

TRANSITION

Transition Plan/Transition Planning Conference

Q1. Are providers REQUIRED to attend transition meetings/aka transition planning conferences, or must they merely be invited? Is a report required if a provider cannot attend? Would submitting a progress note be acceptable for the conference?

A1. Providers with direct involvement in conducting evaluations or assessments and, as appropriate, providers who will be providing EI services must participate in the Transition Planning Conference (aka transition meeting) but if unable to attend in person, arrangements must be made for the person's involvement through other means, including one of the following: participating in a telephone conference or have a knowledgeable equally-qualified provider attend the meeting or making pertinent records available at the meeting. If one of these cannot attend, the attempts to secure their attendance should be documented in case notes.

Q2. May a single member of a team attend the conference to represent the team as a whole?

A2. See answer to question 1 above. The intent of the law, recommended practice, and what we know from experience is that it is better for children and families to have all members of the team present at the transition conference.

Q3. What differentiates the transition plan meeting from the Transition Planning conference?

A3. A transition plan can be developed as an IFSP outcome not fewer than 90 days before the child's third birthday and, at the discretion of all parties, not more than 9 months before the toddler's third birthday. The **transition plan** should include the steps and any services necessary to ensure a smooth transition including:

1. Discussions with, and training of, parents (as appropriate) regarding future placements and other matters related to the child's transition;
2. Procedures to prepare the child for changes in service delivery, including steps to help the child adjust to, and function in, a new setting;
3. Confirmation that child find information about the child has been transmitted by the DHS to the LEA including:
 - a. Listing the same date in PA34 screen in Cornerstone for a child referred more than 45 days before his/her third birthday, or
 - b. If the child has been referred fewer than 45 days before his/her third birthday, and parental consent was received, list the date the Service Coordinator sent the *Early Intervention to Early Childhood Tracking* form to the LEA.
4. Confirmation that additional information needed by the LEA to ensure continuity of services from the Part C program to the Part B program has been sent to the LEA, listing the same date in Cornerstone that the referral packet was sent.
5. Identification of transition services and other activities that the IFSP team determines are necessary to support the transition of the child.

The **transition planning conference** must occur up to 9 months, but no less than 90 days before the child's third birthday. The IFSP meeting for the transition plan and the transition planning conference

could be combined and used to develop the child's transition plan and include the LEA. The following activities must occur:

- Provide parents with information about preschool services under Part B including:
 - A description of Part B eligibility definitions;
 - State timelines and processes for consenting to an evaluation and conducting eligibility determinations under Part B; and
 - The availability of special education and related services.
 - Record the meeting in Cornerstone Case Notes as well as complete the necessary fields on the PA34 screen in Cornerstone.
 - Document in case notes efforts to obtain LEA participation. Whether or not the LEA participates, the conference must occur.

Q4. Could "Review the Educational Rights & Responsibilities book" be written in as a strategy on the transition plan with an EI provider listed directly?

A4. Since the transition plan can include "Discussions with, and training of, parents (as appropriate) regarding future placements and other matters related to the child's transition", it is possible that a review of the Educational Rights & Responsibilities book is a strategy that the team decides to include. The plan would also include who on the team (the specific individual's name) is responsible for implementation of the strategy.

Q5. Is there a timeline when the transition plan meeting (TPC) has to be done?

A5. Yes, it is found in 13.3.1. With Consent, a TPC is convened not fewer than 90 days or not more than 9 months before the child's 3rd birthday.

Q6. When are we supposed to complete the Transition Planning Conference?

A6. Per 13.4.1, "With the consent of the family, a transition planning conference is convened for all toddlers that may be eligible for preschool services under Part B not fewer than 90 days and, at the discretion of all parties, not more than 9 months before the child's third birthday to discuss any services the toddler may receive under Part B."

Q7. We would like to just clarify the difference between the transition planning conference and transition conference call. Is the LEA rep required to attend a TPC?

A7. There is no requirement for a transition conference call, but in some parts of the state, this is how the LEA participates in the transition planning conference. Per 13.4.4, "The LEA has an obligation under the law to participate in transition planning conferences. Case notes must reflect efforts to obtain LEA participation. Whether or not the LEA participates, the conference must occur."

Q8. Do we still have to do a 2.6 meeting if LEA is not available for 2.9 meeting? Wouldn't you be covering the same information if the LEA is not there?

A8. The three requirements of a child who is exiting EI (with transition to LEA) would be to have a Transition Plan IFSP meeting (not less than 90 days but not more than 9 months before 3), a Transition Planning Conference with the LEA (not less than 90 days but not more than 9 months before 3) and an EI Exit IFSP meeting (no more than 120 days prior to 3). These three meetings can be combined into one if appropriate and convenient for all parties.

Q9. What does "reasonable efforts" mean?

A9. "Reasonable efforts" may vary across CFCs based on their relationship with the LEA and knowing what typically works for their area. The CFC should make efforts to maximize participation and document any attempts to contact the LEA and secure participation in the service coordinator's case notes.

Documenting Transition Activities- PA34

Q10. When a parent initially declines transition, but then changes his/her mind, how do we document on the PA34? How is that reflected on monthly stats?

A10. Events should be documented accurately as they occur. SC case notes will help explain edits to this screen. For statistical purposes this will potentially be a late transition. However, if "delayed" when family changes their mind after originally declining, the SC should also enter the Family Delay code appropriately so we can track which conferences are late due to family delay. This is a different circumstance and code from a family who didn't have a timely transition conference due to Family Exceptional Circumstances.

Q11. Could there be something added to the PA34 stating family initially declined, but changed mind at later date?

A11. This could be considered, but per federal regulations, it still would not be counted as a timely transition in the current system. The OSEP is speaking of potential changes in the future and encouraged us to add language in the APR to accommodate this factor.

Q12. Is it necessary to complete the PA34 as activities occur, or is it permissible to complete it in its entirety upon file closure?

A12. The PA34 should be updated as activities occur according to the Procedure Manual. If, however, this doesn't occur, the PA34 must be completed prior to case closure as it contains important information for federal reporting.

Q13. If a family was enrolled in EI prior to 90 days but didn't consent to transition until after the 90 day cut-off, what is the appropriate code to use for delay on the PA34?

A13. If a parent didn't "decline" transition, then the SC should enter a delay code on the PA34 for the question "LEA/EI Transition did not occur (consenting families only) OR was delayed (occurred <90 days

from 3):” as 04 – School District Delay (i.e., scheduling caused the delay), 06 – CFC Delay (i.e., SC failed to establish timely), 07 – Family Delay (i.e., family wasn’t sure, forgot to respond), 08 – Family Exceptional Circumstances (i.e., major illness, serious weather conditions), as appropriate. Given that there will be a percentage of families who enter EI, for example, 93 days before their child turns 3. This is not a large percentage but clear information in Cornerstone and case notes will document what actions were taken.

Consent

Q14. Are we still required to enter the child into Cornerstone if they are referred less than 45 days before his/her third birthday?

A14. In section 7.6.5: “For children who will turn 3 years old in less than 45 days, accept the referral and proceed with the following step: Do not enter the child's information into the Cornerstone system, unless the Service Coordinator has obtained a signed CFC Consent to Use Personally Identifying Information (PII) & Bill Public Benefits form.”

Q15. If a parent does not sign the consent for the school, then does SC still send the top portion of EI tracking form to school?

A15. If the parent does not sign consent, you do not need to send the top portion of the EI to EC Tracking form. In these instances, the 27 month list serves as the Child Find notification.

Q16. Why is consent needed if referring families to other community resources if referred after 45 days?

A16. If the family is not participating in EI, no consent is needed since the CFC will not be making the referrals. In these instances, CFCs will not be directly sharing a family’s information with another entity, but they can and should provide information to these families so they can seek additional community resources that may be available to assist them and their children. See Chapter 14.4 for additional information.

Q17. Has the Consent for Release for LEA changed? Can you clarify how long the consent for release is good for?

A17. The CFC Consent for Release of Information form has not changed. Section 13.1.1 of the Procedure Manual clarifies that the CFC Consent for Release of Information should be used to obtain parental consent for the sharing of transition information with the LEA and/or other community programs. The Procedure Manual recommends obtaining consent for a period that includes three months after the child turns 3 in order to facilitate any necessary post-transition communication.

Q18. So consents don't expire when the IFSP is done?

A18. The various consents utilized in Early Intervention have different expiration dates. Consents related to insurance use and services are tied to the IFSP year. Consents for release of information can be set to expire based on the wants/needs of the family. There is a section that identifies how long the disclosure is valid that should be completed each time the family is asked to sign. The consent for release of information for children with identified hearing loss specifies that it is valid for 365 days following parental signature.

Q19. In the event a family does not consent to transition, but the LEA has the child's basic information [from child find], will they be contacting the family anyway? Should we be letting families know they may get a call?

A19. Since LEAs differ in the way they handle this type of contact with families, it would be best practice to inform families that they “may” get a call from their LEA based on information provided to the LEA to fulfill federal Child Find requirements.

27 Months List

Q20. Can we provide updates or corrections to this information (27 month ISBE list) even without consent from the family?

A20. Since to place a name on the 27 month ISBE list does not require parental consent, a correction or update to information on that list does not require parental consent either. There is not a formal process for this kind of updating, so CFCs may need to contact the district directly to provide corrected/updated information.

Q21. Who is the "Dept." noted in section 13.2.1? Is it DHS?

A21. Yes, “Dept.” stands for Illinois Department of Human Services or IDHS. This is in reference to the 27-month list.

Q22. I was wondering if the Bureau has knowledge of a statement made on the letter that goes along with the list to districts that states the IEP/Eligibility can be determined on the child's 3rd birthday. This has caused confusion with districts since we are telling them their DOB is too late.

A22. Thank you for that information. The Bureau has followed up with ISBE to ensure verbiage is correct and compliant with Part C and Part B/619 Regulations.

IEP Meetings

Q23. We have some providers who have stated that as of November 1st that they are mandated to attend the IEP. Is this true?

A23. Providers are not mandated to attend the IEP, but they may do so as a support to the family when the IEP meeting occurs prior to the child’s third birthday.

Q24. Can you clarify how much time a provider should receive for attending the IEP meeting? How is this attendance authorized? In Chicago, the LEA has combined meetings that could last up to 4 hours.

A24. The provider can be paid for IEP attendance when the meeting occurs prior to the child’s third birthday. It is authorized as a Direct Service – IFSP Development (99499) authorization with offsite method if the provider must travel to the location of the meeting. The CFC should use best practice and judgement on the length of the time for the IEP development portion based on history with the school district. Provider should be reminded to only bill time used.

Q25. How long before a child is 3, can we have the exit IFSP meeting?

A25. The exit IFSP meeting must be within 120 days of the child's departure from the program.

Q26. Can we not send Psych reports to the LEA due to the Health Insurance Portability and Accountability Act (HIPAA)?

A26. Since a Psych report may contain HIPAA protected information about the child and the family, it appears appropriate to not send it to the LEA. A CFC may always ask families for their consent before including and sending certain information (mental health, social work, psych, medical diagnostic) in the school district packet. The Bureau will reach out to Part B to determine if there are specific needs we can address without divulging protected information.

Q27. Could the Bureau develop a chart that highlights the timelines and transition responsibilities for referrals received less than 90 days before the child's birthday?

A27. Yes. We will work on this and share it with CFCs.