# NOTICE TO ALL APPLICANTS: EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to applicants for grant awards under this program.

ALL APPLICANTS FOR NEW GRANT AWARDS MUST INCLUDE THE FOLLOWING INFORMATION IN THEIR APPLICATIONS TO ADDRESS THIS PROVISION IN ORDER TO RECEIVE FUNDING UNDER THIS PROGRAM.

Please respond to the following requests for information:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

The Nevada IDEA Part C Policy Manual provides the following equity policy as follows:

## **Nevada Part C Policy**

34 CFR 303.212 & 303.220 – Additional Information & Assurances: Nevada ensures equitable access to, and equitable participation in, the Part C statewide system as required by the General Education Provisions Act (GEPA) as noted in applicable policies.

See excerpt above in Nevada IDEA Part C's Policy Manual, on page 24 at the following link: <a href="IDEA Part C Early Intervention Policy Manual">IDEA Part C Early Intervention Policy Manual (nv.gov)</a>

Additional description of statewide and local projects and activities promoting equitable access to and equitable participation in early intervention services include:

- A. ICC Equity Subcommittee
- B. Family materials
- C. Dispute Resolution, Monitoring and Corrective Action
- D. Professional Development
- E. Technical Assistance/Programming

#### A. ICC Equity Subcommittee.

IDEA Part C proposed during July 2021 that Nevada's Interagency Coordinating Council (ICC) form an ICC Equity Subcommittee. ICC approval was received and the new ICC Equity Subcommittee held their first meeting during October 2021 to address disparities within Nevada's Early Intervention Services system for families and personnel. The ICC Equity Subcommittee has 14 members representing El programs in public and private community sectors, and individuals which include a parent, a representative for an Institution of Higher Education (IHE), and a

representative from a non-profit family advocacy group. The IDEA Part C Office team is not included in the count of 14 individuals, but IDEA Part C provides administrative assistance for planning, scheduling, following Open Meeting Law, developing agendas, and facilitates quarterly meetings for the ICC Equity Subcommittee. The ICC Equity Subcommittee has developed the following draft statements to date, with continue work intended for possible revisions as well as development of a Vision statement. For now, here is the ICC Equity Subcommittee's work in progress for a Mission statement:

#### **ICC Equity Subcommittee Mission Statement:**

Advise the ICC with up-to-date information with relation to Diversity, Equity, and Inclusion (DEI) practices, while addressing family concerns and promoting equitable access in service delivery with a commitment to underserved and vulnerable populations; Advocate for a culture of DEI among professionals providing services to children and families by identifying professional development and collaborative opportunities for a diverse workforce.

#### B. Family Materials.

IDEA Part C Office is making ongoing efforts to identify where language barriers may be addressed. To date, IDEA Part C has arranged for the following materials to be translated in languages other than English to engage more family participation in El services:

Full Re-Entry post-COVID instructions and Family Support letter in English and Spanish, March 2023: NEIS Full Re-entry Plan 3-20-2023 (nv.gov)

Parent Handbook with procedural safeguards in English, Spanish, with plans to upload Simplified Chinese and Burmese during 2023: <u>Early Intervention Programs</u> (nv.gov)

Family Survey in English and Spanish: Survey of quality (nv.gov)

Professional Development (PD) Center Program Catalog in English, with plans to upload Spanish version and order a Simplified Chinese and Burmese version. A goal is to one day have family feedback to incorporate family perspectives in PD planning, especially for parent involvement in potential parent classes and Communities of Practice (CoP): Nevada Early Intervention Professional Development Center Catalog (nv.gov)

#### C. Dispute Resolution, Monitoring and Corrective Action

IDEA Part C Office addresses with programs concerns for equity, which are noted when a family or EI employee brings a complaint to our office or when monitoring occurs and discrepancies are noted. For example, a parent complaint was formally filed during 2022 regarding a family that lives in a rural location and that was

receiving physical therapy (PT) services in person. Due to a shortage in personnel, this family was informed their PT service method would change from in person to telehealth to accommodate families in a city region. Due to the nature of the child's critical diagnosis, the family felt that the child was not making progress and that an in person method for service delivery was necessary. The EI program was investigated by IDEA Part C. Although the program was making good faith efforts to recruit and hire for the difficult-to-serve region, the program was found to be in violation of IDEA regulations for equitable access to EI services due to several factors, including the fact that families which live in the city do have additional community options which families in rural locations do not have. IDEA Part C met with the program to conduct a Corrective Action Plan (CAP) that outlines enforcements for trainings on equity, compensatory services, and planning for progress toward equitable services options.

#### D. Professional Development

The Nevada EI Professional Development Center was created in 2022 to provide alternative, comparable options for EI personnel to complete comparable coursework toward completion of licensure requirements that would allow these personnel to maintain their positions. Data taken for the first Cohort of applications includes demographics for gender, ethnicity, and program sector to ensure the PD Center is reaching all individuals statewide who are in need of PD options. The IDEA Part C Office will be able to track and identify any patterns or trends to ensure personnel are informed and able to participate if they choose to do so. Of course, traditional options for licensure routes through Institutions of Higher Education programs continue to be encouraged by IDEA Part C. Please see pages 22 to 24 within the PD Center Program Catalog available at the IDEA Part C Website for the PD Center: Nevada Early Intervention Professional Development Center (nv.gov)

IDEA Part C provided a proposal for funding the PD Center—this proposal was approved by the Governor's Finance Office (GFO) for American Rescue Plan Act (ARPA) funds during October 2022, with availability of these funds through June 2026.

PD Curriculum planning will include equity perspectives throughout all coursework, with all curriculum undergoing evaluation for evidence-informed practices. Mention of these recent PD retention initiatives are mentioned in Nevada Part C's Annual Performance Report/State Performance Plan (APR/SPP) within Indicator 11 State Systemic Improvement Plan (SSIP).

#### E. Technical Assistance/Programming

The IDEA Part C Office meets with managers and supervisors for all EI programs monthly (2<sup>nd</sup> Wednesday morning of the month). Since the death of George Floyd in 2020, the IDEA Office has consistently kept a standing agenda item for Equity during monthly TA Calls. Various themes in past months include awareness months such as for the Transgender community with data provided to encourage inclusion and

support for individuals exposed to violence, which may include the families of the children being served in EI programs. Other topics which have been covered with links provided include learning about children of color experiencing disparities, initiatives occurring in Nevada, such as Diversity Equity Inclusion (DEI) principles developed by the Department of Health and Human Services (DHHS). IDEA Part C encourages all programs to follow suit and continue discussions and trainings at their respective program levels with their personnel.

Nevada's new data system is expected to Go Live during August 2023. New, streamlined capabilities for ad hoc reports will be available so that IDEA Part C will be able to better identify trends and patterns for any disparities among geographical location and ethnicities.

Nevada's Part C Coordinator volunteers to participate in NV DHHS DEI Steering Committee, developing action plans for personnel to one day utilize in service to Nevada's diverse populations. Also, Nevada's Part C Coordinator is a board member for the Infant & Toddler Coordinators Association (ITCA), which presented during February 2023 to OSEP leadership regarding ITCA's plans to focus on 'Access' in equity work supporting Part C states. Therefore, Nevada Part C actively continues to learn as well as share about equity efforts throughout and with other states and systems for applicability to Nevada's EI system.

At local levels in Nevada, during January 2023, Nevada Early Intervention Services (NEIS) and the State's Autism Treatment Assistance Program (ATAP) supervisors statewide came together for a winter supervisor retreat in Las Vegas and received a presentation/training from Gender Justice Nevada (website here <a href="https://genderjusticenv.org/">https://genderjusticenv.org/</a>). Following this presentation, some rich debrief discussions have taken place, which has resulted in many supervisors visually demonstrating their allyship by displaying the pride power flag outside and inside their offices, adding their pronouns to their email signature line to show they are a safe space for families and colleagues to express their authentic identities, and deeper conversations about what allyship looks like in the community. In the Northern region of Nevada, programs have widely shared resources from Our Center (local LGTBQIA community and youth center) with Aging and Disability Services (ADSD) colleagues, Developmental Specialists and families, including free queer family playgroups that occur twice monthly.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

Budgetary limitations could be a factor for EI system leadership and administration to consider in that salary increases may be necessary to attract qualified providers to work in difficult to service areas, such as rural and frontier regions. Further, economic hardship arising during this post-pandemic era has been occurring since and following the COVID-19 pandemic statewide, and indeed nationwide. This hardship seems to play a role in whether personnel will remain in the field of EI, further creating challenges for

personnel who may already be at a disadvantage financially, i.e., affected by skyrocketing housing prices, as well as inflation or rising costs for food, gasoline, tuition for position/license required coursework, childcare and overall daily sustenance. In order to address the severe personnel shortage, IDEA Part C began planning no cost Professional Development options in hopes of retaining existing personnel and attracting additional personnel.

**3.** Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

IDEA Part C will continue to perform strategic planning at local, regional and statewide levels, with technical assistance and feedback as is possible from families, programs, public stakeholders, DHHS Director's Office Fiscal Team, OSEP and national technical assistance centers. IDEA Part C will schedule meetings and continue with the dedicated work as previously mentioned and also as described in the next point below. Also, Nevada is standing by for technical assistance from The Early Childhood Technical Assistance (ECTA) Center. The ECTA informed states that an equity assessment tool is in development. Nevada Part C is looking forward to reviewing this resource as soon as it becomes available for potential use in Nevada's Early Intervention Services system.

- **4.** What is your timeline, including targeted milestones, for addressing these identified barriers?
  - A. Engage with Stakeholders, include Legislature

Timeline: Quarterly basis, generally January, April, July and October.

Targeted milestones: Engage ICC stakeholders, including families, through ICC Equity Subcommittee meetings, with specific requests to assembly legislators to consider additional funding as incentives to attract, recruit and hire qualified personnel to work in difficult to serve areas; Legislative session occurs every two years; the ICC is scheduled to have a legislative training during July 2023 with an ICC board member who is also an Assemblywoman; We hope to learn more for how policy decisions may affect funding for personnel hiring incentives and the steps to take to bring this information front and center for decision makers as soon as possible and/or potentially for the next legislative session February to June 2025. Report-out to ICC expected quarterly, with follow up on the July training provided during the October 2023 ICC meeting. Updates may also be provided during annual performance reporting and in FFY 2024 Federal Grant Application.

B. Continued Strategic Planning with Professional Development

Timeline: Monthly workgroup meetings.

Targeted Milestones: Expand professional development (PD) series options to include therapists, supervisors/leadership, administrative professionals, ICC stakeholders,

families and personnel with existing licensure; Developmental Specialist (DS) Series is an 18-month program provided at no cost and will allow DSs to meet their position requirements. DS Series Cohort 1 begins April 2023; Cohort 2 begins August 2023; Cohort 3 is expected to begin during January 2024. Additional therapist series is the next continuing education/professional development in need of planning, which will be able to be planned upon the hiring of a PD Center Contractor who can assist IDEA Part C in this area, with projected hiring to occur during April-May 2023 and potential planning for a Therapist series to begin during June-July 2023, for potential roll out of a quarterly Community of Practice (CoP) series by October 2023. Next report-out will occur monthly to PD Work Group, quarterly to ICC for updates, annual performance reporting to OSEP, and FFY 2024 Federal Grant Application.

## C. Continued Strategic Planning for Language Disparities

Timeline: Quarterly.

Targeted Milestones: Continue to explore other languages to promote representation and access for families who need EI materials in a language other than English, with next report-out during annual performance reporting to OSEP and FFY 2024 Federal Grant Application.

### D. Continued Strategic Planning for Monitoring

Timeline: Annual comprehensive monitoring or more frequently if re: focused monitoring, complaint investigations or desk audits.

Targeted Milestones: Continue completing official child record reviews and providing opportunities for family surveys and personnel surveys among all EI programs according to established monitoring and TA processes to ensure to the extent possible that equitable access is successfully occurring for all EI families and EI personnel are also supported for success. Engage with ADSD's Quality Assurance team to collaborate in contacting families and personnel for follow up and for inquiries for satisfaction of services and work environment. Utilize Division for Early Childhood Recommended Practices to support families and personnel throughout monitoring, community engagement and any evaluation activities. Next report-out expected during annual performance reporting to OSEP and FFY 2024 Federal Grant Application.

Submitted for Posting to IDEA Part C Website, 3/23/2023.

#### **Notes:**

- 1. Applicants are not required to have mission statements or policies that align with equity in order to submit an application.
- 2. Applicants may identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- 3. Applicants may have already included some or all of this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) and page number(s) in their applications or State Plans that includes the information responsive to that question on this form or may restate that information on this form.

## Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1894-0005. Public reporting burden for this collection of information is estimated to average 3 hours per response, including time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain a benefit. If you have any comments concerning the accuracy of the time estimate or suggestions for improving this individual collection, send your comments to <a href="ICDocketMgr@ed.gov">ICDocketMgr@ed.gov</a> and reference OMB Control Number 1894-0005. All other comments or concerns regarding the status of your individual form may be addressed to either (a) the person listed in the FOR FURTHER INFORMATION CONTACT section in the competition Notice Inviting Applications, or (b) your assigned program officer.