



early steps

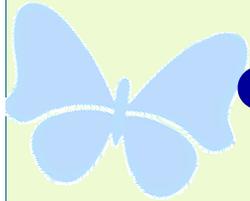
Overview of Early Steps Policy and Guidance Documents

For Implementation 10/2011

Conference Call Etiquette



- We have muted your phone until the end of the call
- Do not put phone on hold
- Be aware that noises are heard by everyone on the call
- If your phone line is making noises, please hang up and redial



About the Q & A period



- Brief Q&A period at end, *if time allows*
- Write down questions during presentation



Purpose of Today's Call



- Introduce revised policy documents (*not a training session*)
- Highlight *major* changes, additions, deletions from interim policy documents
- Focus on what field is expected to do differently, change or cease
- Point out what was previously unclear, misinterpreted, etc.



Policy Review/Revision Process



- Policy-related updates prompted by:
 - Questions and requests from the field
 - Information gathered from state general supervision activities
 - Updates will occur approximately every 6 months, unless there is an urgent need for correction or revision
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Policy Review/Revision Process



- Proposed policies and guidance released January 2011
 - Public comments accepted February – March 2011
 - All comments reviewed and considered April 2011
 - Submission to OSEP for approval May 2011
 - OSEP approval July 1, 2011
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Today's Presenters



- Renee Jenkins
- Carol Burch
- Dawn Lynch
- Kelly Purvis
- Catherine Duncan
- Carole West



Resource Documents



- **Early Steps Policy Website**



http://www.cms-kids.com/home/resources/es_policy_1011/es_policy.html



Policy Handbook



- Symbols continue to differentiate federal  and state  policies
- Formatted for electronic use
 - Links to:
 - Federal Statute & Regulations
 - State Statutes
 - Operations Guide
 - Other Policy
 - Other Relevant Documents



Operations Guide



- Refers to related policy number
- Formatted for electronic use
 - Links to:
 - Attachments
 - Forms
 - Instructions
 - Websites
- Not guidance for every policy



General Rules re: Policies



- Definitions linked
- Other agency/program policies (e.g., AHCA/Medicaid, DOE, DCF, provider management) not included/repeated, but linked





Component 1 – General Supervision and Administration

Denial of Access to Insurance/Financial Loss



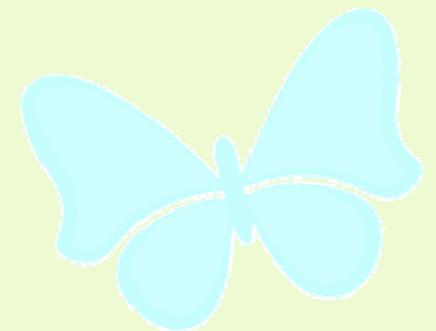
- Clarifies that 'financial loss' per policy is equivalent to reasons family may deny access to insurance (*1.5.5 & 1.6.9 Policy*)
- Clarifies reasons a family may **not** deny access to insurance (*1.6.11 Policy*)



Tax-favored Health Plans



- Clarifies that LES representative must determine terms and conditions of any tax-favored health plans when connected with a family's health insurance package *(1.6.1 Guide)*



Form 1064 - Consent for Evaluation/Use of Insurance



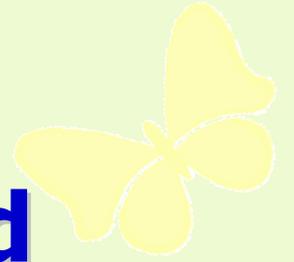
- Information on the form streamlined
- Changes to be consistent with changes to policy 1.5.1 and 1.6.9 re: reasons a family may deny access to insurance/financial loss



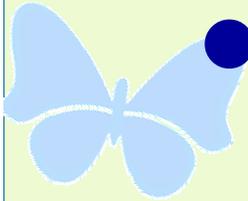


Component 2 – Public Awareness

Public Awareness/Child Find



- *No changes to Component 2 content*



EARLY STEPS REFERRAL CHECKLIST



- Form CF FSP – 5322 EARLY STEPS REFERRAL CHECKLIST



– Form revised in its entirety by DCF





Component 3 – First Contacts/Evaluation/ Assessment

Eligibility

- When a child has both an established condition and developmental delay, the **established condition** takes precedence as the reason for eligibility *(3.1.3C Guide)*

Eligibility/Developmental Delay



- **New** policy and guidance for children made eligible due to developmental delay based on informed clinical opinion/documentated sources beyond standard scores (*3.1.4B Policy*)



- Rationale behind recommendation for eligibility must be clearly and completely delineated in the IFSP/Evaluation Report



- Child's eligibility must be re-determined with parent consent no later than the end of initial 6 month authorization period

Eligibility/Developmental Delay



- If re-determination of eligibility indicates child is no longer developmentally delayed, child should be closed to Early Steps
- If parental consent for re-determination of eligibility is not provided, child will no longer be eligible for Early Steps



Eligibility/Developmental Delay



- The 6-month eligibility re-determination does not require an evaluation in all 5 domains.

(3.1.4C Guide)

- The requirements for 6-month eligibility re-determination apply to children determined eligible on or after October 1, 2011 and are not retroactive *(3.1.4D Guide)*

Eligibility



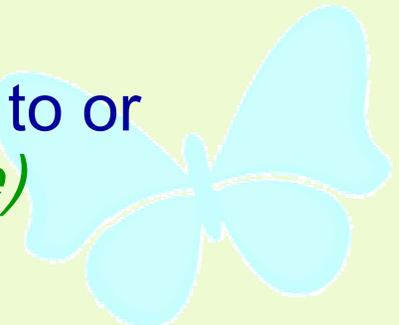
- **New** policy requires additional testing for eligibility determination for children referred between 24 and 36 months of age with low communication scores when specific criteria is met (*3.1.4 C Policy*)

- Additional testing must use a standardized assessment appropriate to the communication domain
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Continuing Eligibility



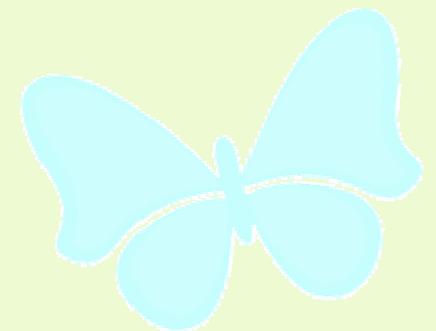
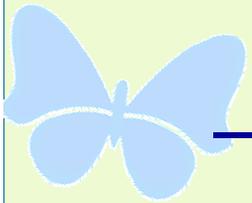
- New policy requires determination of continuing eligibility take place during the annual review of the IFSP *(3.1.11 Policy)*

- To be conducted only on annual reviews completed on or after October 1, 2011 *(3.1.11A Guide)*
 - BDI-2 screener should be considered first to assist with determining continuing eligibility *(3.1.11B Guide)*
 - Progress reports may be used in addition to or instead of BDI-2 screener *(3.1.11C Guide)*
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Continuing Eligibility



- Child should be closed to Early Steps if screening indicates child no longer meets Early Steps eligibility criteria *(3.1.11D Guide)*
- Data reporting and billing for the eligibility re-determination will be consistent with process used. A complete multi-disciplinary evaluation during the re-determination process should be an infrequent occurrence *(3.1.11F Guide)*



First Contacts



- Revises 3.2.2 Policy to delete “made” and replace with “received”. Now reads as: Initial contact must be made with the family within 5 calendar days from the date the referral is received at the LES.
 - Deletes 3.2.8 Policy. Information that applies to any child closed due to unsuccessful attempts to contact is now located in 6.12.2
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Evaluation and Assessment



- **New** guidance to clarify that when a child is in the hospital, the eligibility and IFSP development process should not be delayed unless the child is not medically stable enough for the eligibility evaluation or the family is not ready for the eligibility determination process. *(3.4.3C Guide)*



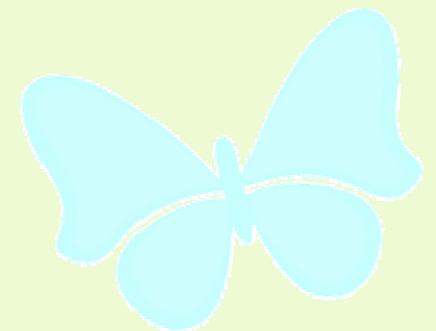
Evaluation



- Replaces terminology “annual evaluation of the IFSP” with “annual review of the IFSP”
- A formal child evaluation is not required for the annual review of the IFSP



(3.5.1C Guide)





Component 4 – Service Coordination

SC Responsibilities & Activities



- Revises language revised to reduce confusion related to the annual IFSP review/meeting (*4.2.4, 4.2.11, 4.2.17 Policies*)
- Revises language to be consistent with changes in policy related to inactive status (*4.2.4, 4.2.17 Policies*)

SC Responsibilities & Activities



- New policy directing the service coordinator to ensure family is aware of eligibility rationale and potential for limited time period for services when child made eligible based on sources beyond standard scores/informed clinical opinion. *(4.2.18 Policy)*
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SC Responsibilities & Activities

- Clarifies that primary service provider (PSP) & service coordinator is one of several possible “dual roles” in the Early Steps system *(4.3.2 Policy)*



Component 5 – Individualized Family Support Plan (IFSP)

Documentation of Continuing Eligibility



- 
- Addresses determination and documentation of *continuing* eligibility on Form D, consistent with policy changes in 3.1.4 and 3.1.11 *(5.3.13 Guide)*
 - Clarifies that a diagnosed established condition takes precedence over developmental delay as the reason for eligibility. *(5.3.13 Guide)*
 - Clarifies that the IFSP, Form D and data reported regarding reason for eligibility should be updated when a child is originally eligible as DD but later there is documentation of EC. *(5.3.13 Guide)*
- 

Annual IFSP Review/Meeting



- Revises language to reduce confusion related to the annual IFSP review/meeting
(5.4.2, 5.6.1, 5.7.1, 5.7.2, 5.7.4, 5.7.5, 5.7.6 Policies)



Initial IFSP Participation



- Clarifies that those directly involved in conducting the evaluation/assessment and those who will provide services to the child/family may participate in initial IFSP via phone or videoconference *(5.5.3 Guide)*



Participants in Periodic Review of IFSP



- Requires those who are or will be providing services to the child or family to participate in periodic review of the IFSP
(5.6.4 Policy)
- 

- Removes duplicate language re: participants in periodic review *(5.6.4 Guide)*
- 

Re-determination of Eligibility

- Requires that a re-determination of eligibility occur at the annual review of the IFSP *(5.7.1 & 5.7.3 Policies)*

Annual IFSP Meeting



- Corrects inaccurate language related to participants in annual IFSP meeting *(5.7.4 Guide)*



IFSP Form D



- Revises Form D to accommodate documentation of re-determination of eligibility



IFSP Form G



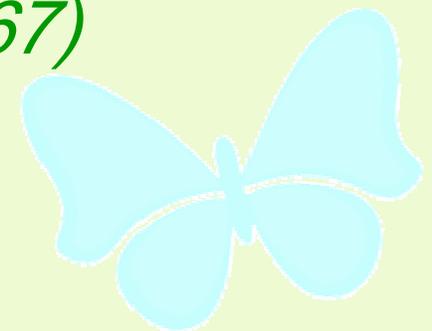
- Revises Form G to allow clear documentation of medical necessity for services for children who are Medicaid recipients



IFSP Instructions



- Describes the process for gathering information to be documented on the IFSP
- Changes instructions to be consistent with Policy Handbook, Operations Guide and IFSP form (*pp. 3-4, 14-15, 20-21, 23, 25, 28-33, 40, 45-46, 48-50, 55, 65 & 67*)



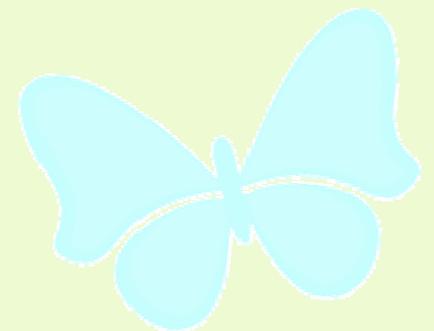


Component 6 – Early Intervention Services and Supports

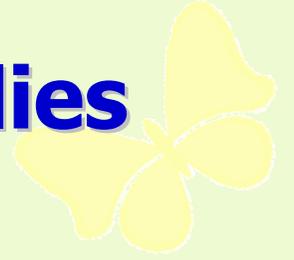
Early Intervention Sessions



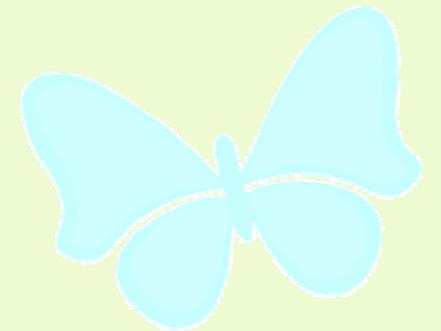
- Clarifies that early intervention services are not limited to “family training, counseling, home visits” *(6.1.1 Policy)*



Requirements for Children/Families with Inactive Status



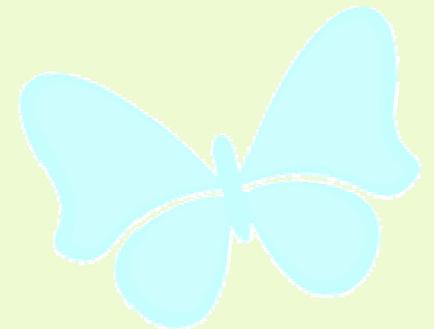
- Replaces section on inactive status with new section on Closure to Early Steps *(6.12.0 Policy and Guide)*



Closure to Early Steps



- Moves and revises language from 7.1.1 D Guide to outline criteria for deciding to close a child to Early Steps during a periodic review or annual IFSP meeting
(6.12.1 Policy)



Closure to Early Steps



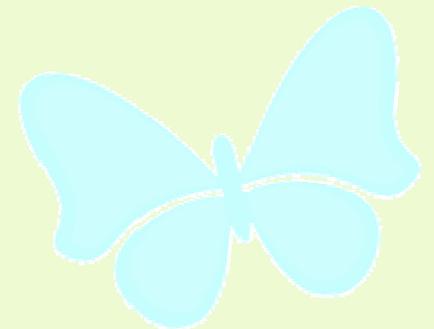
- Moves and revises language from deleted Policy 3.2.8 related to closure due to unsuccessful attempts *(6.12.2 Policy and Guide)*



Closure to Early Steps



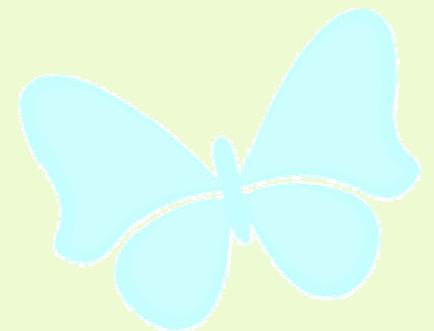
- Moves language from Policy 7.8.1 related to termination of services by third birthday and appropriate uses of IDEA, Part C funds on or beyond a child's third birthday *(6.12.3 Policy and Guide)*



Closure to Early Steps



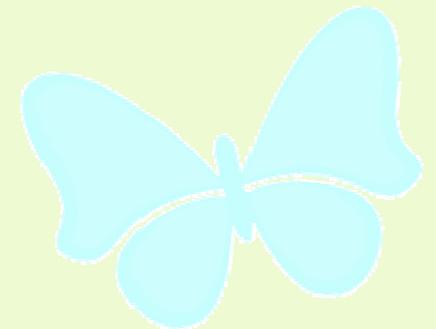
- Moves language from Policy and Guidance 7.8.3 related to Part C and free appropriate public education (FAPE) *(6.12.4 Policy and Guide)*



Communication Development Monitoring Form



- Moved form from Newborn Screening website to Component 6 Attachments





Component 7 – Transitions

Other Transitions



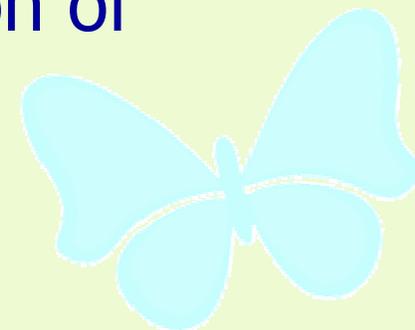
- “Other Transitions” replaces section titled “Closure to Early Steps” (*7.8.0 Policy and Guide*)
- Moves information found previously in 7.1.1 Guide related to transition planning and responsibilities of the service coordinator to 7.8.1 Guide



Notification



- Deletes word “orally” and replaced with “verbally” when parents are asked to indicate whether they wish to opt-out of notification to the LEA (*7.2.5 Policy and Understanding Notification brochure*)
- Deletes requirement for notification of children and families with inactive status (*7.2.5 Policy*)



Other Transitions



- Adds language to ensure LES provides assistance to families in transition planning even when child is not turning three years of age and/or leaving Early Steps
(7.8.1 Policy)



Other Transitions

- Adds language to clarify for children in the hospital, the eligibility process or development of an IFSP should not be delayed or postponed until discharge unless the child is not medically stable enough for eligibility evaluation (*7.8.1 A 1 Guide*)
- Clarifies responsibilities of the sending and receiving service coordinators for children transitioning between LESs in Florida (*7.8.1 B Guide*)

Other Transitions



- Adds language to clarify that when children transition between LESs in Florida, the review of the IFSP to add concerns, priorities, resources, and outcomes may be considered either a periodic or annual IFSP meeting (*7.8.1 B Guide*)



Other Transitions

- Deletes duplicative language related to provision of written prior notice (*7.8.2 Policy*)



Component 8 – Procedural Safeguards

Parental Consent



- Adds language that the locally developed forms used to document the exchange of personally identifiable information include “written notice”, in addition to consent. *(8.5.5 Policy)*
- Adds “G. Method of Communication (phone, fax, email, etc.)” as a requirement on the form to document the written notice and consent to release personally identifiable information. *(8.5.5 Policy)*





Component 9 – Family Involvement

Family Involvement



- *No changes to Component 9 content*





Component 10 – Personnel Development and Standards

Early Steps Providers



- Moves language regarding the use of providers from 12.4.2 Policy and Guide to 10.3.4 Policy and Guide
- Moves language regarding the appropriate use of providers not enrolled in the CMS Provider Management System from 12.4.3 Policy to 10.3.5 Policy



Service Coordinators

- Clarifies that in this policy “dual enrollment” refers to a service coordinator enrolling as a service coordinator and direct service provider *(10.4.9 Policy)*

Infant Toddler Developmental Specialists

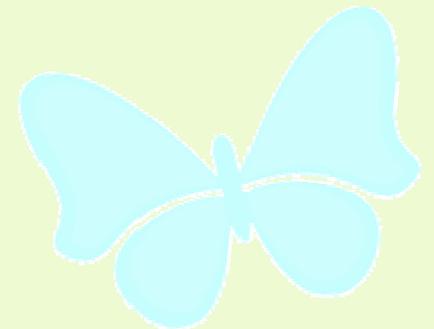


- Revises policies and documentation form related to mentorship (*10.6.2 Policy*)
 - ITDS completing mentorship may now be mentored by either a CMS enrolled ITDS or a CMS enrolled EI provider
 - An ITDS can receive guidance from multiple providers during mentorship process, but only one provider may be primary mentor
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ITDS Committee Review



- Changes timeline for a decision about ITDS enrollment from 14 to 30 calendar days (*10.6.3 Guide*)





Component 11 – Interagency Agreements

Interagency Agreements



- *No changes to Component 11 content*





Component 12 – Data Collection/Reporting & Record Keeping

Early Steps Data System



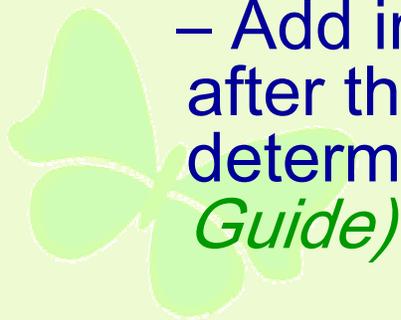
- Adds information regarding the documentation of a child's eligibility category:
 - when new documentation is received that indicates a child is eligible due to established condition instead of developmental delay, the data system should be updated. *(12.3.4 A Guide)*



Early Steps Data System



- Revises the reasons for closure in the data system to:
 - be consistent with other policy changes regarding inactive status
 - correct an error related to use of the term "referral", when "parent" should have been used, and
 - Add information related to closing a child after the 6 month or annual re-determination of eligibility (*12.3.11D Guide*)



Early Steps Data System



- Adds another reason for closure: Children determined to not meet Part C/DEI eligibility criteria based on a developmental screening prior to initial evaluation
(12.3.11D Guide)



Early Steps Record



- Moves language regarding separate or shadow records from 12.5.1 Guide to 12.5.4 Policy
- Renumbers 12.5.4 Policy as 12.5.5 Policy



Reporting Requirements for Providers



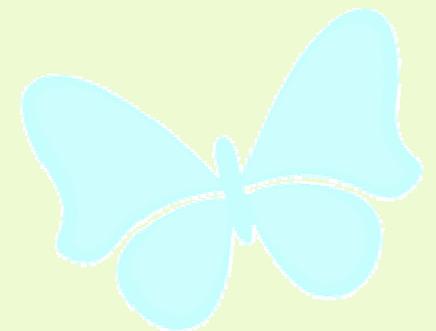
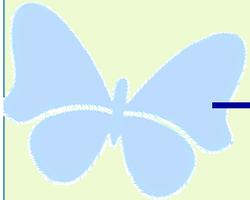
- Clarifies the maximum travel reimbursement is 60 minutes per child per day *(12.6.2 Policy)*
- Adds requirements for the LES when an exception to the maximum is necessary *(12.6.2 Policy)*
- Removes unnecessary and duplicative language regarding completion of the Natural Environment Travel Log and re-lettered accordingly *(12.6.2 Guide)*



Natural Environment Travel Log



- Updates form to insert new logo
- Revises instructions to:
 - Clarify that the maximum travel reimbursement is for 60 minutes per child per day (consistent with policy change)
 - Remove duplicative language



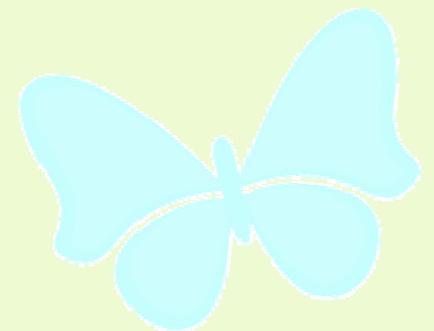


Component 13 – Developmental Evaluation and Intervention (DEI)

Developmental Evaluation and Intervention



- *No changes to Component 13 content*





Component - Definitions

Definitions



- **Revises definition for clarity:**

- Annual Review of the IFSP (*formerly annual 'evaluation' of IFSP*)



- **Adds definition related to policy change**

- Scaled Score

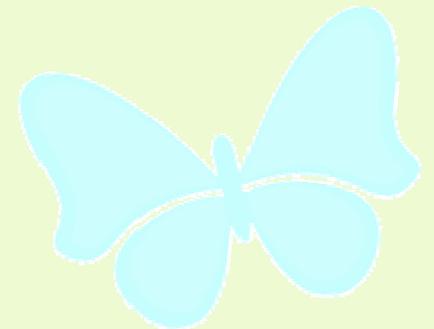


Definitions



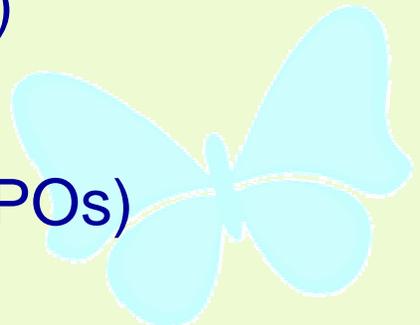
- **Adds definitions related to use of insurance:**

- Co-payment
- Deductible
- Private Insurance
- Public Insurance



Definitions



- **Adds definitions of tax-sheltered health plans:**
 - Exclusive Provider Organizations (EPOs)
 - Health Flexible Spending Arrangement (FSA)
 - Health Maintenance Organization (HMO)
 - Health Reimbursement Arrangement (HRA)
 - Health Savings Account (HSA)
 - High Deductible Health Plan (HDHP)
 - Point of Service Plan (POS)
 - Preferred Provider Organizations (PPOs)
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ESSO NEXT STEPS



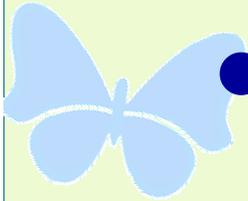
- Ensure implementation October 1, 2011
- Incorporate changes into training materials
- Ensure performance standards are consistent
- Update policies and guidance as an on-going process
- Other



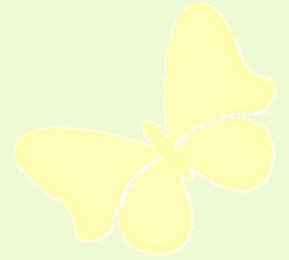
LES NEXT STEPS



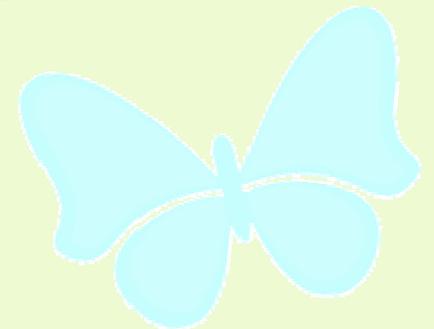
- Review all policy documents
- Orient staff, providers, families, and other stakeholders
- Inform program manager of questions or need for further clarification
- Make changes to local systems as necessary to implement revised policies and forms on October 1, 2011
- Other



Q and A Period (if time allows)



- Questions will now be taken in the order of the policy components
- Do not put your phone on hold !!!
- After call -- follow process outlined to ask implementation questions, report inconsistencies (*via program manager*)





**More Information at
Early Steps website**

www.cms-kids.com/families/early_steps/early_steps.html

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Thank You!

