



Memo #14-01

To: Help Me Grow Early Intervention Contract Managers
Administrative Agents of Family & Children First Councils
FCFC Coordinators

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Ohio Department of Health

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Subject: Service Start Dates

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Ohio Department of Health as the lead agency for Early Intervention is authorized to collect valid and reliable data to report annually to OSEP on the state's performance and each EIS program to ensure compliance with the program requirements under Part C of IDEA.

Federal Compliance Indicator #1: *Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner* or 'timely receipt of services' (commonly known as TRS). In OAC, Rule 3701-8-07.1(D) (7) Ohio defines timely needed service(s) to begin within 30 calendar days from the parent's signature on the IFSP indicating their consent. This memo will clarify what service start date is recorded on the IFSP and in ET when a service is identified.

For many years, we guided EI service coordinators to put the date of the initial IFSP as the start date for a specialized service, when the provision of a service was being received prior to the referral and/or development of an IFSP. Our thinking has evolved on this topic due to updated federal IDEA, Part C regulations and technical assistance accessed by the state.

Documentation verifying compliance with Timely Receipt of Services (TRS) will now be held to the following standard:

- A service is not considered an EI service until the service is listed on the IFSP;
- Each EI service is needed because of at least one outcome on the IFSP;
- The first occurrence of the service after the IFSP date must be within 30 calendar days in order to be compliant with TRS;
- The only time that a service start date should be the same date as the IFSP is if the service actually did start on the same date; and
- When you are asked for verification of service start dates, you must provide provider's case/therapy notes, as service coordinator case notes will no longer be accepted as documentation for service start dates.

If you have questions regarding this memo please contact your program consultant at ODH.