



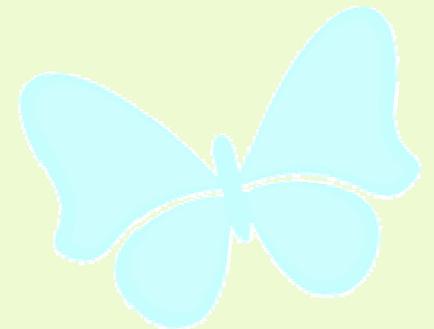
Overview of Early Steps Proposed Policy Updates

Overview Presentation



- Participants:

- Write comments down during presentation
- Make comments following presentation



Access to Documents



● Proposed policies:

- http://www.cms-kids.com/families/early_steps/public_participation.html



● Part C application:

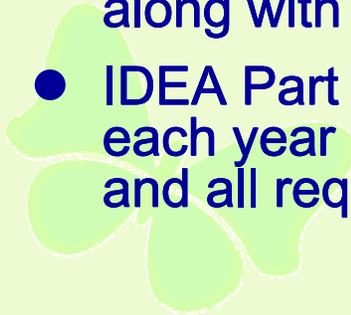
- http://www.cms-kids.com/families/early_steps/public_participation.html



Annual IDEA, Part C Application for Funds



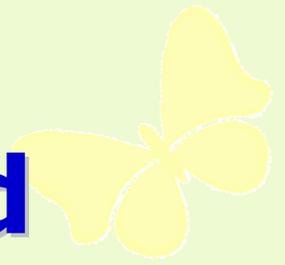
- State submits application for funds to Office of Special Education Programs (OSEP) in spring of each year
- OSEP allots amount of funds each state will receive
- State completes use of funds/budget section
- Amount budgeted must add up to the total amount of the state Part C allotment for the year
- State provides assurances that state will operate consistent with IDEA, Part C requirements
- State submits any policy changes for OSEP review/approval along with the application for funds
- IDEA Part C grant funds are available to states on July 1 each year - as long as application is submitted by due date and all requirements are met



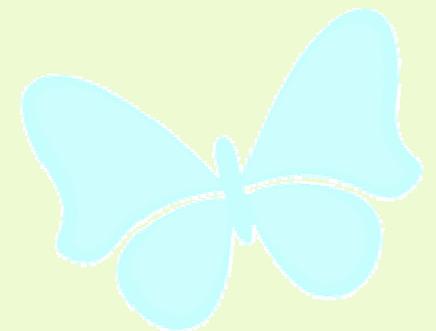
Policy Documents

- Symbols differentiate federal  and state  policies
- States must (per IDEA sec. 608):
 - Identify in writing any policy not required by IDEA
 - Minimize number of policies to which locals are subject
- Formatted for electronic use
- Links to:
 - Federal statutes & regulations
 - State statutes
 - Other policy
- Navigate between policy handbook, operations guide and attachments

Purpose of Policy-Related Changes



- Clarify eligibility
- Correct inconsistencies
- Move some language to a more appropriate section



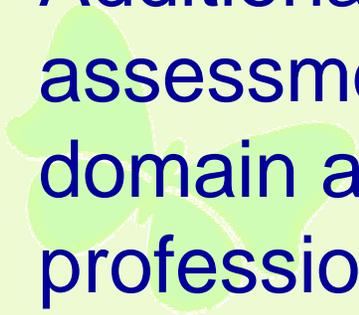


Component 3 – First Contacts/Evaluation/ Assessment

Eligibility



- **New** policy requires additional testing for eligibility determination for children referred between 24 and 36 months of age when specific criteria is met (*3.1.4 Policy*)
- Additional testing must be a standardized assessment appropriate to specified domain and administered by a qualified professional (*3.1.4 Policy*)

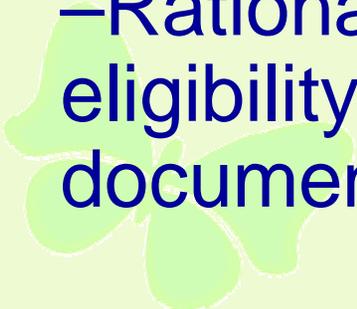


Eligibility/Developmental Delay



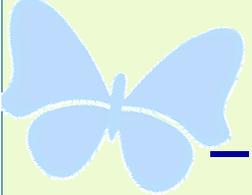
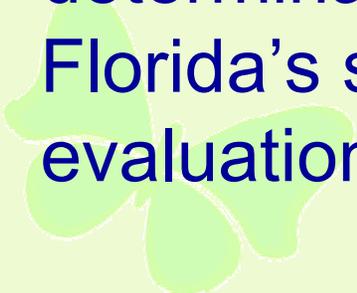
- **New** policy and guidance for children made eligible due to developmental delay based on documented sources beyond standard scores (when the scores on the initial assessment do not meet ES eligibility criteria)
- 

–Rationale behind recommendation for eligibility must be clearly and completely documented (*3.1.4 Policy*)



Eligibility/Developmental Delay



- Child must be re-evaluated with parent consent no later than the end of the initial 6 month authorization period *(3.1.4 Policy)*
 - Eligibility based on documented sources beyond standard scores that do not meet ES eligibility criteria is only allowed at the initial determination of eligibility. A child must meet Florida's stated eligibility criteria at second evaluation to remain eligible *(3.1.4 Policy)*
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Eligibility/Developmental Delay



–Standard scoring that meets the eligibility criteria is now defined *(3.1.4 Guide)*



–A low score in a single subdomain is not sufficient documentation of initial and/or continuing eligibility *(3.1.4 Guide)*



Eligibility Re-evaluation



New – for those children who will require a 6 month re-evaluation to confirm eligibility:

- An evaluation in all 5 domains is not required *(3.1.4 Guide)*
- The re-evaluation should be an individualized process *(3.1.4 Guide)*



Continuing Eligibility

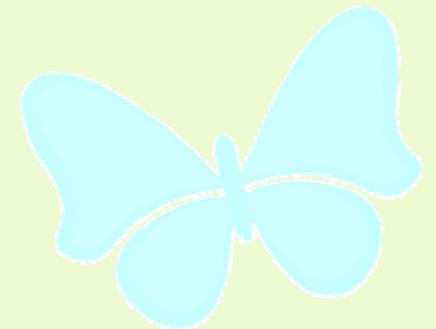


- New policy that requires determination of continuing eligibility to take place during the annual evaluation of the IFSP *(3.1.11 Policy)*
 - BDI-2 screener should be used at this time to assist with determining continuing eligibility (3.1.11 Guide)
 - Child should be closed to Early Steps if screener indicates child is functioning comparably to same-aged peers *(3.1.11 Guide)*
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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.



First Contacts



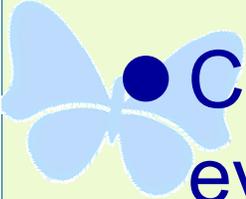
- Deletes 3.2.8 Policy. Information that applies to any child closed due to unsuccessful attempts to contact is now located in 6.12.3



Evaluation



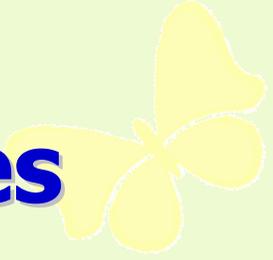
- An evaluation is no longer conducted only for the initial IFSP *(3.5.1C Guide)*
- Child evaluation is not required for the annual evaluation of the IFSP *(3.5.1C Guide)*





Component 4 – Service Coordination

Responsibilities and Activities



- 
- **New** policy requiring the Service Coordinator, when the child is initially determined eligible by other documented sources beyond standard scores, to explain to the family:
 - the basis on which eligibility is made;
 - that services may be provided for limited period up to six months (*4.2.18 Policy*)
- 



Component 5 – Individualized Family Support Plan (IFSP)

Content of the IFSP



- Form D is to be used for reflecting initial **and continuing** eligibility, with revisions to:



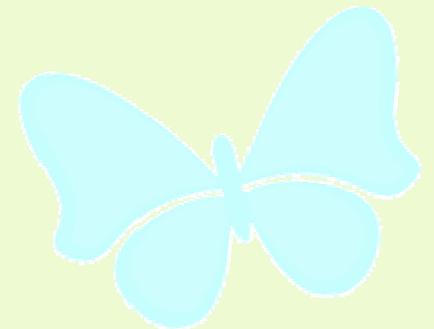
- Guide 5.3.13
- Component 5 Attachment IFSP Form D
- Component 5 Attachment IFSP Instructions



Initial IFSP



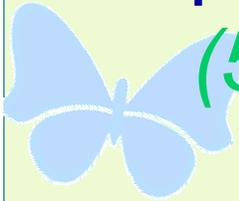
- Clarifies that persons directly involved in conducting the evaluation and/or assessment and persons who will be providing services to the child or family may participate through telephone conference call or videoconferencing *(5.5.3 Guide)*



Periodic and Annual Reviews



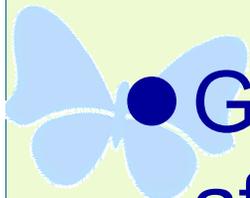
- Removes duplicative language related to participants in periodic and annual reviews
(5.6.4 & 5.7.4 Guide)



Medical Necessity for Medicaid Services



- Section added to IFSP Form G to document medical necessity
- Guidance and instructions to be included after discussions with AHCA



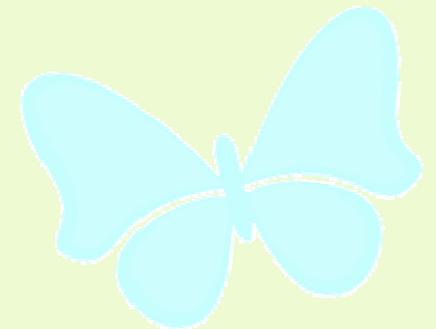


Component 6 – Early Intervention Services and Supports

Requirements for Children/Families With Inactive Status

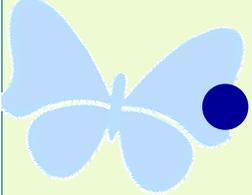


- Deletes Inactive Status for Early Steps children, and all related language
(Section 6.12.0 Policy and Guide)



Closure to Early Steps



- Moves “Closure to Early Steps” Section from Component 7 to Component 6
(6.12.0 Policy and Guide)
 - Adds/deletes language addressing decision to end early intervention services prior to age 3 *(6.12.1 Policy)*
 - Adds language with minimum requirements related to unsuccessful contact attempts prior to closing a child to Early Steps *(6.12.3 Policy)*
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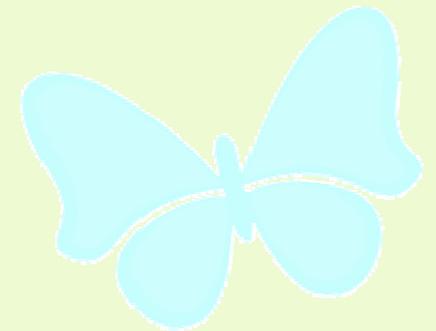


Component 7 - Transitions

Notification re: Inactive Children



- “Revised notification policy to be consistent with other policy changes related to inactive status *(7.2.5 Policy)*”
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Other Transitions



- “Other Transitions” replaces section titled “Closure to Early Steps” and includes:



- Hospital to home

- Between LESs

- A move from Florida to another state

(7.8.0 Policy and Guide)



Other Transitions



- 7.8.2 Policy deleted as it is duplicative of language in 8.4.1 Policy and Guide.





Component 8 – Procedural Safeguards

Exchange of Information



- Deletes the word “prior” from the requirement to provide notice in writing regarding the exchange of personally identifiable information (8.5.2 & 8.6.1 *Policy*)





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
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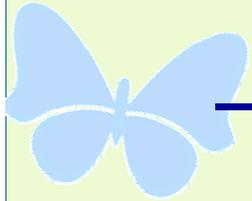


Component 12 – Data Collection/Reporting and Record Keeping

Early Steps Data System

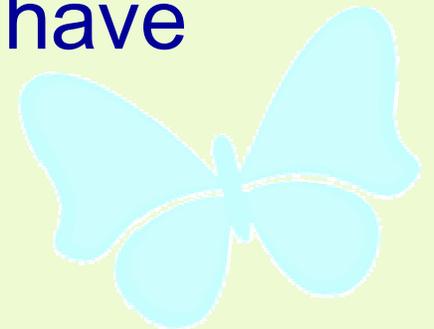


- Revised the reasons for closure of children in the data system to:



- be consistent with other policy changes regarding inactive status, and

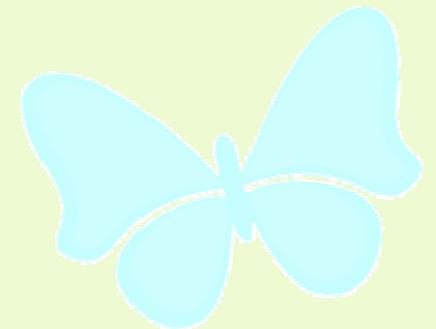
- correct an error re: use of the term "referral", when "parent" should have been used *(12.3.11 Guide)*



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 that the maximum travel reimbursement is for 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-letters 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
- 
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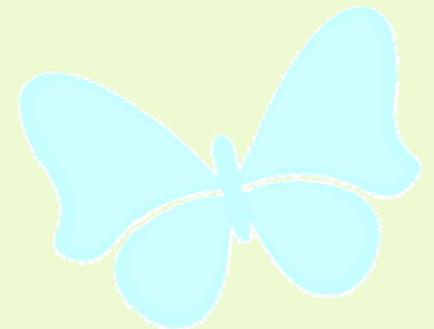
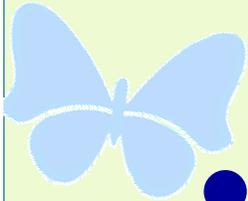
early steps

Definitions

Definitions



- Updates “Annual Evaluation of the IFSP” definition to be consistent with policy changes
- Adds “Scaled Score” definition to clarify changes to eligibility policy



Next Steps



- Early Steps must receive comments no later than March 22, 2011:
 - CMS_EarlyStepsPublicComment@doh.state.fl.us
 - Postal delivery
 - Commercial/Express delivery
 - Hand delivery
- Early Steps will **NOT** accept comments by:
 - Phone
 - Fax
 - E-mail directly to state office staff



Next Steps



- Early Steps State Office will:
 - Review and consider all comments
 - Revise policies and Part C application as deemed necessary
 - Post all comments received on www.cms-kids.com
 - Submit proposed policies and Part C application to Office of Special Education Programs (OSEP) for approval
 - Post final/updated policies on www.cms-kids.com
 - Orient public to approved policy changes
 - Implement policies
 - Receive FFY 2011 Part C funds by July 1, 2011 (or when approved by OSEP)



**More Information at
Early Steps website**

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



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Thank You!

