

CQI Part C Fees and Ability to Pay

Meeting Summary  
Department for the Blind and Vision Impaired  
Library Resource Conference Room – Richmond  
February 19, 2002

**Those attending:** Kay Toombs, Tracy Miller, Karen Walker, Linda Eggleston, Shirley Ricks, Katy McCullough, Brenda Crockett, Forrest Mercer, Liz Fletcher, Sandy Mahon, and Mary Ann Discenza.

Brief update about the status of the ATP Practices Document:

- Document returned from the OAG with recommendations for non-substantive changes related to organization of the document, modifications and wording changes for clarification, and recommendations for deleting certain sections such as the legal citations, fee scale design and work paper, etc. Revisions made and document returned to the OAG for final review. Pending this review, document will be disseminated to the field as soon as is practical.
- Discussion was held with the OAG about promulgating regulations or by means of policies and procedures related to financial matters ensuring compliance with statutory requirements of HB 2738. (Note: there is precedent in Part C for using policies and procedures in lieu of regulatory requirements for ensuring compliance with Part C and state law requirements.)

CIMP Plan of Improvement for ATP:

- Discussion about verifying pre and post data regarding family fees and methodologies for data collection; e.g. re-visit sites where family fees had been identified as an issue and families had expressed hardship, re-sending service coordinators survey about families who opted out of service, etc. Consensus – the ICDF is a way to systematically collect data specifically about whether or not families accessed ability to pay processes or declined services due to family fees.
- Recommendation: request the state data workgroup to consider adding data elements related to family fees as a way to collect post implementation data about family fees. The ICDF form is the appropriate mechanism for collecting data about families opting out of services. The workgroup suggested taking the language off the service coordinators surveys, e.g. the family stated financial hardship as the reason for opting out of services and adding a question, did the family choose to access ability to pay, yes or no. The ATP workgroup is especially interested in the number of families and the reason(s) these families declined services because of fees. Workgroup suggestions – add ATP data elements into the transition category. Workgroup emphasized the importance of capturing data after the child is enrolled since families can decline services at all points in the early intervention system.
- Recommendation: consider developing benchmarks about ability to pay processes to ensure fees are not barrier to families accessing services. Workgroup suggestions – add questions to the Family Survey about access related to procedures add MIMS indicators, target service coordinators for training about interviewing families about financial information and fees, etc. The

workgroup requested staff to explore strategies with John Jackson for topical areas and effective strategies for service coordinators training. Related specifically to MIMS; include indicators about practices, examples, is the state's ability to pay process in place for all localities, is there a financial agreement form, does back-up documentation exist, are all providers using the state forms. Recommendation: request that the MIMS Task Force develop indicators for ability to pay practices and seek input from the CQI Fees workgroup.

Issues- workgroup raised the following implementation issues for further discussion:

- Discussion about children in the DSS system with examples; a child in the custody of adoptive parents and the adoption is not finalized and most likely the child is on Medicaid, is the adoptive family's income considered and if so, when for purposes of accessing the sliding fee scale? Forrest Mercer with DSS provided some clarification on this issue.
- Workgroup suggested the Lead Agency work collaboratively with DSS to develop technical assistance and training for early intervention personnel about the various different types of non-parental custody arrangements recognized by Va. Law and how to determine financial responsibility for children in each type of situation. Second recommendation from the workgroup: ensure that the ability to pay practices are integrated into the service coordination training curriculum.
- The workgroup suggested that this might be an area for on-going technical assistance for localities.
- Workgroup discussed strategies for on-going technical assistance in the form of Q&A document(s), using family scenarios to facilitate understanding about ability to pay procedures, etc. Workgroup members agreed to develop scenarios. Priority area for the workgroup and recommendation to disseminate clarification about full charges, negotiated rates and family's responsibility for payment if the family does not access the sliding fee scale.
- Workgroup discussed whether, in cases where a family chooses not to be on the sliding scale and/or there is no insurance coverage for a session, it was appropriate to charge the provider's full charge to families or the Infant Program's negotiated rate. The Part C office is to develop a consistent policy on this matter.

Meeting adjourned.

**Note: The next meeting of the workgroup is scheduled for Tuesday April 16, 2002 starting at 10:00 AM. The meeting will be held in the Library Resource Center conference room at the Department for the Blind and Vision Impaired.**