

Rhode Island Early Intervention Certification Standards

Policies and Procedures

XII. Administration

Certified Early Intervention providers are required to have strong management systems provided in accordance with best business practices and regulatory requirements. Systems include Administration, Fiscal Management, Data Collection, Quality Assurance/Improvement and Health & Safety/Risk Management. Provider policies and procedures must at minimum include the following:

Administration

Early Intervention providers must:

- Have written policies regarding administration of the organization which include:
 - The Executive Officer, under supervision of the governing body, is responsible for financial management, achieving program outcomes, meeting client needs, and implementing the governing body's strategic goals.
 - A current chart of organization, which clearly defines lines of authority within the organization, is maintained and provided as part of the certification application.
 - The management of the organization is involved in the planning process for performance improvement and is involved in planning for priorities and setting goals and objectives for a written Quality Assurance/Performance Improvement plan.
 - There is a written corporate compliance/strategic plan in place that is adopted by the governing body.
- Have written policies in alignment with Rhode Island Early Intervention Certification Standards, specifically:
 - Early Intervention Principles and Practices
 - Personnel
 - Referral and Intake
 - Eligibility
 - Evaluation/Assessment
 - Individualized Family Service Plan
 - Services on the IFSP
 - Procedural Safeguards
 - Child and Family Outcomes
 - System of Payment
 - Transition
 - Administration
 - General Supervision
- Have the capacity to meet the needs of families with different cultures, backgrounds, languages and modes of communication.
- Have the capacity to provide comprehensive Early Intervention services year-round in natural environments (as defined by the Lead Agency) with flexible hours/days to meet the needs of families
- Communicate with the Lead Agency including but not limited to:
 - Administrative changes (key staff, agency changes such as corporate name/address; financial changes impacting early intervention services; incidents)
- Actively participate in the Rhode Island Early Intervention system
 - Provide administrative representation at state level Early

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Intervention meetings

- Participate in Technical Assistance opportunities
- Stay informed of Interagency Coordinating Council activities
- Participate in state level Comprehensive System of Personnel Development activities and initiatives

- Maintain an interagency agreement with the Parent Consultant Program for the purpose of utilizing parent consultants as a support to families.

Fiscal Management

Financial Management

Early Intervention providers must have a financial management system that:

- Includes financial planning activities such as annual budgeting, revenue projections, revenue/expense reports, billing audits, annual financial audits and planning to ensure financial solvency.
- Includes written policies and procedures that guide financial management activities (including expenditures, billing, and cash control, general ledger, billing system, payroll, accounts payable, charge and encounter reporting system, and accounting administration and internal control procedures).
- Establishes and maintains necessary cost accounting systems according to general accounting principles to properly record, and allocate separately Early Intervention Services, Medicaid funds and private health insurance, local funds, and other funds used to provide Early Intervention;
- Includes appropriate general liability insurance and ensures that professional liability policies are maintained for appropriate personnel.
- Ensures that Medicaid funds are used only as payor of last resort;
- Includes written annual Early Intervention financial statements submitted to EOHHS at the close of the agency fiscal year in a format acceptable by EOHHS. The report must include income and expenses for the Early Intervention program including Early Intervention program revenue by funding source (by insurance carrier, Medicaid, grants, other (specified)); Early Intervention expenses, including Personnel (by position and FTE); Payroll taxes; benefits; contractors (specify role); general and office expenses; occupancy; transportation, travel, professional development and any other program expenses (specified).

Claims Reimbursement

El providers must have the capacity to submit claims for third party reimbursement.

- Provider reimbursement for EI services must comply with the latest version of the *Rhode Island Medical Assistance Claim Reimbursement Guidebook for Early Intervention Services*.
- EI Providers must have a participation agreement with the fiscal agent for the Executive Office of Health and Human Services (EOHHS) and its Medical Assistance Program, and meet all requirements established by

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the fiscal agent.

- Providers must be credentialed with RIte Care Plans and commercial insurance carriers doing business in Rhode Island and bordering states as applicable.
- Providers must have an internal quality assurance plan which includes a review process to ensure billing guidelines are adhered to.
- Denials and/or co-payments from insurance companies can be submitted to the Rhode Island Medical Assistance fiscal agent for reimbursement as the payer of last resort. Documentation of the denial of payment by the insurance carrier must be documented in writing on company letterhead or on an Explanation of Benefits (EOB). Other evidence that the service is not covered, such as a phone call with an attached reference number indicating the service is not a covered benefit or a copy of the policy indicating the service is not a covered benefit is also acceptable.
- Claims for services provided for children whose parents do not give consent for the EI provider to share personally identifiable information to their insurance carrier must be submitted manually to EOHHS. Providers must submit a copy of the *completed Health Insurance Consent to Release Information* form with the claim and indicate there is no consent in the Welligent data system.
- Disallowance of payment by public and private insurance for failure of the provider to follow proper billing procedures, incorrect diagnosis code or other correctable reasons for disallowance will not constitute grounds for payment from the Rhode Island Medical Assistance fiscal agent.
- Service providers must agree to accept Medicaid payment rate as payment in full for initial Early Intervention services and services authorized on the IFSP. EI Providers cannot request additional funds from families to supplement established Medicaid rates.
- Documentation to support Medicaid and insurance billing must be maintained in the child's file for a period of 10 years.
- The child's file is subject to audit to support billing.

Grants

EOHHS reserves the right to provide administrative support grants to certified EI providers as federal funding and budget allow. Grants may be offered to certified EI providers with annual enrollment of at least 100 children to assist with administrative costs. Early Intervention (Part C) Funds will be utilized to provide administrative support funds which may be used to support:

- Data entry and management
- Quality improvement
- Claims reimbursement
- Staff development and training
- Costs associated with providing services in the natural environment, such as travel

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Data Collection/Data Quality

The Executive Office of Health and Human Services (EOHHS) uses data from the Rhode Island Early Intervention Care Coordination System (RIEICCS) to monitor, report, and improve the timely and effective provision of Early Intervention services to infants and toddlers and their families. Early Intervention providers must ensure that the data is accurate and reliable and timely. Early Intervention providers must have policies and procedures that at a minimum include the following:

Data Collection

- Early Intervention providers must utilize the most current version of state required paperwork/forms to assure reliable and consistent data collection. Any changes to state forms must be approved by EOHHS.
- Early Intervention providers must utilize the data system in accordance with *Rhode Island Early Intervention Care Coordination System (RIEICCS) Data Entry Guidelines*.
- Data must be available for state review within 24 business hours of the request
- A designated person must be responsible for the Rhode Island Early Intervention Care Coordination System (RIEICCS) data system who acts as administrator and
 - is knowledgeable about the data system, data forms/completion, data entry requirements, timelines and report generation.
 - is available to provide training to staff utilizing the data system which includes procedures to protect personally identifiable information (i.e. FERPA, HIPAA)
 - participates in Lead Agency training regarding the data system
 - ensures that individual passwords for the data system remain confidential

Information Management

The Early Intervention provider must maintain written policies and procedures for information management that:

- Assure information management systems are protected from unauthorized outside access, loss or destruction, and shall meet all applicable Health Insurance Portability and Accountability Act (HIPAA) and Family Education Rights and Privacy Act (FERPA) regulatory requirements;
- Ensure confidentiality of all client information, including any images of clients (e.g. photos, videos, etc.)
- Include incident reporting
- Ensure electronic records are backed up, transmitted data is encrypted and secure, and access is password protected.
- Ensure appropriate disposal of information and records that are no longer needed

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Health and Safety/Risk Management

Quality Assurance and Improvement

Providers must have a written Quality Assurance plan which ensures:

- A designated individual is responsible for Quality Assurance including entry of all required data; review protocols to ensure data is valid and reliable and adheres to the *Rhode Island Early Intervention Care Coordination System (RIEICCS) Data Entry Guidelines*
- A systematic review and utilization of available data reports to correct and/or add missing data to ensure accurate data reporting. For a specific list of available reports see the *RIEICCS Data Guide*.
- A systematic review utilizing quality assurance protocols to ensure the following written documents are in alignment with certification standards:
 - Individualized Family Service Plan including evaluation summary; family directed assessment; present levels of development; concerns and priorities; outcomes development; natural environment plans and transition plans
 - Services Rendered Form
 - Child Outcomes Summary Form

Early Intervention Providers must have a written health and safety policy communicated to staff and subcontractors.

- The written policy must include:
 - ~~abuse/neglect~~ mandated reporting
 - handling of allegations of abuse or unprofessional behavior by staff or subcontractors
 - professional ethics (including policy regarding the use of social media and electronic communications)
 - handling emergencies
 - providing a drug-free workplace
 - compliance with Public Law 103-227 Part C-Environmental Tobacco Smoke, also known as Pro-Children's Act of 1994
 - handling violence/misconduct in the workplace
 - utilizing universal precautions to prevent transmission of human immunodeficiency virus (HIV), hepatitis B virus (HBV), and other blood borne pathogens
 - identification and monitoring of safety risks, family crises, medical emergencies and other difficult situations
 - an effective incident review process
 - ~~handling consumer complaints~~ an internal process, aligned with Rhode Island Early Intervention Certification Standards Procedural Safeguards, for responding to and addressing complaints
 - compliance with OSHA guidelines
 - compliance with all Federal and State mandates
- Early Intervention providers must meet appropriate licensing requirements for any facilities used or contracted with for the provision of Early Intervention services