



## Department of Children and Youth Memo 25-024

**TO:** Early Intervention (EI) Contract Managers, Family and Children First Coordinators (FCFC), Local EI Service Coordination Agencies, Ohio Association of County Boards (OACB), County Boards of Developmental Disabilities (CBDDs), Councils of Governments (COGs), Local Superintendents, EI Providers

**FROM:** Laura Graf, Deputy Director, Policy

**DATE:** April 1, 2025

**SUBJECT:** Updated Guidance on Completing Early Intervention Requirements Virtually

### **Background**

OAC 5180-10-02 (previously 5123-10-02) outlines requirements regarding Early Intervention eligibility and services, including requirements for completing evaluations, assessments, and Individualized Family Service Plans (IFSPs). Due to circumstances associated with the COVID-19 pandemic, the state provided various guidance throughout 2020 and 2021 that allowed flexibility to complete these EI components virtually, which would otherwise have been required to be completed in person. This memo includes DCY's current, updated guidance around completing evaluations, assessments, and IFSPs.

### **Purpose**

The purpose of this memo is to clarify expectations and requirements around completing Early Intervention evaluations, assessments, and IFSPs, including flexibility to complete these components virtually.

### *Evaluations*

During the height of the COVID-19 pandemic, the lead agency allowed evaluations to be completed virtually in limited cases where it was necessary to protect the health of the child being evaluated and their family. This was intended to be used if eligibility could not be established via other means and there were documented family health concerns. In EI Program Update #2122, the state extended this flexibility that we had initially allowed through August 31, 2021, to allow evaluations to continue to be completed virtually in these limited circumstances and indicated a 60-day notice would be provided ahead of ending this flexibility. While evaluations should not be occurring virtually as a regular practice at this



time, DCY recognizes that the official notice to disallow any virtual evaluations was not previously provided. This communication serves as the official notice, and all evaluations must be completed with at least one evaluator present in person starting no later than **June 1, 2025**.

#### *Initial and Annual Child Assessments*

DCY's expectation is that at least one assessor is present while completing initial and annual child assessments. In limited cases, a child assessment may be administered completely virtually if 1) the tool publisher explicitly allows for completely virtual administration and 2) family circumstances or other factors warrant the completion of an assessment in this manner. Local programs and assessors are responsible for verifying whether the publisher allows virtual administration for the specific tool being used. Additionally, all circumstances and information around the need for and allowance of virtual administration must be thoroughly documented.

#### *Initial and Annual IFSPs*

During the COVID-19 pandemic, the U.S. Department of Education's Office of Special Education Programs (OSEP) provided flexibility for initial and annual IFSPs to be completed virtually during the time of the pandemic when in-person meetings were not feasible or practicable. This was not intended to be widespread or permanent practice. Going forward, EI Service Coordinators (EISCs) and parents must be physically present at initial and annual IFSPs, as required by rule 5180-10-02 (J)(7) (previously 5123-10-02(J)(7)). It is best practice for these IFSPs to occur in person. However, the EISC and parent may participate virtually via video to meet the "physically present" requirement for initial or annual IFSPs if that is determined to be the best method to do so based on circumstances (e.g., the parent to participate from work, weather conditions make traveling unsafe, etc.). Holding IFSPs virtually should not be standard practice, and when parents and EISCs participate in initial or annual IFSPs via video, circumstances regarding the decision to do so should be thoroughly documented.

Please see the [45-Day verification standards](#) for additional information regarding requirements related to eligibility, assessments, and IFSPs.

#### **Contact**

If you have any questions or concerns, contact [ei@childrenandyouth.ohio.gov](mailto:ei@childrenandyouth.ohio.gov).