



The Individualized Family Support Plan needs to be considered an authorizing document for Medicaid-eligible services for children in Part C/ Early Steps.

The Council urges legislators to require that the Individualized Family Support Plan (IFSP) be recognized as the authorizing document for medical necessity and Medicaid reimbursement for Part C Early Intervention Services.

The Florida Developmental Disabilities Council has been advocating for Florida's Part C, Early Steps program since the state adopted the federal initiative in the early 1990s. Early Steps is Florida's early intervention program that offers services to eligible infants and toddlers (birth to thirty-six months) with significant delays or a condition likely to result in a developmental delay. Early Intervention is provided to support families and caregivers in developing the competence and confidence to help their child learn and develop. Families and professionals work together to develop an Individualized Family Support Plan (IFSP) that is based on the unique needs of the child and the child's family

Stretching the dollars of Early Steps has been a challenge in the last several years. The program relies on being the payer of last resort and looks to private insurance companies and Medicaid to pay for infant therapy services that are frequently included in a child's Individualized Family Support Plan. Federal regulations for Part C of the Individuals with Disabilities Education Act (IDEA) require that Early Steps pay for the services identified on the IFSP within 45 days of the documented need.

Currently the Early Steps program is serving about 45,000 children a year. Approximately 70% of the Early Steps enrolled children are Medicaid eligible and many may have therapy services that are recommended and documented in their Individualized Family Support Plan paid for by Medicaid. Medicaid services are offered through individual providers or Medicaid Health Plans. Medicaid will cover all medically necessary services for children under the age of 21. The therapies recommended go through a prior authorization process and may be denied if the services do not meet Medicaid's medical necessity definition. Currently, the IFSP is not recognized by Florida's health plans as an authorizing document. Because Early Steps' regulations prohibit any delay in therapies, there are times when Early Steps pays for Medicaid-eligible services.

Other states recognize the IFSP as an authorizing document which prevents delayed therapy and hours of authorization applications, denials, reapplications, and ultimately, the use of Early Steps funding. Under the Texas Early Childhood Intervention (ECI) Program, the Individualized Family Service Plan serves as the authorization for Medicaid services and documents medical necessity for the services. As long as the IFSP has all the required information required by the Florida Medicaid program, it could also be used as an authorizing document for Part C early intervention services.

Increases in the number of children served and an economic downturn have reduced per-child funding from a high point of \$1,700 per child in 1995 to about \$900 per child this year. If Florida adopts this policy, Early Steps funding won't have to be used for Medicaid-eligible services. This will provide more funding to Early Steps to serve children.