

**Personnel: EI Certification and Training Requirements**  
Statewide Teleconference Call  
November 19, 2008

Introduction/Background

- There are two major factors impacting Virginia's system of personnel development. These are the federal requirements for a comprehensive system of personnel development and the Medicaid Early Intervention Initiative. Both of these factors require a strengthening of Virginia's system of personnel development.
- First, let's look at OSEP requirements. Please pull out your handout titled Individuals with Disabilities Education Improvement Act 2004 – Section 635 – Requirements for Statewide System. I want to direct your attention especially to number 9. You see that the federal statute requires: "Policies and procedures relating to the establishment and maintenance of qualifications to ensure that personnel necessary to carry out this part (that is Part C) are appropriately and adequately prepared and trained, including the establishment and maintenance of qualifications that are consistent with any State-approved or recognized certification, licensing, registration, or other comparable requirements that apply to the area in which such personnel are providing early intervention services." Under Part C, the CSPD must address ongoing training and personnel development for all personnel.
- These requirements actually fit very nicely with what the Department of Medical Assistance Service (DMAS) is requiring as part of the Medicaid EI Initiative.
- The Infant & Toddler Connection of Virginia and DMAS are working very closely to develop this initiative which is intended to
  - Increase access to Medicaid dollars for eligible children, and
  - Align Medicaid regulations, practices and reimbursement requirements with early intervention regulations and evidence-based practices
- Now, we are going to provide the details about the new requirements. We will talk about:
  - Developmental therapy, practitioner roles and responsibilities, and reimbursement categories for developmental therapy
  - Early intervention certification, including the steps to certification
  - The practitioner database that is being developed, including the role this database will play in free choice of practitioners
  - We'll talk about what will be occurring between now and July 1, 2009
  - And finally, we will talk about stakeholder input in Virginia's system of personnel development

Developmental Therapy:

- Please pull out your glossary handout now and take a look at the definition of developmental therapy. Developmental therapy is the term that will be used to describe early intervention supports and services provided to eligible infants and toddlers and their family by qualified early intervention practitioners. As you read through the list of activities included in developmental therapy, you will see that assessment, planning, consultation, teaming, provision of information, training and support and working with the child, including use of assistive devices are all part of developmental therapy.

- While you have your glossary handy, please take a look at the definitions for practitioners and providers. We are using the term “practitioner” to refer to an individual who is qualified to provide supports and services. The term “provider” refers to the practitioner who is selected to deliver supports and services in accordance with an IFSP.
- Now let's take a look at the Practitioner Qualifications and Responsibilities table. On the left side of this table, you will see the list of disciplines that may provide entitled early intervention services in Virginia's early intervention system.
- Take a look at the last column, labeled EI Services. This column lists which disciplines may provide developmental therapy. You will notice that all disciplines except dietitians, physicians and service coordinators can provide developmental therapy.
- Please put this document aside for now, but keep it handy as Cori will be referring to it later in the call.

#### Reimbursement Categories:

- I want to take just a couple minutes now to talk about how the practitioner categories relate to the reimbursement categories for developmental therapy.
- For this part of our presentation, you need to look at the Early Intervention Reimbursement Categories handout.
- There are two categories of reimbursement for developmental therapy, Reimbursement Group I and Reimbursement Group II. In addition, there are some early intervention services that will not fall into the developmental therapy category and which will be reimbursed using the current reimbursement methodology (under outpatient rehab). Examples of this include services provided by physicians and dietitians.
- It's important to understand that the rates are not the amount that an individual practitioner is paid for the service.
- Instead, the rates represent the total cost of providing an hour of developmental therapy, including not only salary and benefit costs, but also administrative and support costs and what we have called “associated costs”. So, time and cost for travel, training, billing, documentation, etc. are built into the rate. For early intervention assistants, the rate also accounts for the supervision costs.
- Establishing one rate for developmental therapy provided by any discipline was considered. However, the rates are based on actual costs and the reality of costs of services provided by various disciplines did not allow for one rate.
- Now, let's look at the two color coded categories for reimbursement for developmental therapy. Developmental Therapy provided by physical therapists, occupational therapists, speech-language pathologists, and nurses falls in Reimbursement Group I and the proposed rate is \$150/hour.
- Developmental Therapy provided by educators, counselors, psychologists, social workers, music therapists, certified therapeutic recreation specialists, PT Assistants, OT Assistants and Developmental Therapy Assistants falls in Reimbursement Group II and the proposed rate is \$110 per hour.

#### EI Certification:

- In order to reimburse for developmental therapy, DMAS requires that the State Lead Agency for Part C certify those who provide that service. This is the mechanism by which we will assure DMAS that these practitioners are qualified not only in their own discipline but also that they meet the competencies for

providing Part C developmental therapy as required by the CSPD. For these reasons, we must establish an EI Certification by July 1, 2009 in order to implement the Medicaid-EI initiative.

- Although not required by DMAS at this time, we will also begin certifying service coordinators by July 1. There are two main reasons for this:
  - The certification process provides us with a consistent mechanism for ensuring and documenting that service coordinators meet the qualifications we have established through Virginia's Part C Personnel Qualifications and CSPD for that discipline.
  - Once the federal Medicaid situation related to Targeted Case Management is resolved, the Part C Lead Agency and DMAS will be looking together at options for expanding Medicaid reimbursement for Part C service coordination. Certification of service coordinators could be required at that point, and it is easier to begin that process now while we're establishing the training system and database rather than backtrack and add service coordinators later.
- All practitioners who provide developmental therapy or service coordination must be certified as an EI Specialist or an EI Assistant or an EI Service Coordinator. Those who will provide both developmental therapy and service coordination must be certified as either an EI Specialist and EI Service Coordinator or an EI Assistant and EI Service Coordinator.
- In order to talk more about the EI Specialist and EI Assistant, let's look now at the Practitioner Qualifications and Responsibilities handout.
  - You'll see that for each discipline (listed down the left-hand column of the table), we've identified whether that practitioner would be certified at the EI Specialist level or the EI Assistant level. When I use the term EI Assistant here I want to be clear that I'm using that term differently than we have in the past. Previously we have had a discipline called EI Assistant (that would have been listed in the left-hand column), but now we're going to call that discipline Developmental Therapy Assistant – you'll see it there on the first page of the table. So people currently practicing as EI Assistants will now be called Developmental Therapy Assistants. That allows us to use the term EI Assistant to describe a practitioner level distinct from EI Specialist. Practitioners who will be certified as EI Assistants include:
    - Developmental Therapy Assistants
    - OT Assistants
    - PT Assistants
    - Licensed social workers (those with a bachelor's degree plus state licensure)
    - Licensed practical nurses and certified nurse aides
- The difference between EI Specialists and EI Assistants is in their scope of responsibilities and supervision requirements. You can see this on page 3, for example, when you compare the scope of responsibilities for the PT and the PT Assistant.
- Certified Early Intervention Assistants will work under the supervision of an Early Intervention Specialist who has completed the Infant & Toddler Connection of Virginia supervision training requirements (we'll talk more about that shortly). Early intervention assistants may be supervised by an Early Intervention Specialist from any discipline unless discipline-specific regulations specify otherwise.

- Certified Early Intervention Service Coordinators who have completed the supervision training requirements will be able to supervise only other service coordinators.
- Now that we've reviewed who will need to have an EI certification, let's move on to look more specifically at the steps to certification.

#### Steps to Certification:

- As I mentioned previously, the purpose of the EI certification is to assure that practitioners have the competencies to provide Part C developmental therapy. Prior to today's call you received a handout called Core Competencies for Service Providers and Service Coordinators. This document outlines competencies associated with:
  - Early Intervention Foundations,
  - Family-Centered Practices,
  - Effective Team Practices,
  - Infant-Toddler Development,
  - Eligibility Determination,
  - Assessment for Service Planning,
  - IFSP,
  - Service Delivery,
  - Supporting Transitions, and
  - Service Coordination
- These core competencies, which are based on the service pathway, will establish the Comprehensive System of Personnel Development (CSPD) for Part C in Virginia. The CSPD ensures that training and support are in place for practitioner certification and re-certification in the Part C system.
- I'm going to talk now about the process for becoming an EI certified practitioner in the Infant & Toddler Connection of Virginia system. If you're a visual learner, you may find it helpful to follow along on the handout called Training/Competency Requirements.
- Let me point out at the start that these requirements were developed in partnership with DMAS to ensure EI certified practitioners meet the level of training required by Medicaid for reimbursement under the Medicaid-EI initiative.
- In order to become certified, the practitioner will do the following:
  - Submit a 1-page online application to the State Lead Agency along with a copy of their discipline-specific credential (license, certification, etc.)
  - Complete the Early Intervention Principles and Practices on-line modules, passing the competency test for each with at least 80% accuracy. The required online modules for all practitioners seeking certification are:
    - Child Development (including typical and atypical development)
    - Family-Centered Practices
    - Service Pathway
    - Practitioner Requirements (which will cover billing, family cost participation, documentation, etc.)

Average time to complete all four modules is intended to be 8-10 hours. Let me mention here that use of the existing Part C Orientation online module will end, and the information from that module will be incorporated within other modules as appropriate.
  - Practitioners who will provide supervision must also complete a Supervision module.

- At that point, your application will be reviewed at the State level and EI certification issued, assuming all requirements have been met.
- In order to maintain EI Certification, you'll need to submit an application for recertification to the State Lead Agency documenting completion of the following training, provided through the State Lead Agency, within 18 months of receiving EI Certification:
  - Child Development
  - Service Pathway: Referral Through Eligibility Determination;
  - Service Pathway: Assessment for Service Planning and IFSP Development;
  - Provision of Supports and Services;
  - Service Coordination I and II (required for service coordinators only); and
  - Supervision (required only for personnel who supervise other practitioners).

The curriculum for most of these trainings will follow directly from the Part C Practice Manual.

- Following the 18-month recertification, you will submit an application for recertification to the State Lead Agency every 3 years documenting completion of at least 30 hours of training related to one or more of the following:
  - Evidence-based practice in early intervention;
  - Changes in Virginia Part C regulations or practices;
  - Topics identified on the practitioner's personal development plan; or
  - Training needed for new responsibilities in the early intervention system.

Mechanisms to complete the 30 hours of training may include, but are not limited to, college coursework, face-to-face training sessions, conferences, online training and independent study.

- In talking about the 30 hours of training, I mentioned that the training could address topics identified on the practitioner's personal development plan. Each practitioner will be required to have a personal development plan that they develop in conjunction with their supervisor and that focuses on advancing knowledge, skills and abilities associated with the Core Competencies discussed earlier in this call. The format for this plan and other specifics about how it will work are topics that will be addressed by a stakeholder group, which we'll talk more about shortly.
- You'll see in the Training Format/Mechanism column of your handout that we are still exploring a number of possible mechanisms for delivery of the training required for the 18-month recertification. We expect that there will be mechanisms other than face-to-face training to meet each training requirement.
- Before, we move on, you've probably noticed that we haven't mentioned local system managers in this discussion of EI certification.
  - If a local system manager will provide developmental therapy or service coordination in addition to his/her administrative duties, then she/he must be EI certified as an EI Specialist, EI Assistant or EI Service Coordinator (whichever applies).
  - If a local system manager will not provide those services, then she/he is not required to be EI certified. However, all local system managers will be required to complete and pass all 5 Early Intervention Principles and Practices online modules and will be required to complete the training listed for the 18-month recertification (except for SC training) within 18 months of assuming LSM responsibilities. These requirements will be

specified in the Local Contract for Continuing Participation in Part C beginning in FY-2010.

- We're going to talk now about the practitioner database.

#### Practitioner Database:

- A practitioner database is being developed as part of the ITOTS enhancement
- The database will serve two major purposes.
  1. It will provide the mechanism to track and manage the process of early intervention certification for individuals providing early intervention services, including service coordination in Virginia
  2. It will support "family choice" of providers and service coordinators by providing the mechanism for families to search online for information about available providers and service coordinators
- Cori mentioned previously that practitioners will submit a one-page application for certification. This will be done through an online process. The Part C Office is in the process of developing a manual to provide specific details regarding the application process.
- The role of the state is to certify that the practitioner meets the state (and federal) Part C personnel requirements, which include certification or licensure for most disciplines, as well as the Infant & Toddler Connection of Virginia EI Certification/competency requirements.
- Once the state office has determined a practitioner has met these requirements, selected practitioner information in the database is "opened" or made accessible to local system managers and families of eligible children.
- The practitioner will be responsible for keeping information in the database current, including contact information, discipline specific licensure dates, and the geographic areas and days/times the practitioner is willing to provide services.
- I want to take a minute here to talk about "free choice of providers". You will see free choice of providers defined in the glossary. Basically, as defined in the code of Virginia, it means that an eligible individual may obtain services from any institution, agency, pharmacy, person, or organization that is qualified to perform the services, including an organization that provides these services or arranges for the availability on a prepayment basis.
  1. For Part C, this means that families enrolled in Part C may obtain developmental therapy and service coordination, in accordance with their child's Individualized Family Service Plan, from any certified Early Intervention Specialist, Early Intervention Assistant or Early Intervention Service Coordinator who is within the family's third party payor network (if applicable) and working in the area where the family lives.
  2. The other thing this means for Part C is that Local lead agencies cannot refuse to contract with an EI certified practitioner.

#### What has to happen for July 1, 2009:

- Practitioners currently in the system must submit an online application for certification and complete the online Principles and practices training modules and competency tests.
- We are aiming for the first of February to have the modules available. Practitioners will need to complete the competency tests by mid June to allow time for the Part C Office to review the applications, grant the certifications and provide notice to the practitioners that that the certification has been granted.

DMAS will be requiring a copy of the documentation of certification for practitioners to enroll as Medicaid early intervention providers.

- There are currently over 1000 practitioners in Virginia's early intervention system. So we are looking at the possibility of staggering the certification process in order to have time to process all of the applications by July 1, 2009.
- Work is also occurring to promulgate the State Part C Personnel Regulations by July 1, 2009.

Stakeholder Input:

- The last thing we need to address before we open up the lines for questions is the process for stakeholder input in the development of the early intervention certification and training requirements.
- We have asked CoCoA to identify a representative from each region to serve on a stakeholder group, along with members of the VICC Personnel committee, the Integrated Training Collaborative and the Family Involvement Project to provide input about the Core Competencies which provide the foundation for the Comprehensive System of Personnel Development (CSPD) for Part C in Virginia.
- The other task for which we will need stakeholder input is the development of the document or form for practitioners' personal development plans. Each practitioner will develop a personal development plan along with her supervisor to determine the activities which will be used to satisfy the requirement for 30 hours of training for the 3-year recertification. The VICC Personnel committee will be drafting a form to be reviewed by the stakeholder group.
- Once all of the stakeholders have been identified, the Part C Office will communicate with the stakeholder group to provide specific information about providing input, including timeframes. Written input will be gathered initially. A phone conference will then be scheduled to discuss any issues which require clarification or further input.