

THE POLICY

PAGES Responses to Questions as Received by Part H

November, 1997

Q: Please provide clarification about the use of interim IFSPs. In particular, when is an interim IFSP appropriate, how is it developed and what should it include?

A: An interim IFSP can be developed for an eligible child when the temporary service coordinator and family decide that early intervention services need to begin before the Part H evaluation and assessment are completed. In accordance with federal Part H regulations, Virginia's policies and procedures state the following in regards to interim IFSPs:

* Early intervention services for an eligible child/family may commence before the completion of the evaluation and assessment, if the following conditions are met:

- (1) Parental consent is obtained;
- (2) An interim IFSP is developed that includes --
 - A) the name of the service coordinator who will be responsible for implementation of the interim IFSP and coordination with other agencies and persons;
 - B) the early intervention services that are determined to be needed immediately by the child and the child's family; and
 - C) signatures of both the temporary service coordinator and the parent(s) or guardian.

(3) The evaluation and assessment

are completed within the 45-day time period required.

* The temporary service coordinator and the family decide if an interim IFSP is warranted. If so, they jointly develop the interim IFSP in accordance with the above.

* In the event of exceptional circumstances that make it impossible to complete evaluation and assessment in 45 days, local service agencies:

- (1) Document those circumstances; and
- (2) Develop and implement an interim IFSP, to the extent appropriate and consistent with the above.

* Interim IFSPs are intended to accomplish two specific purposes:

- (1) To facilitate the provision of services in the event that a child has obvious immediate needs that are identified, even at the time of referral (e.g. a physician recommends that a child with cerebral palsy begin receiving physical therapy as soon as possible), and
- (2) To ensure that the requirements for the timely evaluation and assessment are not circumvented.

Because of the stipulation that interim IFSPs may be developed for *eligible* children who need services prior to the completion of evaluation and assessment, only those children with a diagnosed handicapping condition would ever have an interim IFSP (those with atypical development or developmental delays would not be known eligible until evaluation and assessment were completed). One situation in which an interim IFSP may be appropriate would involve a Part H eligible child who is medically-fragile or in a medical crisis who is currently unable to undergo developmental evaluation and assessment but for whom there is an immediate need for some early intervention service(s). The use of the interim IFSP in this situation allows for needed services to begin while also allowing the child and family to wait until a more appropriate time to complete the evaluation and assessment.

The interim IFSP cannot be used to delay an evaluation and assessment or to extend the 45-day time line. Any time the 45-day time line is not met, there must be written documentation in the child's file to justify this circumstance, regardless of whether or not there is an interim IFSP. Please note that only child and family needs would justify an extension; administrative reasons would not be considered justification for extending the time lines. For instance, the 45-day time line might be appropriately extended when a child is medically unstable and unable to participate in a complete evaluation or assessment. On the other hand, suppose that a locality has a lot of referrals at the time, including one for a child with a diagnosed handicapping condition -- it is not acceptable to postpone completion of that one child's evaluation and assessment beyond the 45-day deadline just because he or she could get

started with services through an interim IFSP. In fact, this scenario represents not only inappropriate extension of the 45-day time line but also inappropriate use of an interim IFSP.

Most children will not need an interim IFSP.

Interim IFSPs are used when there are exceptional circumstances (based upon child and family needs) and to document needed early intervention services (other than temporary service coordination) which need to begin prior to the completion of the Part H evaluation and assessment.

Since the early intervention services listed on a child and family's interim IFSP will have been determined prior to the completion of the evaluation and assessment and may have been designed to meet crisis needs, the early intervention services later determined to be necessary to meet the IFSP outcomes after evaluation and assessment may be very different (in terms of type, frequency, intensity, provider, natural environment, etc.). The temporary service coordinator should communicate this information to the family at the time the interim IFSP is developed.

Your regional Technical Assistance Broker will be happy to assist in answering any additional questions regarding the use of interim IFSPs.