

Practice Guide: Natural Environments (NE) and Justifications for Services Provided Outside of the Natural Environment

Overview

In accordance with federal Part C requirements, each IFSP service is required to be provided in a natural environment unless the early intervention outcome cannot be achieved satisfactorily in a natural environment. If an early intervention service is not provided in a natural environment, a justification must be provided on the IFSP.

Providing services in natural environments is not just the law, but more importantly, it supports one of the key purposes of early intervention services: to enhance the capacity of the family in facilitating their child's development through natural learning opportunities at home or in community settings where children live, learn, and play. By using activities (bath time, mealtime, story time, playing) that occur in natural settings (home, childcare, playground) as the venue for early intervention, numerous opportunities are provided for the child to learn and practice new skills in the settings in which they will be used. The provision of services in natural settings and in daily routines and activities fosters the use and development of natural supports in a family's social and cultural network, enhancing the child's growth and development while promoting the child and family's full participation in community life.

Natural Environments are natural opportunities, day to day moments, and real-time learning experiences. Natural environments support the child and parent in the moment during the week when services are provided in the home. The parent can reflect on that moment and say "I can do this" whenever they need to support their child during times when therapists are not available.

Service providers should enhance any caregiver's capacity to facilitate a child's development **by working with the adult and child within natural learning opportunities**. This is different from the practice of providing services in a therapeutic or clinical setting and providing parents with handouts or suggestions to use at home. The use of natural activities and materials may reduce the need for specialized equipment.

Practice Considerations

34 CFR §303.344(d)(1)(ii) requires that decisions about appropriate settings must be made by the IFSP team (including parents and other team members) and that the setting must be based on the child's functional IFSP outcomes. After the team determines which early intervention services the child and family will need to meet the functional IFSP outcomes, the team should determine where the services will be provided.

When determining if a setting is a natural environment, the following guidance should be considered.

Services to Children in Natural Environments

- **Home.** The most typically used natural environment is the home. It would include grandparents' or other family members' homes.
- **Community Based Natural Environments.** Children and families participate in a variety of community activities that are natural for them and which may be appropriate for service delivery. If the family does not want services in their home, another community setting can be identified where the child's needs may be addressed. Community activities may include visits to the playground, zoo, library, restaurant, store, etc. A therapeutic or clinical setting is **not** a community based natural environment.
- **Natural Groups.** Natural groups of children are groups that would continue to exist without children with disabilities in attendance, such as: child care, library story time, Mommy and Me groups, and parent cooperative preschool program or playgroups. Groups that are **not** "natural groups" include: self-contained playgroups, toddler groups or childcare settings that include *only or mostly children with disabilities* or are designed specifically for children with disabilities. However, even the most "natural" of groups is not a natural setting for a particular child if it is not part of that family's regular routine or community life. In addition, services are not considered to be provided in a natural group if the child is separated or "pulled out" from the group in order to receive individual services. See the Groups and Natural Environments table at the end of this document for more detail.
- **Integrated Programs.** Programs designed exclusively for children with disabilities are **not** considered a natural environment. However, if the program was designed for children without disabilities, it might be considered a natural environment under certain circumstances. OSEP has provided guidance in this instance and in all of its policy letters since August 2000.

"Many center-based programs that formerly served only children with disabilities have now integrated children without disabilities, creating a child care or preschool program constituting a natural environment. If services were provided to an eligible child in such an integrated environment, the child's IFSP would not require a justification for services in that integrated setting." (OSEP Letter to: Morris, Washington, June 7, 2005)

Service Settings NOT Considered Natural

Service settings that are not "natural settings" include: clinics, hospitals, therapists' offices, rehabilitation centers, and segregated group settings at centers and schools. This includes any settings designed to serve children based on categories of disabilities such as "Language Groups", "Adaptive Play Groups", "Feeding Groups" or "Toddler Socialization Groups" selected for the convenience of service providers.

Services to Parents NOT Required to Meet the Natural Environments Definition

- **Parent-to-Parent Support Groups.** Since parent-to-parent support through parent groups or other means is a critical support for families of children with disabilities, OSEP

has determined that such parent activities do not have to be provided in a natural environment. Specifically, OSEP states in a *Letter to Yarnell, Pennsylvania, October 19, 1999* “...for services directed solely at the parent such as parent support, those services are not required to take place in a natural environment. No justification, therefore, is needed on the IFSP. **Such services solely for the parent, however, cannot be used as a justification for providing services to the child in other than natural environments.**”

- **Parent Training Groups.** Sometimes family groups are organized at centers, schools, hospitals, etc. for the purposes of parent training. These services should supplement the early intervention services that are happening in the home rather than being the primary service. Services provided solely for the benefit of the parent or family member, such as information, support or a demonstration of a technique, are not required to take place in a natural environment. **Services (OT, PT, SLP) provided to the child while parents observe in such a setting are not parent training and would require a natural environment justification statement.**

Justification for Providing Services outside a Natural Environment

If the IFSP team determines that one or more of a child’s IFSP outcomes cannot be met by providing early intervention services in a natural setting, the IFSP must include a justification (developed by the IFSP team including the parent) for providing services outside the natural environment and a plan for moving services into a natural environment. This should be a rare exception for an individual child, and not a common practice.

The justification must be based on the child's functional IFSP outcomes and should describe why the IFSP Team determined that the outcome could not be achieved in a natural setting, in the context of everyday activities and routines of that particular child and family.

The plan for moving services includes a description of the steps that will be taken to move services and supports provided in specialized settings into everyday routines and activities of that particular child and family., Each plan includes timelines and supports necessary to move or return early intervention services to natural settings within the child’s and family’s daily activities and routines. Examples of unacceptable and acceptable justifications are provided below.

Unacceptable Justifications

Providing services in settings outside of natural environments should be a very rare exception. As a result, acceptable individualized justifications are very challenging to identify and cannot include any of the following:

- **Administrative convenience:** e.g., convenience for early intervention providers such as equipment or special rooms. At times, it may be appropriate to temporarily provide services in a setting outside the natural environment to determine the appropriateness of a piece of equipment prior to purchasing it for the family’s home. This is appropriate if the justification includes a timeline and specific plan to move the service to the natural environment, in this case, after trying the equipment for a few sessions.

However, it is not appropriate to provide services outside the natural environment for an extended amount of time in order to use specific equipment.

- **Fiscal reasons:** e.g., agency refusal to transport portable equipment due to liability, vehicle space availability, travel costs or need for additional personnel to transport/operate equipment in natural environment.
- **Personnel limitations:** e.g., provider availability (whether due to scheduling or number of enrolled providers in the area) or decisions about necessary services based on provider availability.
- **Parent preference/choice:** e.g., discomfort with providers in the home; parent desire for “time off” or an opportunity to be away from child during services outside the natural environment; family desire to receive other benefits; or parent belief in clinic-based services.
- **Practitioner preferences:** e.g., perceived “undesirable” or dangerous family address or area; refusal to travel away from the clinic or to a particular area or distance; a belief in school-based or clinic-based services; or a belief in the effectiveness of a particular service methodology or implementation style (hippotherapy, aquatherapy, therapy room, music therapy). In the case of safety, the IFSP team should always consider other natural environments that are a part of the child’s routine (e.g. homes of other family members and community settings). Excerpts from OSEP letters included at the end of this brief clarify that family preference, or the preferences of one IFSP team member, is not sufficient justification for providing services outside the natural setting.

Acceptable Justifications

Outcome #	Service(s)/Support(s)	Setting (Non-Natural Environment Setting Where Service(s)/Support(s) Will be Provided)
<i>1 – Lonnie will respond to and interact with adults and other children during play activities</i>	<i>Occupational Therapist</i>	<i>Clinic</i>
<p>Explanation of Why Outcome Cannot be Achieved in a Natural Environment:</p> <p><i>Lonnie’s home and other settings that he normally participates all include multiple children. Lonnie understands what is said to him but he is highly distractible and responds inconsistently to other children and adults during play and other activities. His parents have tried many different strategies to increase his attention and found nothing that works.</i></p>		

Plan for Moving Service(s) and/or Support(s) into Natural Environments:

The OT will work with Lonnie and his mother for 3-4 sessions in the clinic in a quiet room to determine what strategies work to reduce Lonnie’s distractibility and increase his ability to successfully interact with others. The OT will work collaboratively with Lonnie and his mother to use these strategies in the home environment and in other community settings he participates in. The sessions will then be moved to the home.

Outcome #	Service(s)/Support(s)	Setting (Non-Natural Environment Setting Where Service(s)/Support(s) Will be Provided)
2 – Ana will be able to communicate her needs and wants using her augmentative communication device	Speech-Language pathologist	Clinic

Explanation of Why Outcome Cannot be Achieved in a Natural Environment:

Ana has limited communication skills and her team has recommended the use of an augmentative communication device. The team needs to assess Ana’s ability to manipulate the device without her siblings or others interfering and then program the device for usability.

Plan for Moving Service(s) and/or Support(s) into Natural Environments:

The SLP will work with Ana and her mother 2-3 times in the clinic and then transition services to Ana’s home and identify strategies to prevent her siblings from using the communication device inappropriately.

Excerpts from OSEP Policy Letters

- OSEP states in a letter to *Heskett, Missouri, May 26, 1999* in response to a question about whether it violates Part C for a parent to choose a non-natural environment (e.g., center-based program or clinic for children with disabilities) that they deem is best for their child: *“Although Part C recognizes the importance of, and requires, parent involvement throughout the IFSP process, Part C does not relieve the State lead agency of its responsibility to ensure that other regulatory and statutory requirements, including the natural environments provisions, are met. While the family provides significant input regarding the provision of appropriate early intervention services, ultimate responsibility for determining what services are appropriate for a particular infant or toddler, including the location of such services, rests with the IFSP team as a whole. Therefore, it would be inconsistent with Part C for decisions of the IFSP team to be made unilaterally based solely on preference of the family.”*
- OSEP states in a *Letter to Elder, Texas, July 17, 1998* in response to a question about

whether it violates Part C to provide services in a setting selected by the parent, which does not meet the definition of a natural environment even if the parents are incurring the cost of the setting, if the IFSP team determines services can be satisfactorily achieved in the natural environment: *“... if the parents do not consent to a particular location for a service specified in the IFSP, the State may not use Part C funds to provide that service in a location different from that identified on the IFSP. The parents are free to reject any service(s) on the IFSP by not providing written consent for that service(s) or by withdrawing consent after first providing it. If the parents do not provide consent for a particular early intervention service, which also includes the location, that service may not be provided....”*

Resources

Natural Environments video resource explaining the IDEA federal requirements:

http://www.youtube.com/watch?v=vvAv1_eAo9Q&feature=youtu.be

Routines Based Early Intervention videos:

<http://www.youtube.com/watch?v=OpxGC6G0HMY>

http://www.youtube.com/watch?v=sL_WOCu3Ptg

<http://www.youtube.com/watch?v=jA6IOf9A298>

Basic Part C Modules:

<http://ectacenter.org/wamodules/wamodules.asp>

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Groups and Natural Environments

For a setting outside of the home to be considered a natural environment, it must meet the definition of a “community-based setting”.

A Community-based setting* means a setting where children without disabilities are typically found (Childcare centers, preschools, regular nursery schools, Early Head Start, libraries, grocery stores, parks, restaurants and community centers such as the YMCA). Programs designed for typically developing children *and* where most of the children are typically developing are considered community-based settings.

Group Type Documented as a <i>method</i> of service delivery on the IFSP	Design/Intent	Enrollment	Setting/ Natural Environment	IFSP Service Provided
Community-based Playgroup or Child Care	Community-based setting by design and access	The majority of children are typically developing do not have IFSPs	Considered a natural environment	Any service on the IFSP may be provided in this type of group if it supports the achievement of IFSP outcomes. If the service is provided primarily in childcare where the parent is not present, additional services that include the parent are also required.
Specialized Playgroup or child care	Specialized design or access	The majority of children have IFSPs	Not considered a natural environment	If any IFSP service is provided in this type of group, a justification based on the developmental needs of the child must be provided. This must include a timeline to transition services to a natural environment. If the service is delivered in both a natural environment and a non-natural environment, it needs to be listed on the IFSP separately for each setting.
Parent support/ Training groups	Designed solely to provide support and information for the benefit of the parent or family member. For example: Parent to Parent support programs which provide emotional support and information to families of children with special needs and/or disabilities.	Any combination of families with and without IFSPs	Not required to be held in a natural environment**	These groups should supplement the early intervention services that are happening in the natural environment. Services (OT, PT, SLP) provided to the child while parents observe in such a setting or during agency-provided child care while parents meet separately would require a natural environment justification statement.

*Infant and Toddler Coordinators Association (ITCA) position paper (April, 2000)

**Office of Special Education Programs (OSEP) letter (April, 2013)