

The Department would also like to highlight the impact of the proposed amendments for further consideration. The amendments to HB 1237 incorporate the inclusion of the Online Individualized Family Services Plan (IFSP) System into the mandate of the Maryland Online Individualized Education Program (MOIEP) Task Force. The Online IFSP System is an electronic database where IFSPs can be written in a format that ensures state and federal compliance. However, it is imperative to recognize that the Online IFSP System operates independently from the MOIEP, catering to distinct user demographics. Notably, the professional demographics utilizing these systems differ due to the distinction between special education and early intervention staff across jurisdictions. Moreover, among Maryland's twenty-four jurisdictions, four early intervention programs are not under the auspices of the school system (Baltimore City, Baltimore County, Frederick County, and Montgomery County), further emphasizing the divergence in administrative structures.

Similar to the MOIEP, the Department convenes a quarterly IFSP User Group to obtain stakeholder feedback on the Online IFSP System. Regular Online IFSP stakeholders participating in the group include representatives from the Division of Early Intervention and Special Education Services (DEI/SES) at MSDE, Local Infants and Toddlers Program (LITP) leaders, service providers, data managers/data entry staff, public agency staff (e.g., Maryland School for the Blind and Maryland School for the Deaf), and State Interagency Coordinating Council (SICC) members. Attendance by other stakeholders is encouraged. Meetings are held virtually to ensure vast geographic representation. Also, like the MOIEP, Online IFSP users can provide suggestions for Online IFSP revisions directly to MSDE staff.

Considering the proposed composition of the Task Force for the MOIEP in HB 1237, it is probable that many members of the MOIEP Task Force will lack familiarity with the Online IFSP System, given their expertise lies within the MOIEP framework. For these reasons, a workgroup to study and make recommendations about the Online IFSP system could only be conducted separately from a workgroup to study MOIEP. This would necessitate additional funding, staffing, and community outreach to ensure a diverse coalition of early childhood stakeholders is represented in the workgroup. This funding must include a third party to support, organize, convene, and facilitate the separate workgroups (MOIEP and Maryland IFSP). The Department estimates the overall cost of this consultant would be between \$75,000 - \$100,000.

As an agency, MSDE is committed to continuously improving the MOIEP and the Online IFSP for all stakeholders. Currently, MSDE is facilitating the Blueprint Special Education Workgroup (SEW). The SEW is a coalition of practitioners, legislators, state agency representatives, advocates, and parents brought together to discuss and make recommendations on instruction and services for students with disabilities; the topic of special education data systems has been raised by workgroup members as an area for further investigation. Rather than awaiting specific legislation, the SEW will provide concrete recommendations, and develop a cohesive plan for improving the MOIEP and Online IFSP systems that would braid naturally into the work that this landmark group is engaged in.

In closing, MSDE wants to address a letter that Delegate Miller brought to the Department's attention on February 21st. The letter outlines concrete MOIEP suggestions from the Frederick County Board of Education. While some of these suggestions have already been implemented into MOIEP based on feedback from other users, MSDE provided an overview of the concerns to the Blueprint Special Education Workgroup on February 28, 2024. On March 20, 2024, the SEW made a formal recommendation that "MSDE should review the MOIEP and Online IFSP, including data collection, reporting capabilities, user experience, and feedback mechanisms with special consideration for families facing language barriers. The concerns and recommendations are on the April 10th MOIEP User/Workgroup meeting for their consideration and to outline next steps.

We respectfully request that you consider this information as you deliberate **HB1237**. For further information, please contact Dr. Akilah Alleyne at 410-767-0504, or Akilah.alleyne@maryland.gov.