

Start Date for IFSP Supports and Services: Questions & Answers

What to Record on Page 6 of the IFSP:

- 1. What is supposed to be listed for start date? Some individuals are putting the IFSP date as the start date for services. Others are putting an anticipated start date.**

In accordance with federal Part C regulations, Virginia's Part C Policies and Procedures indicate that the **projected** start date must be listed on the IFSP. On Virginia's IFSP form, the projected start date is listed in the entitled services table on page 6. In order to be clearer about this requirement, the revised statewide IFSP form (under development as of this writing) will have a column in the entitled services table that is labeled *Projected Start Date* rather than *Start Date*.

- 2. Does it matter if the projected start date is not the actual start date? If not, are there parameters that are acceptable (e.g., within a week of the projected date. This could still be within the 21 days.)? For instance, the provider that completed the evaluation and participates in the IFSP meeting may not be the same that provides the services. This makes it difficult to anticipate a start date.**

The IFSP team is expected to record the most realistic projected start date possible, based on their knowledge of local provider availability and scheduling practices. There is not, however, a requirement that the service actually begin on the projected start date. It is expected that efforts to arrange for the start of services and any reasons for delay will be documented in the child's record.

Local systems will be monitored on whether they begin supports and services in accordance with Virginia's definition of timely, not on whether they start by the projected start date listed on the IFSP. In other words, for purposes of compliance with the requirement for timely start of services, it does not matter whether the service begins on the projected start date, within a week of the projected start date, or two days before the projected start date ... just that it begins within 21 days of the date the family signs the IFSP.

- 3. How does the start date listed on the IFSP relate to the 21-day definition for timely start of services?**

Generally, the projected start date listed on the IFSP will be within 21 days of the date the parent signs the IFSP, unless the IFSP team agrees to a later start date

in order to meet the individual needs of the child and family. It is also acceptable to plan a later start date due to family scheduling preference.

There are circumstances when the team anticipates a delay in the start of supports and services due to a provider issue. For instance, if audiology is listed as an entitled service and the team knows it usually takes 6 weeks to get an appointment, then the projected start date should be realistic and reflect that fact. The local system will work to get an earlier appointment either through a cancellation or by seeking the services of another audiologist, if possible. The contact notes will document the attempts to get an earlier appointment.

Similarly, if the team anticipates a delay in the start of physical therapy because of a provider shortage, then the projected start date will reflect that. The local system then looks for alternate arrangements to get the service started within 21 days and notifies their technical assistance consultant if they are unable to identify a provider within 10-15 calendar days of the IFSP meeting. The contact notes will detail these efforts.

Local systems will be monitored on whether they begin supports and services in accordance with Virginia's definition of timely, not on whether they start by the projected start date listed on the IFSP. In other words, for purposes of compliance with the requirement for timely start of services, it does not matter whether the service begins on the projected start date, within a week of the projected start date, or two days before the projected start date ... just that it begins within 21 days of the date the family signs the IFSP.

4. Under what circumstances is it okay to list the IFSP date as the projected start date? If the IFSP date is listed as the start date, what documentation is required to show that this occurred? Why can't the IFSP page 8 or 9 serve as documentation of what's happening?

The IFSP is not valid or in effect until the parent signs the IFSP. The IFSP date would be listed as the projected start date only if (1) the family signs the IFSP on that date and (2) the service is anticipated to be delivered that same day. Service coordination activities may begin on the date the IFSP is signed. If the service coordinator participated in the IFSP meeting and/or met with family after the IFSP meeting, then service coordination could be considered as beginning on the date the family signed the IFSP. Other entitled supports and services would begin on the date the parent signs the IFSP only if the service provider delivers an entitled service on that day that is separate from the evaluation and/or IFSP meeting.

A contact note is required to document the date a service actually begins. As indicated in Documentation of Service Provision, Including Service Coordination, in Virginia's Part C Early Intervention System (December 2006), contact notes must be used to document all contacts made and all activities completed with or on behalf of the child and family. Please note that, if a service begins on the date of the IFSP, as described in the paragraph above, then a contact note is required to document that the service was delivered, unless it was service coordination (in which case the service coordinator's signature on the IFSP is adequate documentation).

Page 8 of the IFSP is adequate documentation of the date the parent signs the IFSP. While the IFSP team is welcome to record the actual start date for services on page 9 (IFSP Review page) of the IFSP form, a contact note still is required, as indicated in the preceding paragraph.

- 5. Insurance authorizes the service to start on the start date listed on the IFSP. If we list 9/15/06 as the start date on the IFSP, get insurance authorization, and then the provider is actually able to start the service on 9/7 (earlier than projected), then insurance won't pay for that service on 9/7 because it is before the start date. If an anticipated date is recorded for the start date and the provider can go prior to that date, does Part C cover the cost (this could be very expensive for some systems) or does the provider make the visit and take a loss or do they ignore the availability of an early time slot and possibly end up not being able to begin on the anticipated start date?**

The IFSP team is expected to record the most realistic projected start date possible, based on their knowledge of local provider availability and scheduling practices. Often, the realistic timeframe for the start of a service is a range of days (e.g., 7-10 days or 2-3 weeks). In the situation described in this question, it would be appropriate to list as the projected start date, the earliest possible date within the range of what is realistic.

As indicated in Virginia's Part C Policies and Procedures and in the current IFSP instructions, local systems are not permitted to delay the start of supports and services while waiting for insurance authorization, except by parent request. In order for this to be considered an acceptable reason for the delay in starting a service(s), there must be documentation that contact has been ongoing with the insurance company and that the local early intervention system has been working with the company to determine if there will be coverage for early intervention services AND that the parent chose not to begin services until insurance issues were resolved. Otherwise, Part C funds must be used to avoid a delay in the start of services.

Interpreting the Definition of Timely Start of Services:

- 6. Some individuals have interpreted the 21-day timely start of services as meaning any time within 21 days of the start date listed on the IFSP (regardless of what that date is).**

The 21-day timeline begins on the date the family signs the IFSP, regardless of what projected start date is listed on the IFSP.

- 7. Is it true that services must be initiated within 21 days even if it means that Part C funds need to be used instead of waiting longer and receiving the services from an agency that does not charge the Part C system?**

That is correct. Part C funds must be used, if needed, to prevent a delay in the timely provision of supports and services.

- 8. Child A has an IFSP meeting and services are to be every two months. When the family is asked what this means to them, they reply "my appointment will be 2 months after this meeting." Part C says it must be within 21 days or additional documentation must be provided. If the family signs the page 8 or even page 9, does the first appointment for services (in 2 months) have to happen within 21 days? Why should additional documentation be required?**

It is acceptable for a service to begin more than 21 days after the family signs the IFSP if the IFSP team agrees to a later start date in order to meet individual child and family needs or because of a family scheduling preference. The timely start of services is not related to the frequency with which the service will be provided.

The family's signature on page 8 or 9 of the IFSP is not adequate documentation that the reason for the delayed start of a service is to meet child and family needs or because of a family scheduling preference. The signature means they have agreed to the supports and services as listed on the IFSP, but they may have agreed to a later start date because they were told that date was the earliest available appointment. On the revised statewide IFSP form, which is under development, there will be a box on page 6 of the IFSP where the team can briefly note the justification for a later start date. Until the revised IFSP form is implemented, the justification must be documented in a contact note.

9. Dependent on what data verification shows, should Virginia consider changing the start date?

The Part C Office recognizes and appreciates local system efforts to begin supports and services within 21 days of the date the family signs the IFSP, as well as local concerns about barriers to achieving compliance with the 21-day definition of timely. At this time, there is not adequate documentation to support changing the 21-day definition of timely. Statewide data reported in the Annual Performance Report to OSEP indicated that 72% of infants and toddlers began receiving all supports and services on their IFSPs within 21 days of the family signing the IFSP. However, when the data was examined by service, results showed that 86% of all supports and services listed on IFSPs began within the 21-day period. The record review data statewide indicated that of the 285 services that were delayed due to system reasons, only 74 were due to documented provider shortage. No documentation of any kind was available to explain 207 of the 285 delayed services.

We understand that there are real issues regionally with insurance authorization. While delays in insurance authorization may not be used to delay the start of services (unless a family chooses to wait for authorization before starting services), we recognize that there are cost issues associated with this situation. The Part C Office will work in partnership with affected local systems to address these types of systemic issues.

The state interagency agreement is under revision. The new agreement will include not only a general agreement among all participating state agencies, but also individual agreements between DMHMRSAS and each of the other participating state agencies. These individual agreements will be much more specific and will detail requirements such as the 21-day timeline for start of supports and services listed on the IFSP.

The 21-day definition for timely start of supports and services will remain in place for another year. At that time, the Part C Office will re-evaluate the definition in partnership with local systems. Following the next annual local record review, we expect to have better data from local systems documenting the reasons for delays in the start of supports and services. The one-year period will also allow time to determine the impact of revised state interagency agreements, efforts to address systemic issues related to timely start of supports and services, and implementation of strategies in local corrective action plans/service enhancement plans.

10. How does the 21 day timeline apply to Assistive Technology services? Does the family need to receive the equipment/service within 21 days

of the IFSP or does documentation of steps taken such as ordering the equipment contribute to compliance with the timeline? How can we list this service on the IFSP to allow sufficient time to order equipment since the normal process for ordering/receiving equipment will often take more than 21 days?

Assistive technology services and an assistive technology device are listed separately on page 6 of the IFSP. The 21-day timeline applies to assistive technology services in the same way it applies to all other entitled supports and services. However, the 21-day timeline does not apply to delivery of an assistive technology device. The projected start date listed on the IFSP for an assistive technology device should reflect the anticipated date for delivery of that service/device. The child's early intervention record must include documentation of the steps taken from the date of the signed IFSP to secure the device as quickly as possible.

- 11. How does the 21 day timeline apply to receipt of services such as audiological evaluations where it may take longer than 21 days to obtain an appointment or where families may choose to delay making an appointment or cancel scheduled appointments?**

The projected start date for a one-time service (e.g., an audiology evaluation) should reflect the anticipated date for delivery of that service. If the IFSP team knows it usually takes 6 weeks to get an appointment, then the projected start date should be realistic and reflect that fact. The local system will work to get an earlier appointment either through a cancellation or by seeking the services of another audiologist, if possible. The contact notes will document the attempts to get an earlier appointment. If the audiology appointment occurs more than 21 days after the parent signs the IFSP because the family chooses to delay the appointment or cancels a scheduled appointment, then that is considered a family scheduling preference, and the local system is still in compliance with the requirement to deliver that service in a timely manner.

- 12. In calculating the 21-day timeline for starting services in a timely manner, several systems seem to count plus 21 from day of signature vs. plus 20 days. I guess I question how you can have a day without 24 hours. [As I was entering a referral to ITOTS I noticed that when the ITOTS calendar calculates the 45 day timeline for the IFSP it does not count the day of referral as day one, which I think would be the same principle. Some consistency on this may help service coordinators as they are figuring out deadline dates.]**



The date of parent signature on the IFSP is day 1 of the 21 calendar days. If the IFSP is signed by the family on June 1, 2007, then each entitled support and service must start no later than June 21, 2007 (unless the IFSP team has planned a later start date to meet individual child and family needs or because of a family scheduling preference).

The ITOTS system calculates the date of referral for evaluation as being day 1 of the 45-day timeline. The "45 Day Deadline Date" it reports is the last IFSP date that can be entered without also requiring mitigating circumstances to be entered.