




Illinois Department of Human Services

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To: All Early Intervention Payees and Providers
Child and Family Connections Service Coordinators and Staff

From: Ann M. Freiburg, Chief 
Bureau of Early Intervention

Date: March 16, 2020

RE: COVID-19 (Coronavirus) Exception Policy/Procedures

The Bureau of Early Intervention (EI) has received guidance from the Office of Special Education Programs (OSEP), our federal oversight. We have received information that allows us to provide additional guidance as it relates to the EI service delivery amid the Illinois State of Emergency and the World Health Organizations pandemic assignment over the outbreak of COVID-19, also known as the Coronavirus.

Effective immediately, face-to-face services are discontinued. Please follow the adopted COVID-19 Exception Policy guidance until April 15, 2020 or until notified of any other timeframe.

It is important to know that the EI Program supports families, children, EI providers and Service Coordinators (SC) who are working so closely together. We previously provided information which is located on the EI Training Program for your review at <https://blogs.illinois.edu/view/6096/807027>. We advise you to continue to stay current with information on the federal and state websites who continue to provide updates from the Centers for Disease Control and Public Health Agencies. For another great resource to help support families is the EI Clearinghouse Parent Pack found at <https://eiclearinghouse.org/resources/trying-times/>.

With the OSEP guidance received, multiple EI stakeholders have helped craft our COVID-19 Exception Policy and Procedures, attached to this informational notice. In the current situation, the policies and procedures are meant to best support our diverse population we serve, as well as allow for the flexibility of the structure of the EI Payee/Provider community within the limitation of allowable models currently available in Illinois.

Remember that there is no acceptable virtual option available for Illinois Early Intervention. There is a workgroup of the Illinois Interagency Council on Early Intervention whose members are currently working towards that option, but it is not available currently.

This notice also reminds you to continually review the EI Provider Connections website for further updates. Given the nature of this situation, it would behoove you to review on a more frequent schedule, even daily, as things are changing very quickly!

Thank you for your continued dedication to the infants/toddlers and their families within the Illinois EI Program!

Exception Policy-Procedures for Service Coordinators and EI Payees/EI Providers
Effective March 16, 2020

In the light of recent limitations due to the COVID-19, aka Coronavirus, and information released to the Illinois Early Intervention (EI) Program from the US Department of Education, Office of Special Education Programs (OSEP), the Bureau is adopting the following policy and procedures. To view current OSEP guidance, please go to <https://www2.ed.gov/policy/speced/guid/idea/memosdcltrs/qa-covid-19-03-12-2020.pdf>. Illinois Early Intervention has no approved method of teletherapy in place and will not approve any virtual (screen time) service delivery until a platform and practice is finalized.

These guidelines were created through the intention of the OSEP guidance and are acceptable methods to maintain interaction with families and support to the maximum amount possible, those affected by the COVID-19 pandemic.

Effective today, March 16, 2020, the Illinois EI Program is suspending all face-to-face contact with families. All CFC staff and EI Payee/EI Providers should cease going to family's homes until April 15, 2020. Everyone should monitor the EI Provider Connections and other partners websites for updates on a daily basis as this situation may change at any moment.

It is imperative that we practice the recommended social distancing to minimize the spread of the COVID-19 virus to the maximum extent possible.

ACTIVE IFSP Cases:

Based on the severity of the situation, the Bureau has developed a temporary solution to support the continued progress of children and families currently on active caseloads.

The Bureau will temporarily approve allowing the use of existing IFSP Development authorizations for EI Providers to conduct phone-based **Consultation** with families and submit claims under IFSP Development Time. The frequency/duration would not necessarily match the direct service authorization but is designed to provide time to support the family until regular direct service provision can resume. This Consultation call is to be used solely for reviewing the strategies previously provided to the family to use with their child during daily routines and the progress or barriers associated with the strategies. As a note, according to written policy within the *Illinois Early Intervention Provider Handbook, Chapter 6, Billing Guidelines and Use of Insurance*, billing for time spent speaking with a parent via the telephone is not allowed. The exception allowing the submission of claims for IFSP Development Time utilized for parent consultation, is due to the current pandemic over COVID-19 in our country. The exception will be voided once IDHS determines the crisis is over through guidance of the CDC and other professional organizations or the Governor of the State of Illinois office.

The time anticipated for this Consultation is between 15 to 30 minutes per week, but each child and family is unique which could result in less or additional time. As with all IFSP Development Time, it is imperative that documentation support the time billed and should not be used socially or to discuss non-EI services.

In general, all EI direct service Providers have been authorized for IFSP Development Time (estimated one hour per month use). The EI Provider is responsible for keeping track of all authorizations and should be able to determine when/if the authorization in hand may be exceeded. If additional time is needed on a current authorization to conduct Consultation by phone, it is the responsibility of the EI Provider to contact their Service Coordinator to adjust the authorization. Please note if your current authorization has sufficient time left to allow these Consultations to occur through the pandemic exception period, there is no need to contact your Service Coordinator to increase the amount of time allowed on the authorization until the amount is at risk of being exceeded. As with all EI services, authorizations must be "in hand" prior to the provision of any service

(with the exception of IFSP Meetings). The Service Coordinator for each individual family will continue to make monthly contact via telephone.

NEW REFERRALS:

When referrals are received by Child and Family Connections (CFC) offices, the Intake meeting will be handled similarly as above. CFCs will support the referral and Intake process through telephone and mail or fax, as applicable. Necessary paperwork will be mailed to the family with a stamped, self-addressed envelope for return with instructions to review the forms upon receipt. The Service Coordinator, during a call with the family, will go through the documents individually and answer any questions the parents might have. We understand this will lengthen the period of time to work with the family. The OSEP Guidance released allows states to utilize whatever time is needed without risk of non-compliance with federal regulations during this pandemic.

We acknowledge that Initial Evaluations/Assessments cannot be completed at this time. This means the case must be put on hold. The 45-day policy will be waived in this scenario as a family exceptional circumstance.

Assistive Technology requests and Letters of Developmental Necessity will also be affected by an inability to provide in-person services. The Bureau will review these issues on a case-by-case basis, while working to support the provision of any needed Assistive Technology as quickly as possible.

TRANSITION:

Transition activities and timelines could be affected. If possible, use of phone conferencing for those is an option.

FAMILY PARTICIPATION FEES:

The Bureau will consider Family Participation Fee Credit Requests that are submitted once this exception period is over.

COVID-19 EXCEPTION POLICY:

This Exception policy will be in place for 30 calendar days beginning **Monday, March 16, 2020 and will be rescinded effective Wednesday, April 15, 2020**. As the information continues to evolve daily, the Bureau will evaluate the most current recommendations for addressing COVID-19 and make any necessary extensions as needed.

It is imperative that all EI Payees, Providers, Service Coordinators and families monitor the EI Provider Connections site on a daily basis, as things are ever-changing. You may view the site by going to www.wiu.edu/providerconnections.

Additionally, please visit the EI Training Program's website to review the Facts and other useful information on COVID-19, aka Coronavirus at <https://blogs.illinois.edu/view/6096/807027>.

Another great resource to help support families is the EI Clearinghouse Parent Pack found at <https://eiclearinghouse.org/resources/trying-times/>.

We appreciate all the efforts put forth to protect the citizens of Illinois and the people serving these families during this unprecedented time. If you have any questions about this notice, please contact the Bureau directly at 217/782-1981.