

CQI Part C Fees and Ability to Pay

Meeting Summary Henrico CSB Conference Room C Glen Allen, VA October 5, 2001

Those attending: Linda Eggleston, Brenda Crockett, Katy McCullough, Shirley Ricks, Anne Lucas, Karen Walker, Carmen Sanchez, Wanda Pruet, Nancy Butts, Anne Simmons, Carol Burke, Sandy Mahon, Glen Slonneger, Mary Ann Discenza

I. Updates – Training, Feedback from OAG, etc.

- The Lead Agency received a response from the Office of the Attorney General, substantive changes were not recommended but feedback identified the need for clarification in the practices document related to the legal citations, wording changes etc.
- All forms need revisions and document finalized for internal review and dissemination to the field from the Commissioner's office.
- Additional training needs identified specifically for private providers (billing staff) to increase awareness about early intervention, pre-authorizations, and the early intervention benefit.

II. Implementation Issues -

- A. Financial agreement and Appeals forms – revisions
 - o Suggested date of birth of the child is included in identifying information.
 - o Discussion about use of financial agreement form for 6 months before form is finalized and printed on NCR paper.
 - o Error on sliding fee scale needs correction.
 - o Sub-committee (Brenda Crockett, Carol Burke, Carmen Sanchez, and Katy McCullough) agreed to finalize the financial agreement form.
- B. Use of 1040 and taxable income – discussion
 - o Discussion occurred about determining family's taxable income, use of the federal guidelines for determining taxable income, procedures for documenting income when the family has not filed a tax form, has no proof of income from employment (e.g. pay stub), is undocumented alien, etc.
 - o The fee appeal worksheet is an alternative method for determining disposable income in establishing the family's monthly cap. If net income, when treated as taxable income and applied to the sliding fee scale results in zero fee, proof of income shall be a copy of the pay stub.

- o Workgroup made a recommendation that instructions included with the financial agreement form be clearly written to reflect how to document family income.
 - o Discussion occurred about determining when families would be at zero fees. Issue relates to eligibility requirements for programs such as Medicaid, e.g. means test vs. categorical eligibility, FAMIS, CSS, etc. Under the current practices, families on Medicaid are automatically at zero fees. The workgroup concluded that this issue needed further discussion at a future time since programs other than Medicaid have higher income guidelines, co-payment requirements, etc.
- C. Retroactive adjustments
- o Families Payment Options: Discussion about how to define retroactivity and the more pertinent issue, are retroactive adjustments going to be allowed when a family comes forward and requests a change in the monthly cap? After some discussion workgroup agreed that even if a family's monthly cap changed, retroactive adjustments to the family's monthly cap would not be allowed.
 - o Workgroup discussed activities required from local councils related to third party payors and steps for local councils to take for ensuring Part C as payor of last resort related to insurance denials and providers accessing Part C funds. The Lead Agency will develop guidance about this topic for local councils in the near future.
- D. Assistive technology issues
- o Several issues were raised related to this issue, how to calculate parental liability for assistive technology equipment, who owns the equipment, payment options for families who transition from early intervention, when and what types of equipment are returned to the local program, etc.
 - o The Lead Agency will research this issue and provide information to the workgroup.
- E. Data Tracking Form – timelines for submitting data
- o Dates established for submitting data:
 1. First phase-in sites – November 30, 2001
 2. Remaining sites – May 31, 2002
 Data from the first phase-in sites will be reported to the Early Intervention Interagency Agency Heads at their meeting in December and the remaining sites' data will be reported to the EIIAC May 31, 2002.
- F. Other Information
- o The Lead Agency provided an update about Continuous Improvement Monitoring Project and the self-identification of non-compliance with ability to pay. A plan of improvement on ability to pay was submitted to OSEP on October 15, 2001 that included strategies to meet the outcomes. The ATP workgroup will be given opportunity to provide feedback about strategies to meet the overall outcome that fees will not be a barrier for families to access early interventions services.

Meeting adjourned.

Meeting schedule for November and December:

November 8, 2001 10:00 AM – 3:00 PM
Henrico CSB – Conference Room C

December 4, 2001 10:00 AM – 3:00 PM
Department for the Blind and Vision Impaired – Library & Resource Center
Conference Room