



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

Q: When are Local Lead Agencies (LLAs) required to implement the System of Payments and Fees Policy (SOPAF)?

A: Starting on July 1, 2013 Local Lead Agencies will implement the SOPAF with all *new* families who enter the early intervention program. On January 1, 2014 SOPAF will be implemented with all families at the time of the child's IFSP review or annual IFSP. ESIT recognizes that each agency has developed unique internal structures and processes to implement state policy, and will work with individual LLAs to help problem solve local program specific implementation issues.

Q: Which early intervention functions or services are subject to Family Cost Participation (FCP)?

A: The functions and services subject to Family Cost Participation for which co-payments, co-insurance, deductibles or fees may be charged include: assistive technology, audiology, counseling, health services, nursing services, nutrition services, occupational therapy, physical therapy, psychological services, social work services and speech-language pathology. Special instruction is *not* subject to FCP because it is not currently a billable service.

Q: How can families meet the Family Cost Participation requirement?

A: If families give consent to access their public and/or private insurance for the provision of services that are subject to Family Cost Participation, they will meet the Family Cost Participation requirement.

Q: Which early intervention functions and services must be provided at public expense ?

A: The following services must be provided at public expense:

- implementing child find requirements,
- evaluation and assessment,
- Family Resources Coordination (FRC),
- development, review and evaluation of the Individualized Family Service Plan (IFSP), and
- implementation of procedural safeguards

Q: Will ESIT be developing additional implementation procedures for Local Lead Agencies?

A: No. ESIT has provided the following materials to Local Lead Agencies:

- System of Payments and Fees Policy
- Family Cost Participation Guidelines
- Prior Written Notice, Consent to Access Public and/or Private Insurance, Income and Expense Verification Form
- Family Cost Participation Decision Tree
- Family Cost Participation Monthly Fee Schedule
- Insurance Verification Worksheet
- Family Cost Participation materials

In addition, ESIT hosted a SOPAF implementation workshop with a national consultant on June 12, 2013.

Q: When will Family Resources Coordinators and early intervention providers receive training to implement the SOPAF policy?

A: LLAs will provide local training to FRCs and providers in their system using training materials developed by ESIT and presented at the June 12, 2013 SOPAF implementation workshop. ESIT staff will assist LLAs with local training upon request.

Q: Will all of the forms be translated into different languages?

A: ESIT will translate the SOPAF policy and family brochure into Spanish, and is obtaining estimates for translation into other languages.

Q: When does the SOPAF policy need to be shared with families?

A: The family brochure should be shared when there is initial contact with the family. Prior Written Notice, Consent to Access Public and/or Private Insurance, Income and Expense Verification Form and the SOPAF policy are shared with the family prior to or at the initial IFSP meeting. When there is *any* change in IFSP services subject to Family Cost Participation, Prior Written Notice, Consent to Access Public and/or Private Insurance, Income and Expense Verification Form is given and consent obtained prior to implementing the change.

Q: Will ESIT be developing a form for use when there is non-payment of Family Cost Participation co-payments, co-insurance, deductibles, or monthly fee and before services are suspended?

A: No. The existing Parent Prior Written Notice form has an option for “other” reasons why Prior Written Notice is being given. Programs are encouraged to check the “other” box and provide a statement that explains the early intervention services subject to Family Cost Participation will be stopped until payment plan is developed.