

Dictionary

“Reason for Delay” Definitions

North Carolina Infant-Toddler Program (NCITP)

December 2014; Revised February 2024

Reason for Delay options are defined in the dictionary for three required IDEA timelines. The IDEA timelines addressed are: 1) the initial IFSP Development Meeting (45-day timeline), 2) the initiation of Timely Services (30-day timeline), and the Transition Planning Conference (less than 90 days prior to third birthday). A section on how to use the dictionary is also included.

HOW TO USE THE DICTIONARY

Defining *Reason for Delay*

Reason for Delay options are categories that broadly describe the actions or inactions that bring about a delay in a required IDEA timeline (i.e., noncompliance). The primary purpose for determining a *Reason for Delay* is to account for deviations in IDEA required timelines when reporting compliance results to state and federal authorities. *Reason for Delay* data are also used to identify issues and trends related to noncompliance with the required timelines. Use of this dictionary will help the CDSA make quality decisions when determining the *Reason for Delay* for entry into the Health Information System (HIS).

Using the Dictionary to Determine *Reason for Delay*

In order to identify the primary *Reason for Delay*, the CDSA first needs to identify the circumstances that contributed to the timeline delay. This information is found in well-documented *billable* and *non-billable* progress notes. Once the contributing circumstances are identified and conclusions have been drawn, the CDSA selects the appropriate timeline from the dictionary and compares its findings to the available definitions in order to select the *Reason for Delay* option that most closely matches the circumstances of the case. Complicated cases that involve multiple people and circumstances might require additional review and consultation with a supervisor or designee before selecting a *Reason for Delay* option from the dictionary for HIS data entry.

Factors to Consider When Determining the *Reason for Delay*

1. Consider the entire timeline.

An isolated event does not in and of itself determine the *reason for a delay*. Consider the following scenario, which results in a missed due date: *the CDSA schedules a required activity to occur on the timeline due date, and the family cancels the appointment and reschedules for the next day.* At first glance, one might think that the family caused the delay because the rescheduled appointment pushed the timeline past the due date. Then again, one would also have to wonder why the required activity was scheduled so late in the process.

It is not possible to identify the primary *Reason for Delay* for the given scenario with any certainty without knowing the factors that occurred prior to these isolated events. This holds true anytime the *Reason for Delay* is being determined. The person making the determination, if unfamiliar with the case, should review the progress notes for the entire process from beginning to end. It is also helpful to have a framework to systematically guide the documentation review such as the framework provided by the questions suggested below in Figure 1:

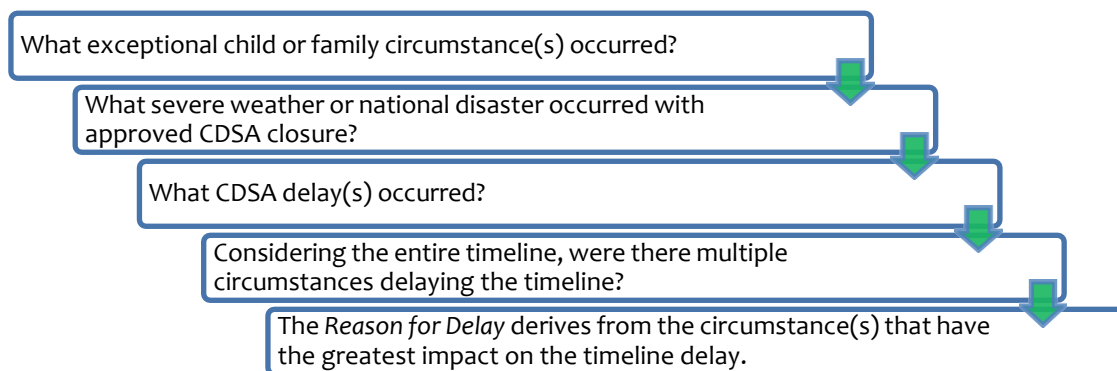


Figure 1: Framework

The entire timeline should be considered before selecting a *Reason for Delay* from the definitions in the dictionary.

2. Consider the greatest impact.

Multiple circumstances often contribute to a missed due date, making it more difficult to identify the primary *Reason for Delay*. When this occurs, the circumstance(s) with the greatest impact on the missed due date should generally be considered the primary *Reason for Delay* and reported in HIS. While this general rule-of-thumb is often used, it should also be noted that other factors, such as parent choice and CDSA due diligence within the authority of the NC Infant-Toddler Program, need to be considered before selecting a primary *Reason for Delay* from the dictionary and entering it into HIS.

3. Consider the difference between *Reason for Delay* and Root Cause (RCA).

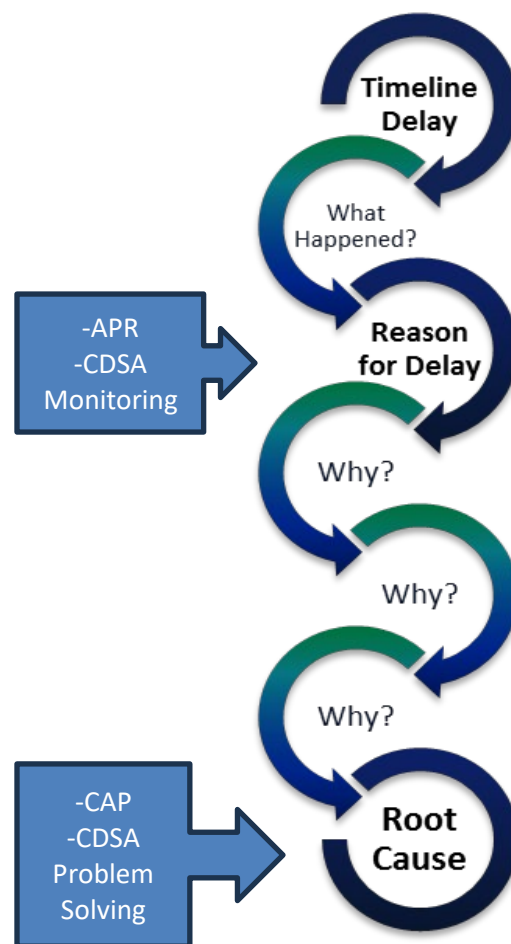
Reason for Delay and root cause are not the same. They derive from two unique processes that are distinguished by different levels of data review and analysis and for different purposes (See Figure 2).

A *Reason for Delay* is identified for a missed due date for a specific child using a high-level review of the child's progress notes and is reported in HIS on a routine basis by the CDSA to account for noncompliance with a required timeline. *Reason for Delay* data are verified annually through the self-assessment process and reported to OSEP in the Annual Performance Report (APR). The CDSA monitors the *Reason for Delay* data across all enrolled children throughout the year to identify issues and trends that need to be addressed. A root cause analysis is sometimes conducted by the CDSA for problem solving purposes related to *Reason for Delay* issues and trends.

A root cause is the originating source of a problem that initiates a chain of events or creates conditions that eventually bring about an undesired outcome such as noncompliance with a required timeline for one or more children. Determining the root cause of noncompliance is a management process that is used for problem solving purposes by CDSAs and the EIB state office. A root cause analysis is also completed when developing a Corrective Action Plan (CAP) to address a Finding identified during the annual self-assessment. On the most basic level, the root cause is identified by repeatedly asking "Why" the noncompliance or the problem occurred. Each time we ask "Why," we are drilling down to the root cause of the problem.

Considering the differences between *Reason for Delay* and root cause will help staff make appropriate selections from the *Reason for Delay* options in the dictionary and will prevent the overuse of the "Other CDSA Delay" option.

Figure 2: Different Levels of Data Analysis for Different Purposes



REASON FOR DELAY DEFINITIONS

Indicator 7: Initial IFSP Development Meeting (45-Day Timeline)

Indicator 1: Timely Services (30-Day Timeline)

Indicator 8c: Transition Planning Conference (90 Day Timeline)

Indicator 7: Initial IFSP Development Meeting (45-Day Timeline)

| Reason for Delay | Definition |
|---|---|
| No Delay | The initial IFSP development meeting was held within 45 days of the referral date. |
| Family Delay | <p>Exceptional circumstances originating with the family extended the IFSP development meeting beyond the 45-day due date more so than any other potential <i>Reason for Delay</i>.</p> <p>Examples of exceptional family circumstances include but are not limited to 1) being <i>unavailable</i> to participate in required steps of the process, and 2) slowing the pace of the process for any reason such as waiting to give consent for the eligibility evaluation and/or child assessment.</p> |
| Child Illness | Extended or recurring illness or hospitalization of the child delayed the 45-day timeline due to exceptional family circumstances such as requesting to slow the pace of the process or missing/cancelling appointments. |
| Severe Weather | <p>An extreme weather condition or natural disaster resulted in an <i>approved</i> emergency closure of the CDSA for all or part of the catchment area, which delayed the 45-day timeline.</p> <p>State government offices/universities and facilities are OPEN, unless a specific decision has been made by the appropriate official to close such offices and/or facilities because of emergency conditions.</p> |
| CDSA Delay - Delay in initial contact | <p>The CDSA did not demonstrate due diligence in attempting to make initial contact with the family after receiving the referral, resulting in a delay in the 45-day timeline.</p> <p>A CDSA demonstrates due diligence within the authority of the Infant-Toddler Program when it notifies the family about the referral to the program in a timely manner using varied and multiple attempts to make initial contact (e.g., phone, home visit, mail, alternate contact information from referral source).</p> |
| CDSA Delay - Inadequate follow-up | The CDSA did not ensure that all involved parties were informed, available and in agreement on the date, time, and place of required appointments in order to provide for the timely occurrence of intake, evaluation and assessment and/ or the initial IFSP development meeting, resulting in a delay in meeting the 45-day timeline requirement. |
| CDSA Delay - Delay in scheduling evaluation (eval) | <p>Due to CDSA circumstances, the eligibility evaluation/assessment was not timely scheduled, which delayed the 45-day timeline.</p> <p>Examples of CDSA circumstances include but are not limited to: (1) scheduling the eligibility evaluation beyond the recommended 21 days of referral and (2) postponing the eligibility evaluation by cancelling and rescheduling the evaluation appointment.</p> |
| CDSA Delay – Delay in scheduling (IFSP) meeting | The CDSA did not adequately plan for and/or facilitate the timely scheduling of the initial IFSP meeting, which resulted in the initial IFSP meeting being held late. |
| CDSA Delay - Other CDSA delay | <p>CDSA circumstances that are not addressed by other available CDSA delay options had the greatest impact on the 45-day timeline delay.</p> <p>This delay option should be used rarely and only with supervisory approval.</p> |

Indicator 1: Timely Services (30-Day Timeline)

| Reason for Delay | Definition |
|--|---|
| No Delay | Service was initiated within 30 days of the date of consent. |
| Family Delay | <p>Exceptional circumstances originating with the family extended the start of services beyond the 30-day due date more so than any other potential <i>Reason for Delay</i>.</p> <p>Examples of exceptional family circumstances include, but are not limited to not responding to CDSA or provider attempts to contact the family to schedule the service start date; missed, cancelled or rescheduled service start dates; and/or other parental decisions that delay the initiation of services.</p> |
| Child Illness | Extended or recurring illness or hospitalization of the child delayed the start of services beyond the 30-day timeline due to exceptional family circumstances such as requesting to postpone the service start date or missing/cancelling appointments. |
| Severe Weather | <p>An extreme weather condition or natural disaster resulted in an <i>approved</i> emergency closure of the CDSA for all or part of the catchment area, which delayed the start of services.</p> <p>State government offices/universities and facilities are OPEN, unless a specific decision has been made by the appropriate official to close such offices and/or facilities because of emergency conditions.</p> |
| Service Never Started | The parent gave consent, but the service was never initiated due to the parent later declining the service, withdrawing from the program, or being lost to follow-up. |
| CDSA Delay - Delay in referral (ref) to provider | <p>The CDSA did not make a timely and/or complete referral to the service provider, thereby delaying the start of services.</p> <p>A timely and complete referral provides sufficient time and information for a provider to be assigned to the child and for a start date to be scheduled with the parent by no later than the projected start date. Once a parent consents for a service, the CDSA must not delay in making the referral to the selected service provider.</p> |
| CDSA Delay - Delay in provider initiating service | The provider was unsuccessful in initiating services by the projected start dates even though there were only inconsequential or no other CDSA or exceptional family circumstances delaying the start of services (including: provider illness, provider cancellations or provider requests to reschedule). |
| CDSA Delay - Provider or staff not available | A network provider and a CDSA staff member, as provider of last resort, was not available to initiate services within the required timeframe. |
| CDSA Delay - Inadequate follow-up | The CDSA did not ensure that the family and provider were informed, available and in agreement on when and where the service would take place in order to provide for the timely start of services by the projected start date. |
| CDSA Delay - Other CDSA delay | <p>CDSA circumstances that are not addressed by other available CDSA delay options had the greatest impact on the delay of the 30-day timeline.</p> <p>This delay option should be used rarely and only with supervisory approval.</p> |

Indicator 8c: Transition Planning Conference (90-Days before 3rd Birthday Timeline)

| Reason for Delay | Definition |
|--|---|
| No Delay | The Transition Planning Conference (TPC) was held no later than 90 days before the child's third birthday (i.e., by no later than age 2 years, 9 months). |
| Family Delay | <p>Exceptional circumstances originating with the family extended the 90-day timeline beyond the due date more so than any other potential <i>Reason for Delay</i>.</p> <p>Examples of exceptional family circumstances include but are not limited to not responding to CDSA attempts to contact the family to plan and schedule the TPC; missed, cancelled, or rescheduled TPC appointments; and other parental decisions that delay the process.</p> |
| Child Illness | Extended or recurring illness or hospitalization of the child delayed the TPC due to exceptional family circumstances such as requesting to slow the pace of the process or missing/cancelling a scheduled TPC. |
| Severe Weather | <p>An extreme weather condition or natural disaster resulted in an <i>approved</i> emergency closure of the CDSA for all or part of the catchment area, which resulted in a scheduled TPC to be cancelled and the TPC timeline to be delayed.</p> <p>State government offices/universities and facilities are OPEN, unless a specific decision has been made by the appropriate official to close such offices and/or facilities because of emergency conditions.</p> |
| Late Referral | When a referral to the program is received less than 135 days and child is determined eligible for Part C services less than 90 days before the child's third birthday, this is considered a late referral for compliance reporting purposes. |
| CDSA Delay - Delay Initiating TPC | The CDSA did not adequately plan for and/or facilitate timely scheduling of the TPC, which resulted in the TPC being held late or not at all. |
| CDSA Delay - Inadequate follow-up | The CDSA did not sufficiently follow-up with the family and/or others invited to the TPC in order to ensure the timely occurrence of the TPC. |
| CDSA Delay - Other CDSA delay | <p>CDSA circumstances that are not addressed by other available CDSA delay options had the greatest impact on the TPC delay.</p> <p>This delay option should be used rarely and only with supervisory approval.</p> |

Common Scenarios Impacting ITP Timelines

45-Day Timeline

- The family requests to postpone scheduling the initial evaluation until they are available, either on a specific day of the week or due to travel plans. *This would be considered a Family Delay.*
- The initial evaluation is originally scheduled beyond the 45-day timeline, then an evaluation slot becomes available well into the 45-day timeline. The family declines the newly offered appointment due to the short notice and inability to take time off from work. *This would be considered a CDSA Delay-Delay in scheduling evaluation.*
- The first available initial evaluation date offered to the family is after day 35. The evaluation was completed, but the parent wasn't offered the opportunity to hold the IFSP meeting on the day of the Initial Evaluation, IFSP development meeting was scheduled for and completed after the 45th day. *This would be considered a CDSA Delay-Delay in scheduling (IFSP) meeting.*

30-Day Timeline

- The service is scheduled to start, but the family reports the child is sick and requests to delay rescheduling the start of services until the child is well. The provider continues to check in with the family and the service is rescheduled for a date beyond the 30-day timeline. *This would be considered a Family Delay.*
- The service is scheduled to start, the child is sick the day of and the family requests to reschedule. The provider does not have any availability to offer or reschedule until after the 30-day timeline has passed. *This would be considered a CDSA Delay-Delay in provider initiating services.*
- The referral for services is sent to the provider. The CDSA does not follow up with the provider in a timely manner to ensure that the referral was received by the provider and the provider is working to connect with the family to begin services. The 30-day timeline is nearing and the CDSA contacts the provider to check on the status of services. They are notified by the provider that the referral was never received. Both the provider and the family are encouraged to schedule and begin the service on short notice and within the 30-day timeline, but the timeline was missed. *This would be considered a CDSA Delay-Inadequate follow-up.*

TPC Timelines (90-Days before 3rd Birthday)

- The child has been enrolled and receiving ITP services. The transition planning meeting was completed timely, but the CDSA does not initiate contact with the family to schedule the Transition Planning Conference (TPC) until less than a month before it is due. Parent is unable to meet until one week after the timeline has passed. *This is considered a CDSA delay-Delay Initiating TPC.*
- The child is determined eligible for ITP services and the IFSP is developed more than 90 days prior to the child's 3rd birthday. The TPC is not offered to occur at the initial IFSP meeting and is subsequently scheduled to occur less than 90-days prior to the child's 3rd birthday. *This is considered a CDSA delay-Delay Initiating TPC.*
- The LEA/PSU does not have any availability to meet prior to 90 days before the child's 3rd birthday. The family is not offered the option to convene the TPC without the LEA/PSU. *This is considered a CDSA delay-Delay Initiating TPC.*