

ADOPTION DATA PROCESS

Local Early Steps (LESs) will ensure confidentiality of pre-adoption Early Steps records of children who are subsequently adopted.

I. Initiating the Adoption Data Process

When notified by a court order or adoption decree that an adoption has occurred, the Early Steps service coordinator will:

- A. Send an encrypted email to the supervisor and the data custodian informing them of the adoption.
- B. Obtain the hard copy Early Steps record, including all volumes and any records that may have been archived in storage.
- C. File the court order/adoption decree in the current volume of the pre-adoption Early Steps record under the "Legal" tab.
- D. Contact the adoptive family within 5 calendar days from the date the LES is notified of the adoption to confirm whether it is their intent for the child to remain open to Early Steps post-adoption or be closed post-adoption.

II. Children Closed to Early Steps Services Post-Adoption

If the adoptive parents express intent to decline services post-adoption, the service coordinator will close the child's record and ensure the pre-adoption record is sealed by doing the following:

- A. Notify all current providers of child's closure to Early Steps.
- B. Schedule a transition meeting, following the process outlined in the Early Steps Policy Handbook components 6.12.1, 7.4.1 and 7.4.2.
- C. Close the data record for the child by completing the steps shown below.
- D. Complete the steps in Section V for sealing the pre-adoption record.

III. Children Who Remain Open to Early Steps Services Post-Adoption

The service coordinator will meet with the adoptive parents if they have expressed the intent to continue receiving Early Steps services post-adoption. During the meeting, the service coordinator will provide information about Early Steps (including family rights and procedural safeguards), and collect updated information. The service coordinator will then create a post-adoption record, using the pre-adoption hard copy of the Early Steps record as the basis for the new record. There will be no reference to the adoption noted in the new record.

- A. For adoptive parents who have expressed intent to continue with Early Steps services post-adoption, the service coordinator will:
 1. Collect new Medicaid and/or insurance information, obtain consent forms and any other necessary forms in preparation for an Individualized Family Support Plan (IFSP) meeting.

2. If it is determined during the IFSP meeting that the pre-adoptive IFSP team members will provide services post-adoption:
 - a. Obtain consent from the parent to notify current providers of the adoption and name change using the *Consent to Disclose Pre and Post Adoption Information to Provider* letter.
 - b. Notify providers of the adoption and name change using the *Provider Notification of Adoption* letter **after** written consent is obtained from the adoptive parents.
 3. Schedule an assessment and IFSP meeting within 30 days of being notified of the adoption (eligibility does not need to be re-established).
- B. To create the new post-adoption record, the Early Steps service coordinator will use the pre-adoption hard copy of the Early Steps record as the basis to take the following steps:
1. Temporarily remove and copy pertinent documents from the original record, including, but not limited to: any medical documentation related to the diagnosis or medical condition of the child, early intervention service records and IFSPs.
 2. Using the documents removed and copied from the pre-adoption record, the service coordinator will redact all pre-adoption identifiers, including: child's birth name, social security number (if changed), and all references to the birth parents and/or foster parents using white-out or white corrective tape so that no pre-adoption information is visible. **No reference to the adoption will be noted in the new record.**
 3. Insert the child's adoptive name, adoptive parent's information and the new demographic information where needed in the documents in the redacted record.
 4. Copy the documents that now have the new information and create a new record under the child's adoptive name.
 5. Shred the redacted documents covered with "white-out" that were removed from the pre-adoption record.
 6. File the *Consent to Disclose Pre and Post Adoption Information to Providers* and *Provider Notification of Adoption* letter(s) under the "Correspondence" tab in the pre-adoption record.
 7. File the court order/adoption decree under the "Legal" tab in the pre-adoption record.

Adoption Closure Log

The Early Steps service coordinator will document the following information on a password-protected electronic *Confidential Adoption Closure Log* which is used to document all adoptions, as well as track the progress of the adoption closures:

- A. Date of the adoption decree;
- B. Date Early Steps was notified of the adoption;
- C. Child's pre-adoptive name;
- D. Child's date of birth;
- E. Child's post-adoptive name;
- F. Parental consent to share adoption information with providers (and date);

- G. Date name was changed in the appropriate data system;
- H. Date closure was completed in the UF Data System or CMS-KIDS;
- I. Date the pre-adoption record was sealed.

V. Sealing the Pre-Adoption Record

The service coordinator will ensure that the pre-adoption record is sealed by taking the steps shown below:

- A. Print any electronic records in their entirety and add it to the hard copy record, ensuring that all records are included.
- B. Place the entire hard copy record in a sealed envelope marked "**CONFIDENTIAL.**"
- C. Place the confidential envelope into another envelope and seal it. Mark the outside envelope with the child's adoptive name. Place a notation on the envelope: "**THESE RECORDS CAN ONLY BE OPENED BY COURT ORDER**". *(A court order **must** be obtained to open or release a sealed record. A written release by either parent or child upon reaching the age of majority is insufficient to allow for accessing the information and/or releasing a sealed record from the office.)*
- D. Place the envelope(s) in a locked file cabinet in an area with limited access.

VI. DATA RECORDS

- A. **In the UF data system** - The service coordinator will complete the pre-adoption closure by changing the child's pre-adoption name to the post-adoption name and updating demographic information. If the child was originally opened in the UF data system and has since transitioned into CMS-KIDS, no changes need to be made in the UF data system.
- B. **In the CMS-KIDS system** – After completing the paperwork shown above, the service coordinator will complete the pre-adoption closure by doing the following:
 - 1. For children dually enrolled in Early Steps and the CMS Network:

CMS is responsible for contacting MED 3000 to initiate the process of changing the child's record. They are also responsible for notifying the Local Early Steps about the child's adoption if they become aware of the event first. After being contacted by CMS, MED 3000 will send the LES a customer service ticket that indicates the child has been adopted. This is notification only – no response or action is expected from the LES.

 - a. If the CMS area office coordinator did not notify the service coordinator of the adoption, the LES service coordinator will contact the child's identified CMS area office coordinator to determine whether the care coordinator is aware of the adoption and to coordinate the demographic change.
 - b. The service coordinator will check to determine whether the CMS Network has submitted a Customer Service Ticket to MED3000. For a child who has

Medicaid, the service coordinator will verify that the name change has been made in the Florida Medicaid Management Information System (FMMIS).

- c. After receiving the Customer Service Ticket, MED 3000 will terminate the pre-adoption record as of the date indicated on the ticket.
 - d. CMS will create a new record and MMI and notify the LES.
 - e. The LES will then follow the post-adoption process.
2. For a child who is enrolled only in Early Steps:
- a. Create a new ED record for the child with the new name and a new MMI number. The referral date will be the date the LES was notified of the adoption.
 - b. For a child who has Medicaid, verify that the name change has been made in the Florida Medicaid Management Information System (FMMIS) prior to submitting a Customer Service Ticket.
 - c. Submit a Customer Service Ticket that includes the identifier, "Child's pre-adoptive name - Specialized Review" to MED3000 requesting that the child's pre-adoption record be closed. Ensure the ticket includes in the "Notes" section the date the LES was notified of the adoption (effective date), the pre-adoption and post-adoption name of the child, confirmation that a new ED record was created, and the new MMI number.
 - d. After receipt of the customer service ticket, MED3000 will terminate the pre-adoption record as of the effective date indicated on the Customer Service Ticket.
 - e. Enter pertinent information into ED such as medical diagnoses and eligibility results from the newly created hard copy, post-adoption record to begin the new electronic record for the child.
 - f. Add new information gathered from the adoptive family during the IFSP process to ED, including the adoptive parents' names, demographic information, insurance information, family concerns, priorities, resources, assessment results, outcomes developed with the family, strategies, services and supports, to document the new IFSP.