

To: All Early Intervention contract managers and FCFC coordinators

From: Nathan DeDino

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Subject: Early Intervention Program Updates, #2117

DODD is providing this off-cycle Program Updates to answer questions and address concerns about the continued COVID-19 unwinding process and how it affects the Early Intervention system. This communication addresses four areas: virtual evaluations, in-person IFSP meetings, service coordinator check-ins, and documentation of mixed methods of EI service delivery. If you have any questions about the information contained in this communication, [please contact your EI program consultant](#).

Virtual Evaluations

On June 2, DODD communicated that it was allowing EI evaluators to continue to conduct developmental evaluations virtually to determine EI eligibility through at least August 31, 2021. DODD expects local EI programs to continue to move to conducting developmental evaluations in person by August 31. We recognize, however, that there may be health and safety considerations on the part of the child and family that make it prudent to continue to utilize a virtual evaluation. Therefore, through December 31, 2021, DODD will allow virtual evaluations consistent with [previous guidance](#) to continue in the limited cases where it is necessary to protect the health of the child being evaluated and their family. It should not be a local program's widespread practice to utilize virtual evaluations. Instead, this option should be reserved for those cases where eligibility cannot be established through other methods (e.g., diagnosis) and there are documented family health concerns.

We remind local EI teams that it is not necessary for both evaluators to be present in person when conducting an evaluation. For example, one evaluator could be with the family while the second evaluator joins via video-conference. The evaluator who is with the family in person in the home would need to administer the tool in all five domains.

In-person IFSP Meetings

Under the federal Part C regulations accompanying the Individuals with Disabilities Education Act (IDEA), initial and annual IFSP meetings must occur in person. State rules for Ohio's EI program are necessarily consistent with this federal requirement. In 2020, the federal [Office of Special Education Programs \(OSEP\) gave flexibility to states to allow these initial and annual meetings to occur through video conferencing or telephonically](#). DODD recognizes the benefits many local EI teams have found in the flexibility of holding initial and annual IFSP meetings through virtual methods. However, this flexibility is not within DODD's authority to grant; it is

solely within OSEP’s authority. Therefore, DODD will allow initial and annual IFSP meetings to occur virtually until such time that OSEP disallows this flexibility. OSEP is currently considering how they will update their COVID-19 guidance. We will communicate this information to local programs as soon as we are made aware of any potential changes.

Service Coordinator Check-ins

At the beginning of the pandemic, DODD required EI service coordinators to check in at least every two weeks with families. DODD is now suspending this requirement. We remind all EI service coordination agencies that service coordination—like any other EI service—should be individualized to the needs of the family and may continue to require bi-weekly or more frequent contact.

Documenting Service Delivery Method

Recognizing the challenges local EI programs might face as they began to increase the amount of in-person EI services while still providing virtual services, DODD gave guidance in March 2021 about [documenting service delivery method on the IFSP](#) during this time of transition. Since the state of emergency has ended and local programs are now better able to plan for what service delivery will look like for a particular family, DODD is providing updated guidance. When a family is receiving an EI service using both in-person and virtual methods, best practice is to determine how many visits are planned for each method and document this on separate lines of the service grid of the IFSP (EI-04). Although there are times when it may make sense to document a mixed method on one line, DODD cautions that this can lead to confusion with IFSP team members including the family about what is planned. DODD reminds EI teams that minor deviations that the family agrees to (e.g., a planned in-person visit that is provided via technology because a child is sick) can occur without updating the IFSP. Providers should ensure that these exceptions are well-documented in case notes.

As a “Tech First” state, DODD recognizes the important strides local programs have made in using technology for EI service delivery in Ohio, and virtual service delivery remains an important method for providing EI services.

Conclusion

We appreciate the many efforts local EI programs have made over the past year and a half to serve families during challenging circumstances. We recognize that the COVID-19 pandemic continues to evolve and the transmissibility of new variants poses ongoing concerns. DODD may update this guidance in the future in order to be responsive to health and safety considerations.