



November 4, 2011

Mary Wherry Director of Public Health and Clinical Services Department of Health and Human Services 4150 Technology Way, Suite 300 Carson City, Nevada 89706

Re: Rural and Frontier Region Rate Study

Dear Ms. Wherry:

In accordance with your request, Strategic Progress, LLC and DP Video Productions, LLC are pleased to submit this Rural and Frontier Region Rate Study report to the State of Nevada, Department of Health and Human Services. Strategic Progress was retained by the State of Nevada to analyze the cost of providing early intervention services to children living in the rural and frontier regions of the state of Nevada. Additionally, NEIS requested an analysis of how each division within NEIS (South, Northwest, and Northeast offices) delivers Early Intervention Services to their respective clients in rural and frontier regions as well as any identified cost variances by operating division.

This report was designed by Strategic Progress in response to your request. We make no representations as to the adequacy of these procedures for all your purposes, only to the thorough approach we have taken to address the questions posed in our scope of work with you. Our findings and estimates are as of November 2011 (the most recent data available) and are dated as of the last day of our fieldwork, November 4, 2011. Data utilized in the report and the analyses underlying it were obtained from third parties, including NEIS. While we have no reason to doubt the accuracy of the data obtained, the information collected was not subjected to any auditing or review procedures by Strategic Progress, and therefore, we make no representations or assurances as to its completeness.

Thank you for allowing us to assist you in this important project. We welcome the opportunity to discuss this report with you at any time. Should you have any questions or require any additional information, please contact Cyndy Ortiz Gustafson at (702) 241-8033.

Sincerely,

Cyndy Ortiz Gustafson, Principal Strategic Progress

# **Table of Contents**

4
5
6
8
<u>9</u>
17
18

# Introduction

Children at risk of a developmental delay or disorder are routinely referred to Early Intervention Services. If a child qualifies, he or she may receive a range of services at no cost to the family. Early Intervention is designed to improve outcomes for children with developmental delays and/or disabilities by providing early, appropriate, and intensive interventions.

In 1986, the U.S. Congress created the mandate for a range of services to be provided to infants and toddlers with disabilities, through what is currently referred to as 'Early Intervention'. In Public Law 108.446, the provision of special services for the youngest members of our society was established. This was due to "an urgent and substantial need" both to "enhance the development of infants and toddlers with disabilities and to minimize their potential for developmental delay."

The Part C Birth to Three program is funded by both State and Federal Part C dollars. To receive funding, the State must comply with IDEA and its regulations that are issued by the Federal Government from the Code of Federal Regulations (34CFR, Part 303, under Public Law 105-117, IDEA), Early Intervention Program for Infants and Toddlers with Disabilities.

Early Intervention, according to the law that created it, is: "a statewide, comprehensive, coordinated, multidisciplinary, interagency system that provides early intervention services for infants and toddlers with disabilities and their families." In simpler terms, it is a range of services designed to intervene at the early stages of an infant or toddler's disability. Early intervention is designed to serve children with disabilities under the age of three, and the families who care for them.

Early Intervention services may include:

- physical or occupational therapy;
- speech or language therapy;
- psychological services;
- social work services;
- educational services;
- nursing care;
- behavior modification;
- nutritional counseling;
- family training, counseling and home visits;
- assistive technology and assistive technology services;
- special instruction;
- speech-language pathology and audiology services, and sign language and cued language services;
- service coordination services;
- medical services for diagnostic or evaluation purposes;
- early identification, screening, and assessment services;
- health services necessary to enable the child to benefit from other early intervention services;
- vision services: and
- transportation and related costs that are necessary to enable an infant or toddler and the infant's or toddler's family to receive another service described in this list.

Services are provided in the home, child care center, or other locations depicting natural environments where the child will feel comfortable. Whenever possible, services are included in the child's normal daily activities.

Infants or toddlers with disabilities in one or more of the following areas of development may qualify for Early Intervention: physical, cognitive, adaptive, communicative, or social and/or emotional development.

Early Intervention Services are defined as services that:

- Are designed to meet the developmental needs of each child eligible under this part and the needs of the family related to enhancing the child's development;
- Are selected in collaboration with the parents;
- Are provided:
  - Under public supervision;
  - By qualified personnel, as defined in §303.21;
  - o In conformity with an individualized family service plan; and
  - At no cost, unless, subject to §303.520 (b) (3), Federal or State law provides a system of payments by families, including a schedule of sliding fees; and
- Meet the standards of the State, including the requirements of Part C.

# **Nevada Early Intervention Services**

The IDEA Part C Office of the Aging and Disability Services Division within the Department of Health & Human Services is the lead agency responsible for administering Nevada Early Intervention Services (NEIS) under Part C (early intervention services) of the Individuals with Disabilities Education Act.

Part C is responsible for:

- The monitoring of Part C programs and activities
- Providing technical assistance to programs
- Developing procedures for resolving complaints
- Develop policies and procedures related to financial matters
- Identification and coordination of resources
- Developing interagency agreements
- Resolution of disputes
- Ensuring delivery of services in a timely manner
- Data collection

While NEIS has historically provided all early intervention services to the community, five years ago, the state began contracting out a portion of its early intervention services to private community providers. This began with Easter Seals Southern Nevada and now includes five additional community providers: four total in southern Nevada and two total in northern Nevada. During FY 2010, the baseline year for this particular analysis, community partners provided approximately 28 percent of all early intervention service hours throughout the state of Nevada. That said, community partners have been limited to serving children in urban areas throughout Washoe and Clark counties only.

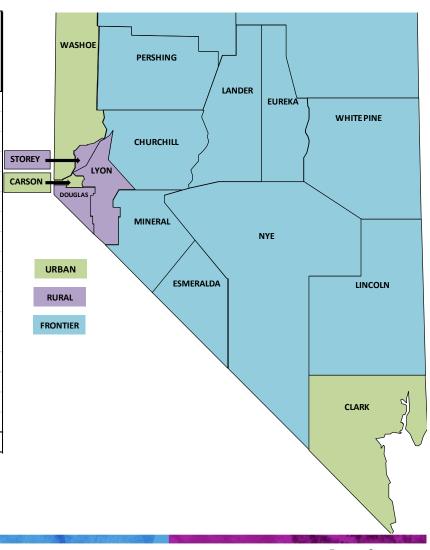
# **Rural and Frontier Nevada**

The state of Nevada spans approximately 110,000 square miles, with 90 percent of its 2.7 million residents living in only three counties (Carson City, Clark County, and Washoe County). These three urban counties comprise a mere 13 percent of the state's land mass. Providing early intervention services to the 10 percent of the state's population residing in rural and frontier Nevada presents a unique set of challenges, principal amongst them is travel time. Even in relatively rural regions, travel time can add up quickly. For instance, serving a child who lives in Mesquite, Nevada, still located within the boundaries of urban Clark County, encompasses 156 round trip miles and takes a provider 3 hours in total travel time. As early intervention services are designed to replicate a child's natural environment, services are required to be provided in the child's home or child care center.

For the purposes of this study, counties with populations of less than 7 people per square mile are considered frontier regions. Counties with a population density greater than 7 people per square mile, but not defined as a metropolitan statistical area (MSA), are considered rural regions. As can be seen from the table and map presented below, the majority of the geographic land mass of the state of Nevada is considered frontier.

#### **Nevada Population and Land Area by County**

			Persons
		Land area	per
	2010	(square	square
County	Population	miles)	mile
Carson City	55,274	143	385.6
Churchill	24,877	4,929	5.0
Clark	1,951,269	7,910	246.7
Douglas	46,997	710	66.2
Elko	48,818	17,179	2.8
Esmeralda	783	3,589	0.2
Eureka	1,987	4,176	0.5
Humboldt	16,528	9,647	1.7
Lander	5,775	5,494	1.1
Lincoln	5,345	10,664	0.5
Lyon	51,980	1,994	26.1
Mineral	4,772	3,756	1.3
Nye	43,946	18,147	2.4
Pershing	6,753	6,037	1.1
Storey	4,010	263	15.2
Washoe	421,407	6,342	66.4
White Pine	10,030	8,876	1.1
Total	2,700,551	109,855	24.6



Consistent with the presentation above regarding the distribution of Nevada's population between urban, rural, and frontier regions, the demand for early intervention services is nearly identical, with 89 percent of all service hours spent serving the urban counties of Carson City, Clark, and Washoe.

## **Early Intervention Service Information, NEIS and Community Partners**

	Children Served	Percent of Children Served	<b>Hours Served</b>	Percent of Hours Served
Urban	3,010	89%	92,639	89%
Rural	121	4%	4,930	5%
Frontier	244	7%	5,642	5%
Total	3,375	100%	103,212	100%
Rural & Frontier	365	11%	10,573	10%

As noted previously, NEIS is the only authorized provider of services to rural and frontier counties, therefore, service information for NEIS by itself is slightly higher in favor of the frontier and rural regions.

## **Early Intervention Service Information, NEIS Only**

	Children Served	Percent of Children Served	Hours Served	Percent of Hours Served
Urban	1,954	84%	63,187	86%
Rural	121	5%	4,930	7%
Frontier	242	10%	5,618	8%
Total	2,317	100%	73,735	100%
Rural & Frontier	363	16%	10,548	14%

County	Designation	Children Served	Percent of Children Served	Hours Served	Hours per Child
County	Designation				
Carson City	Urban	79	3%	3,337	42.24
Churchill	Frontier	45	2%	1,115	24.77
Clark	Urban	1,282	55%	39,594	30.88
Douglas	Rural	43	2%	2,710	63.02
Elko	Frontier	81	3%	1,557	19.22
Eureka	Frontier	2	0%	10	4.84
Humboldt	Frontier	32	1%	1,328	41.49
Lander	Frontier	8	0%	93	11.65
Lincoln	Frontier	2	0%	64	31.98
Lyon	Rural	77	3%	2,204	28.62
Mineral	Frontier	2	0%	13	6.43
Nye	Frontier	36	2%	715	19.87
Pershing	Frontier	2	0%	38	19.08
Storey	Rural	1	0%	16	16.45
Washoe	Urban	593	25%	20,256	34.16
White Pine	Frontier	32	1%	685	21.42
Total		2,317	100%	73,735	31.82

# **Approach and Methodology**

The methodology used to calculate costs for providing early intervention services to the rural and frontier regions of the state of Nevada involved a two prong approach.

First, information obtained from NEIS' TRAC database was analyzed for several important factors:

- The zip code of the child being served (in order to determine whether the child was living in an urban, rural, or frontier region).
- The program ID was obtained to determine whether services were performed by a community provider, or one of the three operating divisions of NEIS (Northwest, Northeast, and South).
- The name of the provider within the program was obtained in order to compare this to matching salary and wages paid.
- Total service time was pulled as well, in order to calculate the amount of time spent serving children in rural and frontier areas.

Additionally, financial information was also collected from NEIS regarding:

- Wages and salaries paid to NEIS service providers
- Travel expenses for each operating division
- Operating expenses for each NEIS division

Using the materials compiled above, the pertinent details of our approach are summarized as follows:

- Travel time and administrative duties comprise a significant amount of time in providing services to all recipients of early intervention services, and even more so for children living in rural and frontier regions of the state. The actual amount of time spent on administrative duties and travel is not tracked and therefore could not be provided. SP created a model to account for this discrepancy by multiplying each provider's annual salary by the proportion of his or her time spent serving rural and frontier regions. This simple, line by line item produced a weighted average for each staff member by zip code. Amounts include salaries and benefits, as well as Avysion administrative fees for contractors.
- Travel expenses were provided for each operating region, however, with the exception of NEIS-NW, expenses were not always clearly delineated as serving exclusively rural or frontier regions. Even NEIS-South, which allocates cars for rural usage, acknowledged that they are sometimes used for urban travel. Given that the amounts involved for motor pool expenses were so small, 100 percent of travel expenses were included in the model. This assumption is correct for NEIS-NW, but can be challenged for NEIS-NW and NEIS-South.
- A small portion of operating expenses for each region was also included in the calculation. For the Northeast region, which exclusively serves frontier areas, 100 percent of expenses were included. The South and Northeast regions were allocated a portion of overall operating expenses in ratios that match the proportion of services provided to rural and frontier regions. As an example, NEIS-South spends 3.1 percent of total service time serving children in rural and frontier regions. Thus, 3.1 percent of NEIS-South's operating expenses were included as a cost component. Operating expenses exclude salaries, wages, benefits, and travel expenses, as these were already accounted for as explained above.

# **Requested Analyses**

In order to develop conclusions for the State of Nevada regarding the cost of providing early intervention services to children residing in rural and frontier regions of Nevada, the following questions were developed to drive the process of inquiry and analysis.

1) What is the cost of providing services to children/families in frontier Nevada (counties with less than 7 people per square mile), including travel? Costs will be broken out and reported on at the county and town levels.

The cost of providing early intervention services to children in frontier counties of Nevada were calculated so that they could be easily compared to the prior statewide study. The results of this analysis were somewhat conflicting, with the average cost per child equaling \$491 and the cost per service hour equaling \$253. The monthly cost per child is actually lower than the statewide cost, which conflicts with the very notion that set about the proposed study to begin with. See the table below for rates for each city within the frontier regions of Nevada.

#### Estimated Costs for Frontier Regions Served, FY 2010

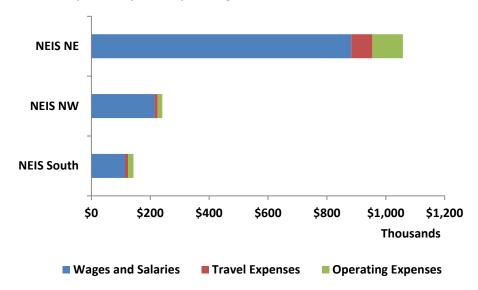
				Annual	W	age and					М	onthly	(	Cost per
NEIS		Children	Hours	Hours per		Salary	Op	erating	Travel	Total	Cc	st per		Service
Region	City and County	Served	Served	Child	E	Expense		penses	Expenses	Expenses	(	Child		Hour
NW	Fallon, Churchill	45	1,115	24.8		\$202,233	\$	15,499	\$ 9,703	\$227,435	\$	421	\$	204
NW	Hawthorne, Mineral	2	13	6.4	\$	3,811	\$	179	\$ 112	\$4,102	\$	171	\$	319
NW	Lovelock, Pershing	2	38	19.1	\$	8,682	\$	530	\$ 332	\$9,544	\$	398	\$	250
South	Amargosa Valley, Nye	1	20	20.2	\$	3,906	\$	526	\$ 310	\$4,742	\$	395	\$	235
South	Pahrump, Nye	35	675	19.3	\$	110,417	\$	17,565	\$ 10,341	\$138,323	\$	329	\$	205
NE	Elko, Elko	42	946	22.5	\$	200,853		25,649	17,644	\$244,146	\$	484	\$	258
NE	Spring Creek, Elko	23	324	14.1	\$	74,318		8,785	6,043	\$89,146	\$	323	\$	275
NE	Carlin, Elko	6	74	12.3	\$	20,665		2,005	1,380	\$24,050	\$	334	\$	325
NE	Deeth, Elko	2	42	21.1	\$	11,137		1,141	785	\$13,063	\$	544	\$	310
NE	Jackpot, Elko	2	28	14.1	\$	7,262		765	526	\$8,553	\$	356	\$	303
NE	Owyhee, Elko	1	1	1.3	\$	315		34	24	\$373	\$	31	\$	294
NE	Wells, Elko	2	49	24.7	\$	12,840		1,338	921	\$15,099	\$	629	\$	306
NE	West Wendover, Elko	3	92	30.7	\$	25,929		2,493	1,715	\$30,137	\$	837	\$	328
NE	Eureka, Eureka	2	10	4.8	\$	2,364		262	180	\$2,806	\$	117	\$	290
NE	Winnemucca, Humboldt	32	1,328	41.5	\$	228,591		35,993	24,760	\$289,344	\$	754	\$	218
NE	Battle Mountain, Lander	8	93	11.7	\$	22,754		2,528	1,739	\$27,021	\$	281	\$	290
NE	Caliente, Lincoln	1	5	5.2	\$	644		141	97	\$882	\$	74	\$	170
NE	Panaca, Lincoln	1	59	58.8	\$	12,477		1,593	1,096	\$15,166	\$	1,264	\$	258
NE	Round Mountain, Nye	1	3	2.7	\$	638		74	51	\$763	\$	64	\$	279
NE	Tonopah, Nye	1	18	17.6	\$	3,784		477	328	\$4,589	\$	382	\$	261
NE	Ely, White Pine	23	534	23.2	\$	203,905		14,483	9,963	\$228,351	\$	827	\$	427
NE	Lund, White Pine	1	17	17.1	\$	3,168		465	320	\$3,953	\$	329	\$	231
NE	McGill, White Pine	4	80	19.9	\$	16,428		2,163	1,488	\$20,079	\$	418	\$	252
NE	Ruth, White Pine	4	54	13.6	\$	11,911		1,471	1,012	\$14,394	\$	300	\$	265
NE	Wendover, Tooele, Utah	1	89	88.5	\$	22,539		2,400	1,651	\$26,590	\$	2,216	\$	300
Total / A	verage of all Frontier	245	5,706	23.3	\$1	,211,572	\$:	138,559	\$ 92,521	\$ 1,442,652	\$	491	\$	253
State of	Nevada - NEIS Statewide	2,328	74,368	31.9		n/a		n/a	n/a	\$17,115,398	\$	613	\$	230

There are a few possible explanations for the findings presented above, the most likely of which has to do with operating expenses.

Salaries and wages were calculated for each individual provider serving the frontier regions in direct proportion to the relative time spent serving those areas in order to account for travel time and any administrative activities performed in conjunction with servicing children in frontier regions. As can be expected, salaries and wages are the largest component of providing early intervention services.

Travel expenses are tracked in the aggregate and do not accurately reflect each trip or destination. While this limitation would impact an analysis of travel expenses at a zip code level, travel expenses in the aggregate should not be severely impacted. For instance, while the expenses associated with a specific destination are estimated, travel expenses for the entire Northeast region specifically would not be affected at all, since the Northeast region exclusively services frontier communities. Additionally, travel expenses as a whole are a relatively small portion of total expenses in serving frontier communities. See the chart below for a graphical illustration.

#### Frontier Expenses by NEIS Operating Division



As can be noted from the above chart, operating expenses are also a relatively small portion of the total expense of serving the frontier regions. This may in fact be the largest detriment to the analysis. While the administrative activities of the service providers themselves have been included in this analysis, any administrative expenses associated with personnel who do not travel to the frontier or rural regions were excluded from this analysis. Further discussions with NEIS staff are required to determine whether this is indeed an accurate assumption.

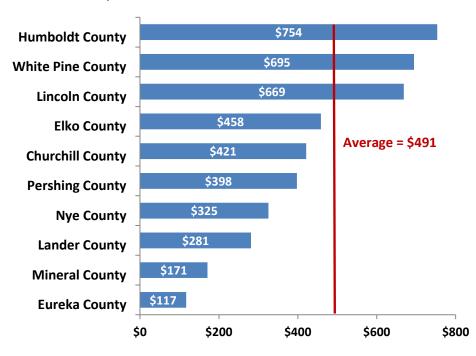
Additionally, it should be noted that upon reviewing the rates for towns that have a smaller number of children serviced, extremely wide fluctuations in estimated monthly and hourly costs persist. This is more than likely due to the intensity and type of service being offered.

While an analysis of rates serving the frontier regions of the state were requested at the town level, they are also presented below at the county level in order to smooth out data anomalies. A larger sample size is always helpful in making specific assumptions about a dataset.

#### **Estimated Frontier Costs by County, FY 2010**

			Annual	W	age and						Mo	nthly	C	Cost per
	Children	Hours	Hours per	:	Salary	Op	erating	•	Travel	Total	Cos	st per	9	Service
County	Served	Served	Child	E	xpense	Ex	penses	Ex	penses	Expenses	С	hild		Hour
Churchill County	45	1,115	24.8	\$	202,233	\$	15,499	\$	9,703	\$227,435	\$	421	\$	204
Mineral County	2	13	6.4	\$	3,811	\$	179	\$	112	\$4,102	\$	171	\$	319
Pershing County	2	38	19.1	\$	8,682	\$	530	\$	332	\$9,544	\$	398	\$	250
Nye County	38	715	18.8	\$	118,745	\$	18,642	\$	11,030	\$148,417	\$	325	\$	7,347
Elko County	82	1,646	20.1	\$	375,858	\$	44,610	\$	30,689	\$451,157	\$	458	\$	477
Eureka County	2	10	4.8	\$	2,364	\$	262	\$	180	\$2,806	\$	117	\$	290
Humboldt County	32	1,328	41.5	\$	228,591	\$	35,993	\$	24,760	\$289,344	\$	754	\$	218
Lander County	8	93	11.7	\$	22,754	\$	2,528	\$	1,739	\$27,021	\$	281	\$	290
Lincoln County	2	64	32.0	\$	13,121	\$	1,734	\$	1,193	\$16,048	\$	669	\$	3,086
White Pine County	32	685	21.4	\$	235,412	\$	18,582	\$	12,783	\$266,777	\$	695	\$	499
Total / Average of all Frontier	245	5,706	23.3	\$1	,211,572	\$1	38,559	\$	92,521	\$ 1,442,652	\$	491	\$	253
State of Nevada - NEIS Statewide	2,328	74,368	31.9		n/a		n/a		n/a	\$17,115,398	\$	613	\$	230

# Estimated Monthly Cost per Child Frontier Counties, FY 2010



2) What is the cost of providing services to children/ families in rural Nevada (all counties and towns not defined as urban or frontier), including travel? Costs will be broken out and reported on at the county and town levels.

In addition to the designated rural counties of Douglas, Lyon, and Storey, NEIS requested that certain areas of urban counties also be designated as rural areas. Specifically, in Clark County, zip codes in Bunkerville, Jean, Logandale, Mesquite, Laughlin, and stateline were included as rural for the purposes of this analysis. In Washoe County, Gerlach, Wadsworth, and Incline Village were designated as rural. The analysis of rural expenses per child and per service hour yielded similar results to the frontier analysis.

### **Estimated Costs for Rural Regions Served, FY 2010**

				Annual	W	age and							Mo	onthly	(	Cost per
NEIS		Children	Hours	Hours per		Salary	Op	erating	1	Travel		Total	Co	st per		Service
Region	City and County	Served	Served	Child	E	xpense	Ex	penses	Ex	penses	E	xpenses	C	hild		Hour
NW	Carson City, Douglas	10	1,033	103.3	\$	75,925	\$	14,366	\$	8,993		\$99,284	\$	827	\$	96
NW	Gardnerville, Douglas	22	1,491	67.8	\$	111,911	\$	20,729	\$	12,976		\$145,616	\$	552	\$	98
NW	Minden, Douglas	6	140	23.3	\$	34,347	\$	1,944	\$	1,217		\$37,508	\$	521	\$	268
NW	Stateline, Douglas	2	5	2.4	\$	1,045	\$	67	\$	42		\$1,154	\$	48	\$	240
NW	Zephyr Cove, Douglas	3	42	13.8	\$	10,173	\$	577	\$	361		\$11,111	\$	309	\$	268
NW	Dayton, Lyon	16	646	40.4	\$	64,772	\$	8,986	\$	5,625		\$79,383	\$	413	\$	123
NW	Fernley, Lyon	42	1,278	30.4	\$	208,683	\$	17,774	\$	11,127		\$237,584	\$	471	\$	186
NW	Silver Springs, Lyon	11	177	16.0	\$	95,080	\$	2,454	\$	1,537		\$99,071	\$	751	\$	561
NW	Wellington, Lyon	2	42	21.2	\$	9,351	\$	589	\$	369		\$10,309	\$	430	\$	243
NW	Yerington, Lyon	6	61	10.1	\$	13,534	\$	841	\$	527		\$14,902	\$	207	\$	246
NW	Virginia City, Storey	1	16	16.5	\$	4,437	\$	229	\$	143		\$4,809	\$	401	\$	292
NW	Gerlach, Washoe	1	6	6.1	\$	2,007	\$	84	\$	53		\$2,144	\$	179	\$	353
NW	Wadsworth, Washoe	2	17	8.6	\$	6,266	\$	240	\$	150		\$6,656	\$	277	\$	385
NW	Incline Village, Washoe	2	7	3.4	\$	9,010	\$	95	\$	59		\$9,164	\$	382	\$	1,344
South	Bunkerville, Clark	1	30	29.7	\$	3,127	\$	773	\$	455	\$	4,355	\$	363	\$	147
South	Jean, Clark	1	15	14.8	\$	1,807	\$	385	\$	227	\$	2,419	\$	202	\$	163
South	Logandale, Clark	7	112	16.0	\$	14,326	\$	2,910	\$	1,713	\$	18,949	\$	226	\$	169
South	Mesquite, Clark	9	319	35.5	\$	53,030	\$	8,312	\$	4,894	\$	66,236	\$	613	\$	207
South	Laughlin, Clark	3	74	24.7	\$	8,242	\$	1,928	\$	1,135	\$	11,305	\$	314	\$	153
South	Cal Nev Ari, Clark	1	15	15.0	\$	1,730	\$	389	\$	229	\$	2,348	\$	196	\$	157
Total / A	Average of all Rural	148	5,525	37.3	\$	728,803	\$	83,672	\$	51,832	\$	864,307	\$	487	\$	156
State of	Nevada - NEIS Statewide	2,328	74,368	31.9		n/a		n/a		n/a	\$1	7,115,398	\$	613	\$	230

			Annual	W	age and							M	onthly	С	ost per
	Children	Hours	Hours per		Salary	Op	erating	1	Travel		Total	Co	st per	S	ervice
County	Served	Served	Child	E	xpense	Ex	penses	Ex	penses	E	xpenses	(	Child		Hour
Douglas	43	2,710	63.0	\$	233,401	\$	37,683	\$	23,589	\$	294,673	\$	571	\$	109
Lyon	77	2,204	28.6	\$	391,420	\$	30,644	\$	19,185	\$	441,249	\$	478	\$	200
Storey	1	16	16.5	\$	4,437	\$	229	\$	143	\$	4,809	\$	401	\$	292
Washoe	5	30	6.0	\$	17,283	\$	419	\$	262	\$	17,964	\$	299	\$	596
Clark	22	565	25.7	\$	82,262	\$	14,697	\$	8,653	\$	105,612	\$	400	\$	187
Total / Average of all Rural	148	5,525	37.3	\$	728,803	\$	83,672	\$	51,832	\$	864,307	\$	487	\$	156

# Estimated Monthly Cost per Child Rural Counties, FY 2010



3) Explore and discuss differences in service delivery between each division within NEIS (South, Northwest, and Northeast offices) to their respective clients in rural and frontier regions. A narrative documenting these differences will be provided. These differences will also be taken into consideration when evaluating the following questions, four and five.

Before discussing the logistics of service delivery differences between the various NEIS divisions, it may be helpful for the reader to first understand some of the challenges in serving the rural and frontier regions in general. Aside from the largest barrier, distance and travel time, several other common challenges are shared by all divisions in serving the rural and frontier regions. In fact, the challenges shared by divisions far outnumber the differences. Challenges include:

- Availability of service providers is the second largest problem facing all divisions. There is a definite shortage in the number of providers who are qualified and willing to serve non-urban areas.
- Scheduling / logistics in order to maximize the time spent driving to and from rural and frontier regions,
   NEIS will often stack appointments for service providers within the space of one or two days. This is a
   smart operational move to reduce travel time as well as motor pool and per diem expenses; however, it
   does take quite a bit of time to coordinate schedules between the therapist, multiple families, and any
   other individuals who may need to be involved, such as the school district or child care settings.
- Weather can also be a significant challenge in winter months when there is snow through mountain passes. Normally providers are able to track any oncoming storms before leaving the office, however, even so, this would require a revisit to the scheduling and logistics issue of rescheduling a days' worth of appointments.
- Cell phone reception is an issue throughout many rural and frontier areas of the state. This poses a serious safety concern in the event of a breakdown or run-in with weather.
- Time Zones despite the fact that a frontier or rural town is located in Nevada, some border towns use the
  time zone of the bordering state, such as Utah or Idaho. This poses an additional challenge for providers,
  as they must adjust their schedules to meet families on their time zone, and may also result in the provider

encountering per diem meals due to the fact that they are leaving earlier in the morning or later in the evening to accommodate the border time zone.

- Cultural Sensitivity not all providers are well suited for serving rural and frontier clients, therefore further limiting the pool of available providers.
- Administrative Items depending on the intended location, an out of state travel request may be necessary in order to reach the intended rural or frontier Nevada destination (for instance, driving 15 miles into Utah, and then 15 back in to access a portion of Nevada).
- Child Find activities add to the cost of service delivery. When communities or school districts host health fairs, NEIS must attend and set up a booth for the fair. On average these types of events occur once or twice a month.
- Late Referrals late referrals will be processed directly to a developmental specialist. Oftentimes they will double up on their caseload to get the referral through in time.

Now that the commonalities between divisions have been established, SP will now address the differences in service delivery between divisions.

#### The Referral Process

**NEIS South** — Referrals from the family are usually completed by an Administrative Assistant IV. Once the family provides their information, the referral is sent to an Administrative Assistant II (scheduling) and automatically set as a home visit. The scheduling Administrative Assistant II notes which staff serve the area in question and place the child on an assignment list.

When the therapist performs the initial home visit, they usually determine eligibility and the initial IFSP on the same visit. This is usually performed by a Developmental Specialist (level?) and sometimes a physical or occupational therapist.

**NEIS NE** - Referrals are received by an Administrative Assistance II or III. Sometimes this task may even be performed by a Development Specialist IV. (scheduling?) After that, a Registered Nurse or a Developmental Specialist will determine eligibility. In order to cut costs, NE has tried to cut back therapist visits until eligibility is approved.

**NEIS NW** - NEIS NW did not add anything different than the above regarding the intake process.

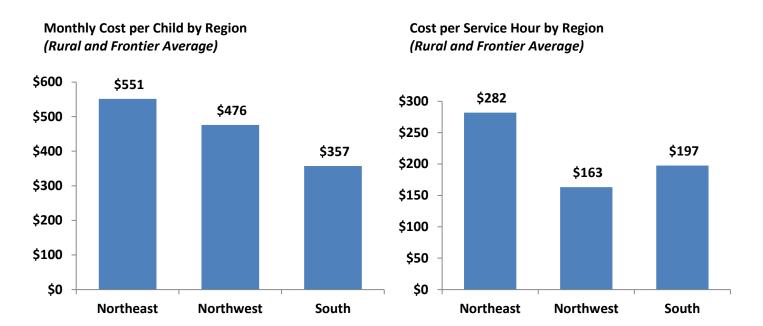
#### **Service Delivery**

After the IFSP has been set and services have begun, all divisions report consistencies in service delivery until preparation for exit from the program. At program exit, all divisions report different procedures that are dictated not by the division but by the incoming school district. It was decided that these distinctions would not be elaborated on due to the sheer number of different school districts serving the rural and frontier portions of the state.

4) Is there a difference in service delivery costs for the rural and frontier regions based on NEIS' current operating regions, Northeast, Northwest, or South? Cost differences will include an analysis of travel costs. Costs will be broken out and reported on at the county and town levels when possible.

A relatively large variation in service costs exists between NEIS' designated operating divisions. The most obvious contributor to this variation is the very differences between the clients they serve. The Northeast region exclusively services frontier counties and has a much larger travel component than the Northwest or South regions. Travel expenses on its own for the northeast region account for a mere 7 percent of the total expenses, however, it is estimated that travel time is the primary expense for the Northeast region. While the exact amount of travel time could not be calculated, the cost of travel time is included in the wage and salary expenses for all providers serving rural and frontier regions. The best example of inflated travel time expenses can be seen from the higher monthly costs per child as well as the higher costs per service hour for the Northeast region.

			Annual	Wage and				Monthly	Cost per
	Children	Hours	Hours per	Salary	Operating	Travel	Total	Cost per	Service
County	Served	Served	Child	Expense	Expenses	Expenses	Expenses	Child	Hour
Northeast - Frontier	160	3,757	23.5	\$ 882,523	\$ 104,262	\$ 71,722	\$1,058,505	\$ 551	\$ 282
Northwest - Frontier	49	1,166	23.8	\$ 214,726	\$ 16,208	\$ 10,147	\$241,081	\$ 410	\$ 207
Northwest - Rural	126	4,961	39.4	\$ 646,543	\$ 68,974	\$ 43,179	\$758,694	\$ 502	\$ 153
South - Frontier	36	695	19.3	\$ 114,324	\$ 18,091	\$ 10,651	\$143,066	\$ 331	\$ 206
South - Rural	22	565	25.7	\$ 82,263	\$ 32,788	\$ 19,304	\$134,353	\$ 509	\$ 238
Total / Average	393	11,143	28.4	\$1,940,373	\$240,323	\$ 155,003	\$ 2,335,699	\$ 495	\$ 210
State of Nevada - NEIS Statewide	2,328	74,368	31.9	n/a	n/a	n/a	\$17,115,398	\$ 613	\$ 230



In a separate analysis, SP constructed a simple ratio analysis to try and determine the degree to which geographic distance may present a barrier for each operating division within NEIS. This analysis is presented

on the next page and is largely inconclusive. SP would like to verify mileage figures for the Northwest and South regions.

## Mileage Analysis by NEIS Operating Division

County	Children Served	Annual Mileage	Miles per Child	Miles per Child per Month
Northeast - Frontier	160	88,601	554	46.1
Northwest - Frontier & Rural	175	42,000	240	20.0
South - Frontier & Rural	58	34,471	594	49.5
Total / Average	393	165,072	420	35.0

5) Are costs significantly different based on state employee tenure/salaries, distance traveled, operational costs, including rent and amount of physical plant (satellite offices) needed for more limited services in some areas. SP will document and account for disparities between grade levels of staff performing similar functions by region.

Question 3 needs to be verified before this question can be completed accurately. Additionally, while SP was provided information regarding salaries for all employees, both full time and contracted, job titles and staff grades were largely missing.

## **Data Limitations**

In discussions with NEIS staff, several concerns were expressed regarding the accuracy of TRAC data collected for children served under Part C. These concerns and several more were documented upon inspection and analysis of the TRAC dataset provided. These data limitations are listed here in order to assist NEIS in the development of a more comprehensive data analysis system, which is understood to be currently under construction:

- Records for the actual date of service do not exist. Rather, data is collected documenting the terms of the IFSP. While it is important to document the records of the IFSP, it is equally important to document the specific actual dates of service. All assumptions within this report operate under the context that services were delivered as specified within the plan, which may or may not be true.
- If a child exits and then re-enters the system, previous records disappear from the system.
- If a child moves, all records are changed to the new zip code and region, therefore confusing actual locations of service delivery. For instance, several children served live out of state, in locations all across the country.
- NEIS currently lacks a manager to oversee TRAC data.
- Based on the data provided, it appears that some children who live in Utah are served. It is unclear whether this is due to a family move, or a zip code that straddles both Nevada and Utah.
- Two community providers, Integrated Support Solutions and Positively Kids, are already serving children in rural and frontier areas, specifically Nye County.

Additionally, the database is rife with data entry errors, which include but are not limited to:

- Nonexistent zip codes permeate throughout the system, making it impossible to determine where the child was served, or if the service area encompasses a rural, frontier, or urban setting.
- Most fields allow for open entry of any text, which results in common misspellings across multiple fields. It
  is recommended that a drop down box of some sort exist for provider names in order to ensure
  consistency.
- A child can be listed in multiple zip codes.
- Program IDs are often incorrect several providers were marked as NEIS-NW when in fact they are affiliated with a community provider.

# **Author Qualifications**

Strategic Progress, LLC is a Nevada based company founded and led by Cyndy Ortiz Gustafson, a strategy consultant who specializes in regional planning, public policy research and advocacy, federal grant development, fundraising and nonprofit strategic positioning. She is known for her work in researching and writing Southern Nevada's Ten Year Plan to End Homelessness, The Community We Will Business Case for Casey Family Programs, and the Ready for Life Plan that will drive regional investment in at risk youth. She has also worked in the disability community for over 8 years to build capacity and advance innovation in service models across the state.

Her combination of data analysis, writing and positioning of initiatives, based on community and stakeholder engagement, make her uniquely positioned to work with community EI providers to determine fair and appropriate rates for services. Her nonprofit consulting experience, and her current work with the Southern Nevada Regional Planning Coalition, a policy making body made up of the heads of each municipality in Southern Nevada, uniquely position her to obtain stakeholder feedback, buy in, and access information in a politically sensitive and strategic way to advance Nevada's ability to provide comprehensive and effective EI services. Additionally, Ms. Ortiz Gustafson has direct experience at the federal and state levels writing legislation, building coalitions and working on issues management and strategic positing of initiatives. She is currently spearheading the Accelerate Nevada initiative at the Nevada Community Foundation to make Nevada more competitive for national foundation and federal grant funding, and to advance systems planning and investment across the state.

The lead Strategic Progress research analyst on this project is Jennifer Ouellette, whose background and experience in qualitative and quantitative analysis bring an incredible depth of research ability to the team. Ms. Ouellette, who has a MA in Accounting from USC, has worked for a variety of research and analytics firms such as Applied Analysis, PricewaterhouseCoopers, and Econ One Research. She has led extensive industry research projects, mapping and data analysis projects, research and policy projects and presented those findings to various groups and entities across sectors. She has also conducted research and analysis for the Southern Nevada Regional Planning Coalition's Committee on Youth, Casey Family Programs Community We Will Project and provided data and model development consulting on a number of large federal grant projects. Strategic Progress has been fortunate to have Ms. Ouellette and her talents as a part of the team since 2009.