

## CQI Workgroup on Part C Fees

### Meeting Summary

January 11, 2000

9<sup>th</sup> Floor Conference Room - DMHMRSAS  
Richmond, Virginia

**Those Attending:** Wanda Pruett, Glen Slonneger, Elisabeth Hutton, Emily Dreyfus, Shirley Ricks, Anne Lucas, Joy Yeh, Christa Shifflett, Martha Adams, Anne Simmons, Barry Mason, Carmen Sanchez, and Mary Ann Discenza

**Those Absent:** Geri Pratt, Joe Sharrer, Pat Abrams, Forest Mercer, John Jackson, and Joel Rothenberg.

After introductions, welcoming comments were provided by Joy Yeh and Martha Adams. Both expressed commitment from the Department for the resolution of issues associated with family fees for early intervention services and the strong support for the CQI Workgroup's activities. Joy emphasized the need for analyzing the financial impact of all the recommendations forthcoming from the Workgroup.

New workgroup members were provided a packet of information that provided background information about the activities undertaken by the DMHMRSAS internal Part C fees workgroup. Anne Lucas summarized the materials and suggested that workgroup members review the materials and contact Anne or Mary Ann if additional clarification is needed. Anne indicated that these materials would be helpful for the analysis of the preliminary recommendations.

The workgroup was given a draft copy of a purpose statement for the CQI Workgroup and was asked to provide feedback about the statement. After some discussion the purpose statement was revised to read as follows:

*The purpose of the CQI Workgroup on Part C Fees is to fully analyze preliminary recommendations, including those set forth in the Department of Mental Health, Mental Retardation and Substance Abuse Services report to HJR on December 10, 1999, and develop recommended policies and procedures to ensure consistent and reasonable family fees for Part C early intervention services in Virginia.*

The workgroup then reviewed a handout entitled *Guidelines for Our Work* including ground rules for decision making. The members accepted the *Guidelines* and asked for clarification about the guideline *conversation stays in room* and agreed that the group will ensure discussion at the end of each meeting about identifying which issues are appropriate for sharing with others and what information may be appropriate to remain in the room. Around the discussion about decision-making, the members agreed that topics/issues will be summarized and members will work to develop consensus. While there was general agreement about decision-making by consensus, some members expressed concerns that meeting summaries reflect detailed discussions including topics/issues where there was not clear consensus among the membership. On a related matter,

members requested meeting summaries well in advance of scheduled meetings.

An issue was raised about the existing workgroup membership not including CSB early intervention provider. In order to ensure full participation of all stakeholders, the workgroup recommended adding two additional members, one CSB infant program director designated by CoCoA and a second CSB early intervention provider designated by the VICC ATP Workgroup.

Anne Lucas presented background and overview of key ATP issues, specifically the need to develop recommendations about policies and procedures that ensured consistent fees for early intervention services. The key ATP issues are summarized below:

- ▶ Inconsistent fees and ability to pay procedures
- ▶ Fees that exceed third party reimbursement rates
- ▶ Fees that impact on accessing all early intervention services
- ▶ Fees that significantly impact families= lives.

Anne also reviewed the preliminary recommendations (see below).

Around discussion about the preliminary recommendations from the DMHMRSAS Internal Workgroup meeting of December 6, 1999 there were a number of questions about what happens to the recommendations once the workgroup has completed its work. Anne related that the Early Intervention Management Team (EIIMT) will be kept informed about the activities of the CQI Workgroup with the expectation that the EIIMT representatives to the workgroup (DOH, DOE, VDH, and DSS) will keep their agency heads informed. Anne reported that family fees was an agenda item for the Early Intervention Agency Committee (EIAC) (state agency heads) meeting on December 16, 1999 and that Commissioner Kellogg identified that resolution of issues related to family fees needs to occur through consistency of policies, procedures and a statewide sliding fee scale if possible. Recommendations from the CQI will be included on the agenda of the next meeting of the EIAC scheduled for May 2000. Anne further explained that OSEP requires a public comment period of 60 days regarding any substantive changes to policies and procedures. For these reasons, i.e. the EIAC meeting and the required public comment period, a draft of the preliminary recommendations and analysis must be ready for dissemination by April, 2000. Workgroup members then discussed possible strategies for public input, i.e. forums, etc. Anne also commented about those recommendations that might involve implementation issues and that these issues will need to be built into Part C's Monitoring and Improvement Measurement (MIMS) system.

Christa Shifflett, on behalf of CoCoA presented data from a recent survey developed and disseminated by CoCoA to local council coordinators. Only the survey results which reflected broad support of local coordinators are identified below:

- ▶ No fees to families but continue to bill third party payors
- ▶ No fees for non-reimbursable services
- ▶ Statewide appeal process with same expenses.

Christa indicated that there was no support from local coordinators for a statewide fee system and concerns were expressed about increased cost of services and the potential untoward impact on

families. Anne relayed Joe Sharrers concerns about the importance of consistent and clear direction from the state about fee policies.

The CoCoA survey generated considerable discussion including questions about the following: 1) whether other groups have brought forward recommendations which the workgroup should consider; 2) the insurance requirements regarding no fees to families; 3) potential changes to the *Code of Virginia* that would be required; and 4) other states activities related to insurance coverage for early intervention services. Carmen indicated that she had information from families in other states regarding no family fees and the state's billing of third party payors for those services. Carmen indicated she would e-mail this information to share with workgroup members.

Workgroup members discussed a number of issues related to the need for statewide procedures relating to ability to pay and the fee appeal process. Differences among localities were explained, i.e. whether localities use gross or net income in determining ability to pay, what are allowable expenses, how are CSB's sliding fee scales set up, when and how are families given information about the appeals process, what types of information are shared, etc. Barry Mason indicated that 38 CSB's have submitted copies of their policies and procedures regarding fees. The Part C Office requested local coordinators to collect policies and procedures and sliding fee scales from private providers in local early intervention networks but there has been a poor response to the request. Christa indicated that CoCoA would be willing to assist the Part C Office in collecting this information and asked for a list of councils who have private providers in order that CoCoA can request the information. Mary Ann assured that Christa will get the list.

The workgroup decided that the DMHMRSAS preliminary recommendations would be analyzed by small groups of the larger workgroup. These small groups would discuss and identify activities related to the preliminary recommendations and report back to the full workgroup at a future meeting. The recommendations are listed below and include what the group needs to get for the analysis of the recommendation(s) and who is participating on each small workgroup:

- 1) Explore the use of a statewide sliding fee scale including an analysis of family income and utilization data and financial impact.

What do we need to get:

Statewide scales from other states  
Statewide fee scales from other state  
(VDH, DSS) agencies  
Information from 38 CSB's  
Median Income Projections  
Tax laws  
Private providers sliding fee scales

Who will get it:

Part C Office  
Part C Office  
DMHMRSAS Reimb Office  
Carmen  
Anne L  
Part C Office/CoCoA

Participants: \***Note: underlined name indicates lead for topic**

Glen, Carmen, Liz Hutton, Anne L

- 1) Develop consistent procedures for determining family fees (e.g. fee appeal process)

What do we need to get:

Reimbursement procedures  
Sample CSB procedures  
Private provider procedures  
Other state agency scales  
Sample information families are given (fee agreements, financial intake forms, etc.) and when (when families are given information on appeals)

Who will get it:

Already have (DMHMRSAS)  
DMHMRSAS Reimb Office  
Part C Office/CoCoA  
Part C Office  
  
CoCoA

Participants: **\*Note: underlined name indicates lead for topic**

Anne Simmons, Barry, Shirley, Christa, and Wanda

- 2) Determine which Part C services must be consistently charged for across all public and private agencies (e.g. no fees to families and bill 3<sup>rd</sup> party payors and no fees for non-reimbursable services.)

What do we need to get:

Service definitions (Part C regulations)  
Insurance regulations  
What services are being charged for

Who will get it:

Already have  
DMHMRSAS Reimb Office  
Provider survey (In workgroup packets)

Services other states charge for as well as which ones are billed

Part C Office

Participants: **\*Note: underlined name indicates lead for topic**

Emily, Mary Ann

- 3) Financial impact of the recommendations.

What do we need to get:

Analysis of revenue generated from all early intervention services across agencies.  
CSB performance contracts (21 Boards)  
Private providers revenue  
DOH and DSS revenue (98 Study)  
3-5 local councils revenue from all agencies

Who will get it:

Part C Office/DMHMRSAS  
DMHMRSAS  
Part C Office  
Part C Office  
Part C Office

Participants: **\*Note: underlined name indicates lead for topic**

Barry, Carmen, and Christa

**Note: It was determined that each state agency will do its own financial impact.**

Each small workgroup agreed to hold conference calls/meetings by February 1, 2000 to identify what steps

need to be taken to develop next steps and an outline of activities around the recommendations. As soon as the information needed is collected, it will be disseminated to members prior to the small group meetings.

Mary Ann agreed to contact members not present to update them on the meeting and solicit their participation on one the small workgroups.

**The next meeting of the CQI Workgroup is scheduled for Monday, February 7, 2000 from 10:00 AM until 12:30 PM in the 9<sup>th</sup> floor conference room at DMHMRSAS.**

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