



MICHIGAN ASSOCIATION OF INTERMEDIATE SCHOOL ADMINISTRATORS

Early On Redesign **Issues and Recommendations**

This is a critical time for public education and human services. With severe budget shortfalls at every level, decisions must be made with extreme care. Redesigning a system as complicated as Michigan's *Early On* early intervention program is a monumental task, which requires a great deal of input and thought to do well. While we support the philosophy of the current *Early On* plan, which is intended to provide an optimum level of service to every child experiencing delays, there are several issues that make it very difficult to implement successfully. Therefore, the MAISA Early Childhood Committee encourages the State Interagency Coordinating Council (SICC) to consider the following issues and recommendations as the redesign process moves forward.

Funding

Issues

- *Early On* was originally designed to **coordinate** services already provided by other agencies. It was not designed to provide **direct** services. In the past fifteen years, there has never been adequate funding to provide the level of service required for the number of children eligible for this program. Funding is insufficient, even when ISDs have supplemented *Early On* dollars with other resources.
- Adopting additional proposed indicators to those recommended by the Office of Special Education (OSEP) would cost additional dollars, resulting in increased unfunded mandates by the state.
- The funding allocation for the state of Michigan included in the Reauthorization of IDEA is based on new census data. Since Michigan's general population has decreased, its federal allocation for *Early On* has decreased.

Recommendations

- Match the level of funding with the level of service requirements.
- Identify funding streams through the proposed fiscal study and maximize multiple funding streams across agencies.

Eligibility

Issues

- Michigan currently has one of the most liberal eligibility requirements in the nation, i.e., “a developmental delay” is sufficient to qualify a child for Part C services. *Early On* cannot provide service for all children with any level of delay, especially when the level of delay may not be statistically significant.

Recommendation

- Redesign the eligibility criteria so they result in a more effective use of limited resources in coordinating services to children with developmental delays eligible for Part C of IDEA 2004.

Partnerships/Collaboration

Issues

- Funding cuts have resulted in a reduction of services provided by *Early On* partners at the local level.
- Excessive state regulations, procedures and paperwork have created a system that eliminates participation from partner agencies. They simply do not have the time or resources to comply with all of the *Early On* requirements and paperwork.
- New legislation, such as the Child Abuse Prevention and Treatment Act (CAPTA), has added responsibility to the *Early On* system to evaluate additional children for possible services.

Recommendations

- To encourage participation of partner agencies, develop or identify common paperwork and forms that satisfy all agencies’ requirements.
- Support the development and engagement of new statewide collaborative agreements that realistically articulate meaningful accountability from and between participating agencies, as these become the foundation for addressing funding, resource, regulatory and accountability components of a statewide plan.

Accountability

Issues

- Part C of the reauthorization of IDEA 2004 has increased accountability standards for funded programs. For example, in addition to monitoring for compliance of programs and services, there will also be increased emphasis on improved child and family outcomes. The monitoring standards, which are redundant and seem excessively disproportionate to the length of the law, were written prior to IDEA 2004 and should be revisited due to the extent of the revisions in Part C.

- The proposed indicators exceed the recommendations of OSEP, would be difficult to measure without new infant and toddler assessments or costly data collection systems, and increase the paper, documentation, and financial burden on an already over-taxed system.

Recommendation

- Create a seamless monitoring process of services in both Part C and Part B Continuous Monitoring Process (CIMS).

The Redesign Process

Issues

- Intermediate School Districts (ISDs) have the responsibility for implementation of Part C of IDEA, so the level of representation on the *Early On* Redesign Committee and subcommittees must be proportionate to the degree of ISD responsibility.

Recommendation

- Continue to have representation commensurate with the level of responsibility for implementation.
- Ensure that ISDs representing diverse geographical areas, size, ethnic and cultural groups, and educational disciplines are represented on decision-making committees.

Summary

In conclusion, the Michigan Association of Intermediate School Administrators appreciates the hard work of the committees in addressing the many complex issues related to *Early On*. We support all efforts to simplify and streamline the *Early On* process.