



Eric Holcomb, Governor  
State of Indiana

*Division of Disability and Rehabilitative Services*

*First Steps*

402 W. WASHINGTON STREET, P.O. BOX 7083  
INDIANAPOLIS, IN 46207-7083  
1-800-545-7763

Date: March 16, 2020

To: Indiana First Steps stakeholders including families and personnel

From: Christina Commons, First Steps Director, Indiana Family and Social Services Administration, Division of Disability and Rehabilitative Services, Bureau of Child Development Services

Re: First Steps' COVID-19 policies

Dear Stakeholders of Indiana First Steps,

As you are aware, businesses, individuals, and organizations around the world are making preparations related to COVID-19, and the state of Indiana is no exception. Due to the community-based nature of First Steps services, the Division of Disability and Rehabilitative Services, Bureau of Child Development Services is issuing several temporary policies for families, service providers and service coordinators who wish to postpone First Steps services or use alternative methods for service delivery.

These temporary policies are outlined below and include suspension of the 2019 make-up session policy and permission to provide some services virtually using video technology. Implementation of allowable tele-services will be at the discretion of the family and service provider and the policy is not intended to allow entire organizations to stop providing in-home services altogether. For example, if no positive COVID-19 cases have been identified in a particular county, it may not be appropriate for the providers in that county to utilize virtual sessions.

The following temporary policies will be in effect until May 31, 2020, or when Indiana's public health emergency declaration is lifted, whichever date is soonest.

Please note that for allowed virtual services, providers are asked to delay billing until further guidance is issued. This guidance is coming soon.



POLICY	PROCEDURES
Documentation	Any interruptions or delays in First Steps services occurring as a result of COVID-19 must be clearly documented in the child and family's early intervention record (EI record). All required forms and checklists and related guidance are included at the end of this announcement and will also be available online at <a href="https://www.in.gov/fssa/ddrs/3399.htm">https://www.in.gov/fssa/ddrs/3399.htm</a> .
Make-up sessions	The make-up session policy dated Oct. 31, 2019, will be temporarily suspended for all providers until May 31, 2020, or when Indiana's public health emergency declaration is lifted, whichever date is soonest. This means make-up sessions will be allowed but not required. The policy being suspended can be found here: <a href="https://www.in.gov/fssa/files/First_Steps_Make-Up_Session_Policy.pdf">https://www.in.gov/fssa/files/First_Steps_Make-Up_Session_Policy.pdf</a>
Fourteen day break from services – family initiated	<ul style="list-style-type: none"> <li>• A family may choose a 14 day break from First Steps services as a precaution against COVID-19.</li> <li>• Either services must resume as written on the family's individualized family service plan after 14 days or another option from this list of temporary policies must be chosen.</li> <li>• The service coordinator must clearly document all communication with the family regarding the family's decision to suspend services, including all related IFSP team communication, in the EI record.</li> </ul>
Fourteen day break from services – provider initiated	<ul style="list-style-type: none"> <li>• A provider may choose a 14 day break from First Steps services as a precaution against COVID-19.</li> <li>• The provider must notify the family in writing and specify the date services will pause and the date services will resume. The provider must share this communication with the service coordinator and other members of the IFSP team.</li> <li>• Either services must resume as written on the family's individualized family service plan after 14 days or another option from this list of temporary policies must be chosen.</li> <li>• The service coordinator must keep all related communication and documentation in the EI record.</li> </ul>
Remote methods for service coordination	<ul style="list-style-type: none"> <li>• Service coordinators may conduct initial IFSP meetings, six month IFSP review meetings, annual IFSP review meetings, and any other IFSP team meeting over the phone or with videoconferencing technology using the state-approved procedures outlined below in the policy on virtual sessions.</li> <li>• The service coordinator must document the use of virtual or telephone meetings in the service coordination log.</li> </ul>
IFSP with service coordination services only	<ul style="list-style-type: none"> <li>• A family may request an IFSP with service coordination services only to maintain their child's eligibility status but withdraw from ongoing services.</li> <li>• The service coordinator must document all communication with the family regarding the family's decision to revise their IFSP, including all related IFSP team communication, in the child's early intervention record (EI record).</li> <li>• The family may resume their prior IFSP services at any time subject to provider availability.</li> <li>• When the family is ready to resume services, the service coordinator in collaboration with the IFSP team must review child progress and the IFSP to determine if the outcomes or services should be updated as a result of the interruption in services.</li> </ul>

Methods for evaluation and assessment	<ul style="list-style-type: none"> <li>• As needed, evaluations and assessments may be completed with videoconferencing technology using the state-approved procedures outlined below in the policy on virtual sessions.</li> <li>• If a child is eligible based on a diagnosed physical or mental condition, the child’s assessment can be completed over the phone. Only one assessment team member is required for this scenario.</li> <li>• A SPOE can exercise discretion in determining the number of assessment team personnel to send for in-home evaluations and assessments. In the event that only one team member meets with the family in person, the SPOE must ensure another team member completes a paper review and contributes to the recommendation concerning the child’s eligibility and service needs as applicable.</li> </ul>
Virtual sessions for allowable IFSP services	<p>Virtual sessions for First Steps services must be provided using videoconference technology in accordance with the following procedures:</p> <ul style="list-style-type: none"> <li>• Allowable IFSP services means nutrition services, occupational therapy, psychology services, social work services, speech therapy, developmental therapy (including developmental therapy provided by Blind/Low Vision Specialists and Deaf/Hard of Hearing Specialists), and services provided by any other licensed occupation not listed whose practice act permits the provision of teleservices.</li> <li>• Virtual sessions must be conducted in accordance with the Family Educational Rights and Privacy Act. This means: <ul style="list-style-type: none"> <li>○ Parental consent must be obtained using the state-approved form included at the end of this memo.</li> <li>○ Virtual sessions must be conducted using a secure internet connection and a secure videoconferencing platform with end-to-end encryption such as Zoom, Microsoft Teams, or Signal.</li> <li>○ Recording virtual sessions is prohibited.</li> <li>○ Virtual sessions should be conducted where other people can’t hear or observe.</li> </ul> </li> <li>• To qualify for virtual sessions, a family must meet all items in the family teleservices technology checklist included at the end of this memo. The checklist will also be available online at <a href="https://www.in.gov/fssa/ddrs/3399.htm">https://www.in.gov/fssa/ddrs/3399.htm</a>.</li> <li>• <b>Sessions will be reimbursed at the off-site rate. Providers are asked to delay billing until further guidance is issued. This guidance is coming soon.</b></li> </ul>
Virtual sessions for family training and counseling only	<ul style="list-style-type: none"> <li>• Family training and counseling may be provided in a virtual session in place of a standard in-person session or a virtual session for allowable IFSP services.</li> <li>• This policy is available to any provider type on the IFSP and must be utilized in accordance with the virtual session procedures outlined in this memo.</li> <li>• Sessions will be reimbursed at the off-site rate for CPT code T1027. <b>Providers are asked to delay billing until further guidance is issued. This guidance is coming soon.</b></li> </ul>
Face-to-face sheets for virtual sessions	<p>The requirement for families to sign the face-to-face sheet after each visit will be waived for virtual sessions. Ongoing providers will be required to use the face-to-face sheet template included in this memo for each virtual session and must send the completed document to the family as soon as possible after each session either by secure email or mail if email is not available. The required face-to-face sheet will also be available online at <a href="https://www.in.gov/fssa/ddrs/3399.htm">https://www.in.gov/fssa/ddrs/3399.htm</a>.</p>
Reimbursement restrictions	<p>Ongoing service providers will not be reimbursed for phone calls, text messages or emails.</p>

## **Best Practice COVID-19**

In an effort to keep our First Steps families and personnel safe and healthy, the Division of Disability and Rehabilitative Services Bureau of Child Development Services is closely monitoring the 2019 novel coronavirus or COVID-19 in conjunction with other state and local partners. It is important that everyone continues everyday preventative actions and stay informed with accurate information.

### Preventative actions:

- Wash hands with soap and water for at least 20 seconds: see [CDC's handwashing guidance](#)
- Avoid touching face
- Cough, sneeze into shoulder or arm
- Clean and disinfect frequently touched objects and surfaces
- Limit close contact with others as much as possible (e.g., shaking hands)
- Do not take any unnecessary items such as toy bags or blankets into family homes
- Sanitize hands before and after each home visit

### General resources:

- Indiana State Department of Health (ISDH) 24/7 call center
  - 317-233-7125 (Monday through Friday, 8:15 a.m. to 4:45 p.m.)
  - 317-233-1325 (after hours)
  - ISDH dedicated email box: [epiresource@isdh.in.gov](mailto:epiresource@isdh.in.gov)
- [Provider webcast recording available on the ISDH video center](#) (Internet Explorer only)
- [Sign up for the Indiana health alert network](#)

### Specific resources for business, employers and healthcare workers:

- ISDH – [Information for healthcare professionals](#)
- CDC – [Interim guidance for business and employers to plan and respond to COVID-19](#)
- CDC – [Information for healthcare professionals](#)

### Stay informed with accurate information:

- [ISDH COVID-19 dedicated webpage](#)
- [CDC dedicated webpage](#)