




Iowa's Area
Education
Agencies

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Expanded Parameters for AEA Staff Working During COVID-19 Outbreak

Early ACCESS - Part C

April 8, 2020

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Early ACCESS

This guidance is fluid and may change once more information is provided by OSEP and Iowa Department of Education. We will update the guidance as needed.

Existing Early ACCESS (EA) Families

1. Service Coordinators will contact each family and explain that EA staff are currently unable to make home visits or meet face-to-face due to agency closure per the CDCs guidance regarding the COVID-19 pandemic. This precaution will be in place for sure through April 13. Our agency is monitoring the situation, however at this point we are unsure when we will be able to resume face-to-face visits. Offer to continue services via electronic means - this could be Zoom sessions or phone consultations. Discuss with the family how these options could work and determine if they would like to pursue this or temporarily pause visits during the agency closure.
2. Service Coordinators document the discussion of each family within the log notes of the IFSP.
3. Service Coordinator will document the discussion and decision(s) on a PWN. (This does not mandate a periodic.)
4. Service Coordinators will communicate with the IFSP team members to coordinate any services that the family would like to pursue. Providers will document the decisions made within the log notes of the IFSP.
5. Home visits using Zoom will continue to utilize a coaching approach with an emphasis on routines the family currently has in place.
6. Phone consultations will be more general in nature (check-ins).
7. If at any point the parents request to temporarily pause one or more services, accommodate this request and document using a PWN.

For example: *Due to the unprecedented COVID 19 pandemic and restricted face-to-face home visits due to agency closures, the parents have requested to temporarily pause _____ (list service) Early ACCESS services for an extended period of time starting _____. The team will revisit services when face-to-face visits resume.*

Updated 4/8/2020 Note: If there any subsequent changes are made to the services being provided, the team will document the changes on a PWN and provide the family with a copy.

New Referrals Received During Closure

1. Service Coordinators will contact each family for a new referral within 7-10 business. Inform the referral source:
 - *All AEAs offices are closed and we are unable to come into homes to share information with you on early intervention services in an effort to mitigate the spread of the coronavirus. We are unclear how long the closure will last and the*

AEA administration team is communicating weekly to assess the situation.

- *At this time, we are limited to gathering information from families and referral sources which may include interviews and review of existing information.*
 - *To best determine how we can support you and your child during this unique time, could you share information on the child and your concerns?*
 - *If information shared indicates the child has a known condition or the referral source can provide adequate information to establish a developmental delay, offer to begin Early ACCESS services virtually until closure is over.*
 - *If there is not adequate information to determine a known condition and/or a developmental delay, share information and answer questions the referral source may have on Early ACCESS services, offer additional information either email or mail as soon as reasonably possible and inform parent that the agency will contact them to initiate more formal Early ACCESS activities once face-to-face services resume."*
2. Service Coordinators will document the conversation on the intake form, but leave the intake open and follow up with the family when face-to-face visits resume.
 3. Service Coordinator will follow up on all open intakes once face-to-face visits resume.
 4. **Updated 4/8/2020:** If unable to contact the family, procedures will be followed for contacting and documentation of attempts. Follow up letters will be sent either by email or mail as soon as reasonably possible. If unable to contact the family or contact the family by letter, the Service Coordinator will maintain a running list to follow up on when face-to-face visits resume.

Updated 4/8/2020: If a child is a late referral (within 46-90 days prior to the child's 3rd birthday) to Early ACCESS, follow processes for intake, determining eligibility for Part C services as outlined in this document.

Updated 4/8/2020: If a child and/or family moves into Iowa from another state and has been receiving early intervention services out of state, the Iowa IFSP team will continue to serve the child and family based on the out-of-state IFSP with the parameters currently in place due to the public health emergency. The Service Coordinator will follow the Part C Parameters for new referrals when unable to complete comprehensive evaluations until face-to-face services resume.

Updated 4/8/2020 Note: For all consents requiring parent signature (excluding exchanges/releases of information, the team may accept an email or a text message indicating parent consent. For the exchanges/release of information the team must use the official form to obtain physical parent signature.

Existing IFSPs

- If an IFSP meeting was held prior to the closures, staff will complete the IFSP paperwork and submit the IFSP.
- **Updated 4/8/2020:** Complete all IFSP log notes.
 - To document virtual services:
 - For the place of service(s) select “other.”
 - For the mode select “phone.” If the service(s) was provided via Zoom, begin the log note by stating: “Home visit was conducted via teleservices using Zoom meeting format due to the Covid 19 Public Health Emergency. ”
- **Updated 4/8/2020:** Maintain accurate log notes that could be used to bill Medicaid potentially in the future. Staff will not enter these sessions into the Medicaid billing software at this time.
- If a **periodic** review is coming due and if possible, complete the periodic review meeting virtually or over the phone.
- If an **annual** IFSP meeting is coming due and the child has a known condition and if possible, complete the annual IFSP meeting virtually or over the phone.
- If an **annual** IFSP meeting is coming due and staff have adequate existing data to verify the 25% delay and if possible, complete the annual IFSP meeting virtually or over the phone.
- **Updated 4/8/2020:** If an **annual** IFSP meeting is coming due and staff do not have adequate existing data to verify the 25% delay and need to complete additional assessments, use a PWN to document that the evaluation will be completed as soon as possible upon the reopening of the agency. The IFSP team will rely on previous evaluation and existing information to support the redetermination of eligibility and to retain services for the child and family as outlined in the most recent IFSP until face-to-face services resume.

For example: *Due to the unprecedented COVID 19 pandemic all face-to- face Early ACCESS services are temporarily paused for an extended period of time. As a result, the IFSP team was not able to complete _____’s IFSP on the due date of _____. The IFSP team will continue to provide the services virtually until the team can redetermine eligibility can be completed, that must be documented in the PWN.*

Updated 4/8/2020 Note: For all consents requiring parent signature (excluding exchanges/releases of information, the team may accept an email or a text message indicating parent consent. For the exchanges/release of information the team must use the official form to obtain physical parent signature.



Open Evaluations for Part C

The DE guidance states that teams should complete evaluations *if* they have the necessary existing data to make the determination or *if* the data can be gathered through alternative means. The goal is to complete as many open evaluations as possible while having great respect for the need to have data to make these decisions.

If the team has adequate data to complete the evaluation, move forward with the meeting and development of an IFSP.

- If parents are willing to meet virtually, complete the initial meeting.
- If the parents are unable to participate in the initial meeting virtually or by phone for any reason, including health and safety reasons, document the attempts to hold the meeting on a PWN and outline that a meeting will be attempted again once home visits resume. Leave the evaluation open in the system. Schedule the meeting as soon as possible once face-to-face home visits resume.

For example: *Due to the unprecedented COVID 19 pandemic, all face-to-face Early ACCESS services are temporarily paused for an extended period of time. As a result, the team was unable to meet face to face to complete the evaluation process for _____ by the intended deadline of _____. The team will meet when home visits resume.*

Updated 4/8/2020 Note: For all consents requiring parent signature (excluding exchanges/releases of information, the team may accept an email or a text message indicating parent consent. For the exchanges/release of information the team must use the official form to obtain physical parent signature.

Part C to Community Resources

If data suggests a child is comparable to same-age peers and IFSP team has no concerns about the child's development without specialized educational services and supports, then the IFSP team shall follow procedures to transition the child to community services.

- If parents are willing to meet virtually, complete the exit process.
- If the parents are unable to participate in a meeting virtually or by phone for any reason, including health and safety reasons, document the attempts to hold the meeting on a PWN and outline that a meeting will be attempted again once home visits resume. Leave the IFSP open in the system. Schedule the meeting as soon as possible once home visits resume.

For example: *Due to the unprecedented COVID 19 pandemic, all face-to-face Early ACCESS services are temporarily paused for an extended period of time. As a result, the IFSP team was not able to complete _____'s transition to community services by _____ third birthday. The team will meet when home visits resume.*

Part C to Part B

If the transition timeline starts during the agency and district closure, the team and family will determine if there is adequate data to determine if there is a suspicion of a disability.

- If yes, the team will obtain consent for evaluation for special education (a parent may decline to give consent.)
- If there is not adequate information to determine suspicion, the team will need to gather the additional data necessary (which may require waiting until face-to-face visits resume).
- The parents may decline a meeting for transition.

Updated 4/8/2020: Adequate Information and LEA Collaboration

If the team has adequate data to suspect a disability **AND** to complete the comprehensive evaluation for Part B **AND** the school team is available for meaningful collaboration, the team may move forward with the eligibility determination meeting and potential initial IEP meeting, if the child is determined eligible.

- If virtual methods are used to meet, all procedural safeguards must be assured (i.e. meeting notice, parent participation, all required IEP meeting members in attendance, offering parents an electronic copy of the Procedural Safeguard Manual for Parents).
 - If the student is determined to be eligible for Part B services, the IEP will be written to reflect the services and supports to be provided when face-to-face school instruction resumes or the district implements required educational services.
 - If the student is determined to be not eligible OR the parents decline Part B services, the evaluation will be closed and the child is exited from Early ACCESS before their 3rd birthday.
- If the parents are unavailable to participate in the meeting because of work or other commitments, offer other meetings dates and time to try and attempt to schedule the eligibility determination and IEP meeting. If the team can't find a common time to meet, document attempts to schedule on the PWN and schedule a meeting when school resumes.
- NOTE: If the child turns three prior to the eligibility determination meeting, the child must be exited, prior to age 3, from Part C services using the BND exit code and documentation on the PWN. However, the Service Coordinator will maintain contact with the family to ensure a smooth and supported transition to the child's next learning environment. The Service Coordinators will document continued contacts with the family in their working notes.

For example: *Due to the unprecedented COVID 19 pandemic, all face-to-face Early ACCESS services are temporarily paused for an extended period of time. As a result, the team was not able to complete _____'s transition to Part B services by _____ third birthday. The team will meet when home visits and schools resume.*



Updated 4/8/2020: Lack of Adequate Information and/or LEA Collaboration

If the team does not have adequate information and are unable to obtain and gather information using alternative means to ensure a comprehensive evaluation and solid decision-making, OR the school team is not available for meaningful collaboration, the team may elect to consider exceeding evaluation timelines. The team will use a Prior Written Notice to inform the parents of the proposal to resume the evaluation process upon the conclusion of the closure. It will be important to ensure that teams adhere to the practice of not delaying services to potentially eligible individuals.

For example: Due to the unprecedented COVID 19 pandemic, all face-to-face Early ACCESS services are temporarily paused for an extended period of time. As a result, the team was not able to complete the evaluation for _____ by his/her third birthday. The evaluation will be completed and the team will meet when home visits and schools resume.

Updated 4/8/2020: The child must be exited prior to the child's third birthday. The Service Coordinator will maintain contact with the family to ensure a smooth and supported transition to the child's next learning environment. The Service Coordinators will document continued contacts with the family in their working notes.

Web IFSP programming adjustments:

- Added the reason "Public Health Emergency- COVID 19" as a reason for missing a 45- day timeline.
- Added "Public Health Emergency- COVID 19" as a reason for the closure of intake.
- Added "Public Health Emergency- COVID 19" as a delay reason for 30 day first delivery.

Note: Additional adjustments may arise in the weeks to come to support users.