

# Early Intervention Payee Compliance Review Tool 2023

## Review Purpose

The Illinois Department of Human Services (IDHS) and the Bureau of Early Intervention fund programs to provide Early Intervention (EI) services and support to Illinois families of infants and toddlers with disabilities and developmental delays. All plans for service delivery are based upon the unique needs of each child/family and focus on the coordination of developmental activities to ensure that all members of the team involved in a child's intervention, including the family and/or caregiver, are working together.

Monitoring EI for compliance and quality service delivery enhances program fidelity, integrity, and effectiveness in improving child development and family support. Annual Early Intervention monitoring also fulfills the state's legal obligations to ensure adequate oversight of the service providers funded by these grants.

## Results of Monitoring Review Table:

The table represents the approved monitoring tool.

The table columns are labeled as follows: Column 1 shows the number associated with the standard and requirement of monitoring tool, Column 2 shows Compliance status, Column 3 references the compliance standard, Column 4 provides the compliance requirement, Column 5 lists evidence of non-compliance that may be collected, and Column 6 indicates whether a Corrective Action Plan is required as well as documented Technical Assistance to guide practice.

#	Status	Compliance Standard	Compliance Requirement	Evidence	Response
<b>Administrative Review</b>					
1	Compliant/ Non-Compliant	<p><b>Early Intervention Provider Handbook - Forward</b> All EI Providers, including credentialed and enrolled Providers, are required to review the Provider Handbook regularly and become accustomed to the rules, policies, and procedures of the EI Program.</p> <p><b>Early Intervention Provider Handbook 3.1</b> EI Providers must monitor the Provider Connections' website on a weekly basis at a minimum. <a href="https://providerconnections.org/">https://providerconnections.org/</a></p>	<p>It is highly recommended the Service Provider/Provider Agency check the EI Partner's website regularly but at least weekly to ensure you are aware of updates or changes to the EI Program.</p> <p><i>(Not subject to verification)</i></p>	N/A	N/A
2	Compliant/ Non-Compliant	<p><b>Early Intervention Provider Handbook 2.6</b> A Corrective Action Plan (CAP) may be required for a finding of non-compliance. A CAP is a document written by the EI Provider that identifies the area of non-compliance (specific policy or procedure that was not followed), and strategies or practices that will be amended to regain compliance moving forward.</p>	<p>The Service Provider/Provider Agency has documentation that supports previous corrective action as written in the approved plan.</p>	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required

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3	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook 3.1</b> Service Provider/Provider Agency maintained liability insurance for the entire Fiscal Year being reviewed.	The Service Provider/Provider Agency has documentation that supports liability insurance for the entire Fiscal Year being reviewed.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
4	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook 2.5.1</b> HIPAA Standards for Privacy and Security: The service provider/provider agency must develop and implement written privacy policies and procedures that are consistent with HIPAA Privacy Rules. Contents should include: <ul style="list-style-type: none"> <li>•Collection, storage, disclosure, and destruction stages.</li> <li>•Privacy Office which is responsible for the development, implementation, and oversight of the policies and procedures pertaining to HIPAA (164.530).</li> <li>• HIPAA complaint process (160.306 and 164.530).</li> <li>• Access to Protected Health Information (PHI) (164.524).</li> <li>• Minimum Necessary Requirements for using, disclosing, or requesting PHI (164.502).</li> <li>•Accounting of disclosures of PHI (164.528).</li> <li>•Telehealth/LVV requirements and notice</li> </ul>	The Service Provider/Provider Agency has developed and implemented Privacy Policies and Procedures that are consistent with the Privacy Rule, and Administrative Directives.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
5	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook 2.5</b> A Service Provider/Provider Agency must also provide a notice of its privacy practices, separate from the HIPAA Compliance Documents listed above, to all families receiving EI services at the initiation of services.  It is the responsibility of the EI Payee/EI Provider to be familiar with the latest privacy rules. For examples of Notice of Privacy Practices, visit <a href="http://www.hhs.gov/hipaa/forprofessionals/privacy/guidance/model-notices-privacy-practices">www.hhs.gov/hipaa/forprofessionals/privacy/guidance/model-notices-privacy-practices</a> .	The Service Provider/Provider Agency has a Privacy Practices Notice that is consistent with the Privacy Rule, Notice of Privacy Practices Document.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
6	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook – 2.5</b> To provide evidence of compliance with standards, providers submit documentation, most often electronically, to the assigned monitor to review.	All documentation for the early intervention monitoring review was received by the assigned EI monitor in a timely manner (agreed upon due date).	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required

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Case File Review

1	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook 3.12.6 (d)</b> The selection of the appropriate evaluation/assessment tool(s) is done by the Credentialed Evaluator and is based on the information provided by the Service Coordinator. Early Intervention Approved Evaluation and Assessment Instruments may be viewed at: <a href="http://www.dhs.state.il.us/page.aspx?item=86067">www.dhs.state.il.us/page.aspx?item=86067</a> .	The Service Provider/Provider Agency has documentation to support the use of authorized assessments using a department-approved test instrument.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
2	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook 3.12.6</b> A minimum of two or more separate disciplines are required to complete Initial Evaluations/Assessments to determine eligibility and they shall be completed by EI Credentialed/enrolled Evaluators only.	Initial evaluation to determine eligibility, or the need to add a new service document that was completed by a credentialed/enrolled evaluator.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
3	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook – Attachment 3</b> Upon completion of either an Evaluation/Assessment or an Assessment, a written report of findings is required and must be submitted using the Illinois Early Intervention Evaluation/Assessment Report format.	All evaluations and assessment reports were completed using the required report format and the report in the file represents the format.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
4	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook – 2.5.3 &amp; Chapter 23:</b> Separate from the evaluation/assessment report, documentation must include the date, time in and time out assessing the child, and time spent completing evaluation activities (ex. scoring and interpreting, writing the assessments to be completed by a credentialed, enrolled Evaluating EI Provider) and the provider's signature.	Evaluations/assessments are documented with the date, time in and out for assessing the child, the additional time spent on other evaluation activities, and the provider's signature.  The file also contains a copy of the report.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
5	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook – 3.13</b> All Evaluation/Assessment services must be performed within 14 calendar days from the date the request for an Evaluation/Assessment is received by the EI Provider. The authorization start date will serve as the request for the Evaluation/Assessment and should reflect the date that the service will be provided. The EI Provider must report the findings of the Evaluation/Assessment to the Service Coordinator within those 14-calendar days unless the actual service date of the evaluation is on day 12 to 14 of the 14-day authorization due to exceptional circumstances (family rescheduled, child ill, etc.).	There is documentation that the Service Provider/Provider Agency submitted all evaluation/assessment reports to the service coordinator within 14 days of the start date of the authorization or the exceptional circumstance.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required

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6	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook – 2.5.5</b> A physician's prescription is not required for initial/annual evaluations but must be obtained prior to direct service provision for audiology, aural rehabilitation services (when services are provided by a speech-language pathologist or audiologist), occupational therapy, physical therapy, speech-language pathology therapy, and AT devices/services. Prescriptions are valid for a maximum of 15 months unless a shorter time frame is noted on the prescription by the authorizing physician	The file contains documentation of the initial and continued physician authorization for all licensed direct service providers for the time period being reviewed.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
7	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook 2.5.4, 2.5.6, 5.4</b> All EI providers should also keep the following: Copies of all authorizations under which you have billed for services. A copy of the child's current IFSP. The provider should obtain a copy of the IFSP (at annual and when changes occur) within 15 days of the IFSP meeting.	There is documentation that the service provider/provider agency has the complete IFSP and authorizations for the time period being reviewed.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
8	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook 5.4</b> Meetings must be held in settings and at times that are convenient to the family and in the family's native language or another mode of communication used by the family unless it is clearly not feasible to do so.	There is evidence that services are provided in the native language or mode of communication understood by the family directly, or as necessary, using an interpreter.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
9	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook 2.5.4 and the IFSP:</b> Monitoring staff will compare billing information from the CBO to the authorizations on file to ensure services are being provided according to the frequency, intensity, and duration/minutes listed in the authorization (IFSP).  All fully credentialed/enrolled EI Providers, that are not Associate-Level, must receive authorizations under their name.	There is evidence that services are provided as indicated in the IFSP and authorization in the rendering provider's name, frequency, intensity, and duration.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
10	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook 2.5.3:</b> EI providers are required to maintain supporting documentation for all procedure codes billed to and paid for by the CBO.	There is evidence that the Service Provider/Provider Agency has documentation to support the services billed.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required

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11	Compliant/ Non-Compliant	<p><b>Early Intervention Provider Handbook – Chapter 23</b> Documentation of direct service for each date and procedure code must include the child’s full name, the actual date of service, the exact time in, exact time out, location, modality (if LVV, the platform used), all persons present, EI provider’s name, and signature and a concise, complete, objective account of service, and for each direct service provided. R07/2022 5 Documentation – Cont. Further details on effective documentation rules, tips, and strategies - EI Documentation Graphic (illinois.edu).</p> <p>IFSP development time documentation must include the date, type of IFSP development activity, duration, and the provider’s signature.</p>	<p>There is evidence that the following information is included to support services rendered: child’s full name, date of service, time in, time out, location, modality (if LVV, the platform used), all persons present, EI provider’s name, provider’s signature, and a concise, complete, objective account of service, and for each direct service provided.</p> <p>There is evidence that the following information is included to support IFSP development time: date, type of IFSP development time activity, duration, and the provider’s signature.</p>	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
12	Compliant/ Non-Compliant	<p><b>Early Intervention Provider Handbook, 5.2, 5.3 (b), Attachment 4:</b> A periodic review of each child’s IFSP must occur every six months or more frequently if conditions warrant, or if the family requests such a review, to determine if adjustment of the IFSP is needed.</p> <p>Providers are required to submit a report to each individual child’s Service Coordinator prior to the six-month review.</p>	There is evidence that the Service Provider, provides direct service reports, in the required format, to the Service Coordinator at least every six months and prior to each IFSP update/review or more often if the child’s progress or lack thereof warrants.	(Description of the non-compliance)	Technical Assistance and/or Action Plan (AP) Required
13	Compliant/ Non-Compliant	<p><b>Early Intervention Provider Handbook 5.6, Attachment 7:</b> EI Providers must submit a written Developmental Justification of Need and the EI Provider Developmental Justification to Change the Frequency, Intensity, and/or Location of the Authorized Services Worksheet to the Service Coordinator for any requested changes to existing authorizations for the time period between annual IFSP meetings.</p>	Prior to implementing any changes to services listed on the IFSP, the Service Provider developed and submitted a written Developmental Justification of Need to the service coordinator.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
14	Compliant/ Non-Compliant	<p><b>Early Intervention Provider Agreement # 13:</b> Service Provider/Provider Agency may never terminate services without a 30-calendar day written notice to the Service Coordinator and the family.</p>	Service Provider/Provider Agency provided written notice to the child’s service coordinator and the family at least 30 days prior to the anticipated date of service termination.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
15	Compliant/ Non-Compliant	<p><b>Early Intervention Provider Handbook – 3.13</b> All EI Providers are required to submit a Discharge Report, see Attachment 2, to the Service Coordinator following the requirements of the Discharge Report within 14 calendar days, if necessary, from the child’s exit from the EI Provider’s care. The report must be written prior to the child’s third birthday.</p>	There is evidence of a discharge report in the required format if the child is no longer receiving services from the Service Provider/Provider Agency.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required

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16	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook – Chapter 23</b> Supervisory documentation should include all contact between the supervisor who is responsible for a child’s case. Documentation from the account of the supervisor attending the direct service session can include the following information: • review of IFSP functional outcomes identified in each child’s IFSP to determine if the IFSP requires modifications; • discussion with parent/caregiver about family priorities and concerns; • observation of interaction between the Credentialed Associate-Level Provider and the parent/caregiver; • observation of interaction between the Credentialed Associate-Level Provider and the child; • observation of direct service to the child; • review of child’s progress or lack thereof.	There is evidence that a Credentialed/Enrolled Provider maintains supervision documentation regarding the implementation of IFSP services by any associate-level providers whom they supervise.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
17	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook 3.5.2 (f)</b> Conduct direct, in-person, supervision during the Credentialed Associate-Level Provider’s sessions at a minimum of once per 30 calendar days for each child served.	There is documentation that the Credentialed/Enrolled Provider conducts supervision during client services a minimum of once each 30 days for each child to which an Associate Level Provider provides intervention services.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
18	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook 5.7</b> IFSP Development time supports the development of the IFSP, reporting of child progress, communication among team members, adjustments to the IFSP, and transition planning. These activities must be completed by the credentialed, enrolled EI.  <b>Early Intervention Provider Handbook 3.5.4</b> Associate-Level Providers who have a master’s degree in speech-language pathology, are in their Clinical Fellowship Year (CFY) and are credentialed as Associate-Level Speech-Language Pathologist Assistants shall engage in IFSP development.	The Credentialed/Enrolled Provider (not associate level provider) is the actual provider of services under IFSP development time. The exception is speech therapists and audiologists in CFY.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
19	Compliant/ Non-Compliant	<b>Early Intervention Provider Handbook 6.3:</b> The primary insurance EOB must accompany all claims submitted to the CBO for further reimbursement and for claims paid in full by the primary insurance.	There is evidence that the insurance EOB and a completed claim were submitted to CBO for all EI children, even if the entire claim was paid by private insurance.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required
20	Compliant/ Non-Compliant	<b>Early Intervention Central Billing Office – Billing Information for Providers:</b> Daily documentation is written and signed by the provider who actually provided the services and consists of a complete overview of the services provided for each procedure code and date of service billed.	Billing forms submitted by the Service Provider/Provider Agency to CBO indicate the specific individual who actually provided the services or the associate who actually provided the services and their credentialed supervisor.	(Description of the non-compliance)	Technical Assistance and/or Corrective Action Plan (CAP) Required