

Report of Technical Team D

System Component:

General Supervision System: State Performance Plan Indicator 1 (timely delivery of services in natural environments).

5 year goal:

The state shall have a system of general supervision for its services under IDEA/Part C, established through a single line of authority in a lead agency (designated or established by the governor) for carrying out:

- a) General administration and supervision;
- b) Identification and coordination of available resources;
- c) Assignment of financial responsibility to the appropriate agencies;
- d) Development of procedures to ensure that services are provided in a timely manner, pending resolution of any disputes, including resolution of intra- and interagency disputes;
- e) Policy pertaining to contracting or otherwise arranging for services, including procedure for securing timely reimbursement of funds;
- f) Procedural safeguards for families and children enrolled in the early intervention system; and
- g) A system for compiling accurate and valid data on the early intervention program.

Short term Goals:

To ensure a system that ensures timely access to all needed services for eligible families and children in all geographic areas.

Improvement Activities:

Indicator 1: Timely Delivery of Services

1. Increase specificity in policy and provider contracts in an effort to standardize assessment and service delivery methodology.
2. Link contractual obligations to providers' payments.
3. Explore the possibility of directly employing certain service providers within Lead Agency to increase accountability for contractual requirements and timely access.
4. Explore the cost savings associated with the use of licensed paraprofessionals as appropriate, particularly in geographic areas of provider shortage.
5. Explore centralized billing and payments system (e.g., as used in Colorado and/or Indiana).
6. Clarify and enforce policy and contractual obligations regarding providers' acceptance of all forms of payment (private insurance, public insurance [fee-for-service, Managed Care Organization, or Medical Home Network, and BabyNet Service Funds).
7. Examine state definition of 'timely' delivery of services relative to other states, as the state has the right to set the timeframe.

Justification of team recommendations:

For all indicators, Team D examined the current State Performance Plan, FFY 2007 Annual Performance Report, FFY 2007-2009 Grant Award Letters, and reviewed the document entitled, "Developing and Implementing an Effective System of General Supervision," accessed at:

<http://www.accountabilitydata.org/BIG%208%20PART%20C/Part%20C%20generalsupervisionword4-07.pdf>

Justifications from review of state data include the following for Indicator 1: APR data indicates failure to reach compliance targets for this indicator for three of the last four years.

System Component:

General Supervision System: State Performance Plan Indicator 7 (45-day process and activities from referral to development of initial IFSP).

Short term Goals:

To have all children's eligibility determined, assessment of unique needs completed, completion of assessment of family's resources, priorities, and concerns, and development of initial IFSP finalized within 45 days of referral to the state early intervention system.

Improvement Activities:

1. Separate child find activities (screening) from orientation and intake process; i.e., a referral is a referral for eligibility evaluation, vs. a child find activity.
2. Explore legality of having 45-day process begin when family signs consent (TA request from MSRRRC/NECTAC), and whether this would make it more difficult for families to access services in a timely manner.
3. Set time limit on how long staff have to complete a screening once information is received.
4. Explore separation of intake service coordination from eligibility evaluation functions, and/or intake service coordination from ongoing service coordination; short of system redesign, additional staff will be needed.
5. Consider use of dedicated eligibility determination teams.
6. Complete analysis of staffing data (numbers needed; qualifications and pay scale of existing intake staff).
7. Review definition of 'timely' delivery of services relative to other states, as the state has the right to set the timeframe.

Justification of team recommendations:

For all indicators, Team D examined the current State Performance Plan, FFY 2007 Annual Performance Report, FFY 2007-2009 Grant Award Letters, and reviewed the document entitled, "Developing and Implementing an Effective System of General Supervision," accessed at: <http://www.accountabilitydata.org/BIG%208%20PART%20C/Part%20C%20generalsupervisionword4-07.pdf>

Justifications from review of state data include the following for Indicator 7: While FFY 2008 data indicate 95% compliance with this indicator, recent changes in state funding and loss of positions will likely result in a lower rate of compliance in FFY 2009.

System Component:

General Supervision System: State Performance Plan Indicator 9 (System of General Supervision).

Short term Goals:

To ensure a system of general supervision exists that addresses all levels of service coordination and delivery, and ensures correction within one year of identification of non-compliance.

Improvement Activities:

1. Examine existing system of monitoring, and as needed, develop and support additional mechanisms for overall increased monitoring, to include appropriate use of evidence-based practices in delivery of all services.

2. Define and monitor levels of accountability in system of general supervision across all levels (State ICC, Lead Agency, Partnering Agencies, service coordinators, service providers; and, as relates to funding sources, licensure requirements, and professional associations standards).
3. Eliminate opportunities for conflict of interest and/or potential overbilling (for example, set policy such that ongoing service providers do not serve on initial eligibility determination teams, or that at annual determination of Part C eligibility, there is a review of ongoing providers' re-evaluations by an independent source).
4. Set policy so that there is a clear distinction Part C eligibility, and benefits related to receipt of services; services must be necessary in order that the family can support the child's attainment of the IFSP goals.
5. Examine and validate all available data sources that may be used for the purposes of identification and correction of non-compliance, making annual local determinations, and reporting annual state determinations.
6. Streamline the multiple existing systems through integration, coordination, and communicate findings of (intra-agency) monitoring systems.
7. Clarify relationship between HHS monitoring of Medicaid-funded services and lead agency monitoring of the provision of those service in accordance with IDEA/Part C.
8. Identify and examine all sources of system funding, regarding regulations addressing non-supplantation of funds and maintenance of effort.

Justification of team recommendations:

For all indicators, Team D examined the current State Performance Plan, FFY 2007 Annual Performance Report, FFY 2007-2009 Grant Award Letters, and reviewed the document entitled, "Developing and Implementing an Effective System of General Supervision," accessed at:

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Justifications from review of state data include the following for Indicator 9: While components of a general supervision system exist and are effective, South Carolina has received multiple citations of non-compliance with federal statute and regulations for this indicator.

System Component:

General Supervision System: State Performance Plan Indicator 14 (Valid and Reliable Data).

Short term Goals:

To ensure statewide access to and ongoing use of a valid, accurate, and reliable data system for purposes of measurement of performance and results, identification of non-compliance with IDEA/Part C statute and regulations, correction of non-compliance, and federal/state reporting.

Improvement Activities:

1. Explore options for a flexible web-based data system that includes on-demand queries and online system of billing and payments.
2. Ensure that data used for in meeting public reporting requirements for §§ 616, 618, and local determinations are valid and reliable.
3. Determine if current data platform is sufficient for all required and necessary reporting for ongoing monitoring.
4. Use federally-agreed upon data definitions in design of queries and reports.
5. Supervision of service coordination responsibilities for data reporting.
6. Use portion of remaining ARRA stimulus monies to fund revision of existing data system or purchase software to upgrade and replace existing system.

Justification of team recommendations:

For all indicators, Team D examined the current State Performance Plan ,FFY 2007 Annual Performance Report, FFY 2007-2009 Grant Award Letters, and reviewed the document entitled, “Developing and Implementing an Effective System of General Supervision,” accessed at:

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Justifications from review of state data include the following for Indicator 14: While components of a valid and accurate data system exist, South Carolina has received multiple citations of non-compliance with federal statute and regulations for this indicator.