

## Early Childhood Intervention IFSP Form

### Background

ECI is a statewide service system for families with children, birth to three, with disabilities and developmental delays. ECI provides a full range of developmental services that support families to help their children reach their potential. To be a provider of ECI services, an entity must have a contract with the Texas Department of Assistive and Rehabilitative Services (DARS) for the provision of ECI services. ECI contractors include public (e.g., local community centers, independent school districts) and private (e.g., Easter Seals) non-profit agencies.

### *Description of the ECI Service System*

A key component of the ECI service system is the use of interdisciplinary teams consisting of professionals, family members, and other persons as requested by the parent/legally authorized representative (LAR). Each child's team develops an Individualized Family Service Plan (IFSP) to identify and address the unique needs of the child and family. As stated in section 8.1.9.4 of Attachment B-1 of the Uniform Managed Care Contract, the IFSP identifies the services to be provided to the child to meet the needs of the child and the family, and identifies the person or persons responsible for each service required by the plan. The IFSP is a contract between the ECI contractor and child's parent/legally authorized representative (LAR). Section 8.1.9.5 indicates the IFSP serves as authorization for services provided by the ECI contractor.

### **Update** - April 2015 Modification of the IFSP

DARS has modified the required IFSP form to clarify the state's expectations and improve oversight of the ECI contractors. Contractors will begin using the updated IFSP on April 22, 2015. Contractors are expected to convert to the new form at the child's next IFSP review. This will result in 100% use of the updated IFSP by November 1, 2015.

The change to the IFSP form is the removal of "Parent Arranged" and the addition of "Services Designation." There are four services designations:

1. Program Provided (PP) – This designation is used when the IFSP team identifies a need and the **ECI contractor will be providing the service** to address that need. The **IFSP serves as service authorization** and claims are submitted to the MCO by the ECI contractor.
2. Parent Choice (PC) – This designation is used when the IFSP team identifies a need and the parent chooses a provider other than the ECI contractor. The IFSP does not serve as service authorization and claims are submitted to the MCO by a provider other than the ECI contractor. An MCO is not responsible for payment for unauthorized non-emergency services provided to a child by out-of-network providers.
3. Program Arranged (PA) - This designation is used when the IFSP team identifies a need and the ECI contractor does not have the necessary staff to provide the service. The IFSP does not serve as service authorization and claims are submitted to the MCO by a provider other than the ECI contractor. An MCO is not responsible for payment for unauthorized non-emergency services provided to a child by out-of-network providers.

4. Not Part C (NP) - This designation is used when the IFSP team identifies a need and the ECI contractor does not have the necessary staff to provide the service. The IFSP does not serve as service authorization and claims are submitted to the MCO by a provider other than the ECI contractor. An MCO is not responsible for payment for unauthorized non-emergency services provided to a child by out-of-network providers.

Example:

Service Information									
Service	Discipline of Provider	Expected Frequency	Expected Intensity	Total Authorized Visits	Location*	Method	Start Date	End Date	Services Designation **
CM	Service Coordinator's Name: Sally Worth	Ongoing	As Needed	Not Applicable	<input checked="" type="checkbox"/> Home <input checked="" type="checkbox"/> Community <input type="checkbox"/> Other Specify other: _____	Not Applicable _____	9/1/15	9/1/16	PP
SST	EIS	3 x per month	45 minutes	36	<input checked="" type="checkbox"/> Home <input checked="" type="checkbox"/> Community <input type="checkbox"/> Other Specify other: _____	<input checked="" type="checkbox"/> Individual <input type="checkbox"/> Group	9/1/15	9/1/16	PP
OT	OT	1 x per month	60 minutes	12	<input checked="" type="checkbox"/> Home <input checked="" type="checkbox"/> Community <input type="checkbox"/> Other Specify other: _____	<input checked="" type="checkbox"/> Individual <input type="checkbox"/> Group	9/1/15	9/1/16	PP
PT	PT	4 x per month	45 minutes	48	<input checked="" type="checkbox"/> Home <input checked="" type="checkbox"/> Community <input type="checkbox"/> Other Specify other: _____	<input checked="" type="checkbox"/> Individual <input type="checkbox"/> Group	9/1/15	9/1/16	PA
ST	SLP	1 x per month	60 minutes	12	<input type="checkbox"/> Home <input type="checkbox"/> Community <input checked="" type="checkbox"/> Other Specify other: SLP Office	<input checked="" type="checkbox"/> Individual <input type="checkbox"/> Group	9/1/15	9/1/16	PC
AI	TASC	4 x per month	30 minutes	48	<input checked="" type="checkbox"/> Home <input checked="" type="checkbox"/> Community <input type="checkbox"/> Other Specify other: _____	<input checked="" type="checkbox"/> Individual <input type="checkbox"/> Group	9/1/15	9/1/16	PP

This serves as an example only. Any individual IFSP may include as few as one, or as many as all four service designations, depending on the circumstance of the individual child. The implications to the MCO in this specific example are as follows:

- Both case management (CM) and specialized skills training (SST) are carved out of managed care and the Texas Medicaid & Healthcare Partnership (TMHP) is the payor.
- The IFSP authorizes payment to the ECI contractor not to exceed 60 minutes of OT once a month for 12 months.
- Neither the physical therapy (PT) or speech therapy (ST) will be provided by the ECI contractor. The designation of PA (or NP) indicates the ECI contractor will work with the MCO to assist the family in locating an in-network provider for the PT. The designation of PC indicates that the parent has selected a non-ECI provider for the provision of ST. The providers of the PT and ST must seek service authorization and payment independent of the ECI contractor.
- The auditory services (AI) are provided by the local educational agency (LEA) and are considered (for ECI contract purposes) as program provided (PP). This is also the case for visual services (VI). AI and VI services provided by the LEA are funded with IDEA Part B funds and the ECI contractor cannot receive Medicaid reimbursement for these services.

### ECI Contractors and Other Service Providers

Section 1905(r)(5) of the Social Security Act requires that a Medicaid recipient under the age of 21 must receive the health care services listed in the Act for which she/he has medical need ([Social Security Act section 1905\(r\)](#)). There is no prohibition to ECI contractors and non-ECI providers from providing services to the same child. If a child has Medicaid, they are entitled to receive all medically necessary services. The IFSP is the authorizing document for ECI services, but if the family of a child with Medicaid wants more therapy services than what the IFSP requires, the family would be able to receive the additional therapy if authorized by a physician, APRN, or PA (in accordance with HHSC medical policy).

Given the MCOs' obligation to ensure the child receives all medically necessary services, it is important that the IFSP accurately reflect the developmental needs identified by the IFSP team regardless of the service provider. Similarly, the ECI contractor is expected to keep the MCO informed with regard to needed auditory and vision evaluations. ECI contractors are expected to put forth good faith effort to obtain the necessary release of information from the parent/LAR to allow the ECI contractor and the MCO to exchange information regarding needed evaluations.

### **Next Steps**

HHSC staff will hold a conference call to discuss the IFSP on Thursday May 28, 2015 from 3:00 pm – 4:00 pm. MCOs are welcome to submit additional ECI related questions prior to the meeting. If you have additional questions please contact Daniela De Luna via email at [daniela.deluna@hhsc.state.tx.us](mailto:daniela.deluna@hhsc.state.tx.us).

Date: May 28, 2015

Time: 3:00 pm – 4:00 pm

Call-in Number: 1-877-226-9790

Access code: 7171813