

Frequently-Asked Questions: Service Coordination, Maintenance of Records and Exit 5123:10-02 (N)-(P)

(N) Service Coordination

Q: What if a child is eligible, but following the assessment for program planning (child assessment and if parent consents, FDA), the parents do not have any concerns about the child's development and/or the family has no concerns about their capacity to support the child's development, what forms would the SC provide to the family?

A: The EI Service Coordinator would provide the completed parts of the IFSP (on EI-04) and PWN of exiting (EI-10).

Q: Does non EI services include outpatient therapy? IF not on the IFSP or provide by sop?

A: Non-EI services would include any services not provided by CBDD or SOP contracted provider.

Q: If a child is receiving EI services and the parent wants to pursue medical therapy services and EI services, what is the role of the EISC in this situation.

A: Parents may seek additional therapy services outside the EI program for many reasons. It is the role of the EISC to help families make informed decisions and gain access to the additional services they want for their child. Services provided outside of EI should not factor into the decision of which discipline serves as the PSP or SSP. Families may seek outside services because the family perceives that the child will only have access to one team member; the EISC can explain that using a PSP approach, the family and child have access to all team members.

Q: How does the provider document coordinating "other services?"

A: Document any conversation in case notes consistent with your licensure. The EISC must be able to verify the services that are being provided.

Q: Is it necessary to get all case notes from all EI service providers for the child's EISC record?

A: It is not necessary to obtain all case notes from all EI service providers. At a minimum, the EISC will need to obtain case notes documenting the initial delivery of a

service for TRS purposes and case notes as necessary to the EISC's monitoring of the implementation of a family's IFSP.

Q: Do we still need consent for EI 14 when the referral is from a medical provider or professional?

A: Yes, consent is needed to provide referral follow-up information to medical providers and other professionals who do not work for a participating agency as defined in 5123-10-02(B) (27).

Q: What do you do when the request for TRS notes from providers is not completed within the timeline?

A: Please contact your EI program consultant if you are encountering difficulties in obtaining provider case notes for TRS or monitoring the implementation of the IFSP.

Q: We are under the impression that the EISC should have the PSP's copies of case notes in the file? Is this correct?

A: No. The child file may be located in numerous locations. When the state or parent requests the record, the SC agency must provide a copy of the entire record 5123-10-02: (B)(8) within 10 business days 5123:10-02 (O)(3)

Q: What if the EISC attends the provider start date and documents the visit in their case notes. Would they still need to obtain the providers case notes as well?

A: Yes. The EISC needs to obtain case notes from the provider for any service they did not provide. For more information, see the <u>Verification Standards</u> document.

Q: Do EI providers know that SC's will request this? Meaning its part of the contract that they sign to be an EI provider (for example: therapy providers)?

A: It is part of the POLR provider's contract and DODD rule.

Q: Is there a provider documentation training or guidance document similar to the EISC training that providers can access?

A: Yes. The training, "High Quality Case Notes in Early Intervention" addresses requirements for EISCs and other service providers. It is available on DODD's My Learning.

Q: Are SC required to have the provider case notes in the file or just that SC are connecting with the provider to make sure the TRS occurred?

A: Most local EISC agencies have methods to monitor TRS. Remember when the state requests records we will request the case note from the EI provider that verifies the first time that the family received their EI service.

Q: I think the term "case note" is maybe confusing people? We have a specific form the provider completes for TRS documentation in my county. If TRS is NOT met on time they provide their case notes documenting attempts to contact family, no shows, etc. Is this ok?

A: Please confer with your EI program consultant and check the <u>verification checklist</u> to make sure the documentation you are currently using meets verification standards.

Q: If the child's record can be stored in different locations, do we have to request a physical case note when the PSP is located within the same building/program?

A: That is up to your local protocol.

Q: I typically only collect provider case notes if TRS will be delivered late or never delivered. Should I have it for every TRS, delivered on time as well?

A: Yes, under most circumstances, you should collect a provider case note documenting TRS.

Q: Can Service Coordination go on the IFSP after July 1 since it is one of the 18 EI services?

A: Section 2 is where service coordination services are documented on EI-04, Ohio's IFSP form.

Q: How often is it recommended the EISC request the EI Providers documentation?

A: At a minimum, the EISC will need to obtain case notes documenting the initial delivery of a service for TRS purposes and case notes as necessary to the EISC's monitoring of the implementation of a family's IFSP.

Q: You mentioned Special Instruction, would this also include the case note from a SLP, OT, or PT that has been added to the plan? Disciplines include DODD and another agency that provide these services?

A: The EISC should obtain a case note for TRS from *any* provider on the IFSP grid that is providing an EI service.

Q: Do monthly unit tracking forms count as documentation?

A: No. While this can be helpful, we need the first note for timely receipt of services. Monitoring requires this to be compliant with this mandate. 5123-10-02 (N)(7)

Q: Will the EISC tell the family that their child's information will be shared with anyone that considered an EI provider?

A. EISCs should discuss with families who will have access to what types of information about the family.

Q: Will there be detailed cross walks and must do lists, example case notes and scenarios created with all this new information before rule becomes effective?

A: We have a documentation training on MyLearning: High Quality Case Notes in Early Intervention, and we plan to update this training soon. A forms cross-walk and PWN and Consent document have been developed, along with a revised verification checklist. These can be found on the <u>EI website</u>.

Q: Sometimes districts surprise us and offer preschool services the next day (prior to the 3rd birthday), this option to not allow families to waive their 10 days for PWN would prevent the child from starting preschool as Part C and Part B services cannot be provided simultaneously. Have we considered this? Example- Sept 1st, and ETR/IEP meeting occurs and the district offers preschool services tomorrow. Currently, if parent chooses to have their child start preschool the next day, we agree as a team to exit child effective the day of the IEP meeting if it is the day before Part B services begin. Not allowing the family to waive their PWN in this scenario would potentially delay the start of preschool services by 10 days. It may only happen in the early fall, but this may be something to consider.

A: In this situation, follow the IFSP process. We would provide PWN of exiting and exit the child after the 10 days have elapsed. We could not continue to provide EI services because a child cannot receive Part C services and Part B services at the same time.

Q: What all should the SC provide during intake, besides consent and data collection? No more screening.

A: Initial visits should focus on what EI is, discussions of how the process looks, focusing on procedural safeguards and parent rights and informed consents. Having discussions on what participation will look like. Remember as an EISC we have mandates that we are responsible to do.

Q: When you say to advocate for services within "the process" are you referring to EI services and the EI process or are you talking about transition and advocating for the child with regard educational services for the child /family?

A: Many opportunities to support the family with advocating for their child – including the examples listed in this question. Please contact your EI program consultant for additional information.

Q: Do we still refer to HV even if we do not have it in our county?

A: Yes. (Insert rule citation 5123-10-02 (K)(6)(a)?)

(O) Maintenance of Records

Q: The rule states that EI service providers must provide the EI records within 10 business days. Does this mean when SC's request TRS case notes they must be provided within 10 business days?

A: Yes. 5123:10-02 (O)(3)

Q: Is there any rule stating that the county board cannot share provider documentation with SCs unless a request has been made by the state?

A: No. CBDDs are part of the EI system (cite rule/regulation)

Q: Does the EI provider need to retain records for a certain time frame?

A: Yes, until the child's ninth birthday. 5123-10-01 (E)(1)(a)

Q: If there are two records in two locations, shouldn't they follow rule regarding record retention?

A: Any agency that holds EI records must follow DODD rules/federal regulations around EI (cite rule)

(P) Exiting and Transferring from the early intervention program

Q: Can you explain again why you would send a ten-day notice for exit?

A: Leaving the EI system (i.e., "exiting") is an activity that requires PWN except when the child is exiting because of turning three or because the child is deceased.

Q: If a child has reached their IFSP outcomes and no longer needing services when do you send the prior notice, does the service coordinator wait 10 days to exit them from the program?

A: In this example, PWN could be provided as early as the IFSP review where it was determined that the child had reached all IFSP outcomes and needed no new outcomes. Once PWN was given, the EISC would wait until 10 days have elapsed to exit the child from EI.

Q: We are confused when we are sending 10-day prior notice and then when to exit can you please research and answer in the FAQ?

A: In (P)(2), the other reasons for exiting are listed, all of which require the use of EI-10. When the child is determined ineligible, the parent must receive the evaluation results and PWN of ineligibility (EI-09) along with EI-10. In this situation, there is no option to waive the 10-day PWN. We need to ensure families have PWN.

Q: Didn't you say when the child reaches 3 that the PWN is required and the family cannot waive their 10 days?

A: No. Prior Written Notice is not required when the child is exiting due to turning 3. 5123-10-02 (P)(2)

Q: Clarification: parent will be exited if no response within 10 calendar days once letter sent, correct?

A: Yes, you may exit the child on the 11th day if you receive no response from the family during the 10-day PWN period.

Q: Is a PWN needed for exit when there is no IFSP?

A: Yes. You would check "you have not responded to our attempts to contact you." Follow your local exit protocol. Follow your local exit protocol.

Q: Just clarifying - If we have a new referral and cannot make contact with the family to start the EI process does Form EI-10 need to be sent or not?

A: Paragraph (P) (3) includes the requirements for the EISC when the parent cannot be located. The EISC shall use form EI-10 to provide PWN that the child will be exited if the parent does not contact the EISC within ten calendar days from the date of notice.

It is important to be aware of your local exit policy as well and to document all attempts to locate and contact the parent. There are no changes here from previous rule.

Q: What if the family is referred by children's services and says that they aren't interested?

A: EI is a voluntary program. EI would exit and with parent consent send a referral follow-up form (EI-14) to the referral source (5123-10-02(P)(2)(f). On referral follow up form, we would only be able to check "parent declined" if you'd met with the parent, explained the form and obtained parent consent.

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Q: What happens when you do not know that they family is moving until they are gone?

A: This sounds like a case where you have lost contact with the family. You would follow your local exit policy and provide EI-10 when proposing to exit. Ensure the agency is waiting the 10 days before exiting.

Q: Please clarify for exit: If a parent and team agree a child is age-appropriate and no longer in need of services on (for example) 8/1/19, then the EISC would provide PWN for exit, and this child would exit on 8/11/19. Same for a parent who chooses to exit for any reason, correct? Ultimately, what is considered the exit date: the date the parent requests exit, or the date ten days later?

A: PWN must be provided before the exit. Thus, the exit would be at the least, ten days after PWN was given.

Q: Will there be a report in EIDS that will list children pending exit due to ineligibility? This is very difficult to track in a large county.

A: Unfortunately, there is no way to accurately track this in the data system. However, tracking children who are exiting due to ineligibility is not a requirement of the EI rules.