

# CSI - Ohio

The Common Sense Initiative

## Revised Business Impact Analysis

**Agency Name:** The Ohio Department of Health

**Regulation/Package Title:** 3701-8 Help Me Grow

**Rule Number(s):** Rescind rules 3701-8-01 to 3701-8-10 and adopt new 3701-8-01; 3701-8-02; 3701-8-02.1; 3701-8-03; 3701-8-04; 3701-8-06; 3701-8-06.1; 3701-8-06.2; 3701-8-07; 3701-8-07.1; 3701-8-08; 3701-8-08.1; 3701-8-09; 3701-8-10 (posted as draft 3701-8-05); 3701-8-10.1 (posted as draft 3701-8-05.1); and 3701-8-10.2 (posted as draft 3701-8-05.2)

**Date:** Revised May 3, 2012

**Rule Type:**

☒ New

☐ 5-Year Review

☐ Amended

☐ Rescinded

The Common Sense Initiative was established by Executive Order 2011-001K and placed within the Office of the Lieutenant Governor. Under the CSI Initiative, agencies should balance the critical objectives of all regulations with the costs of compliance by the regulated parties. Agencies should promote transparency, consistency, predictability, and flexibility in regulatory activities. Agencies should prioritize compliance over punishment, and to that end, should utilize plain language in the development of regulations.

**Regulatory Intent**

**1. Please briefly describe the draft regulation in plain language.**

*Please include the key provisions of the regulation as well as any proposed amendments.*

The rule package outlines regulations for participants and providers in Help Me Grow, which is Ohio's statewide prenatal to age three Home Visiting and Early Intervention programs administered by the Department of Health. The Help Me Grow Early Intervention program for infants and toddlers with disabilities fulfills Part C of the Individuals with Disabilities Education Act and carries with it the federally mandated regulations for early intervention service

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providers which are included in this rule package. The package also includes regulations for the statewide Help Me Grow Home Visiting program, supported by state general revenue funds.

**2. Please list the Ohio statute authorizing the Agency to adopt this regulation.**

Revised Code Section 3701.61

**3. Does the regulation implement a federal requirement? Is the proposed regulation being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal law or to participate in a federal program? If yes, please briefly explain the source and substance of the federal requirement.**

The rules within this package related to Help Me Grow Early Intervention implement federal requirements under Part C of the Individuals with Disabilities Education Act [Public Law 105-17 (20 USC 1437(a))], which is the federal law for the Early Intervention Program for Infants and Toddlers with Disabilities. The regulations for this federal law (34 CFR part 303) were revised and re-issued on September 28, 2011. These rules are required to comply with federal law and to maintain federal Part C funding in Ohio. The updated federal regulations for Part C of the Individuals with Disabilities Education Act, captured in these rules include clarified definitions and expectations for state early intervention lead agencies specifically around the use of public and private insurance, personally identifiable information, and the frequency of, and mandated participants for Individualized Family Service Plan (IFSP) meetings.

**4. If the regulation includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.**

Section 3701.61 of the Ohio Revised Code requires the Director of the Ohio Department of Health to adopt the rules necessary and proper to implement the Help Me Grow program, which includes both Help Me Grow Home Visiting and Help Me Grow Early Intervention. While there are no federal regulations pertaining to the Home Visiting program, there are for the Early Intervention program. The proposed Early Intervention rules are aligned with the federal law for Early Intervention and include the following instances when the rule exceeds federal regulations:

**3701-8-04:** Follow up information is provided to every referral source, except self-referrals. Although not required in federal regulations, the federal regulations require the state to provide a “comprehensive, coordinated system” for children in Early Intervention. Via public comment, ODH has heard from medical and service providers that they make referrals into Help Me Grow and never hear back about the result of their referral. While protecting confidentiality, this requirement was included to help referral sources know that their referrals were received by HMG service providers.

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**3701-8-07.1:** Requires a nutrition screening be done with children, unless they have a documented nutrition disorder. This requirement goes beyond the federal regulations, but it is recognized as necessary and important because of the known link between nutrition deficits and developmental delays, and because nutrition services are one of the seventeen early intervention service types required by federal law.

This rule package also includes regulations for the home visiting program as established in state statute.

**5. What is the public purpose for this regulation (i.e., why does the Agency feel that there needs to be any regulation in this area at all)?**

The public purpose for this regulation is to provide programs which provide services and support to parents and children at risk for poor childhood outcomes. These regulations are necessary to implement the federal provisions of the Individuals with Disabilities Education Act for infants and toddlers in Ohio. More specifically, Early Intervention provides a statewide comprehensive, coordinated, multidisciplinary, interagency system of supports and services to infants and toddlers with disabilities and/or developmental delays and their families.

They are also necessary to implement the Home Visiting program as established in state statute and funded by the Ohio General Assembly. Home Visiting provides a program to first time expectant parents, parents engaged in active military duty, and parents who are raising a child who is a victim of substantiated abuse or neglect. This program's goals are to increase healthy pregnancies, increase the confidence and competence of parents to parent very young children, make meaningful needs-based referrals to community supports, and to transition children to a development-enhancing program by the time they are three years old.

These rules establish the standards for implementing these programs and are designed to assure the achievement of the set outcomes for the participants. For example, the rules require all providers to enter information into a centralized data base so that outcomes can be measured, the impact of the program can be evaluated, and the return on the investment can be calculated.

**6. How will the Agency measure the success of this regulation in terms of outputs and/or outcomes?**

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ODH will monitor the Help Me Grow Home Visiting contractors for compliance with the standards set forth in these rules. Success will be measured by using the statewide web-based data system which includes participant outcomes, technical assistance staff, monthly professional development calls with providers, and results of performance-based monitoring. Success of the Early Intervention program will be measured in the same way, but also will include 14 indicators of outcomes as set forth by the federal Office of Special Education Programs within the US Department of Education.

### **Development of the Regulation**

- 7. Please list the stakeholders included by the Agency in the development or initial review of the draft regulation. *If applicable, please include the date and medium by which the stakeholders were initially contacted.***

Numerous stakeholders were included throughout the eighteen months that ODH worked on revising these regulations. The table in Appendix 1 provides the list of individuals. By way of summary, the ODH invited known stakeholders to participate in a *Rule Revision Leadership team*, which met first in August 2010. Their charge was to provide guidance on monthly conference calls with four *Rule Revision Workgroups* who were invited to recommend rule content to the ODH between November 2010 and April 2011. The 60 individuals who made up the workgroups were identified and invited to participate through letters to stakeholder groups, state agency directors, and leaders in the early childhood field. The comments affected the draft regulation in that numerous changes were made to drafted timelines, language, and level of detail provided. The comments were immensely helpful in clarifying the expectations and requirements across all fifteen rules in this package. The *writing team* included state employees from the ODH DODD and OFCFC. In September 2011, the workgroup as established in the 2012-13 budget bill made recommendations for the eligibility criteria for the Help Me Grow Early Intervention program.

The draft rules were posted for public comment between November 25 and December 30, 2011. E-notification and other emails alerted interested parties of the timeline and method to provide public comment. Overview presentations were made on the draft rules and process for making public comment during the comment period.

- 8. What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?**

As noted above, many stakeholders were engaged throughout the eighteen months the ODH

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took to revise these rules. To date, the ODH has received over fifty emails containing public comment on the drafted rules. Those comments are listed by commenter in Appendix 2, and by content of the rule in Appendix 3. Each comment received to date has been reviewed and discussed by ODH program administrators, legal counsel, and program staff. The ODH considered every public comment received, but did not make a change for every suggestion for the following reasons: funding limitations, federal requirements for IDEA, or other cited policy reasons. The ODH did meet with stakeholders numerous times before, during, and after public comments were received and made attempts to address concerns that were outstanding or could not be resolved.

**9. What scientific data was used to develop the rule or the measurable outcomes of the rule? How does this data support the regulation being proposed?**

For Early Intervention, the rules were developed using the federal law and regulations provided September 28, 2011. Other documents which reflect the state of the science on early childhood development and provided by the US Department of Education's Office of Special Education Programs (USDOE/OSEP), the National Early Childhood Technical Assistance Center (NECTAC), the Infant and Toddler Coordinator's Association (ITCA), Early Intervention Family Alliance (EIFA), Early Childhood Outcomes Center (ECO), and the Data Accountability Center (DAC), were also used.

For Home Visiting, the rules were developed using the research literature on home visiting as well as federal guidance provided by the U.S. Department of Health and Human Services including, The Design Options for Maternal, Infant, and Early Childhood Home Visiting Evaluation (DOHVE) Technical Assistance (TA) Team, and the scientific data provided by the Nurse-Family Partnership and Healthy Families America.

**10. What alternative regulations (or specific provisions within the regulation) did the Agency consider, and why did it determine that these alternatives were not appropriate? If none, why didn't the Agency consider regulatory alternatives?**

Many alternatives were considered. Some examples include: various models of home visiting, including variations in visit schedule, criteria for inclusion as a provider; caseload and supervision requirements; diagnoses included on the Early Intervention conditions list and the whole of the criteria for eligibility (an entire workgroup was convened to consider alternatives to the existing criteria). Drafted rules fulfill the requirements of the federal Individuals with Disabilities Education Act, Part C and maintain the home visiting standards put into place in July 2010 with the new Help Me Grow Home Visiting program. More flexibility was added, but specific standards are maintained to maximize consistency in order to evaluate the effectiveness across time. Through the extensive use of stakeholders throughout the eighteen months of revision,

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almost every aspect of this rules package has been discussed with various alternatives considered and debated.

**11. Did the Agency specifically consider a performance-based regulation? Please explain. *Performance-based regulations define the required outcome, but don't dictate the process the regulated stakeholders must use to achieve compliance.***

Yes, the ODH did consider performance-based regulations throughout the proposed rule package. Specific examples include outlining the activities required by the federal law for service coordinators in Early Intervention without mandating a maximum caseload of children to each service coordinator and eliminating the minimum number of supervision hours required for service coordinators and home visitors. The ODH took every opportunity to specify and clarify the exact performance measures it is held to by the federal law for Early Intervention without inserting additional proxies for quality outcome measures. This new approach clearly focuses more on outcomes than process.

**12. What measures did the Agency take to ensure that this regulation does not duplicate an existing Ohio regulation?**

The ODH conducted a review of existing rules and included representatives from other state agencies in the stakeholder meetings, revision workgroups, and writing team. This rule package does not duplicate existing Ohio regulation because it is specific to Help Me Grow.

**13. Please describe the Agency's plan for implementation of the regulation, including any measures to ensure that the regulation is applied consistently and predictably for the regulated community.**

Once the rules are final, the ODH will provide training on the new rules for all interested parties, including service providers, parents, and referral sources. The agency is currently planning a statewide meeting for June 2012 where the rules will be an often-repeated session for attendees. In addition to this burst of training using a variety of electronic and in-person methods of delivery, the ODH will update its Home Visiting Program manual and create an Early Intervention Program manual. Both will be available upon request via CD and on the program website ([www.ohiohelpmegrow.org](http://www.ohiohelpmegrow.org)).

To ensure that the regulation is applied consistently throughout all 88 Ohio counties, the ODH will continue its technical assistance using six Early Intervention and six Home Visiting program consultants. These individuals are available by phone and email for program-related technical assistance, as well as for local provider-requested on-site training and technical assistance visits. The program's data and monitoring teams will continue to provide guidance in meeting program

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outcomes and data quality procedures. Through the use of program-specific reports, consultants help service providers identify areas of non-compliance or obstacles to implementation and use improvement plans to strategize solutions.

#### Adverse Impact to Business

**14. Provide a summary of the estimated cost of compliance with the rule. Specifically, please do the following:**

- a. Identify the scope of the impacted business community;**
- b. Identify the nature of the adverse impact (e.g., license fees, fines, employer time for compliance); and**
- c. Quantify the expected adverse impact from the regulation.**

*The adverse impact can be quantified in terms of dollars, hours to comply, or other factors; and may be estimated for the entire regulated population or for a “representative business.” Please include the source for your information/estimated impact.*

- (a) In addition to local governmental agencies, businesses that may enter into a contractual relationship to provide Help Me Grow services include, but are not limited to, non-profit agencies that provide early childhood services; for-profit entities or licensed professionals that provide early childhood health, social or educational services, and hospitals.
- (b) These rules establish standards for entering into a voluntary contractual relationship with the Ohio Department of Health to carry out services within the HMG programs. In this coming year, ODH anticipates approximately 100 governmental agencies to participate in the HMG program through a grant or agreement relationship. ODH also anticipates approximately 100 businesses to participate in the HMG program through contract with the ODH. As the system changes to direct contractual relationships between ODH and providers of services, we are uncertain how this will shift, if at all, but expect that both governmental agencies and businesses will remain in the pool of providers. These rules set forth requirements that the contractors must meet in order to maintain a contract with ODH. In addition, the rules list remedies ODH may take if ODH determines the contractor does not comply with these rules and the terms of the contract, including a corrective action plan, attendance at mandatory training, compensating families in early intervention for failure to provide services under federal early intervention; return of ODH funds or withholding future funds; and suspension or termination of contract. The ODH has analyzed and responded to each assertion of a negative business impact and believes that the impact is minimal. With the explanation of the allocation table now out to potential providers, the ODH has anticipated and provided for concerns expressed about transitioning families, providing services before reimbursement from Medicaid becomes available, affiliating with an evidence-based home visiting model, serving existing “At-Risk” population, the potential delay in receiving funds and being able to get those funds into sub-contracts, as well as forecasting counts of referrals and children served in the most generous possible way based on actual

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performance over the past two years.

- (c) For those businesses that seek and are approved for a contract or grant, the rules require an investment of time to comply with these regulations and the terms of the contract or grant. Agencies that demonstrate that they can comply with the rules and then choose to enter into a contract or grant with ODH to provide Home Visiting or Early Intervention services will have to employ or subcontract with qualified staff who can provide the defined service, enter accurate data into the centralized system, assure parents' rights, etc. These standards define a more standardized service that also means higher accountability for reporting and fiscal bookkeeping, billing, applications, and training. To assist with any additional costs to transition to the Home Visiting program and new requirements set forth in these rules, ODH intends to initially provide some funding for affiliation costs. More specifically, ODH has budgeted for \$2500.00 per contractor, reimbursable upon achieved affiliation with an evidence-based home visiting model. Our estimates indicate a small commitment of time and on average, \$2500, per contractor, to achieve affiliation. This estimate comes from average affiliation costs from the Nurse-Family Partnership, Parents As Teachers, and Healthy Families America models; which are the predominant home visiting models already operating in Ohio and closest to the Help Me Grow program standards.

In addition, ODH trainings are provided at no cost, other than the trainees' travel and time, and technical assistance is provided directly to service providers to minimize the burden of the increased expectations. In addition, there will be reimbursement using GRF funding for authorized Home Visiting services and federal Part C funding for Early Intervention contractors.

**15. Why did the Agency determine that the regulatory intent justifies the adverse impact to the regulated business community?**

These rules have minimal adverse impact to businesses due to the voluntary nature of the relationship. The rules are justified given that the Ohio Revised Code Section 3701.61 sets forth the requirements for ODH to administer the Help Me Grow program and develop rules to monitor the dissemination of public money to local communities throughout the state through contract, grant or subsidy agreement. Further, the requirements applicable to the early intervention program are necessary for Ohio to continue receiving federal funding under Part C of the IDEA.

**Regulatory Flexibility**

**16. Does the regulation provide any exemptions or alternative means of compliance for small businesses? Please explain.**

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Under the federal IDEA, Part C law and regulations, the state of Ohio must enforce minimum requirements and provide assurances of written policies which uphold the law and allow the state to monitor and sanction local service providers when non-compliant. The federal law and regulations require the state's lead agency, the ODH, to collect consistent, valid and reliable data with which to report in the required annual performance report to the US Department of Education. However, wherever there was room for flexibility, the drafted rules preserve and provide the decision making to service providers. There are instances where a policy or process is required, rather than specifying a required form, because retaining flexibility was an important goal of these rules. There are other instances where historical rules were eliminated because they were proxies for quality rather than a valid measure of outcomes. For example, restricting service coordinators to a 1:45 caseload was removed because the requirement is not in federal law. Similarly, requiring 4 – 6 hours of clinical supervision per month was not in federal law, and although it has existed in HMG for more than a decade, it was removed.

The money to administer and serve families in Help Me Grow is distributed through grants, subsidy agreements, or contracts which are voluntary. There are no requirements in these rules which prohibit small businesses from conducting their business without the money distributed by the ODH.

**17. How will the agency apply Ohio Revised Code section 119.14 (waiver of fines and penalties for paperwork violations and first-time offenders) into implementation of the regulation?**

These rules do not impose fines or civil penalties. The rules do allow for ODH to impose one or more of the following when a contractor/grantee does not meet the requirements in these rules: require a corrective action plan; required attendance at mandatory technical assistance training; withhold future funds or require the return of funds provided; and suspend or terminate the contract or grant. In addition, consistent with the federal regulations for early intervention, ODH may require an early intervention contractor to provide compensatory services or monetary reimbursement to families who have been denied appropriate services.

The ODH is committed to working with contractors through corrective action plans and providing technical assistance as well as training before taking further action like withholding money from a contractor, suspending or terminating a contract or grant.

**18. What resources are available to assist small businesses with compliance of the regulation?**

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The ODH has already planned for training (both on-line and in-person) for local providers statewide, providing technical assistance and program consultation on these new rules. Monthly update and informational calls already exist and are planned to continue for service providers to ask questions about rules, procedures, and expectations. As we did to engage stakeholders and encourage public comment, the ODH created a series of slides and delivered webinars which highlight what the new rules say. There will also be training and follow up on what the new rules means, how to implement them, timelines for implementation, and reporting and monitoring requirements.

In addition to the resources provided by the program staff at the ODH, there are numerous national resources which we have, and will continue to use for ourselves and local service providers, especially in the area of fulfilling the federal Part C of IDEA law and regulations, including the National Early Childhood Technical Resource Center (NECTAC) and the North Central Regional Resource Center (NCRRC), the Evidence-Based Home Visiting Center; and in-state resources like Ohio Train (for on-line trainings) and the Ohio Professional Development Network registry (for individual credentialing in HMG).

Finally, the ODH employs individuals within the programs who monitor the adherence to federal and state rule, where applicable. Utilizing the web-based statewide data system, program consultants, researchers, and monitoring personnel work together to identify areas of non-compliance with rule and once it is identified, work with local service personnel to resolve the issues. This monitoring is continual and ever evolving; service providers use strategies for self-monitoring, working to self-correct before a problem, habit, or misunderstanding of program rule becomes systemic.

## Appendix 1: Rule Revision (3701-8) Stakeholder Involvement

| <b>Rule Revision Leadership Team</b><br>August 2010 – May 2011                                                                                                 |                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| <b>Name</b>                                                                                                                                                    | <b>Organization</b>                                                                |
| Kim Johnson                                                                                                                                                    | HMG Advisory Council                                                               |
| Kimberly Travers                                                                                                                                               | HMG Advisory Council                                                               |
| Marilyn Demma                                                                                                                                                  | Clark County Family & Children First Council                                       |
| Sue Giga                                                                                                                                                       | Green County Family & Children First Council                                       |
| Sara Winters                                                                                                                                                   | Hocking County HMG Project Director                                                |
| Melissa Manos/Lori Mago                                                                                                                                        | Cuyahoga County HMG Project Director                                               |
| Cindy Davis                                                                                                                                                    | Washington County HMG Project Director                                             |
| Amanda Runyon-Lynch                                                                                                                                            | HMG Early Intervention Parent                                                      |
| Kay Reitz/Marla Himmeger                                                                                                                                       | Ohio Department of Mental Health                                                   |
| Maureen Corcoran/Bibi Manev                                                                                                                                    | Ohio Health Plans                                                                  |
| Sam Chapman                                                                                                                                                    | Bureau for Children with Medical Handicaps                                         |
| Jane Wiechel /Barbara Weinberg                                                                                                                                 | Ohio Department of Education                                                       |
| Katrina Bush                                                                                                                                                   | Ohio Department of Developmental Disabilities                                      |
| Alicia Leatherman                                                                                                                                              | Early Childhood Cabinet                                                            |
| Joyce Calland/Angela Sausser Short                                                                                                                             | Ohio Family & Children First                                                       |
| Peg Burns                                                                                                                                                      | Ohio Council of Behavioral Health & Family Services Providers                      |
| Teresa Lampl                                                                                                                                                   | Ohio Council of Behavioral Health & Family Services Providers                      |
| Karen Cincione                                                                                                                                                 | Nurse-Family Partnership                                                           |
| Kimberly Friedman                                                                                                                                              | Nurse-Family Partnership                                                           |
| Margaret Hulbert                                                                                                                                               | The Ohio Partnership to Build Stronger Families                                    |
| Tom Schied                                                                                                                                                     | The Ohio Partnership to Build Stronger Families                                    |
| Dee Dee Kabbas                                                                                                                                                 | Ohio Association of Superintendents of County Boards of Developmental Disabilities |
| <b>Rule Revision Workgroups</b><br><b>(Early Intervention, Home Visiting, Children &amp; Family, and Program Administration)</b><br>November 2010 – April 2011 |                                                                                    |
| <b>Name</b>                                                                                                                                                    | <b>Organization</b>                                                                |
| Charlotte Axe                                                                                                                                                  | Auglaize County Help Me Grow                                                       |
| Holly Brugh                                                                                                                                                    | Summit Co. Board of DD                                                             |
| Cindy Davis                                                                                                                                                    | Washington County Family & Children First                                          |
| Beth Foreman                                                                                                                                                   | Help Me Grow provider                                                              |
| Ginger Heyneman                                                                                                                                                | Help Me Grow provider                                                              |
| Maria Jirousek                                                                                                                                                 | Center of Science and Industry                                                     |
| Cathy Kramer                                                                                                                                                   | Ohio Department of Developmental Disabilities                                      |
| Susan Miller                                                                                                                                                   | Help Me Grow Brighter Futures; (State Support Team 7)                              |
| Debra Moscardino                                                                                                                                               | Ohio Health Plans, ODJFS                                                           |
| Heather Rice                                                                                                                                                   | Muskingum County HMG                                                               |
| Melissa Smith                                                                                                                                                  | Fayette County Help Me Grow                                                        |
| Lorie Untch                                                                                                                                                    | Easter Seals                                                                       |
| Kathleen Bachmann                                                                                                                                              | Bureau for Children with Medical Handicaps/Parent Advocate                         |
| Pam Barton                                                                                                                                                     | Franklin County Help Me Grow                                                       |

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|------------------------|--------------------------------------------------------------------------------------------|
| JoAnn Brace            | Geauga County Board of DD                                                                  |
| Madelyn Connell        | Ohio Head Start Association                                                                |
| Brenda George          | Occupational Therapist serving children in Early Intervention                              |
| Crystal Kaiser         | Associate Professor, Ashland University, Department of Early Childhood Education           |
| John Kinsel            | Miami Valley Child Development Centers, Head Start                                         |
| Ginger O'Connor        | Washington County BDD & Speech-Language Pathologist serving children in Early Intervention |
| Beth Popich            | Clermont County Board of Developmental Disabilities                                        |
| Lesley Scott-Charlton  | Ohio Health Plans, ODJFS                                                                   |
| Kim Travers            | Parent & Co-Chair, HMG Advisory Council                                                    |
| Carolyn Westfall       | Jefferson County Help Me Grow Project Director                                             |
| Chris Arestides        | Help Me Grow Brighter Futures                                                              |
| Carrie Beier           | Erie County Board of Developmental Disabilities                                            |
| Jeanine Bensman        | Council on Rural Services                                                                  |
| Denielle Ell-Rittinger | Child Welfare, ODJFS                                                                       |
| Kimberly Friedman      | Nurse-Family Partnership                                                                   |
| Pam Hamer              | Greene County Help Me Grow                                                                 |
| Shannon Hand           | Parent served by Help Me Grow                                                              |
| Brenda Hernandez       | Head Start                                                                                 |
| Angela Miller          | Head Start & Early Head Start Supervisor at WSOS CAC                                       |
| Sam Sprinkle           | Ohio Department of Developmental Disabilities                                              |
| Yolanda Talley         | Ohio Health Plans, ODJFS                                                                   |
| Sandra Allison         | Lake County Help Me Grow                                                                   |
| Tammy Blankenship      | Columbiana County General Health District                                                  |
| Margie Eilerman        | Shelby county health department                                                            |
| Timothy Floyd          | Parent served by Help Me Grow                                                              |
| Diane Fox              | Dept. of Developmental Disabilities                                                        |
| Lisa Garofalo          | Cincinnati Public Schools                                                                  |
| Suzie Huse             | Wayne County Help Me Grow                                                                  |
| Susan Jones            | Logan County Board of Developmental Disabilities                                           |
| Cindy Keller           | Kenton Hardin Health Department                                                            |
| Aimee Roberts          | Pickaway County Help Me Grow Program                                                       |
| Renee Johnson          | ANC McGuffey Center                                                                        |
| Laurie Dinnebeil       | University of Toledo                                                                       |
| Katie Kelly            | GroundWork                                                                                 |
| Julie Litt             | Richland Newhope CB                                                                        |
| Thomas Scheid          | Ohio Partnership to Build Stronger Families                                                |
| Donna Savage           | Logan County Help Me Grow                                                                  |
| Deb Kimble             | Early Childhood Education Center                                                           |
| Julie Brem             | Hamilton County Family & Children First Council                                            |
| Mary May               | Butler County Board of Developmental Disabilities                                          |
| Debbie Morog           | Elyria City Health District-Help Me Grow                                                   |
| Brandi Daniels         | Huron County Help Me Grow                                                                  |
| Jennifer Hunker        | Hancock County Family & Children First Council/Help Me Grow                                |
| Cathy Marrone          | Summit County HMG Project Director                                                         |

|                                                 |                                                                                    |
|-------------------------------------------------|------------------------------------------------------------------------------------|
| Cathy McEvoy                                    | HMG Service Coordinator & Evaluator                                                |
| Robert Frank                                    | Dynamic Therapeutic Services                                                       |
| Kim Johnson                                     | Mahoning County Help Me Grow project Director                                      |
| Suzanne Prescott                                | Butler County Educational Service Center                                           |
| Julie Esparza                                   | Lucas County Board of Developmental Disabilities                                   |
| Robert Frank                                    | Dynamic Therapeutic Services                                                       |
| Donna Gibson                                    | Kollege Tots & Kids II, (Childcare Provider owner & operator)                      |
| Sarah Winters                                   | Hocking County Board of Developmental Disabilities                                 |
| <b>Rule Writing Team</b>                        |                                                                                    |
| June 2011 – October 2011                        |                                                                                    |
| <b>Name</b>                                     | <b>Organization</b>                                                                |
| Katrina Bush, Cathy Kramer, & Sam Sprinkle      | Ohio Department of Developmental Disabilities                                      |
| Joyce Calland/Angela Sausser-Short              | Ohio Family & Children First Council                                               |
| <b>Early Intervention Eligibility Workgroup</b> |                                                                                    |
| July 15, 2011 – September 30, 2011              |                                                                                    |
| Peg Burns                                       | Ohio Council of Behavioral Health and Family Services Providers                    |
| Joyce Calland                                   | Ohio Family and Children First Cabinet Council                                     |
| Denielle Ell-Rittinger, B.A.                    | Ohio Department of Job and Family Services                                         |
| Marla Himmeger                                  | Ohio Department of Mental Health                                                   |
| Katrina Bush, M.Ed.                             | Ohio Department of Developmental Disabilities                                      |
| Cindy Davis                                     | Ohio Family and Children First Coordinators Association/Washington County FCFC     |
| Jessica Foster, M.D.                            | Bureau for Children with Medical Handicaps                                         |
| Dee Dee Kabbes                                  | Ohio Association of Superintendents of County Boards of Developmental Disabilities |
| Melissa Manos                                   | Help Me Grow Advisory Council                                                      |
| Kimberly Travers                                | Parent and Co-Chair, Help Me Grow Advisory Council                                 |
| Barbara Weinberg                                | Ohio Department of Education                                                       |
| Laurie Zeeff, EIS                               | Help Me Grow Project Director                                                      |
| Rebecca Love                                    | Ohio Association of County Boards of Developmental Disabilities                    |
| Paula Prentice                                  | County Commissioners Association of Ohio                                           |
| Kay Treanor                                     | Ohio Developmental Disabilities Council                                            |
| Debra K. Wright, MS, CNP                        | Franklin County Public Health                                                      |
| <b>Stakeholder Meeting</b>                      |                                                                                    |
| October 14, 2011                                |                                                                                    |
| Judy VanGinkel                                  | Every Child Succeeds                                                               |
| Robert Ammerman                                 | Every Child Succeeds                                                               |
| Margaret Clark                                  | Every Child Succeeds                                                               |
| <b>Stakeholder Meeting</b>                      |                                                                                    |
| November 18, 2011                               |                                                                                    |
| Margaret Hulbert                                | The Ohio Partnership to Build Stronger Families                                    |
| Thomas Scheid                                   | The Ohio Partnership to Build Stronger Families                                    |
| Kim Johnson                                     | Help Me Grow                                                                       |
| Margaret Clark                                  | Every Child Succeeds                                                               |
| Judy Van Ginkel                                 | Every Child Succeeds                                                               |

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| Angel Sausser-Short                                                                                                                                       | Ohio Family & Children First                                  |
| Kimberly Friedman                                                                                                                                         | Nurse-Family Partnership                                      |
| Pamela Albers                                                                                                                                             | Nurse-Family Partnership & HMG                                |
| Tom Kelley                                                                                                                                                | Montgomery County Family & Children First Council             |
| Rebekah Dorman                                                                                                                                            | Invest in Children                                            |
| Andrea Reik                                                                                                                                               | Athens County Children's Services                             |
| Cindy Davis                                                                                                                                               | Washington County Family & Children First Council             |
| Peggy Calestro                                                                                                                                            | Ohio Children's Fund                                          |
| Nikki Reiss                                                                                                                                               | Carpenter, Lipps, & Leland                                    |
| Robyn Lightcap                                                                                                                                            | Ready, Set, Soar                                              |
| Teresa Lampl                                                                                                                                              | Ohio Council of Behavioral Health & Family Services Providers |
| Melissa Manos                                                                                                                                             | Cuyahoga County HMG                                           |
| Chad Hibbs                                                                                                                                                | Ohio Family & Children First Coordinator's Association        |
| Anju Mader                                                                                                                                                | Stark County HMG                                              |
| Katrina Bush                                                                                                                                              | Ohio Department of Developmental Disabilities                 |
| Lara Abu-Absi                                                                                                                                             | County Commissioners Association                              |
| Sandy Oxley                                                                                                                                               | Voices for Ohio's Children                                    |
| Jane Whyde                                                                                                                                                | Franklin County Family & Children First Council               |
| Joyce Calland                                                                                                                                             | Ohio Family & Children First Council                          |
| <b>Meeting to solicit feedback</b><br><b>Special Needs Committee of the Ohio Chapter of the American Academy of Pediatrics</b><br><b>December 1, 2011</b> |                                                               |
| Rosalind Batley, MD                                                                                                                                       | Nationwide Children's Hospital                                |
| George Benzing, III, MD                                                                                                                                   | Cincinnati Children's Medical Center                          |
| James Bryant, MD                                                                                                                                          | Local Pediatrician                                            |
| Katrina Bush, MEd                                                                                                                                         | Ohio Department of Developmental Disabilities                 |
| Irene Dietz, MD                                                                                                                                           | MetroHealth Medical Center                                    |
| James Duffee, MD                                                                                                                                          | Local Pediatrician                                            |
| Margie Eilerman, RN                                                                                                                                       | Director of Nursing, Shelby County Health Department          |
| Willard B. Furnald, MD                                                                                                                                    | Local Pediatrician                                            |
| Jeffrey Hord, MD                                                                                                                                          | Akron Children's Hospital                                     |
| Steven Kalavsky, MD                                                                                                                                       | Akron Children's Hospital                                     |
| Susan Havercamp, MD                                                                                                                                       | OSU/Nisonger Center                                           |
| Eileen Kastan, MD                                                                                                                                         | Dayton Children's Medical Center                              |
| Sonya Oppenheimer, MD                                                                                                                                     | Cincinnati Center for Developmental Disabilities              |
| Karen Ratliff-Schaub, MD                                                                                                                                  | Nationwide Children's Hospital                                |
| Robert Ruberg, MD                                                                                                                                         | Nationwide Children's Hospital                                |
| Howard Saal, MD                                                                                                                                           | Cincinnati Children's Hospital                                |
| Robert Stone, MD                                                                                                                                          | Local Primary Care Physician                                  |
| Kay Treanor                                                                                                                                               | Ohio Developmental Disabilities Council                       |
| Melissa Wervev Arnold                                                                                                                                     | Ohio Chapter of the American Academy of Pediatrics            |
| Max Wiznitzer, MD                                                                                                                                         | Rainbow Babies & Children's Hospital                          |
| Elaine Wyllie, MD                                                                                                                                         | Cleveland Clinic Foundation                                   |
| Jennifer Warfel, RN                                                                                                                                       | Bureau for Children with medical Handicaps                    |
| Kim Weimer                                                                                                                                                | Parent Advocate                                               |

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| <b>Interested Parties Memo emailed widely</b>       |                                                               |
| November 28, 2011                                   |                                                               |
| <b>Stakeholder Meeting</b>                          |                                                               |
| <b>December 7, 2011</b>                             |                                                               |
| Margaret Hulbert, Tom Scheid                        | The Ohio Partnership to Build Stronger Families               |
| Gayle Channing Tannenbaum                           | Channing and Associates                                       |
| <b>Webinar conducted on Rules Overview</b>          |                                                               |
| December 9, 2011                                    |                                                               |
| County Boards of Developmental Disabilities         |                                                               |
| Help Me Grow Advisory Council                       |                                                               |
| State Agency program partners                       |                                                               |
| <b>Webinar conducted on Rules Overview</b>          |                                                               |
| December 12, 2011                                   |                                                               |
| Local County HMG Project Directors                  |                                                               |
| County Family & Children First Council Coordinators |                                                               |
| Local Health Districts                              |                                                               |
| <b>Early Childhood Advisory Council</b>             |                                                               |
| <b>Presented Rule Package Overview</b>              |                                                               |
| December 15, 2011                                   |                                                               |
| Alford, Bill                                        | Akron Summit Community Action                                 |
| Arnold, Melissa Wervey                              | Ohio Chapter, American Academy of Pediatrics                  |
| Bacon, Kevin                                        | Ohio Senate                                                   |
| Buecker, Cheryl                                     | Edison Community College                                      |
| Byrd, Stephanie Wright                              | Success By 6                                                  |
| Cannon, Jessie                                      | Ohio Business Roundtable                                      |
| Celeste, Ted                                        | Ohio House of Representatives                                 |
| Chesney, Day                                        | Miami Valley Child Development Centers, Inc.                  |
| Close, Joni                                         | Sisters of Charity Foundation of Canton                       |
| Collamore, Jerry                                    | Collamore Group                                               |
| Day-Mackessy, Linda                                 | YMCA of Central Ohio/ Ohio Association of Childcare Providers |
| Dorman, Rebekah                                     | Invest in Children                                            |
| Egbert, Marcia                                      | The George Gund Foundation                                    |
| Furniss, Teresa                                     | Tru-Mah-Col AEYC                                              |
| Fyffe, Tammy                                        | Pike County Help Me Grow                                      |
| Haile, Asyia                                        | Type B Child Care Provider                                    |
| Haxton, Barbara                                     | Ohio Head Start Association                                   |
| Howard, Lowell                                      | South Central Ohio Educational Service Center                 |
| Hulbert, Margaret                                   | United Way of Greater Cincinnati                              |
| Johnson, Mary                                       | Type A Child Care Provider                                    |
| Kabbes, Dee Dee                                     | Champaign County Board of DD                                  |
| Kanary, Patrick                                     | Center for Innovative Practices                               |
| Kelly, Katie                                        | GroundWork                                                    |
| Kroeger, Janice                                     | Kent State University                                         |
| Lampe, Karen                                        | Creative World of Child Care                                  |
| McCauley, Roger                                     | ECE Advocate                                                  |
| McFadden, D. J.                                     | Holmes County Health Department                               |

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|------------------------------------------------|------------------------------------------------------|
| Miller, Barbara                                | Ohio Children's Foundation                           |
| Osborne-Fears, Billie                          | Starting Point                                       |
| Pollard, Anthony (Tony)                        | ADAMHS Board of Adams, Lawrence and Scioto Counties  |
| Putnam, Frank                                  | Cincinnati Children's Hospital, ML 3008              |
| Roberts, Stephen                               | AFSCME Council 8                                     |
| Romano, Judith                                 | Ohio Chapter, American Academy of Pediatrics         |
| Ruege, Katrina                                 | St. Vincent Family Center                            |
| Sausser Short, Angela                          | Ohio Family & Children First Council                 |
| Slutsky, Ruslan                                | University of Toledo GH 4500L                        |
| Smith, David                                   | Horizon Activities Centers                           |
| Smith, Tracey                                  | Greene County Educational Service Center             |
| Somerlot, Roxanne Guzman                       | Marion County DJFS                                   |
| Steel, Steven                                  | Toledo City Schools Board of Education               |
| Swanson, Amy                                   | Voices for Ohio's Children                           |
| Tenenbaum, Gayle Channing                      | Channing and Associates                              |
| Tice, Kimberly                                 | Ohio Association for the Education of Young Children |
| Whyde, Jane                                    | Franklin County Family & Children First Council      |
| <b>Stakeholder Meeting</b><br>December 7, 2011 |                                                      |
| Margaret Hulbert, Tom Scheid                   | The Ohio Partnership to Build Stronger Families      |
| Gayle Channing Tannenbaum                      | Channing and Associates                              |