

In this example, a state determined there was a need for statewide rules for Part C. This decision was made after conducting the Framework Self-Assessment (available for download from: <http://ectacenter.org/sysframe/selfassessment.asp>). The self-assessment team, which included the Part C coordinator and other Part C staff, identified that within the Governance component, Subcomponent 2: Legal Foundations, Quality Indicator GV2: needed work. There were no state rules, only procedures and guidance that were continually challenged by regional programs. It was felt that state rules would help to provide more enforceable authority and oversight to bring about consistency in program design and delivery of services.

The self-assessment team proposed the development of state rules for the Part C system. Leadership in the lead agency agreed and gave approval for the rules to be developed.

Suggested Citation: Pletcher, L. & Walsh, S. (2015). *Applying implementation science to state system change: an example of improving the governance system component: promulgating state rules in a hypothetical state*. Retrieved from <http://ectacenter.org/~pdfs/sysframe/implement-governance-example.pdf>

The ECTA Center is a program of the FPG Child Development Institute of the University of North Carolina at Chapel Hill, funded through cooperative agreement number H326P120002 from the Office of Special Education Programs, U.S. Department of Education. Opinions expressed herein do not necessarily represent the Department of Education's position or policy.

Project Officer: Julia Martin Eile



Exploration Stage

The goals of the exploration stage are to identify the need for change using the Framework Self-Assessment and explore what innovation(s) are likely to meet those needs. A State Leadership Team (SLT) guides this stage, and all following stages. The State Leadership Team is comprised of people to guide the change process and best able to address the components to be changed. The membership of the team is flexible and designed by each state to fit their circumstances and desired changes. Exploration can include selecting an innovation. If the innovation has already been selected, exploration would focus on an analysis of the “fit” with needs, structures and resources, potential adaptations and system supports needed for successful implementation.

Key Activities:

- Establish a state team to lead implementation
- Involve a representative Stakeholder Group
- Analyze the current system and document the need for change
- Explore potential innovations that could address needs
- Select the option(s) that fit the mission, and resources of system Stakeholders.
- Secure commitment from agency (or cross agency) leadership

Example Exploration Activities

1. The Part C coordinator established a small internal state team to work on the rules development. The team includes the Part C coordinator, the general supervision coordinator and the CSPD coordinator. The team decided to meet biweekly to coordinate the development of the rules.

2. The Part C coordinator and the general supervision coordinator met with the state agency’s administrative regulatory office to set up the schedule for the rules process and to obtain the current state rule-making guide.
3. Members of the state team attended a state rule-making training which focused on the state’s rules format and how to determine what is included in the rules and how the rules language is developed.
4. The state team spent several meetings reviewing the state rule-making guidelines and other state examples to prepare for their work.
5. The Part C Coordinator prepared and distributed an announcement statewide regarding the plans and timelines for rules development.
6. The state team developed a plan which outlined the following timelines for: development of the draft rules, completion of the public comment process, completion of the federal OSEP policy approval process, completion of the final rules and final implementation of the rules statewide.
7. The state team selected a task force of stakeholders to advise the process including representatives from other state agencies, local administrators, local providers, service coordinators, representatives from higher education and parents.
8. The state team sent invitation letters announcing 6 meetings of the stakeholder task force, each to address a different content topic of the rules.

Development Stage: “The new way of working”

In system improvement work, the innovation or “new way of working” is rarely available and ready to be adopted “as is.” An innovation will usually need to be adapted or developed, in order to fit the existing structures, needs and resources of the state and local system. The exploration of components and features of similar innovations from other states or locales can provide options and choices. In this stage, the innovation must be functionally described and operationalized so that it can be implemented and evaluated according to clearly articulated indicators of fidelity. The work of this stage is to answer this question... “What” will be implemented and how will people know when it implemented as intended?

Key Activities:

- Determine who needs to be involved in developing, or adapting the innovation.
- Clarify the components and features of the innovation
- Define what is needed to put the innovation into practice by the people who will use it.

Example Activities to Develop New State Rules

1. The state team outlined the contents of the rules and identified the following components to include: Authority, Definitions, Child Find, Evaluation and Eligibility, IFSPs and Provision of Services, Procedural Safeguards, Personnel Standards, Finance and General Supervision.
2. The state team outlined the sections of the rules with timelines for completion and responsible person(s) for drafting each section.

3. The stakeholder task force met six times over a six month period to provide input and review draft language.
4. The state team and task force reviewed sections of the rule as these are drafted.
5. Members of the state team met with the state agency regulatory office as specific sections are drafted to obtain input.
6. The state team completed full draft of the state rules, including supplementary material required by state process to include the statutory citations and authority for each rule, rationale for each rule, summary statements for each section of the rules, and impact statements.
7. The state team worked with regulatory office to post the draft rules for public comment according to federal and state requirements, plan dates and locations of hearings and announces public comment opportunities.
8. The state team conducted public hearings based on required process and compiled written public comments on the draft rule.
9. The state team considered comments and made final revisions to the rules and developed required supplementary materials such as a summary of comments and the decisions in response to the comments.

Installation Stage: Getting the System Ready

The goal of the installation stage is to build system capacity to support the improvements in the selected component/subcomponent(s). Specific elements of quality identified that need improvement are identified. Existing organizational structures, policy/guidance and resources are aligned or developed to support the desired improvements. A written implementation plan describes all activities, including plans for communication, TA & training, organizational changes and evaluation. When appropriate, local implementation teams are formed to oversee the implementation process, build communication mechanisms and feedback loops, prepare trainers or coaches and develop a site implementation plan.

Key Activities:

- Develop an implementation plan
- Use multiple communication structure to inform stakeholders and build public support
- Align organizational structures, policies and resources to support the innovation
- Develop TA and training capacity, including materials and personnel

Example Installation Activities

1. The Lead Agency prepared and issued a press release announcing when the rules would go into effect.
2. The state team developed a roll-out/training plan, including timelines for implementation, posting on website, webinars, workshops, and fact sheets.
3. The state team designed and created a new page on the state's website for the new rules.
4. The state team developed training materials and scheduled a series of 4 webinars for providers and families.
5. The state team developed fact sheets for providers and families outlining each component of the new rules.
6. The state team identified already scheduled training opportunities and arranged to include sessions on the rules by working with the CSPD coordinator.
7. The state team identified other related newsletters and websites to share information about the new rules.
8. The state team determined what information should be shared with other early care and education agencies (i.e. referral sources) and developed information for these audiences.
9. The state team established the process and timelines for monitoring the new rules and shared the information across the state.
10. The state team reviewed other state documents and training materials and made up-dates and changes as needed related to the new rules.

Implementation Stage

This stage for many other change initiatives is broken into 2 stages- initial implementation and full implementation. For this specific example there could not be an initial implementation stage as state rules needed to be put in place and used across the state all at the same time. In this example there were no initial implementation sites or pilots.

The goals of full implementation are to assure the innovation is used with fidelity to its design and that desired outcomes and benefits are being achieved. The State Leadership Team focuses on both use and sustainability. All technical assistance and organizational supports should be fully functioning. Newly hired staff are trained and supported. Changes in leadership, funding and program requirements are monitored for potential impact on the use of the innovation. In this example there were no initial implementation sites or pilots therefore, the focus of full implementation should be on continuous improvement, achieving fidelity and sustainability.

Key Activities

- Incorporate “lessons learned” into the new way of working, aligning policy, procedures, funding, and organizational supports as necessary.
- On-going training and TA is functioning for continuous improvement of personnel performance
- System infrastructure supports the use of the innovation
- State and local personnel focus on sustaining fidelity in use of the innovation
- State-wide monitoring, evaluation and targeted TA assure continuous improvement and increasing fidelity in statewide implementation

Example Implementation Activities

1. The state rules were implemented statewide.
2. The state rules were monitored, and feedback was provided to the state team about where more information or training was needed.
3. Monitoring data were used to create additional on ongoing training or clarification documents.
4. Information about the new rules and subsequent changes were shared with referral groups and other agencies.
5. Ongoing support and assistance was provided to local and regional Part C agencies/programs so that rules continue to be fully implemented.
6. Continuous improvement activities addressed new rules and their full implementation across the state.