to contact
- 2) includes parent declined, moved out of CT, deceased and unable to contact
- 3) EITS stands for Early Intervention "Treatment" Services vs EIS (also evaluations, assessments, and IFSP meetings)
- 3) includes parent withdrew, moved out of CT, deceased and unable to contact
- 4) includes eligible for Part B, not eligible, and eligibility not determined/LEA not included