Eastern Los Angeles Regional Center Performance Contract 2018

January 2, 2018

Public Policy Performance Measures

Public Policy Performance Measure	Activities Regional Center will Employ to Achieve Outcome
1.) Number and percent of RC (Regional Center) caseload in Developmental Centers	Statement: The Eastern Los Angeles Regional Center is committed to providing assistance to individuals and their families who choose to move from a state developmental center into a less restrictive environment within their home communities and in response to the Lanterman Developmental Center closure plan. Through these efforts the percentage of people living in a SDC will decrease. Activities: (Continue with 2017 Activities) Please refer to the Community Placement Plan for fiscal year 17/18.
2.) Number and percentage of minors residing with families	 Statement: ELARC is committed to keeping children at home by providing the necessary supports and services. Activities: Service Coordinators (SC) will continue to place the highest priority on keeping families informed about services and supports available through Regional Center as well as through generic agencies that would assist them to care for their children at home. Continue to provide training for families in behavior management practices Community Services and Consumer Services Departments will continue to collaborate on developing and expanding those in-home services and supports to assist families to maintain children at home. Continue to collaborate with the Department of Children and Family Services (DCFS) Support the decision making authority of the family.
3.) Number and percentage of adults residing in independent living	Please reference plan for "Number and percent of adults residing in home settings"

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4.) Number and percentage of adults residing in supported	Please reference plan for "Number and percent of adults residing in home
living	settings"
5.) Number and percentage of adults residing in Adult	Please reference plan for "Number and percent of adults residing in home
Family Home Agency homes	settings"
6.) Number and percentage of adults residing in family	Please reference plan for "Number and percent of adults residing in home
homes (home of parent of guardian)	settings"
7.) Number and percent of adults residing in home settings	Statement:
	ELARC will ensure consumers are encouraged to assert their rights to
	determine and control the living arrangement of their choice. This may
	include owning, renting, or leasing the home where the consumer resides.
	The availability of assistive technology services to maximize consumer
	participation will be explored annually at the IPP and as needed, and
	implemented and monitored on a case by case basis.
	Activities:
	Work with existing Family Home Agency (FHA) vendors to increase
	developments of certified families within the catchment area.
	Work with housing resources in order to be better informed and have
	access to affordable housing developments in Los Angeles County.
	Include and identify developments for special needs population such as
	the elderly, homeless, mental health and battered women in order to
	integrate consumers based on these needs.
	The regional center will identify needs and coordinate developments
	related to independent living, supported living and supports for adults
	residing in home settings.
	Work with Non Profit Housing Organization(s) to demonstrate affordable
	funding feasibility for new apartment units within the catchment area.
	Housing Specialist to coordinate regular meetings with unit liaisons to
	provide information on alternate housing resources and funding streams
	to Service Coordination.
	IPP process already included discussion of the consumer living
	arrangement each time the IPP is reviewed. Over time as issues and

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	concerns are raised, services are identified for the needs identified.
	Consumer Trends and Risk Management committees meet regularly to
	make recommendations for consumers who are having difficulties in
	their present living arrangements.
8.) Number and percent of minors living in facilities serving	Statement:
> 6 individuals	Children served by ELARC and in need of residential services will be provided
	with the most appropriate level of care in the least restrictive and most
	home-like setting possible. It is our belief that through our efforts, the
	percentage of children residing in facilities with seven or more beds will be
	maintained or decreased from its currently low level throughout the next
	five years.
	Activities:
	On a quarterly basis, needs assessment will be conducted by
	Outcome Coordinator and any unmet needs will be relayed to
	Community Services Division for resource development activity.
	 Children residing in facilities with 7+ Beds will be assigned to the
	Intensive Services Liaison (ISL) caseload and diligent efforts will be
	made to assess appropriateness of placement, provide information
	on smaller, less restrictive living options to parents and assist in
	relocation efforts if agreed to by the planning team.
	ELARC will provide information and explore training opportunities
	for Service Coordinators to increase their knowledge of medically
	fragile/high medical needs children, understand risk factors and
	identify services and supports that benefit the child. The same
	process will apply to children with high behavioral and/or psychiatric
	needs.
	 Service Coordinators will conduct ongoing evaluation of cases in order to identify medically fragile/high medical needs children as
	early as possible and collaborate with Healthcare Facilities and
	Medically Fragile Unit Supervisor and/or Placement Coordinator (PC)
	in the event more intensive medical or nursing supports are needed
	to maintain the child in the family home or if residential services are

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	needed. This same process will apply for children with behavioral issues who may be in need of more specialized and intensive behavioral and psychiatric services. • ELARC will continue to collaborate with the community in identifying resources (natural supports, generic and funded) available to assist families in mitigating stressors as a result of caring for a medically fragile/high medical need's child and children with complex behavioral and psychiatric needs. • ISL and PC will participate with ELARC's resource development staff and in community placement planning (CPP) meetings each month in an effort to assist in identifying unmet future needs for children. • Outcome Coordinator, ISL, and PC will reach out to DCFS in an effort to provide information regarding regional center resources for dually served consumers.
9.) Number and percent of adults living in facilities serving > 6 individuals	Statement: ELARC is committed to providing all adult consumers, who may need residential services, with appropriate living options which foster homelike living arrangements and opportunities for meaningful community integration and experiences.
	 Activities: The Intensive Services Liaison and Service Coordinators will continue to provide information on the array of community living options, including certified FHA homes, Independent Living Services, Supported Living Services, and small group homes as alternatives to living in large group home settings, to all adult consumers and/or their families. Current residential resources, available beds for adults in facilities of < 6 beds, appear sufficient to meet overall needs however in instances where a viable living option is not available, responsible ELARC staff will collaborate with Community Services staff in making known unavailable resources and promote development of such. ELARC will support development of small community care and

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	 intermediate care nursing facilities targeting consumers with medical/healthcare needs. Continue to collaborate with Community Services and vendors regarding development of facilities 6 or less beds as well as other services and supports designed to maintain the consumer in less restrictive living arrangements. Placement Coordinator will periodically attend unit meetings, participate in committees and review and disseminate information on less restrictive, more inclusive living options during living options staffing meetings at ELARC. Consumer and Community Services will continue discussion of resources, grants, and other innovative living options for elderly (i.e., the Green House® Project) and alternatives to nursing facility placements in future.
10.)Indicator showing the relationship between annual authorized services and expenditures by individual's residence type and ethnicity.	Statement: ELARC will continue to support that consumers and their families/authorized representatives determine and control the living arrangement of their choice. ELARC is committed to providing equitable access to and delivery of culturally and linguistically competent services and supports. ELARC will ensure consumers are encouraged to assert their rights to determine and control the living arrangement of their choice.
	 Activities: Ongoing Service Coordination ELARC has identified 200 individuals currently served by ELARC with the lowest per capita expenditures and pilot an intensive technical assistance/support approach to case management. ELARC is targeting monolingual Spanish and monolingual Cantonese consumers and their families whose cases have been identified as having low per capita expenditures (<\$2000 annually) The enhanced caseload service coordinators will continue to find innovative ways to communicate information to individuals/families, facilitating visits to generic resources locations and assisting individuals/families navigating the complex generic resource systems. ELARC developed two positions of Person Centered Practice coordinators, one

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	who speaks Spanish and the other who speak Cantonese. The Peron Centered
	Coordinators are working with families using person centered techniques to
	identify personalized resources families need in order to control the living
	arrangement of their choice.
	RFP for Outreach with Grassroots Community Partners
	 ELARC identified both large and small key community partners and develop agreements regarding mutual outreach to underserved populations in their communities within mutual service areas.
	ELARC has partnered with Proyecto Pastoral and Chinatown Service Center in order to increase awareness of Regional Center and its services.
	ELARC is participating in community organization partnership meetings in order to obtain information on all generic resources available.
	Partner with FRC to Provide Orientation to Early Start Families
	ELARC will continue to partner with the Family Resource Center (FRC) to provide
	regularly scheduled orientations to the Regional Center for Early Start families with representatives from the Regional Center, and parent groups that serve
	 underserved populations. FLARC will continue to support monolingual Spanish and monolingual Chinese
	• ELARC will continue to support monolingual Spanish and monolingual Chinese parents of children 0 -3. The intended outcome is to increase families'
	understanding of the transition from Early Start to Lanterman services,
	understanding of the transition from Early Start to Earlierman services, understanding of the role and responsibilities of the Regional Center, and
	knowledge of support systems in the community.
	Parent Organizations to Provide Orientations to Families of Individuals over 3
	ELARC is partnering with parent run organizations that serve populations
	identified as underserved in our catchment area to provide a regularly
	scheduled orientation in languages other than English to families going through
	the intake and assessment process at ELARC for consumers over 3 years old .
	Sessions would be held in the community. Childcare and bus tokens would be
	offered to enhance accessibility for families.
	ELARC will continue to support monolingual Spanish and monolingual Chinese
	families that are entering and new to the ELARC community to understand the
	basics about Regional Centers and services and to identify community supports.
	Ongoing Training of Parents • FLAPC will provide engaing training for parents in the role of the Regional
	 ELARC will provide ongoing training for parents in the role of the Regional Center, understanding services and supports available, understanding policies,
	and developing partnerships in languages other than English.

ELARC will target non English Speaking parents of children and adults already served by ELARC and provide them with information on services that can be of benefit when discussing the living arrangement of their choice. Behavioral Management Workshops in Spanish and Cantonese to enhance understanding of behavior management and promote the development of skills and approaches that families may utilize. To share resources and support among parent attendees. These families will learn information and gain skills that will assist in controlling the living arrangement of their choice. Develop and Translate Materials for Families with Low English Literacy ELARC will develop and translate selected materials specific to the ELARC community, as well as word collaboratively with public information representatives of other Regional Centers, on the development of easy-to-understand, informative publications in multiple languages which can be used by cleints/families of any production in modification and parallel should be already be centered to the services assessment and diagnosis, early start, services available by age, generic resources, and information about transitions. ELARC will target individuals/families with low English literacy with easier to understand materials in non-English languages, plan language, and through a variety of media ELARC will target individuals/families with low English literacy with easier to understand materials in non-English languages, plan language, and through a variety of media ELARC will competency and Communication Training ELARC will competency and Communication Training to ELARC staff. In addition management and er designated staff will be trained in Motivationa interviewing techniques in a coaching model. ELARC will cordinate child supervision for: Understanding Regional Center training for parents, Peaces in Services amongst individuals and families.	Public Policy Performance Measure	Activities Regional Center will Employ to Achieve Outcome
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		:
Early Start Orientation at the FRC for families of consumers under 3		

Public Policy Performance Measure	Activities Regional Center will Employ to Achieve Outcome
	 ELARC will support efforts for monolingual Spanish and monolingual Chinese speaking parents to be able to attend the above identified sessions. Bus Tokens for Approved Parent Training and Parent Orientation Activities ELARC will purchase bus tokens for: Understanding Regional Center training for parents; Parent Run Orientation for families of consumers over 3; Early Start Orientation at the FRC for families of consumers under 3 ELARC will support efforts for monolingual Spanish and monolingual Chinese speaking parents to be able to attend the above identified sessions.
 11.) Percent of total annual purchase of service expenditures by individual's ethnicity and age: Birth to age two, inclusive Age three to 21, inclusive Twenty-two and older 	Statement: The Eastern Los Angeles Regional Center (ELARC) is committed to providing equitable access to and delivery of culturally and linguistically competent services and supports.
- Twenty two and older	 Activities: Ongoing Service Coordination ELARC has identified 200 individuals currently served by ELARC with the lowest per capita expenditures and pilot an intensive technical assistance/support approach to case management. ELARC is targeting monolingual Spanish and monolingual Cantonese consumers and their families whose cases have been identified as having low per capita expenditures (<\$2000 annually) Through the enhanced caseload project service coordinators are able to provide personalized education on Regional Center and Service Coordinator roles and responsibility, IPP process and access to services and supports. All meetings and interactions are in the native language of the individual and or family. The enhanced caseload service coordinators will continue to find innovative ways to communicate information to individuals/families, facilitating visits to generic resources locations and assisting individuals/families navigating the complex generic resource systems in their native language. ELARC developed two positions of Person Centered Practice coordinators, one who speaks Spanish and the other who speak

Public Policy Performance Measure	Activities Regional Center will Employ to Achieve Outcome
	Cantonese. The Peron Centered Coordinators are working with families
	using person centered techniques to identify personalized resources
	families need in their native language.
	RFP for Outreach with Grassroots Community Partners
	ELARC identified both large and small key community partners and
	develop agreements regarding mutual outreach to underserved
	populations in their communities within mutual service areas.
	ELARC has partnered with Proyecto Pastoral and Chinatown Service
	Center in order to increase awareness of Regional Center and its services.
	ELARC is participating in community organization partnership meetings
	in order to obtain information on all generic resources available for
	different age groups and in different languages.
	ELARC will continue to outreach to underserved populations in their
	communities in order to better understand their needs.
	Partner with FRC to Provide Orientation to Early Start Families
	ELARC will continue to partner with the Family Resource Center (FRC) to
	provide regularly scheduled orientations to the Regional Center for Early
	Start families with representatives from the Regional Center, and parent groups that serve underserved populations.
	 ELARC will continue to identify early start families who will benefit from parent orientations in their native language.
	ELARC will continue to support monolingual Spanish and monolingual
	Chinese parents of children 0 -3. The intended outcome is to increase
	families' understanding of the transition from Early Start to Lanterman
	services, understanding of the role and responsibilities of the Regional
	Center, and knowledge of support systems in the community.
	 Early start will continue to use the "Take a Minute" resources and materials which assist families facilitating social and emotional
	development.
	Parent Organizations to Provide Orientations to Families of Individuals over
	3

Public Policy Performance Measure	Activities Regional Center will Employ to Achieve Outcome
	ELARC will continue to connect families with parent run organizations to
	better support their needs in their local communities.
	• ELARC is partnering with parent run organizations that serve populations
	identified as underserved in our catchment area to provide a regularly
	scheduled orientation in languages other than English to families going
	through the intake and assessment process at ELARC for consumers over
	3 years old . Sessions would be held in the community. Childcare and bus
	tokens would be offered to enhance accessibility for families.
	ELARC will continue to support monolingual Spanish and monolingual
	Chinese families that are entering and new to the ELARC community to
	understand the basics about Regional Centers and services and to
	identify community supports.
	Ongoing Training of Parents
	ELARC will provide ongoing training for parents in the role of the
	Regional Center, understanding services and supports available,
	understanding policies, and developing partnerships in languages other than English.
	 ELARC will target non English Speaking parents of children and adults
	already served by ELARC and provide them with information on services
	that can be of benefit based on theirs needs and age.
	 ELARC will continue to offer in depth parent training on accessing
	services and developing a vision for your child (PICI) in participants
	native language and with interpretation when needed.
	Behavioral Management Workshops in Languages other than English
	ELARC is offering behavioral management workshops in Spanish and
	Cantonese to enhance understanding of behavior management and
	promote the development of skills and approaches that families may
	utilize. To share resources and support among parent attendees.
	These families will learn information and gain skills that will assist with
	different age groups.
	Develop and Translate Materials for Families with Low English Literacy
	ELARC will develop and translate selected materials specific to the ELARC

Public Policy Performance Measure	Activities Regional Center will Employ to Achieve Outcome
	community, as well as work collaboratively with public information
	representatives of other Regional Centers, on the development of easy-
	to-understand, informative publications in multiple languages which can
	be used by clients/families of any regional center. This may include
	creation of new materials and/or translation into additional languages,
	of materials which have already been created. Topics for public
	information to be developed may include information on application for
	services, assessment and diagnosis, early start, services available by age,
	generic resources, and information about transitions.
	ELARC will target individuals/families with low English literacy with easier
	to understand materials in non-English languages, plain language, and
	through a variety of media
	ELARC is working with partners to obtain input family friendly content for information and the street in
	informative publications.
	 Update Cultural Competency and Communication Training ELARC will provide updated cultural competence training to ELARC staff.
	In addition management and other designated staff will be trained in
	Motivational interviewing techniques in a coaching model.
	ELARC will continue to have the Cultural Specialist seek methods to
	address cultural barriers for accessing services amongst individuals and
	families.
	Child Supervision for Approved Parent Training and Parent Orientation
	Activities
	ELARC will coordinate child supervision for: Understanding Regional
	Center training for parents; Parent Run Orientation for families of
	consumers over 3; Early Start Orientation at the FRC for families of
	consumers under 3
	ELARC will support efforts for monolingual Spanish and monolingual
	Chinese speaking parents to be able to attend the above identified
	sessions.
	Bus Tokens for Approved Parent Training and Parent Orientation Activities
	ELARC will purchase bus tokens for: Understanding Regional Center

Public Policy Performance Measure	Activities Regional Center will Employ to Achieve Outcome
	training for parents; Parent Run Orientation for families of consumers
	over 3; Early Start Orientation at the FRC for families of consumers under
	3
	ELARC will support efforts for monolingual Spanish and monolingual
	Chinese speaking parents to be able to attend the above identified sessions.
12.) Progress in implementing the Employment First Policy pursuant to WIC section 4869; specific outcome measures listed below:	Statement: Opportunities for integrated, competitive employment shall be given the highest priority for working age individuals with developmental disabilities regardless of the severity of their disabilities.(Employment First
	Policy: WIC Sect. 4869(a)[1])
Number and percentage of consumers, ages 16 -64 with	A services
earned income	Activities:
Average annual wages for consumers ages 16 -64	Gather, review, and analyze data from state (DDS, Employment Development (SDD), and SLABC data reviews to
 Annual earnings of consumers ages 16 – 64 compared to people with all disabilities in CA. 	Development Department {EDD}) and ELARC data sources to establish a baseline.
 Number of adults who were placed in competitive, integrated employment following participation in a Paid Internship Program. Percentage of adults who were placed in competitive, integrated employment following participation in a Paid Internship Program. 	Collaborate with ELARC Vendor Advisory Committee to host at least 3 CIE and PIP information presentations in order to assist service providers in developing the capacity to provide effective consumer training that will lead to successful employment and internship placements in our catchment and adjoining areas.
 Average hourly or salaried wages and hours worked per week for adults who participated in a Paid Internship Program during the prior fiscal year. 	 Partner with service providers who specialize in employment services to identify opportunities and obstacles to supporting adults to obtain paid employment.
 Average wages and hours worked for adults engaged in competitive, integrated employment, on behalf of whom incentive payments have been made. Total number of \$1000, \$1250, and \$1500 incentive 	ELARC Employment Forum meets quarterly (January, April, July, October) with service providers and Department of Rehabilitation (DOR) staff assigned to the region to address opportunities and obstacles in the delivery of employment services.
 payments made for the fiscal year. Percentage of adults who reported having integrated employment as a goal in their IPP. 	➤ ELARC and the Vendor Advisory Committee including the service providers involved in the Employment Forum will develop, release and utilize survey data to implement a plan to ensure the quality and effectiveness of job developer and

Public Policy Performance Measure	Activities Regional Center will Employ to Achieve Outcome
-	job coaching services.
Public Policy Performance Measure	
	 Build partnerships with local business entities in collaboration with DOR and school districts. Provide 3 public presentations to stakeholders to disseminate program information regarding CIE and PIP.
	ELARC Employment Specialist, and selected service providers will participate in a DOR and Workforce Innovation Technical Assistance Center/SDSU sponsored Customized Employment Training (10 days) contributing to the development of a model for service provision to build capacity for this service in California.

Activities Regional Center will Employ to Achieve Outcome
➤ ELARC will explore and secure training in relevant employment topics in 2018 for consumers/family members, ELARC staff, service providers and local community partners to participate including but may not be limited to "2018 Benefits and Employment Workshop", "Customized Employment", "Employment and Integrated Settings". • Increase service coordinator and family/consumer knowledge on Department of Rehabilitation. ➤ Provide at least 3 to 5 service coordinator (SC) consultations per week to provide guidance, and subject matter expertise, that will increase in both post-secondary education and employment development services that will lead to Competitive and Integrated Employment opportunities. ➤ Establish closer working relationships with local and adjoining DOR vocational counselors. • Increase service coordinator and family knowledge on the employment options and how to navigate through the system utilizing a handbook and employment policy. • Ensure that transitional IEPs explore work/employment. • Inform and educate service coordinators on work/employment prior to transitional IEPs in order to best serve the needs of the

Compliance Performance Measures

Compliance Performance Measure		
13.) Unqualified independent audit with no material findings		
14.)Substantial compliance with DDS fiscal audit		
15.) Accuracy percent of POS fiscal projections (based on February Sufficiency of Allocation Report {SOAR})		
16.)Operates within OPS budget		
17.) Certified to participate in Waiver		
18.) Compliance with Vendor Audit Requirements per contract, Article III, Section 10		

Compliance Performance Measure	Activities Regional Center Will Employ to Achieve Outcome
19.) Client Developmental Evaluation Report (CDER)/Early	Statement:
Start Report (ESR) Currency	ELARC will ensure that ESR/CDER information is entered into SANDIS (RC
	Database) in a timely and accurate manner. ELARC will ensure that ESR
	information is entered into the ESR program in a timely and accurate manner.
	Activities:
	CDER
	Service Coordinator will enter accurate and current CDER information for
	consumers during birth month.
	Supervisors will monitor accuracy and accountability via the CDER error
	report.
	 Utilize a tracking form to alert SCs of CDERs due the following month.
	<u>ESR</u>
	The service coordinator will enter accurate information and current ESR
	information for consumers upon a child's entrance into the program,
	update the ESR at least annually, and at the time the child exits the program.
	 Supervisors will monitor accuracy and accountability via the "Early Start
	Reports" and "Federal Reports" tabs of the ESR Program.
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	ES Department to collaborate with Assessment and Special Services division to include in the population and a special Services division
	to include in the psychological evaluations age equivalent development

Regional Center Eastern Los Angeles Regional Center

Compliance Performance Measure	Activities Regional Center Will Employ to Achieve Outcome
	levels in all 5 developmental domains, especially in the areas of
	communication and cognition, (as instructed by Elise Parnes with the
	Department of Developmental Services.)
	 Implementation of the State Systemic Improvement Plan.
20.)Intake/assessment and IFSP time lines (0-2)	Statement:
	ELARC will ensure that the Early Start intake and assessment process, for
	applicants birth through age 2, are completed within 45 days of referral. This
	includes the development of the initial IFSP for Early Start consumers.
	Activities:
	 Service coordinators will complete the initial IFSP and generate an ESR for all Early Start consumers within the required time lines (45 days from the date of referral).
	 Additional vendors have been recruited for intake and assessment due to the increased volume of referrals. In order to be in compliance with the 45 day timeline
	Implementation of the State Systemic Improvement Plan.
21.)Intake/assessment time lines for consumers ages 3	Statement:
and above	ELARC will ensure that intake and assessment time lines for applicants ages three and above are met.
	Activities:
	Will continue to maintain timeline compliance throughout the year.
22.)Individual Program Plan (IPP) Development (WIC	Statement: All active cases will have a current IPP which is reflective of a
requirements)	person- centered approach and adheres to all WIC requirements
	Activities
	Training in Person Centered Practices (PCP) will become a regular
	feature of Consumer Services meetings and on supervisors' meeting
	agenda.
	The agency will be participating in community outreach to enhance

Compliance Performance Measure	Activities Regional Center Will Employ to Achieve Outcome
	 community understanding of services and supports and the value of the IPP process to meet service needs. Continue required IPP/PCP training to new service coordination staff. Continue organizational support of the PCP model. Continue mandatory Medicaid Waiver training to all new service coordinators. Supervisors are responsible to provide on the job training on IPP and support of PCP concepts. Continue to support family/consumer participation in the IPP development.
23.)Individual Family Services Plan (IFSP) Development (Title 17 Requirements)	Statement: All Early Start consumers will have a current IFSP which will reflect a family centered approach.
	 Activities: Initial IFSP to be completed within 45 days of referral. Early Start services will be initiated in a timely manner upon obtaining parental consent. Early Start services will be provided within the child's natural environment or the IFSP will contain appropriate justification for the service not being provided in the natural environment. The service coordinator will update the ESR annually. ELARC will provide timely notification, not fewer than 90 days before the child's 3rd birthday, to Part B services for all children served in Early Start. Implementation of new Individuals with Disabilities Act (IDEA) Part C regulations per updated policies and procedures. Interagency agreements with local school districts will be updated to reflect new Part C regulations. Implementation of IFSP format includes a structured family assessment. Continued training with staff in department meetings on child and family outcomes. Cross training with Los Angeles County Department of Child & Family

Regional Center Eastern Los Angeles Regional Center

Calendar Year(s) 2018

Compliance Performance Measure	Activities Regional Center Will Employ to Achieve Outcome
	Services (DCFS)/RC on Child Abuse Prevention Treatment Act (CAPTA)
	requirements.
	Working with the Department of Children and Family Services to ensure
	ELARC receives holder of educational rights to complete the IFSP within 45
	days.
	Implementation of the State Systemic Improvement Plan.