



Department  
of Health



**EI-Hub**  
EARLY INTERVENTION SOLUTION

# NYS Early Intervention Program

*Moving Forward from NYEIS to the EI-Hub Early Intervention Solution – Information on Attachments*

**April 20, 2020**

# Agenda

- Welcome
- Early Intervention Program (EIP) record retention policy
- Request For Proposal (RFP) requirements related to migration of attachments from NYEIS to the *EI-Hub*
- Stakeholder Survey Results
- Attachments moving forward
- Next steps for early intervention system users
- Questions and Answers

# NYS Early Intervention Program Record Retention Policy

# Policy on EIP Record Retention

- Department of Health – retains administrative records, consistent with its oversight responsibility as the lead agency for Part C of IDEA.
  - The EIP data system consists of a series of data points to support overall management of the statewide Early Intervention Program and reporting to the federal Office of Special Education Programs (OSEP).
- EIP billing providers – retain child records and documentation to support submission of billing and claiming and abide by additional record retention requirements for fiscal and clinical purposes.
  - These records must be available from the provider of record (the billing provider) for audit and programmatic monitoring purposes.



# Policy on EIP Record Retention

NYS Department of Health (Department) – as lead agency for the EIP – is responsible for general administration and supervision of municipalities and EI service providers

- Administrative records must be retained by the Department for a period of six years

Municipalities and providers are responsible for creating and maintaining EI records for the children and families with whom they interact

- EI records pertaining to a given child and family must be retained by public agencies and EI providers in accordance with all applicable requirements

# Policy on EIP Record Retention

- All EI providers must also be enrolled in the Medicaid program
- Medicaid regulations at 18 NYCRR section 517.3(b) related to retention of records require EI providers to prepare and maintain contemporaneous records demonstrating their right to receive payment under the medical assistance (Medicaid) program. All records necessary to disclose the nature and extent of services furnished and medical necessity of such services, including any prescription or fiscal order for the service or supply, must be kept by the provider for a period of six years from the date the care, services or supplies were furnished or billed, whichever is later.

# Policy on EIP Record Retention

Municipal Retention of EI Records – Records Retention and Disposition CO-2, for use by counties

**Early intervention program records**, including but not limited to case record and screening, assessment and referral records

a. Individual Case Records – 7 years after discharge or last contact, but not until 3 years after person attains age 18

b. Screening, assessment and referral records, not found in individual case record: 7 years

*[http://www.archives.nysed.gov/records/retention\\_co-2\\_public-health](http://www.archives.nysed.gov/records/retention_co-2_public-health)*

# Policy on EIP Record Retention

## EI Provider Retention of EI Records

1. Minimum retention in accordance with Medicaid requirements
2. Additionally – professional practice acts may have longer record retention requirements.

For example, for speech-language pathologists, audiologists, physical therapists, and occupational therapists: All patient records must be kept for 6 years. Records for children must be kept until the child is 22, even if that means keeping the records for more than 6 years.



# Support for Operational Management of the EIP – RFP #17744 Requirements

# SOM RFP #17744 Requirements

## RFP Language

- “The contractor’s system must have the functionality to allow for the upload and storing of PDF attachments.” - (Section 4.5b.2(b))
- “The new case management solution must have the ability for users to upload/attach and retrieve relevant required documentation such as complete MDE results, IFSP and provider session notes.” - (Section 4.5b.2(e))
- “The case management system must have file management capabilities.” - (Section 4.5b.2(b))

*\* Taken from the Request for Proposal, RFP#17744 – Support of the Operational Management of New York State’s Early Intervention Program – August 17, 2018*

# SOM RFP #17744 Requirements

## RFP Language

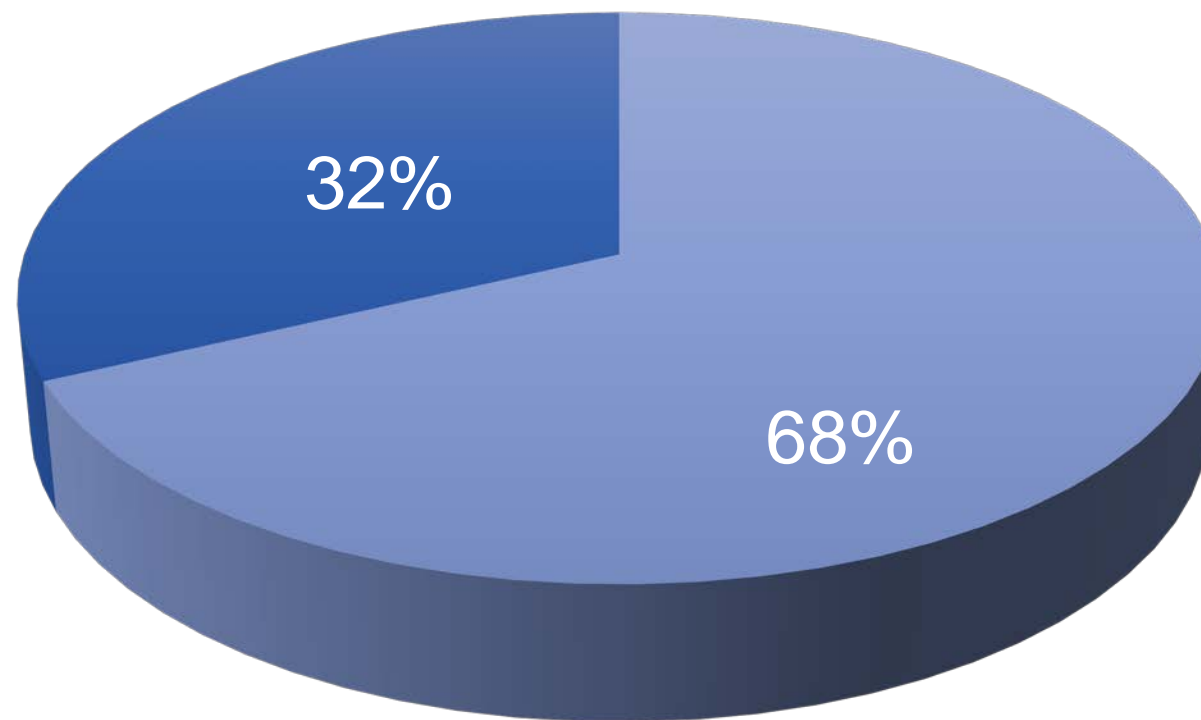
- “Existing attachment data in NYEIS will not be converted or migrated, but the contractor’s system must allow for PDF file uploads and perform file management.” - (Section 4.4)
- “When the transformation is completed, NYEIS will remain available to users for a time limited period of up to six months for users to access attachment data.” - (Section 4.4)

*\* Taken from the Request for Proposal, RFP#17744 – Support of the Operational Management of New York State’s Early Intervention Program – August 17, 2018*

# Stakeholder Feedback Survey Results

# Stakeholder Survey Results

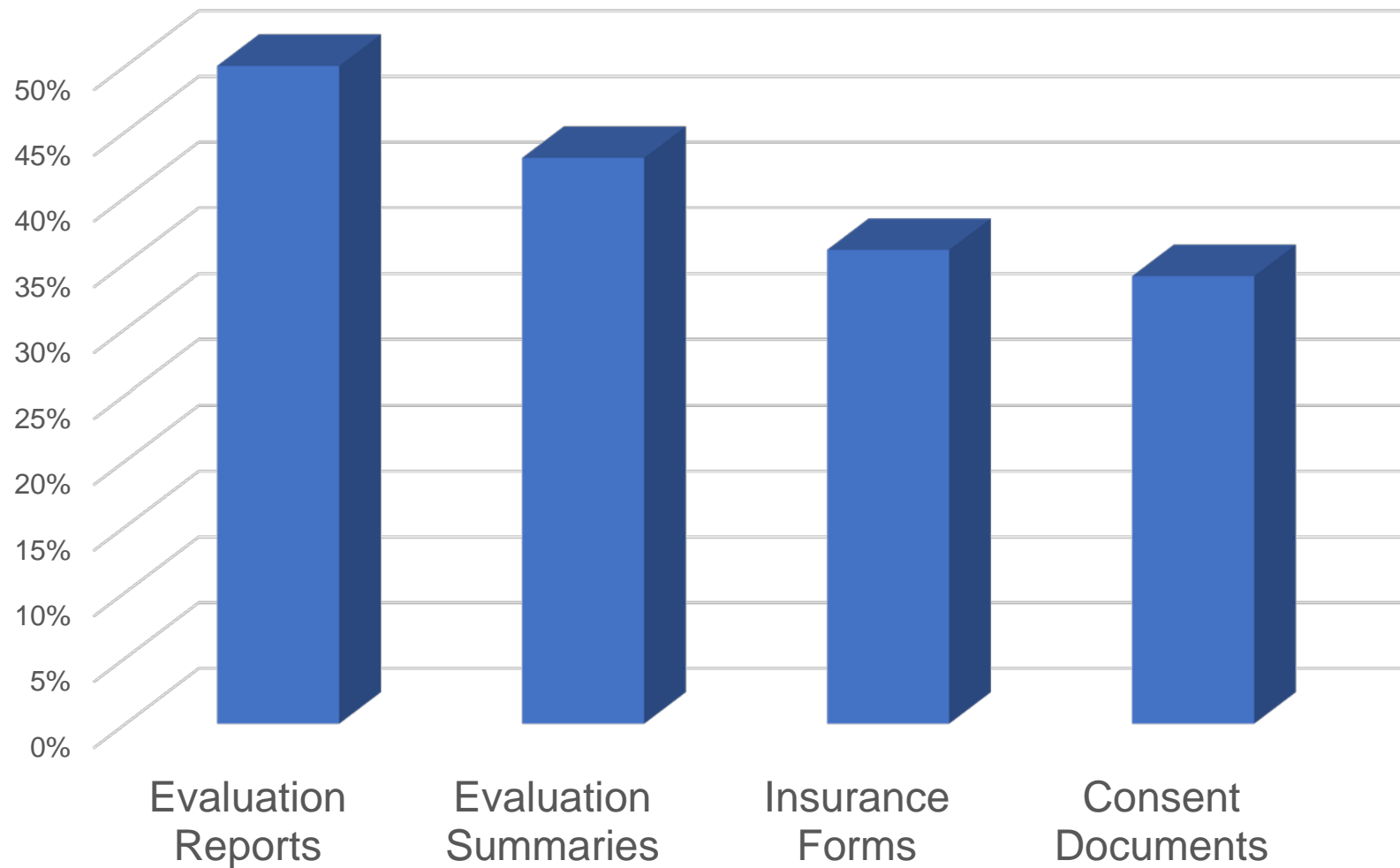
*“I utilize the attachments function in NYEIS to upload documents”*



■ Yes ■ No

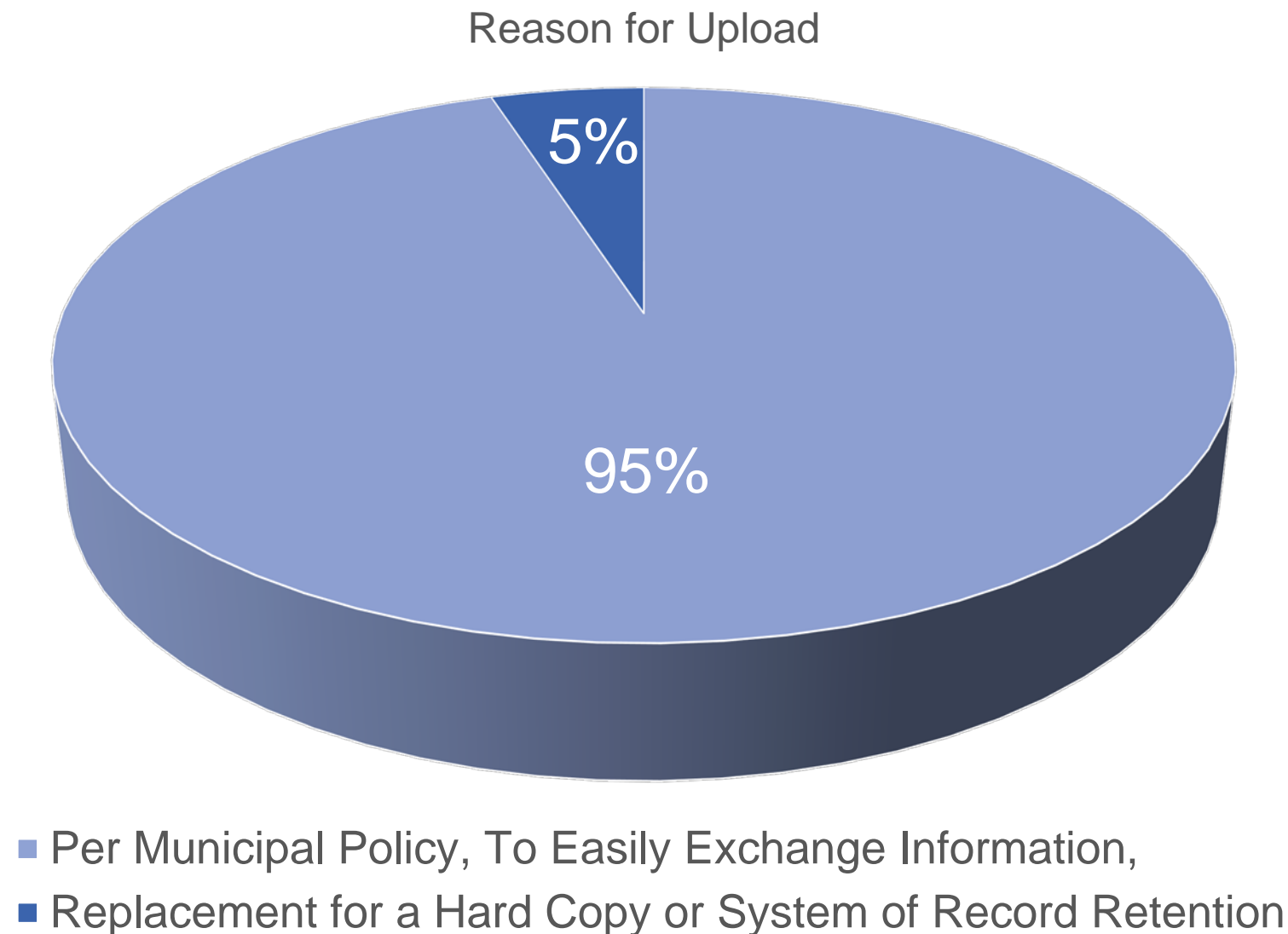
# Stakeholder Survey Results

***“I upload the following documents:”***



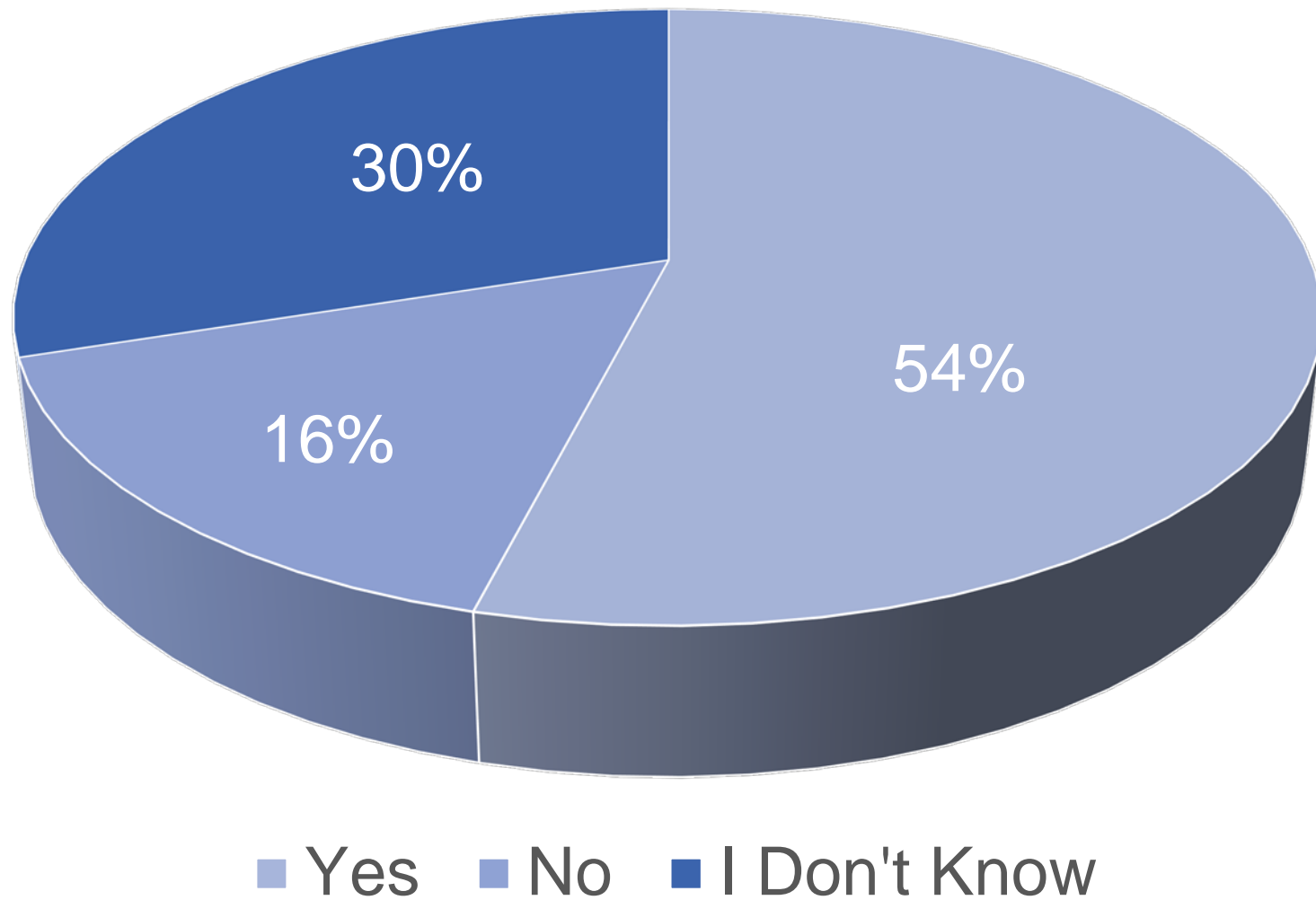
# Stakeholder Survey Results

*“I primarily upload attachments into NYEIS for the following reasons”*



# Stakeholder Survey Results

***“After children exit the EIP, I access attachment files:”***





# Attachments in the *EI-Hub*

# Attachments in the *EI-Hub*

- The *EI-Hub* will have functionality for users to upload attachments.
- As it has in NYEIS, functionality related to attachments is intended to facilitate communication and information sharing, with informed consent as applicable, among providers furnishing services to a child and family for the time the child's Individualized Family Service Plan is in effect.
- Examples of documents that might be uploaded are reports of evaluations or assessments that were conducted outside of the EIP and are relevant to intervention strategies or goals included in the child's IFSP.

# Highlights – attachment functionality under development for *EI-Hub* users

## Documents Generated Outside *EI-Hub*

- Users can upload electronic documents into the *EI-Hub*
- Before upload, users will enter data such as Document Title; Document Type
- On upload, the document will be virus scanned
- Document will be ‘attached’ to a Child / Billing Provider / Rendering Provider / Service Coordinator record
- Document upload function will be located on a suitable panel for the specific document in a specific record
- After upload, the document will be listed as a hyperlink on the Library tab in the specific record

# Highlights – attachment functionality under development for *EI-Hub* users

## Documents generated by *EI-Hub*, other than the IFSP

- Users can generate a set of documents from *EI-Hub* (fields can be masked if specified)
- A “document generate” function will be located on a “Library” tab in that record
- Document will be generated from a Child / Billing Provider / Rendering Provider / Service Coordinator record
- Document will be pre-filled with relevant data from that Child / Billing Provider / Rendering Provider / Service Coordinator record
- After generation, the document will be listed on the Library tab in that record

# Highlights – attachment functionality under development for *EI-Hub* users

## IFSP generated by *EI-Hub*

- Users can generate an IFSP from *EI-Hub*
- Document will be generated from a Child record
- Document will be pre-filled with relevant data from that Child record
- The “Document generate” function will be located in:
  - The IFSP tab in that record
  - The Library tab in that record
- After generation document will be:
  - Listed as a hyperlink on the IFSP tab in that record
  - Listed on the Library tab in that record

# Conclusion & Next Steps

# Existing Attachments will not be migrated from NYEIS to *EI-Hub*

- Provider and municipal record requirements have not changed based on implementation of successor EI data systems (NYEIS and *EI-Hub*)
- NYEIS data does not serve as a complete child record
- The provider of record must produce records for purposes of programmatic monitoring or audit; NYEIS attachments are not utilized for this purpose
- The RFP does not contemplate migration of records
- Stakeholder survey indicated a small percentage of users may be attempting to utilize the EI data system as a document repository/record

# Next Steps

- NYEIS will be decommissioned six months after *EI-Hub* launch
- Attachments in NYEIS will be accessible until March 31, 2021

Users who utilized NYEIS as a document repository

- If the document in NYEIS is the only record, download file from NYEIS to include in the child's record in accordance with EIP policy, as necessary

Users who utilize NYEIS to easily share information

- User may continue to do so; such file(s) will NOT be moved to EI Hub
- Save document in a secure location and upload when *EI Hub* is live; suggested for currently active children



# Questions?