

# Idaho Infant Toddler Program

## System of Payments Policy for Families



The Idaho Department of Health and Welfare (DHW) is the lead agency responsible for the Idaho Infant Toddler Program (ITP). The Infant Toddler Program is the early intervention system for infants and toddlers who have disabilities or developmental delays and their families.

Part C of the Individuals with Disabilities Education Act (IDEA) requires states to establish a system of payments for early intervention services, including federal, state and private resources.

**The purpose of this information is to provide parents of children enrolled in the Infant Toddler Program with the system of payments policy for Part C early intervention services in Idaho.**



### How are Infant Toddler Program Services Financed?

Early intervention services provided to eligible infants and toddlers and their families are financed through multiple funding sources. Early intervention services are provided at no cost to the families served, however families have an option to allow the Idaho Infant Toddler Program to use public or private insurance to pay for their child's services.

If a family allows the Idaho Infant Toddler Program to use public benefits (Medicaid) or private insurance to pay for services, they are not charged family fees, copayments, or deductibles associated with receipt of early intervention services. Families may be responsible to pay any insurance premiums they incur if applicable per their insurance plan or other long-term costs such as the loss of benefits because of annual or lifetime health insurance coverage caps under their insurance policy.

Idaho's system of payment does not include family fees or sliding fees.

The Idaho Infant Toddler Program cannot require parent permission for the use of a parent's public insurance or private benefits (Medicaid) as a condition of receiving early intervention services. If a parent or family of an infant or toddler with a disability does not provide consent to bill their insurance, the lack of consent may not be used to delay or deny any services to that child and family.

### How are funds used by the Infant Toddler Program?

The Idaho Infant Toddler Program may use funds for activities or expenses that are reasonable and necessary for implementing Idaho's early intervention program for infants and toddlers with disabilities including funds:

- For direct early intervention services for infants and toddlers with disabilities and their families that are **not** otherwise funded through other public or private sources; and
- To expand and improve services for infants and toddlers with disabilities and their families that are otherwise available.



- Idaho does not provide services for at-risk infants and toddlers. Idaho will strengthen the statewide system by initiating, expanding, or improving collaborative efforts related to at-risk infants and toddlers, including establishing linkages with appropriate public and private community-based organizations, services, and personnel for the purposes of:
  1. Identifying at-risk infants and toddlers;
  2. Making referrals for the infants and toddlers; and
  3. Conducting periodic follow-up on each referral to determine if the status of the infant or toddler involved has changes with respect to their eligibility for infant toddler program services.

## Payer of Last Resort

Funds may not be used to satisfy a financial commitment for services that would otherwise have been paid for from another public or private source. Therefore, funds under this part may be used only for early intervention services that an infant or toddler with a disability needs but is not currently entitled to receive or have payment made from any other federal, state, local or private source.

If necessary to prevent a delay in the timely provision of appropriate early intervention services to a child or the child's family, funds may be used to pay the early intervention provider pending reimbursement from the agency or entity that has ultimate responsibility for the payment.

## How does the Infant Toddler Program Coordinate with Other Agencies?

The Idaho Infant Toddler Program ensures it has methods in place for State interagency coordination. Each method includes procedures for achieving a timely resolution of intra-agency and interagency disputes about payments for a given service, or disputes about other matters related to Idaho's early intervention system. The method:

1. Permits the agency to resolve its own internal disputes, based on the agency's procedures that are included in the agreement, so long as the agency acts in a timely manner.
2. Includes the process that the Idaho Infant Toddler Program will follow in achieving resolution of intra-agency disputes, if a given agency is unable to resolve its own internal disputes in a timely manner.
3. Includes a mechanism to ensure that no services that a child is entitled to receive under this part are delayed or denied because of disputes between agencies regarding financial or other responsibilities.

Families are not charged family fees, co-payments, or deductibles for any early intervention services. Co-payments and deductibles related to use of private insurance for any early intervention services are covered by the Idaho Infant Toddler Program.

## How does Private Insurance pay for Infant Toddler Program services?

The Idaho Infant Toddler Program may not use the private insurance of a parent of a child with a disability to pay for Part C services without receiving written consent from the child's parents. Parental consent is obtained:

1. When the Idaho Infant Toddler Program or EIS providers seeks to use the parent's private insurance or benefits to pay for the initial provision of an early intervention service in the Individual Family Service Plan (IFSP); and
2. Each time consent for services is required due to an increase in frequency, length, duration, or intensity in the provision of services in the child's IFSP. These changes are authorized by the parent on the IFSP Addendum form.

Consent to use insurance is obtained on the *Financial Resources for Early Intervention* form and is completed prior to IFSP development and the provision of initial services, as well as reviewed annually.

Families may be responsible to pay any insurance premiums they incur if applicable per their insurance plan or other long-term costs such as the loss of benefits because of annual or lifetime health insurance coverage caps under their insurance policy.

Parents may choose to allow use of their private and public insurance to pay for early intervention services. For families who are dually insured by both public and private insurance, parents are informed that Medicaid is required to seek reimbursement from the family's private insurance prior to claims being paid by Medicaid. Because of this, for families covered by both public (Medicaid) and private insurance, Idaho does not bill Medicaid without also having written consent to disclose information and to access the family's private insurance.

## How does Public Insurance pay for Infant Toddler Program services?

With regard to using the public benefits or insurance of a child or parent to pay for Part C services, Idaho:

- May not require a parent to sign up for or enroll in public benefits or insurance programs as a condition of receiving Part C services and must obtain consent prior to using the public benefits or insurance of a child or parent if that child or parent is not already enrolled in such a program;
- Must obtain consent to use a child's or parent's public benefits or insurance to pay for Part C services if that use would:
  - Decrease available lifetime coverage or any other insured benefit for that child or parent under that program;
  - Result in the child's parents paying for services that would otherwise be covered by the public benefits or insurance program;
  - Result in any increase in premiums or discontinuation of public benefits or insurance for that child or that child's parents; or
  - Risk loss of eligibility for the child or that child's parents for home and community-based waivers based on aggregate health-related expenditures.
  - If the parent does **not** provide consent, Idaho still makes available those Part C services on the IFSP to which the parent has provided consent.

In Idaho, Medicaid (the program managing public benefits) and the Infant Toddler Program are both housed within the same agency, the Department of Health and Welfare. The consent obtained by Medicaid when the family applies for public benefits allows sharing information between programs within the agency. This consent provides the necessary authorization to share personally identifiable information for billing purposes.

**Prior to using a child's or parent's public benefits or insurance to pay for services, the Idaho Infant Toddler Program must provide written notification (at least one time) to the child's parents. The notification includes:**

- A statement that parental consent must be obtained before the Idaho Infant Toddler Program or EIS provider discloses, for billing purposes, a child's personally identifiable information to Idaho's Department of Health and Welfare;
- A statement of the no-cost protection provisions and that if the parent does not provide the consent, the Idaho Infant Toddler Program still makes available those Part C services on the IFSP for which the parent has provided consent;
- A statement that the parents have the right under confidentiality of information provisions to withdraw their consent to disclosure of personally identifiable information to the Idaho Department of Health and Welfare, at any time; and
- A statement that families are not charged fees for any early intervention services and do not incur any costs when using public insurance (i.e., Medicaid) or private insurance.

## What services are subject to billing private or public insurance?

- Special instruction
- Speech evaluations and therapy
- Occupational evaluations and therapy
- Physical therapy and evaluations
- Hearing evaluations
- Language interpretation



For additional information regarding the System of Payment policy, please contact your service coordinator or go to [www.infanttoddler.idaho.gov](http://www.infanttoddler.idaho.gov).