

Early ACCESS Guidance on Documenting Timely Delivery of First Services

Office of Special Education Programs (OSEP) Indicator C1

Background

Federal Annual Performance Report Indicator C1 is the Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.

Timely receipt of services is a compliance indicator with a target of 100% with each state defining what constitutes “timely services”. In Iowa timeliness of services is defined as “within 30 days” from parent consent. Timeliness is based on actual number of days between parental consent and the provision of services for the first time.

This document is intended to give early intervention providers guidance on documenting their first service delivery so that Iowa can accurately report timely services data to OSEP.

What data does the Iowa Department of Education (IDOE) pull when reviewing documentation for the first delivery of a service (Indicator C1)?

In the fall of each year, the IDOE pulls information from the IFSP data system on all new services that have been added to IFSPs during the fiscal year (July 1 – June 30). The data pulled from the system comes from information that is entered under “Services” and “Meeting” pages in the IFSP. For each new service, the following data is pulled and reviewed for compliance:

- IFSP meeting date
- Date consent for service was signed
- Date first service was delivered

- Delay code (If 30-day timeline was missed)
- Information in the contact/attempts PRIOR to First Delivery text box
- First Delivery log note that is created when providers click the First Delivery button on the “Services” page in the IFSP

What are reviewers looking for when reviewing the data?

Reviewers must determine that each new service was delivered within 30 calendar days, and if it took longer, what the reason was for the delay. To do this, reviewers look to see:

1. That consent for service was signed either on the same date as or shortly after the IFSP meeting. Families **cannot** consent to a service prior to the IFSP meeting date.
2. The number of days between the signed service consent date and the date the first service was delivered.
3. That the First Delivery log note contains information about an actual first service delivery and not notes about an IFSP meeting, evaluation, canceled meeting or other contact with the family that was not a first delivery of a service.
4. That a delay reason/code and the justification for the delay is provided for services that are delivered 31+ days after the consent for service was signed. Justification for the delay must be documented in the Contacts/attempts PRIOR to First Delivery text box.

What errors are found when reviewing documentation for compliance with timely first delivery?

Below is list of the most common errors found by reviewers:

1. **Same meeting date and first service delivery date.** Providers are delivering the service on the same date as the IFSP meeting with no differentiation between the initial IFSP time and the first delivery of service time. The service can be delivered AFTER the IFSP meeting and after the consent is signed. The First Delivery log note **must** reflect that the service followed the meeting.

2. **First service delivery log note is not for the first service.** Providers are clicking the First Delivery button and recording a cancelled visit, missed visit or a phone call to set up visit in the log. This type of information must be documented in the Contacts/attempts PRIOR to First Delivery text field on the “Services” page of the IFSP.
3. **First service delivery log note appears to be an IFSP meeting and/or evaluation note rather than for the first service.** Log notes that share who was in attendance, evaluation information, when the next meeting will be, or other comments that do not provide a description of a specific service being delivered are not considered a first service delivery log note. The First Delivery log note must reflect the service that was delivered with enough detail that it is obvious to the reviewer that the family received the service.
4. **First Delivery button clicked and no note added.** Providers are clicking the First Delivery button, but provide no further documentation. Reviewers need to have a note entered that provides evidence of the actual service that was delivered to the family and child.
5. **No log notes have been entered.** At the time the data is pulled from the data system, the provider has not entered the First Delivery log note. Data is pulled 3 months after the end of the fiscal year and notes are not entered timely creating the appearance that services have never been delivered.
6. **Missing justification for delay in services.** All delays in providing a first service must have a delay code and an explanation on what caused the delay. Documentation must be in the Contacts/attempts to Contact PRIOR to First Delivery text field on the “Services” page of the IFSP.

Solutions to the Most Common Documentation Errors

How should providers document the first delivery of a service when provided on the same date as the IFSP meeting?

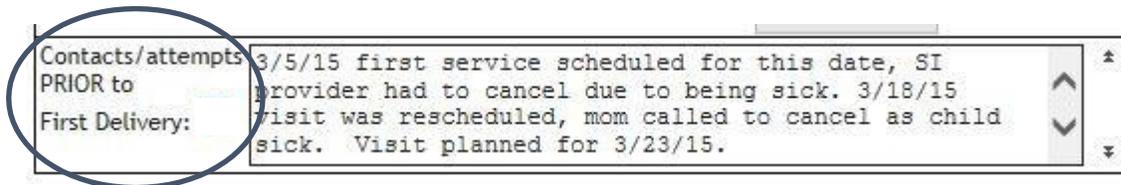
Only the wording from the First Delivery log note text field is pulled from the data system which does not include the time in and out for the service. Reviewers have no way of knowing the meeting time and the service time unless the information is typed in the log text field. Simply stating that services were provided after the meeting and consent were completed, followed by notes about what service was actually delivered satisfies this documentation requirement.

Here is an example of clear documentation of a first service that was delivered on the same day as the IFSP meeting:

Date: 04/10/2015	Time In: 10:00 AM	Time Out: 11:30 AM	Place of service: Home
Name/Role: [REDACTED]	Special Educator	Mode of contact: Home visit	
NOTES: **First Delivery** first home visit with family. Coaching session after review of Initial IFSP. Coached parents on interactive social activities they can do at home and outside their home within their daily routines.			

How and where should providers document cancelled visits, missed visits, phone calls to set up the first visit or any other notes PRIOR to delivering the first service?

Documentation of cancelled visits, missed visits, phone calls to set up the first visit or any other contacts PRIOR to delivering a first service must be recorded in the Contacts/attempts PRIOR to First Delivery text box on the services page of the IFSP. The text documented in this box will also serve as justification if the service is not provided within 30 days of the consent for the service. Here is an example of documentation found in the Contacts/attempts PRIOR to First Delivery text box:



In the example above, the provider documented why visits were cancelled in the Contacts/attempts text box associated with the service that would have been provided. If the deadline for a timely first service had been missed, reviewers have evidence that justifies the delay since dates and reasons for not providing the service have been documented. In this example, if the first service was delivered 31 or more days from consent for services, the delay code would be AG for Agency/System reason since the first delay was due to staff illness.

Providers should not use the First Delivery button to enter a note that only contains documentation of cancelled visits, missed visits, phone calls to set up the first visit or other information regarding activities prior to delivering the service for the first time. See non-example below where the provider clicked the First Delivery button and entered a log note for a missed visit:

Service: Developmental Services			
Date: 02/23/2015	Time In: 09:00 AM	Time Out: 09:15 AM	Place of service:
Name/Role: [REDACTED]		Mode of contact:	
NOTES: **First Delivery** No Show			

What information is considered evidence of a first service being delivered so that it is obvious to the reviewer what service was provided?

The First Delivery log note must contain documentation that clearly illustrates what service was delivered to a family and child. The reviewer must be able to read the documentation and know that the notes clearly show that, for example, special instruction, occupational therapy, speech services, etc. were provided. First Delivery log notes can be brief or lengthy depending on provider style of documenting services. The key is to add enough detail so that the reviewer can clearly identify that a first service was provided.

Here are **examples** of documentation for the first service delivery in the First Delivery log note.

SS log	**First Delivery** Visit with PT. Child worked on walking with PT. Worked on repeating sounds during play activities and helping his mom to learn some of those strategies of repeating a word throughout the day.
SI log	**First Delivery** Went to Child's home and gave mom strategies to motivate functional actions in toddlers. Child is scribbling, looking at a book, and stacking blocks.
OT log	**First Delivery** Doing well with French toast. Good chewing skills. Now eating Pop Tarts. Usable to use straw.
VS log	**First Delivery** Began service delivery to Gunner to introduce pre-cane (blindness techniques for movement and orientation) skills. His mother was in attendance.
FT log	**First Delivery** Home visit complete. Talked about parent concerns and challenges during family routines.

Here are **non-examples** of documentation for the delivery of a first service in the First Delivery log note:

First Delivery See uploaded service log dated 12/09/14.
First Delivery Visit attended by ECS, SC, and SLP.
First Delivery First delivery date
First Delivery Home visit

First Delivery Next HV scheduled on 8/13/15 at 10:30 a.m.
First Delivery 8/25/14 - Home visit with SLP. Scheduled visits for September.

What do you mean providers are clicking the First Delivery button but no note is added?

Here is an example of a First Delivery log where the provider clicked the First Delivery button and did not provide any documentation that illustrated to reviewers that a service was provided. There is no description of what service was actually provided which would be the evidence reviewers need as documentation.

Date: 02/20/2015	Time In: 02:00 PM	Time Out: 03:00 PM	Place of service:
Name/Role: [REDACTED]	Mode of contact:		
NOTES: **First Delivery**			

What is the timeline for adding First Delivery log notes to a child's IFSP?

The Iowa Department of Education has not dictated a timeline for data entry. However, there was general agreement among all Early ACCESS Regional Liaisons that log notes would be entered within 30 days of a service. For the First Delivery log note, it is important for notes regarding the delivery of a first service to be entered within this timeframe. This will eliminate the appearance of services not being delivered when, in reality, they have been.

What are the different delay codes and when would you use them?

All circumstances for not meeting the 30-day timeline must be documented using a delay code. This is a federal requirement. A dropdown menu asking you to select a delay reason will appear when entering the First Delivery log note if the timeline has been missed. The delay codes/reasons are: AG=Agency/System, FA=Family, OT=Other, and PH=Public Health. The image below shows the dropdown with delay code choices.

The screenshot shows a web form titled "First Service Delivery Log Note". It includes fields for "Consent for Services" (10/14/2020), "First Service Delivery" (11/17/2020), "Time In:", "Time Out:", and "Delay Reason:". A dropdown menu is open for "Delay Reason:", showing a table with the following data:

Code	Description
AG	Agency/System
FA	Family
OT	Other
PH	Public Health Emergency- COVID 19

The following chart shows the delay code and a description of circumstances that fit within each code category. This table does not constitute an exhaustive list.

Code	Examples of Circumstances Causing Delay
AG = Agency and/or System	Staff shortage; Staff schedule including vacations, other personal leave; Staff illness; Lack of translator services available
FA = Family	Child hospitalization or illness; Family schedule including vacations; Family move; Family chooses to have quarterly services and requests starting date greater than 30 days from consent
OT = Other	Significant weather-related events; Coordination or collaboration problems due to other agency outside of the early intervention system
PH = Public Health Emergency	Public health emergency is declared, and the family opts to delay services until face-to-face intervention is resumed

Note: Select the delay code based on the first circumstance that caused the service delivery to be cancelled or missed. Example: Three home visits for first service delivery were cancelled. The first visit was cancelled due to winter weather and the next two were cancelled due to the child being sick. Use OT (Other) delay code because the first cancellation was due to winter weather.

Justification or an explanation of why the delay occurred is recorded in the Contacts/attempts PRIOR to First Delivery text box. Reviewers must be able to clearly determine that the circumstances around the delay justify or match the delay code used.

Where can I find additional information on timely delivery of early intervention (EI) services?

There are several resources available to assist in understanding timely first service delivery and documentation.

IFSP Data System: Embedded throughout the IFSP are question mark icons  that contain either the text from the Procedures Manual or link to you to online videos and guiding documents. You will find this icon within the “Services” page of the IFSP to assist with timely services information.

Read the warning boxes that pop up in the IFSP data system as data is entered. When the First Delivery button is pushed, a warning box reminds providers to only enter the First Delivery log note if it is the actual first delivery of the service to the family and child.

Video Tutorials on EduVision: Watch the *Services & First Delivery* or *Services Tab* training videos that were created in 2013 and review the guiding document that accompanies the videos. The videos can be found by going to an EduVision website: (<https://aea111.eduvision.tv/default.aspx>) and selecting the Early ACCESS channel. Early ACCESS has 28 videos, so scroll down to find the correct video.