

Early Support  
for Infants  
and Toddlers



**September 2013**  
**System of Payment and Fees (SOPAF) Policy**  
**Frequently Asked Questions (FAQs)**

---

**Q. We thought Early Intervention (EI) was free unless a family wanted to use their insurance?**

A. Early Intervention (EI) is not a free and appropriate education (FAPE) like Special Education. Because early intervention is not FAPE, early intervention fiscal policy includes implementing a System of Payments and Fees policy that acknowledges there often is not enough public funding to pay for all the services a child may need. In the past, EI providers may not have asked families to use their public or private insurance to help pay for the services that are subject to Family Cost Participation (FCP). Some services must be provided at public expense, but others are subject to (FCP), which includes use of public and private insurance, or in rare circumstances, charging a family fee. Please see the Family Cost Participation Brochure for more information about how early intervention services are funded in Washington State.

**Q. Do families have to use their insurance under the new policy?**

A. Most families consent to use their insurance for the provision of services because they are willing to financially contribute to their child's program. They understand that this resource is needed to help pay for the services their child needs. Families may also consent to use their public or private insurance for the provision of services because it may assist in establishing their child's need for future services and establishing a payment history. EI providers are required to obtain consent to bill a family's public or private insurance for the provision of services. Families have the right to withhold their consent. When they do, they may be assessed a monthly fee for those services that are subject to Family Cost Participation.

**Q. Why are families being asked to pay fees right now?**

A. The September 2011 federal early intervention regulations established more rigorous early intervention finance requirements. These more rigorous requirements focused on the state's implementation of its system of payment and fees policy. These new requirements had to be implemented by July 1, 2013. A variety of funding sources may be accessed to pay for early intervention services. These include federal, state and local funds, as well as private and public health insurance plans. Families can give or withhold consent to bill their public or private insurance. When families do not give consent to access insurance or do not have insurance, Washington's "System of Payments and Fees" (SOPAF) policy allows programs to assess a monthly fee for services provided that are subject to Family Cost Participation.

**Q. If a family already has an IFSP and has not consented to use their insurance in the past; do they need to start paying a fee right now?**

A. Effective July 1, 2013, the “Systems of Payments and Fees” (SOPAF) policy was required to be implemented for all new families enrolling in early intervention. Effective January 1, 2014, the SOPAF policy will apply to all families in early intervention. Beginning January 1, 2014, the FRC will ask at the annual IFSP or review, if insurance can be used to help pay for the EI services subject to FCP listed on the family’s IFSP. At that time a family must give their consent to use public or private insurance to help pay for services subject to FCP or possibly be assessed a monthly fee where applicable. (See SOPAF policy to for more information regarding monthly fees)

**Q. How can a family learn more about what their insurance covers and how early intervention will impact their coverage?**

A. Learning about insurance coverage will help families make the best decisions to meet their child’s needs. Insurance plans have a “Summary Plan Description”, a document that summarizes coverage and provides some guidance on how to find providers who accept the families insurance as well as what services are covered. Families can also contact their employer’s human resources department or member services information on their insurance card. The State Family Leadership and Involvement Committee developed materials specifically for families to help them learn about what services their insurance plan will cover. The “Understanding Your Medical Insurance – Navigating Your Insurance Coverage” document contains an “Insurance Verification Worksheet” that can help families ask the important questions about their insurance coverage and benefits. This worksheet is comprehensive and will provide families with all of the important questions they need to ask in order to access their benefits for early intervention services. These materials are available on the ESIT website at <http://www.del.wa.gov/publications/esit/Default.aspx>.

**Q. What if a family consents to use their insurance and they start running out of allowed benefits or the costs become too high for them?**

A. Anytime during the implementation of the IFSP, should the family’s ability or inability to pay change, they must inform their FRC as soon as possible and may request a new determination of their ability or inability to pay for IFSP services subject to FCP.

**Q. Where can a family get more information about Washington’s System of Payments and Fees?**

A. Start with the family’s FRC, the Lead FRC or Local Lead Agency. ESIT FAQs and SOPAF materials located on-line at <http://www.del.wa.gov/publications/esit/Default.aspx> may also be helpful. Call ESIT’s Parent Participation Coordinator at (360) 725-4413, if you have additional questions.

**Q. When should I start talking to families about the new SOPAF?**

A. At the first contact when the program is explained, new families need to know that not all early intervention services are provided at no cost to them. The family curriculum “Families are Important” page 19, (<http://www.wapave.org/iteip/webinars.asp>) is a good starting point and can give you a tool to talk with families about the funding sources that pay for early intervention services. Give families the parent “Family Cost Participation” (FCP) brochure on your initial visit so they can begin to learn the basics about SOPAF. For families already on IFSPs, they will need to know that fees may be applied after January 1, 2014, if they do not give consent to use public or private insurance to help pay for services subject to FCP and are determined to have an ability to pay.

**Q. What are the basic ideas to share with families?**

A. Share the SOPAF parent materials on the ESIT website to help you create talking points for yourself.

**Q. What forms do I need to use and when?**

A. Families who receive services subject to FCP will need to use a portion of the SOPAF Prior Written Notice/Consent Form. Each family will also check boxes on the IFSP signature page that relate to SOPAF. You may need to use the fee calculation worksheet if the family needs to pay a fee. There are also SOPAF reference documents to help explain the process at <http://www.del.wa.gov/publications/esit/Default.aspx>.

**Q. Is it permissible for an agency to alter the Prior Written Notice, Consent to Access Public and/or Private Insurance, Income and Expense Verification Form?**

A. No, that form cannot be changed or modified. The form is to be used consistently statewide, to ensure compliance with the new Part C regulations related to obtaining parent consent on matters related to fiscal requirements.

**Q. Do families need to fill out the PWN and Consent to Access Public and/or Private Insurance, Income and Expense Verification Form each time a service, subject to Family Cost Participation (FCP) changes on the child's IFSP?**

A. Early Intervention must obtain parental consent for the use of private health insurance to pay for any increase in frequency, length, duration, or intensity of services in the child's IFSP. One suggested process could be that the FRC or other appropriate person could review the originally signed PWN consent form Sections A or B, or both, as appropriate with the parent(s), and have them initial the consent form with a new signature and date that gives their consent to the changes in services subject to FCP on subsequent IFSPs.

**Q. Do providers need to store or shred a family's personal financial information gathered during the SOPAF process?**

A. The family and staff review all information that the family has provided for section C through G of the PWN/Consent to Access/ Income and Expense Verification form. Once they agree and sign the form as accurate, personal documents used to fill out the information can be given back to the family. If the documents are not wanted by the family, the documents should be shredded.