



NANCY BARGMANN  
DIRECTOR

State of California—Health and Human Services Agency  
**Department of Developmental Services**  
1215 O Street, Sacramento, CA 95814  
[www.dds.ca.gov](http://www.dds.ca.gov)



GAVIN NEWSOM  
GOVERNOR

May 31, 2024

Larry Landauer, Executive Director  
Regional Center of Orange County  
P. O. Box 22010  
Santa Ana, CA 92702-2010

Dear Mr. Landauer:

This letter is to convey the results of the Department of Developmental Services' (DDS) review of the Early Start Program at Regional Center of Orange County (RCOC). This review was conducted through DDS' Self-Assessment Monitoring (SAM) system on November 9, 2023, through January 9, 2024, to ensure that California meets Part C of the Individuals with Disabilities Education Act (IDEA) requirements.

RCOC completed a self-assessment of 89 records through SAM. This consisted of 45 regular records and 44 transition records. DDS verified the documentation and the findings for each of the 89 records. DDS identified finding(s) of noncompliance in the following areas:

- Parental consent must be obtained prior to evaluations/assessments being conducted,
- Initial assessments including a child's unique strengths and service needs in all five developmental domains (including hearing, vision, and health), must be completed prior to developing (the initial Individualized Family Service Plan (IFSP),
- IFSP must be completed within 45 days from the date of referral,
- Timely provision of services,
- Early Intervention Services must be provided in the natural environment,
- IFSP must include services to meet the child and family needs,
- Written parent consent must be obtained prior to the provision of Early Intervention Services,
- Location of all Early Intervention Services must be identified on the IFSP,
- Periodic reviews of the IFSP must be completed when an Early Intervention Service is added, decreased or changed,
- Timely notification to the Local Educational Agency (LEA) must be sent at least 90 days prior to the child's 3<sup>rd</sup> birthday, and
- Timely transition conference must occur at least 90 days prior to the child's 3<sup>rd</sup> birthday.

The details of the findings are in the enclosed monitoring report.

Larry Landauer, Executive Director  
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Required Action:

The U.S. Department of Education's Office of Special Education Programs (OSEP) requires the state lead agency, DDS, to verify correction of noncompliance at the individual child level (prong 1) and the systemic level (prong 2) as soon as possible, and no later than one year from the date of this letter. A plan, signed by you, addressing the systemic level (prong 2) areas of noncompliance is required to be submitted to DDS within 30 days from the date of this letter.

As part of the plan of correction, RCOC should identify and address the root cause of noncompliance on each outstanding finding. Identifying the root cause ensures that corrective actions are meaningful and effective. Please forward the required evidence of clearance on each of the outstanding individual findings (prong 1) as soon as it is available (if applicable). DDS will require RCOC to provide subsequent records to clear the systemic level findings. In addition, please see recommendations listed on page 7 of the monitoring report.

Thank you for your cooperation during the monitoring review of the Early Start program at RCOC and your commitment to serve children and families. If you have any questions, please contact Nathaniel Taleon, Chief, Part C Federal Reporting and Monitoring Section, at (951) 374-0174, or by email at [Nathaniel.Taleon@dds.ca.gov](mailto:Nathaniel.Taleon@dds.ca.gov).

Sincerely,

Original Signed By

MARICRIS ACON  
Deputy Director  
Children, Adolescents, and Young Adult Services Division

Enclosure

cc: John Wright, Board Chairperson  
Jennifer Montanez, RCOC

**EARLY START MONITORING REPORT SUMMARY  
REGIONAL CENTER OF ORANGE COUNTY**

DATE OF REVIEW: NOVEMBER 9, 2023 – JANUARY 9, 2024  
FINAL REPORT DATE: MAY 31, 2024

<b>ITEMS AT 100% COMPLIANCE</b>				
	<b>REQUIREMENT</b>	<b>RECORDS IN COMPLIANCE</b>	<b>TOTAL RECORDS REVIEWED</b>	<b>COMPLIANCE PERCENTAGE</b>
R2	Initial evaluation determined the infant's or toddler's level of functioning in all developmental domains, including hearing, vision, and health.  34 Code of Federal Regulations (CFR), Sections 303.21, 303.24, 303.310, 303.321 and Title 14, California Early Intervention Services Act (CEISA) Section 95014	45	45	100%
R7	The Individualized Family Service Plan (IFSP) included the frequency and length for all early intervention services.  34 CFR, Section 303.344(d)(1)(i)	45	45	100%
T1	The IFSP included timely transition steps and services.  34 CFR, Sections 303.209(d) & (e) and 303.344(h)	44	44	100%

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**CLEARED FINDINGS**

Findings cleared prior to the issuance of the report. No further action is required.

REQUIREMENT		ORIGINAL RECORDS IN COMPLIANCE	TOTAL RECORDS REVIEWED	ORIGINAL COMPLIANCE PERCENTAGE	SUBSEQUENT RECORDS IN COMPLIANCE	TOTAL SUBSEQUENT RECORDS REVIEWED	SUBSEQUENT COMPLIANCE PERCENTAGE
R4	Written notice of the IFSP meeting. 34 CFR, Section 303.342(d)(2)	44	45	97.78%	■	■	100%
O1	IFSP includes services necessary to meet needs of child & family. 34 CFR, Sections 303.344(d)(1) and (e)	44	45	97.78%	■	■	100%

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<b>NONCOMPLIANCE</b>						
Regional Center of Orange County must clear findings on both the child-specific and systemic levels. Systemic level findings must be cleared as soon as possible but no later than one year from the final report date. <b>A Plan of Correction and subsequent review are required to clear these items.</b>						
REQUIREMENT		RECORDS IN COMPLIANCE	TOTAL RECORDS REVIEWED	COMPLIANCE PERCENTAGE	PRONG 1 (CHILD-SPECIFIC)	PRONG 2 (SYSTEMIC)
					OUTSTANDING	OUTSTANDING
R1	Obtained written parental consent for evaluation/assessment. 34 CFR, Sections 303.321(a) and 303.420(a)(2)	37	45	82.22%	X	X
R3	Initial assessment for service planning identified unique strengths and service needs in all five developmental domains, including hearing, vision, and health, prior to the initial IFSP. 34 CFR, Sections 303.21, 303.24, 303.310, 303.321 and Title 14, Section 95014	44	45	97.78%		X
R5	Initial IFSP meeting was conducted within the 45-day timeline. 34 CFR, Sections 303.310 and 303.342(a)	36	45	80.00%		X
R6	Timely provision of services 34 CFR, Sections 303.344(f)(1) and 340.420(b)(2) Title 17, California Code of Regulations (CCR), Section 52109(b)	42	45	93.33%		X
R8	Early intervention services are provided in the natural environment or the IFSP contains an appropriate justification when services are not provided in a natural environment. 34 CFR, Sections 303.26, 303.126 and 303.344(d)(1)(ii)	29	45	64.44%	X	X
O3	Parental consent was obtained prior to the provision of services. 34 CFR, Section 303.342(e)	33	45	73.33%	X	X

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**NONCOMPLIANCE**

Regional Center of Orange County must clear findings on both the child-specific and systemic levels. Systemic level findings must be cleared as soon as possible but no later than one year from the final report date. **A Plan of Correction and subsequent review are required to clear these items.**

REQUIREMENT		RECORDS IN COMPLIANCE	TOTAL RECORDS REVIEWED	COMPLIANCE PERCENTAGE	PRONG 1 (CHILD-SPECIFIC)	PRONG 2 (SYSTEMIC)
					OUTSTANDING	OUTSTANDING
O5	A Periodic Review was completed when early intervention services were added, decreased or changed.  34 CFR, Section 303.342(b)(1)(ii)	40	45	88.89%	X	X
T2	Timely referral to Local Educational Agency (LEA).  34 CFR, Sections 303.209(b) and 303.401(d)	38	44	86.36%		X
T3	Transition Conference occurred in a timely manner and the LEA was invited to the transition meeting.  34 CFR, Section 303.209(c)(1)	41	44	93.18%		X

Key:

R – “Regular” corresponds to the Regular Review Tool item, followed by the number of the Regular Review Tool item (ex.- R1 refers to the Regular Review Tool item number 1).

T – “Transition” corresponds to the Transition Review Tool item, followed by the number of the Transition Review Tool item (ex.- T3 refers to the Transition Review Tool item number 3).

O – “Other” refers to an additional finding, not included in the Regular or Transition review tools.

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**OUTSTANDING INDIVIDUAL FINDINGS (PRONG 1)**

#	UCI	Item 1 Consent for Evaluations/ Assessments	Item 8 Natural Environment	Other 3 Consent for Services	Other 5 Periodic Review
4	██████			X	
5	██████	X	X	X	
6	██████	X		X	
8	██████	X	X	X	
9	██████		X		
11	██████	X		X	
12	██████		X		
13	██████		X		
14	██████		X		
15	██████		X		
17	██████				X
18	██████		X		
20	██████		X		
23	██████		X		

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**OUTSTANDING INDIVIDUAL FINDINGS (PRONG 1)**

#	UCI	Item 1 Consent for Evaluations/ Assessments	Item 3 Initial Assessment	Item 8 Natural Environment	Other 3 Consent for Services	Other 5 Periodic Review
27	██████	X		X	X	
28	██████			X		
29	██████			X		
30	██████	X		X	X	X
37	██████	X			X	
40	██████	X			X	
44	██████			X		



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**RECOMMENDATIONS**

Considering what is outlined above, DDS recommends RCOC to align practices/procedures related to:

- Consent for Evaluation/Assessment,
- Initial Assessments,
- Timely IFSP,
- Timely Provision of Services,
- Natural Environment,
- Written Consent,
- IFSP includes Necessary Services,
- Periodic Review,
- LEA Notification. and
- Timely Transition Conference and LEA Invitation

For further information, the department encourages RCOC to further review available technical assistance resources related to the IFSP. These resources include but are not limited to:

- Early Start Service Coordinator’s Handbook: [Service Coordination Handbook – Early Start Neighborhood](#)
- IFSP resources through the Early Childhood Technical Assistance Center: [ECTA Center: Individualized Family Service Plan \(IFSP\)](#)
- Educational and Developmental Intervention Services – IFSP Process Guidance Handbook: [EDISIFSPProcessGuidanceHandbook.pdf \(ectacenter.org\)](#)

As required by 34 Code of Federal Regulations (CFR) Sections 303.321(a), 303.420(a)(2), 303.21, 303.24, 303.321, 303.24, 303.310, 303.321, 303.342(a), 303.344(f)(1), 340.420(b)(2), 303.26, 303.126, 303.126, 303.44(d)(1)(ii), 303.342(e), , 303.342(b)(1)(ii), 303.209(b), 303.401(d), 303.209(c)(1) Title 17, California Code of Regulations (CCR) Section 52109(b) and Title 14, California Early Intervention Services Act (CEISA) Section 95014.