The Early Development Network Co-Leads have provided answers to frequently asked questions during COVID-19. Please contact the Co-Leads with additional questions as they arise.

What are the district and Services Coordinator’s responsibilities upon receiving new Part C referrals? Must we conduct Intake, evaluation and assessment procedures using virtual/technology methods?

- The Co-Leads recommend that the Services Coordination (SC) office ensures referrals are received and make phone contact with families in a timely fashion. The SC should explain to the family that the district and/or SC offices are unable to provide home visits at this time due to the COVID-19 outbreak, but will initiate the evaluation and assessment procedures once the restrictions are lifted. The SC should inform families of the anticipated length of time this may take, and the SC should periodically contact the family to update them on the progress of the timeline. The COVID-19 Pandemic could be considered an “exceptional family circumstance” per the OSEP supplemental fact sheet dated 3/21/20, therefore the SC will need to document these situations in the CONNECT narrative.

If a referral is made for an infant/toddler with a diagnosed condition, can the team conduct an Interim IFSP via virtual means in order to initiate service provision?

- If the district agrees that it is likely that the infant/toddler is eligible per Rule 52, and is willing to participate in an Interim IFSP meeting to initiate services, then the Services Coordinator (SC) may contact the family and offer to conduct the Interim IFSP meeting via technology (Phone or video capabilities). If parent agrees, the SC will document this in the CONNECT narrative. Prior to the meeting, the SC would send a blank copy of the IFSP to the family for their review/preparation. The SC would lead the meeting and draft the contents of the Interim IFSP. After the meeting, the SC will send the finalized version of the IFSP to the family for review and ask the family to respond “yes” or “no” to consenting to the provision of services as written on the Interim IFSP. The SC will need to print off the emails in which the parents indicated a response to the IFSP service provision and place in the child’s SC file for record keeping. Additionally, the Interim IFSP service page will need to reflect that the services will be provided in an “alternate method” as chosen by the parent, aligned to the OSEP memo – and determine an approximate period of time the alternate method(s) will be utilized (i.e. start date of 3/19/20 and end date of 5/19/20). The SC/IFSP team will need to inform the family that once the restrictions are lifted, the team will proceed with the evaluation, assessment procedures and the Initial IFSP.

Districts and SC offices are asking for clarification on conducting Initial MDT and Initial IFSP meetings since the evaluation and child/family assessment process was completed prior to the outbreak and the MDT/IFSP meeting is scheduled to occur during the outbreak period.

- The Co-Leads recommend that the Initial MDT and Initial IFSP meeting be conducted via technology (phone or video capabilities) if parent agrees to this alternate method. If parent agrees, the Services Coordinator (SC) will document this in the CONNECT...
narrative. The district should draft the MDT report and send to the parent prior to the MDT meeting in order for the parent to review, ask questions and provide input during the meeting. The district should ask the parent if they agree to the eligibility decision so they know how to proceed with the meeting. The district will finalize the MDT report after the meeting and send to parent via email, and ask the parent to respond to the email as “yes” or “no” regarding their agreement to the MDT eligibility decision. The team would then conduct the IFSP meeting in a similar manner. Prior to the meeting, the SC would send a blank copy of the IFSP to the family for their review/preparation. The SC would lead this portion of the meeting and draft the contents of the IFSP. After the meeting, the SC will send the finalized version of the IFSP to the family for review and ask the family to respond “yes” or “no” to consenting to the provision of services as written on the IFSP. The SC will need to print off the emails in which the parents indicated a response to the MDT decision and IFSP service provision and place in the child’s SC file for record keeping. Additionally, the IFSP service page will need to reflect that the services will be provided in an “alternate method” as chosen by the parent, aligned to the OSEP memo – and determine an approximate period of time the alternate method(s) will be utilized (i.e. start date of 3/19/20 and end date of 5/19/20). Then, the services will need to be listed again on the service page with an approximate start and end date for the natural environment setting (i.e. home or child care) (example: start date of 5/20/20 and end date of 9/18/20).

Districts and SC offices are asking for clarification regarding holding periodic, and annual IFSP meetings.

- The Co-Leads recommend that districts and Services Coordinator offices conduct Periodic and Annual IFSP meetings via technology (phone or video capabilities) if parent agrees to this method. The Co-Leads understand that the services on the IFSP are end dated and may require a Periodic or Annual IFSP to be conducted in order to enter a new start date and obtain parental consent for continuity of Part C service provision. Procedurally, the SC would lead the IFSP meeting and draft the contents of the IFSP. After the meeting, the SC will send the finalized version of the IFSP to the family for review and ask the family to respond “yes” or “no” to consenting to the provision of services as written on the IFSP. The SC will need to print off the emails in which the parents indicated a response to the IFSP service provision and place in child’s file for record keeping. Additionally, the IFSP service page will need to reflect that the services will be provided in an “alternate method” as chosen by the parent, aligned to the OSEP memo – and determine an approximate period of time the alternate method(s) will be utilized (i.e. start date of 3/19/20 and end date of 5/19/20). Then, the services will need to be listed again on the service page with an approximate start and end date for the natural environment setting (i.e. home or child care) (example: start date of 5/20/20 and end date of 9/18/20).

- If the parent declines to hold a meeting at this time in light of the COVID-19 situation, then the SC will need to explain to the family that IFSP services will not be able to continue. If the parent still does not want to conduct a meeting in order to continue with IFSP/Part C services, then the SC should document this in the CONNECT narrative and send the HHS-6 Notice of Action closing the case. The SC will need to inform the district who will provide a written notice informing the family that the IFSP services will end per their request. The family should be informed about how to re-contact the EDN program if and when they’d like to resume services.
If the IFSP team (including the family) propose to change the Outcomes and/or service type, frequency, intensity or duration due to the COVID-19 emergency, then a Periodic IFSP is required (via alternate means) to make any changes to the services or outcomes on the IFSP. The IFSP, with parental consent, serves as the PWN in Part C. A separate PWN is not required per Part C regulations. Nor can a PWN alone meet the regulatory requirements related to changing/modifying IFSP outcomes or services as parents must provide written consent to any changes to the IFSP. The Periodic IFSP must be sent to the family, and the family must acknowledge consent to the changes on the IFSP via email or by signing the consent page and scanning/emailing back to the SC.

Is it ok for the Services Coordination agency to remain open and continue to provide SC services (either in person or via alternate methods) during the COVID-19 outbreak, even if the district is closed and is not providing IFSP services?

- Yes, it is acceptable for the Services Coordination (SC) agency to continue to provide SC services even if the district is closed, as long as the family continues to engage with the SC via phone, text, email, etc. This allows the family to receive SC services and routine updates on timelines related to district service provision, etc.

OSEP Resources:
COVID-19 information and resources page
Q-and-A on providing services to children with disabilities during coronavirus outbreak
OSEP Supplemental Fact Sheet

Nebraska COVID-19 Resources:
www.education.ne.gov/sped
http://dhhs.ne.gov/Pages/Coronavirus.aspx

Nebraska Routines-Based Early Intervention Resources during COVID-19:
http://edn.ne.gov/cms/edn-covid-19-resources