Philadelphia Department of Behavioral Health/Intellectual disAbility Services
Infant/Toddler Early intervention

Early Intervention Funding Policy:
Public Law, 108-446; Pennsylvania Act 212-1990: The Early Intervention Service System Act; and Title 55, Chapter 4226. Early Intervention Services and OCDEL announcement EI-13#02 guides policy for eligible children and their families and establishes requirements for state policies and procedures related to system of payment for EI services. Thus policy outlines the procedures that will be used in Philadelphia County related to funding early intervention services.

Procedure:
1. 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 early intervention 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.
6. 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) that states:

2. 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.

3. 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.

4. 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.

5. During the initial contact meeting 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.

6. Funding options shall be explained to families during the initial contact and/or during meetings with the service coordinator prior to the IFSP development.

7. During the IFSP development process funding decisions will be determined to include a discussion of what funding sources will be utilized

Infants and Toddler 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 waiver services.

3. Signed Parental consent will be obtained to participate in the waiver.

4. Infants and toddlers will be recertified annually to determine their continued eligibility for funding using the Infant Toddler Waiver.