



Troy Hunter

Director of Research, Evaluation, & Performance

thunter@groundworkohio.org

mobile: 614-668-2206

4041 N. High St., Suite 204

Columbus, Ohio 43214

To Whom It May Concern,

Groundwork Ohio is a committed, nonpartisan public-policy research and advocacy organization formed in 2004 that focuses on the prenatal period to age 5. We advance quality early childhood systems in Ohio by engaging, educating, and mobilizing diverse stakeholders and strategic partners to promote data-driven and evidence-based early childhood policies. As an organization dedicated to championing high-quality early learning and healthy development strategies for Ohio's youngest, we appreciate the proposed changes to the Early Intervention program.

The timing of the rule renewal aligns with the Ohio Department of Children and Youth's application to become the lead agency for the state's Part C Early Intervention program, replacing the Ohio Department of Developmental Disabilities. We are optimistic that this change will better integrate Early Intervention with other child-serving programs under the new department. We have faith that this transition will be seamless and will increase collaboration between Early Intervention with relevant agencies and other child-serving programs. The proposed changes to the Early Intervention rules by the Ohio Department of Developmental Disabilities are a significant step forward in ensuring that children and families receive the support they need. Expanding eligibility criteria to include newborns born before 28 weeks without an additional diagnosis and increasing the number of units of Early Intervention services available to parents will help ensure that more children and families can access the support they need.

We appreciate the updated list of physical and mental conditions with a high probability of resulting in a developmental delay as outlined in Appendix C. Preterm birth can result in developmental delays. Currently, [many](#) of Ohio's babies and young children born preterm, who are at [higher risk](#) for developmental delays are not getting the early intervention services they may need. Increasing eligibility to include newborns who are under 28 weeks will increase access to services that will support their development. We hope that with the expansion of eligibility established by the new rule that there will be an increased investment in the Early Intervention program to sustain the influx of children that would become eligible for services.

Expanding the number of units of Early Intervention services available to parents from 55 to 100 per year is a significant step towards improving access to essential services for families in Ohio. This increase allows for more comprehensive support to children with developmental needs and their families. By doubling the number of visits, parents will have access to more support and guidance in navigating their child's development. These additional visits provide opportunities for Early Intervention providers to offer tailored interventions, monitor progress more closely, and collaborate with other stakeholders—such as child care programs—to support the child's development and inclusion in various settings.

However, it's essential to consider the potential consequences of this rule change. In counties where there is already a high demand for Early Intervention services, increasing



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the number of visits without additional resources could strain existing programs. This strain may lead to longer wait times for services, decreased quality of care, and increased stress on providers. In counties with limited Early Intervention providers, the increased demand for services could exacerbate existing challenges in service delivery. Without sufficient funding and support, these providers may struggle to meet the needs of all families, hindering the effectiveness of Early Intervention services in those areas. While the rule change is undoubtedly beneficial for children and families, it is essential to accompany it with additional funding and resources to support the Early Intervention system adequately. Investing in workforce development, expanding provider networks, and increasing funding for Early Intervention programs are important steps to ensure that all children in Ohio have access to high-quality early intervention services.

While we appreciate the positive intent behind these rule changes and recognize their potential to enhance access to services for families, we must emphasize the importance of accompanying these changes with substantial investment in the Early Intervention system. Without adequate support for providers, the increased workload resulting from these rule changes could undermine the quality and effectiveness of services, ultimately impacting the well-being of Ohio's children and families. It is essential to recognize that these changes must be accompanied by significant investment to ensure their effectiveness. Without adequate support for providers and resources to meet the increased demand for services, the quality and accessibility of Early Intervention services may be compromised, ultimately impacting the well-being of Ohio's children and families.

Groundwork Ohio urges the Ohio Department of Developmental Disabilities to consider the importance of accompanying these rule changes with substantial investment in the EI system.

We appreciate the opportunity to provide feedback on these proposed rule changes and encourage the Department to carefully consider our concerns. By investing in Early Intervention, we can ensure that all children in Ohio can thrive and reach their full potential.

Sincerely,

A handwritten signature in black ink that reads "Troy Hunter". The signature is written in a cursive style with a large, stylized "H" and "T".

Troy Hunter

Director of Research, Evaluation, and Performance

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