**Philadelphia Infant Toddler Early Intervention**

**Early Intervention Funding and Fiscal Procedures**

**Policy**

All staff in Philadelphia Infant Toddler Early Intervention, including Service Coordinators and Early Interventionists, will be knowledgeable about the system of payment for Infant Toddler Early Intervention in Pennsylvania.

Infant Toddler Early Intervention has a coordinated process for obtaining Medical Necessity through referral information and by record reviews by a health practitioner at the respective Service Coordination entities when needed. Service Coordinators assist families to enroll their infants and toddlers in Medical Assistance (MA) and obtain permission to bill MA.

Philadelphia Infant Toddler Early Intervention has an integrated process that supports and monitors the Service Coordination Entities to identify infants and toddlers who are eligible for the Infant Toddler and Families (ITF) Waiver. We ensure that the requirements for implementation of the ITF Waiver are met.

Timely billing by SCEs, Initial Multi-disciplinary Evaluation Agencies and Early Intervention agencies is monitored and a process for distribution of funds is utilized.

Monitoring of the Service Coordination Entities includes analysis of service coordination direct and indirect time.

**Procedures**

Knowledge of Infant Toddler Early Intervention Funding

All Early Interventionists are required to take the TLC online Policies and Procedures Course which includes this policy. Agencies that are new to Philadelphia Infant Toddler Early Intervention must complete a review of the PreService Handbook, which includes a section on fiscal operation and funding sources.

Service Coordinators and Early Interventionists Share Information About the Use of Funds Through Discussions with Families About the System of Payment and Available Sources of Funding

1. Early Intervention (EI) services in PA are provided at no cost to the families of infants and toddlers with disabilities per state regulations at Chapter 4226.5(ii).
2. Fees will not be charged to families for EI services that an infant or toddler would otherwise be entitled to receive at no cost to the family under Part C of IDEA and Pennsylvania Act 212-1990: The Early Intervention Service System Act.
3. Income information is not collected from families therefore, fees are not charged for failure to provide such information.
4. Families will be informed of how EI services are funded.

**Medical Assistance (MA)**

1. The use of Medical Assistance (MA) funds will results in no cost or potential negative impact on children or families.
2. Families will not be required to apply for MA for infants or toddlers to receive EI services. However, the Service Coordinator will inform families of MA and encourage families to use all financial resources available to them to support their EI services.
3. Parental consent will be obtained prior to using the MA of a child or family who is currently enrolled or newly enrolled in MA
4. If a family does not provide consent for the use of the child’s or family’s MA, all services on the IFSP shall be available to the child and family.
5. Written notification will be provided to the family prior to using a child’s or family’s MA benefits. The notification shall include the following:

* A statement that parental consent must be obtained before disclosing a child’s personally identifiable information to the MA program;
* A statement that if a family does not provide consent to use their MA benefits, all EI services on the child’s IFSP shall be available;
* A statement that a family has a right to withdraw consent for the disclosure of personally identifiable at any time; and
* A statement that services are at no cost to families.

1. Medical Assistance will be considered the **payer of last resort.** Therefore, MA funds may not be used to satisfy a financial commitment for services that would otherwise have been paid for from another public or private source. Funds may only be used for EI services that an eligible child needs but is not currently entitled to under any other federal, state, local or private source.

**Private Insurance**

1. Although private insurance is considered a potential funding source for EI services under Chapter 4226.13, PA insurance companies do not consider EI services as a covered service under their health insurance policies. If private insurance was utilized, we will follow the requirements outlined in state regulations at §4226.13(b)(1-3), specifically, that private insurance may be used to pay for EI services only with the consent of the family, as long as such use will not result in a cost to the family, including but not limited to the following:

* A decrease in available lifetime coverage or any other benefit under an insurance policy
* An increase in premiums or the discontinuation of the policy;
* An out-of-pocket expense such as the payment of a deductible amount incurred in filing a claim.

1. The Service Coordinator will obtain parental consent for the disclosure of personally identifiable information prior to billing private insurers for the initial provision of services and any subsequent increases in service due to changes in frequency, length, duration or intensity of a service.
2. If a family does not give consent to use their private insurance, the lack of consent shall not delay or deny EI services to the child or family.
3. During the Initial Home Visit with families, the service coordinator will provide families with the following:

* Information on the no-cost provision of EI services in PA;
* The state’s system of payment policy; and
* The family’s rights related to filing a complaint, mediation, or due process hearing should they disagree with the use of their private insurance.

1. Funding options shall be explained to families during the Initial Home Visit (IHV) and/or during meetings with the service coordinator prior to the IFSP development.
2. During the IFSP development process funding decisions will be determined to include a discussion of what funding sources will be utilized

**Infant Toddler and Family (ITF) Waiver**

1. Waiver funds will be used for the provision of EI services to infants and toddlers with disabilities to the extent that eligible services and eligible infants and toddlers can be identified.
2. Waiver applications will be completed for children who are enrolled in medical assistance and who are eligible for ITF services.
3. Signed parental consent will be obtained to participate in the ITF by the assigned Service Coordinator.
4. Infants and toddlers will be recertified annually to determine their continued eligibility for funding using the Infant Toddler Waiver.

Obtaining Medical Necessity Information

The referral form shared by EI Intake to be used by physicians includes information about authorizing Medical Necessity. Physicians, hospital and other medical referral sources are encouraged to include this information in referral forms they use as part of their electronic health records.

If Medical Necessity authorization is not given as part of the referral, each of the Service Coordination Entities contracts with a Nurse Practitioner who reviews the child’s record and available information and authorizes Medical Necessity, as appropriate.

Enrollment in Medical Assistance

See procedures in Medical Assistance section above.

Identification and Implementation of the Infant Toddler and Families Waiver

Children who meet the criteria for the Infant Toddler and Families (ITF) Waiver will be identified based on the scores obtained from standardized assessments that are used for eligibility determination. The Service Coordinators are trained to recognize the criteria for the ITF Waiver and are prompted in PEIDS (Philadelphia Early Intervention Data System) when this information is entered. Each Service Coordination Entity employs a Qualified Professional to complete the information for the evaluation and re-evaluation requirements of the ITF Waiver. The Philadelphia Infant Toddler Early Intervention assigned Program Analyst and the Program Supervisor monitor the implementation of these procedures.

Also see Infant Toddler and Families Waiver section above.

Timely Billing and Distribution of Funds

The Program Fiscal Manager regularly communicates with the Service Coordination Entities and Early Intervention agencies to promote timely billing for services. The Program Fiscal Manager collaborates with the City Fiscal Department to support the procedures for distribution of funds to the contracted agencies.

Monitoring of the Service Coordination Entities for Service Coordination Direct and Indirect Time

The ongoing monitoring of the Service Coordination Entities (SCE) includes analysis of service coordination direct and indirect time and ensuring that this is reviewed by the SCE leadership.