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MEMORANDUM

TO: Child and Family Connections Managers
Service Coordinators

FROM: Janet D. Gully, Chief
Bureau of Early Intervention

RE: Natural Environments

DATE: July 1, 2005

This memo provides general guidance for working with providers to develop justification for services that are not in natural environments.

The outcome page of the IFSP specifically asks whether or not all EI services are provided in natural environments. If the answer is no, then **effective July 1, 2005**, you should use the attached worksheet to document the extent to which services will be provided in a setting other than a natural learning environment. This justification becomes part of the IFSP.

Written justifications should be based on the needs of the child. They should indicate why the recommended setting is necessary to achieve the identified outcome, as well as why no other natural learning environment is appropriate. An IFSP team should maximize their efforts to support the family within the child's natural learning environments before contemplating the need for any justification process.

Administrative convenience, fiscal reasons, personnel limitations, and parent or therapist preferences are NOT acceptable justifications for providing services outside the natural environment. The following are examples of unacceptable justification statements.

- Administrative convenience - e.g., convenience for EI personnel, such as equipment rooms
- Fiscal reasons - e.g., refusal to transport portable equipment due to liability, vehicle space availability, travel costs or need for additional personnel to transport/operate equipment in natural environment

- Personnel limitations - e.g., provider availability (whether due to scheduling or number of enrolled providers in the area)
- Parent preferences - e.g., discomfort with providers in the home, desire for “time off” or ability to be away from the child during services, desire for an individual provider from previous experiences even though other providers exist who will come to the natural environment, parent belief that services outside the natural environment will enable the family to receive other benefits (SSI-eligibility, more or greater amount of services, “better” equipment), parent belief in clinic-based services.
- Therapist preferences - e.g., a perceived “undesirable” family address or area, refusal to travel away from the clinic or to a particular area or distance, a belief in clinic-based services or a belief in the effectiveness of a particular service methodology or implementation style

Services outside the natural environment may be justified when necessary specialized equipment is unable to be transported to the child or found in the natural environment or a community setting within the natural family routines, if the family lives in a shelter and shelter rules prohibit services being provided, etc.

In these cases, written justification would indicate why such specialized equipment or methodology is necessary for the child (testing or training of peripheral vision or auditory equipment) or that the use of such equipment or methodology is a temporary means to increase the child’s skills **and** how such equipment or services are necessary to achieve a particular outcome within the family’s typical routines. Identification of a particular disabling condition cannot be cited as suitable justification.

Plan to transition interventions into natural settings: Justification should incorporate a plan to transition interventions into natural settings. Such plans might include references to the limited duration of service authorization and explanation of how service outside the natural environment is a precursor step in implementing specific strategies to achieve a particular outcome. The plan should include a description of how the transition will occur, whether through another IFSP meeting, automatically with the end of service authorization, etc.

A memo to providers will be posted on the EI, CBO, Training and Provider Connections web sites to ensure they are aware that you will be requesting this information.

If you have questions, please contact your assigned EI Specialist.