CQI Part C Fees & Ability to Pay

Meeting Summary
Richmond, VA
May 17, 2001

Attending: Sandy Mahon, Carol Burke, Linda Eggleston, Tracy Miller, Brenda Crockett, Anne Lucas, Shirley Ricks, Liz Fletcher, Carmen Sanchez (guest) and Mary Ann Discenza

Absent: Barbara Willard, Emily Dreyfus, John Jackson, Glen Slonneger, Forrest Mercer, Wanda Pruett, and Deborah Mack

Participants in the first phase-in training scheduled for June 14 2001 include: Rappahannock-Rapidan, New River Valley, GRIP (Roanoke), Crater (PD 19), Southside, Rockbridge, and Hanover.

Pertinent points from the meeting:

- Concerns were expressed about whether DMHMRSAS would continue as Lead Agency for Part C and the potential impact on funding from the General Assembly if the Department of Education assumed the role of Lead Agency.
- Point was made that removing family fees from Virginia's system of payment would eliminate the use of private insurance as a revenue source.
- Agreement that collaborative efforts are necessary regardless of where the lead agency is located and the importance of data collection was emphasized to determine impact on the system.
- On-going discussion and questions around using taxable income for determining family fees and whether standardized ways for calculating estimated taxes exist, how will local agencies be able to verify tax information within time frames for filing tax returns, and concerns expressed about how to help localities implement ability to pay practices as outlined in the draft policy document. Point was made that many CSBs use gross income as the basis for determining family fees.
- Workgroup spent considerable time discussing local implementation of uniform family fee system and strategies for assisting localities with implementation. Priority topic for training involves assisting localities with decision-making about logistics related to billing, e.g. who manages billing if multiple providers are involved, what mechanisms to use for disbursement of family fees among providers, affects policies and procedures, local agency practices/requirements, interagency agreements, local board approval, and overall, development of local implementation plans with time frames etc.
- Points were raised about local system re-design/modifications around computer/billing systems, notifying families about changes in fee systems, completing new financials for all families by January 1, 2002.

- Questions about Lead Agency expectations related to full implementation, e.g. uniform system statewide by January 1, 2002 and recognition that while some adjustments may be required retroactively, there will be full statewide implementation of uniform family fees by January 1, 2002 to conform with legislative mandate.
- Discussion about prior notice to families and clarification about federal Part C requirements related to prior notice. It was reported that the Part C Office is working on this issue around federal requirements and would report back to the workgroup soon.
- Recommendation was made to move the training schedule ahead and hold regional training sessions instead of the two in October and November as originally planned. Agreement to target September for regional training and to schedule them around when regions usually meet.
- Workgroup emphasized the importance of ensuring that information and training materials are disseminated ahead of training and that information is shared with reimbursement and fiscal staff. Recommendation from the workgroup for the Lead Agency to send a general letter to the field including information about the law, training, draft document, etc. It was also suggested that local coordinators be notified about the intent for regional training events and that TA staff assist with identifying sites.
- Suggestion that questions raised in public comment is addressed in training and that the Part C office turns the public comment into a Q&A format for use in regional trainings. It was shared with the workgroup that the Part C office intends to develop interpretative guidelines/guidance for dissemination to the field. The Part C office welcomes suggestions from the field about topical issues.
- Discussion about the use of family scenarios and several parameters were offered including:

    - CSB provides service coordination and infant education and multiple providers for other early intervention services
    - CSB provides service coordination and other public and/or private agency provides therapies
    - CSB provides therapy and some service coordination
    - CSB provides all services
    - CSB contracts with private not-for-profit for all services including service coordination
    - Fiscal agent is a non-CSB and all services are provided by a private agency/provider
    - Family has private insurance
    - Family has private insurance with the early intervention mandated benefit
    - Family has no insurance
    - Family refuses access to their insurance

- Other topical areas: guidelines for how to organize billing with advantages/disadvantages; examples of how to complete financials, how to assist families with financial intake, etc.
- Point was emphasized again about the importance of data collection for a variety of reasons, demonstrating fiscal impact, ensuring that supplanting does not occur, developing method to go through family scenarios with concrete usable strategies.
- Discussion about organization of the training materials and agenda for the initial phase-in training, emphasis on the need for parent partners for the training, and commitment to send draft agenda out to workgroup for comment/feedback.
- Final item related to a proposal from the VICC ATP workgroup to conduct outreach to families related to family rights, prior notice, sliding fee scale information, appeal process, etc.

Meeting adjourned.

The schedule for the workgroup is as follows:

June 5: 10 AM – 3:00 PM DBVI Library & Resource Center
June 13: 12:30 PM – 3:00 PM United Methodist Church- Skipwith Road-Richmond