Early Intervention (EI) Noncompliance Correction Framework for CFCs

Purpose

This framework is intended to support Child and Family Connections (CFC) offices in understanding expectations for correcting noncompliance identified through monitoring activities. It is designed to build capacity and promote timely, effective, and sustained correction in alignment with federal requirements under IDEA Part C.

Key Principles of Noncompliance Correction

All identified noncompliance must be:

- **Corrected as soon as possible, but no later than one year from identification**, and
- **Supported by evidence that correction is both individual (child-level) and systemic (CFC-level)**

Types of Correction

1. Child-Level Correction

Child-level correction ensures that the specific child impacted by the noncompliance receives all required actions or services.

Examples may include:

- Obtaining missing documentation (e.g., eligibility, consent, IFSP components)
- Reconvening an IFSP meeting to address missing or incomplete requirements
- Issuing or updating service authorizations
- Documenting and addressing service delays

✅ **Key Requirement:**
Correction must demonstrate that the **individual instance of noncompliance has been fully resolved**, or that appropriate action has been taken if correction is no longer possible.

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2. System-Level Correction

System-level correction ensures that the noncompliance is not recurring across the CFC.

Examples may include:

- Staff training on specific regulatory or procedural requirements
- Development of internal procedures or guidance
- Updates to any existing internal procedures or guidance
- Increased supervisory review or quality assurance processes
- Internal ongoing self-monitoring of compliance indicators

✅ **Key Requirement:**
The CFC must demonstrate that it is now **correctly implementing the requirement for all children moving forward**, typically through a review of new cases.

Methods of Correction Support

Technical Assistance (TA)

Targeted support provided to build staff knowledge and improve practices.

Examples:

- All staff will review existing EI Training Program (EITP) modules within 30 days
- Participating in coaching or targeted training sessions
- Reviewing policies and procedures with state or monitoring staff

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Corrective Action Plan (CAP)

A formal plan required when more structured intervention is needed.

A CAP typically includes:

- Identified root cause(s) of noncompliance
- Specific action steps to address the issue
- Responsible staff
- Timelines for completion
- Methods for monitoring implementation and effectiveness

Verification of Correction

Correction is considered complete when:

1. **Child-Level Correction** is verified (if applicable), and
2. **System-Level Correction** is verified through evidence of compliant practice in a subsequent review.

Important Notes

- Not all findings will require all types of correction; actions will be determined based on the nature and scope of the noncompliance
- CFCs are encouraged to **proactively review and strengthen practices**; however, formal findings and required corrective actions will be issued through an integrated monitoring process (e.g. data verification and validation, review of APR data and compliance monitoring visits, etc.)
- Timelines for corrective action strategy implementation should be rigorous but feasible
- The goal of correction is not only to resolve individual findings, but to ensure **ongoing compliance and improved outcomes for children and families**