

Early Steps Program Operational Guidance: COVID-19

Service Component	Guidance	Data Component
<p>Evaluation/ Assessment</p>	<ul style="list-style-type: none"> • The multidisciplinary evaluation team, including the family, should work together to determine the best method and tool(s) to determine the child’s status in the five developmental domains. This can include methods other than face-to-face contact. • For children with an established or at-risk condition, an eligibility evaluation does not need to occur. • Please check with the publisher of the evaluation/assessment tools to determine methods in which the tool can be administered. 	<p>A new barrier code, “V” for COVID-19 Public Health Emergency, should be used in any circumstance an evaluation, IFSP meeting, or service does not occur, as required. In addition to the barrier code, please ensure the delay is documented in the Early Steps record. <i>*Please note that COVID-19 barrier code should only be used in the Early Steps Data System when COVID-19 is the reason for an impact or an interruption of services.</i></p>
<p>Individualized Family Support Plan (IFSP)</p>	<ul style="list-style-type: none"> • Initial and Annual IFSP Reviews may be conducted by phone until further notice. • IFSP Teams should continue to assess each child to determine if their needs have changed and determine whether the IFSP Team needs to convene to identify whether changes to the IFSP are needed. 	<p>A new barrier code, “V” for COVID-19 Public Health Emergency, should be used in any circumstance an evaluation, IFSP meeting, or service does not occur, as required. In addition to the barrier code, please ensure the delay is documented in the Early Steps record. <i>*Please note that COVID-19 barrier code should only be used in the Early Steps Data System when COVID-19 is the reason for an impact or an interruption of services.</i></p>

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<p>Service Delivery</p>	<ul style="list-style-type: none"> If the Local Early Steps (LES) program or service provider determines that face-to-face Part C services cannot be provided during the public health emergency, or at the family's request, the provider or service coordinator may consult with the parent through a teleconference or telemedicine to provide guidance and advice (as needed). Families should be informed the changes in the method of service delivery are in response to the COVID-19 public health emergency and will resume as previously authorized when the emergency is resolved. Services provided via electronic means must be compliant with the Health Insurance Portability and Accountability Act (HIPAA) and the Family Educational Rights and Privacy Act (FERPA). If a family temporarily moves out of Florida during the public health emergency, services cannot be provided until they return; however, the team should provide the family with developmental resources specific to the child's needs until they reengage in services upon their return. <p><u>Telemedicine</u></p> <ul style="list-style-type: none"> Telemedicine may be used as an alternative option for Early Steps services during the public health emergency. Telemedicine is the practice of health care delivery by a practitioner who is in a site other than the site where a recipient is located, using interactive telecommunications equipment that minimally includes real time, two-way interactive communication between a recipient and a practitioner using audio and video equipment. All Medicaid requirements must be followed when providing telemedicine services to Medicaid recipients. <p><u>Telephone Conferences</u></p> <ul style="list-style-type: none"> A <i>temporary</i> new Current Procedural Terminology (CPT) code has been added to the Early Steps Data System for a teleconference by phone from a direct service provider to a family dedicated to discussing services and strategies pertaining to the child and/or family's needs. 	<p>A modifier has been added to the Early Steps Data System, "GT", when a service is provided using telemedicine and should be used, regardless of payor.</p> <p>The code for a Teleconference is "TELEC" and should be used by any provider type providing a Telephone Conference.</p>
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April 28, 2020

Revised: May 18, 2020

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	<ul style="list-style-type: none"> • Note – this service is different than Consultation which occurs between service providers to share content expertise in a specific area or discuss evidence-based practice related to the implementation of strategies to achieve outcomes on IFSP. • Service Rate: \$9.25 • Units: 15mins Max Allowable: 1 hour per day <p><u>Make-Up Sessions</u></p> <ul style="list-style-type: none"> • If services are not provided for an extended period, the IFSP team must meet under 34 CFR § 303.342(b)(1) to determine if changes are needed to the IFSP and determine whether compensatory services are needed. <p><u>Suspended Services</u></p> <ul style="list-style-type: none"> • If a family requests their child’s services to be suspended as a result of COVID-19, documentation must be included in the child’s record and the Early Steps Data System. <p><u>New Services</u></p> <ul style="list-style-type: none"> • If a new service was not provided within 30 days from the date the family consents to the service because of COVID-19 it must be documented in the Early Steps Record and the Early Steps Data System. 	<p>Suspension Indicator</p> <p>A new barrier code, “V” for COVID-19 Public Health Emergency, should be used in any circumstance an evaluation, IFSP meeting, or service does not occur, as required. In addition to the barrier code, please ensure the delay is documented in the Early Steps record.</p> <p><i>*Please note that COVID-19 barrier code should only be used in the Early Steps Data System when COVID-19 is the reason for an impact or an interruption of services.</i></p>
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Transition	<ul style="list-style-type: none"> • LES programs should continue to provide notification to the Local Education Agency and the Florida Department of Education, if the family has not opted out. • LES programs should continue to invite the local education agency to transition conferences and document participation, or non-participation, in the Early Steps record. • The IFSP team should work with the family and the program the child is transitioning to, if applicable, to assist with transition activities. 	
Closure	<ul style="list-style-type: none"> • If a family requests to stop their child's participation on Early Steps due to COVID-19, it must be documented in the Early Steps Record and the Early Steps Data System. • Early Steps services must be terminated by the child's third birthday except for one of the following reasons: <ul style="list-style-type: none"> ○ fund a service coordinator's attendance at an initial IEP meeting for a child transitioning from IDEA, Part C to IDEA, Part B, ○ pay for the administration of the exit evaluation for child outcome measurement, or ○ provide compensatory services after a child's third birthday, as justified and authorized on the IFSP, because it has been determined, via one of the following means, that services have been delayed or interrupted due to some failure on the part of the LES or service provider: <ul style="list-style-type: none"> ○ Hearing decision ○ State complaint decision ○ Mediation agreement ○ Finding through other general supervision activities. 	<p>A new disposition code, "D" for COVID-19 Public Health Emergency, should be used if a family requests to stop their child's participation in Early Steps due to COVID-19, it must be documented in the Early Steps Record and the Early Steps Data System.</p> <p><i>*Please note that COVID-19 disposition code should only be used in the Early Steps Data System when COVID-19 is the reason for closure.</i></p>
Consent	<ul style="list-style-type: none"> • If a wet-signature cannot be obtained from the parent, consent can be obtained the following ways: <ul style="list-style-type: none"> ○ send the entire IFSP to the family via U.S. mail with instructions to provide a wet signature and mail back, or ○ obtain signed and dated parental consent in electronic format as long as there is a process to: <ul style="list-style-type: none"> ○ Identify and authenticate a person as the source of the electronic consent, and ○ Indicate such person's approval of the information contained in the electronic consent. 	
Documentation	<ul style="list-style-type: none"> • Any interruptions or delays in services occurring as a result of COVID-19 must be clearly documented in the child's Early Steps Record and the Early Steps Data System. 	

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Reimbursement	<ul style="list-style-type: none"> • The natural environment support fee can only be billed/reimbursed if the provider goes to the natural environment when providing the service. • Travel reimbursement can only be billed/reimbursed when a provider has traveled to provide a service. • The services actually provided should be billed, not the services authorized. 	
Medicaid	<ul style="list-style-type: none"> • All Medicaid-reimbursable services must be billed to Medicaid before billing Early Steps. • Please visit the Agency for Health Care Administration COVID-19 webpage at https://ahca.myflorida.com/covid-19_alerts.shtml for additional information. 	
Resources -	<p> Florida Department of Health Early Steps COVID-19 Resource Page Early Steps State Office Policy Handbook A Guide to COVID-19 and Early Childhood Development AHCA COVID-19 Alerts AHCA COVID-19 Medicaid Information Autism Navigator Online Professional Courses Bipartisan Policy Center: How the CARES Act Impacts Child Care Center for Disease Control and Prevention Centers for Medicare & Medicaid Services Center on the Developing Child COVID-19 Resources Coronavirus (COVID-19): SBA Small Business Guidance & Loan Resources Early Childhood Personnel Center Resources for Families Early Childhood Technical Assistance Center Fundera Small Business Grants INFORMATIONAL MEMORANDUM OIR-20-06M National Center for Hearing Assessment and Management Tele-Intervention Services Providing Pediatric Physical Therapy Services via Telepractice Salesforce Care Small Business Grants Save Small Business Fund Should I Get Tested? Suspension Indicator US Department of Education </p>	