



Serving Children with Developmental Delays

Early Intervention Management Verification Tool

#1 Protocol for Preparing and Conducting Verification Review

Early Intervention Management Verification Tool

Protocol Format

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Introduction to Protocol Document

This document is designed to assist all participants in the Early Intervention Management Verification activities to prepare for, conduct and respond to the Management Verification process. Responsibilities are listed for the verification chairperson as well as for the specific members of the team and the Early Intervention (Infant/Toddler or Preschool) program. The reader will find it helpful to read the entire document to learn about all aspects of the verification process. Timelines are included where appropriate.

This document is the first of seven documents that make up the Early Intervention Management Verification Tool. The entire list of documents includes:

1. Protocol for Preparing and Conducting Verification Review
2. Verification Requirements
3. Self-Verification: Policies, Procedures and Worksheets
4. Child Record Review
5. Observation Tool
6. Chairperson's Worksheet and Scoring Summary
7. Improvement Plan
8. Child Record Review Summary

9. Preparation for Verification

Verification Chairperson Responsibilities

1. Scheduling of verification visits is the responsibility of the chairperson and will be coordinated among OCDEL central office staff, OCDEL field staff expected to chair the verification visit, the program being reviewed, and the EITA consultant assigned to the program being reviewed. This should be done near the beginning of the fiscal year so that all necessary schedules can be accommodated as well as possible.
2. Before the verification visit, the Infant/Toddler or Preschool EI program will receive official notification of the review.
 - A minimum of 60 calendar days prior to the actual scheduled verification visit, OCDEL staff will send a letter to the Infant/Toddler or Preschool EI program using the standard template. The letter will include a list of the materials and personnel that should be available during the verification visit.
 - The standardized letter should be sent to the county administrator or Preschool program executive director. The letter will refer to an email that is sent to the Infant/Toddler EI coordinator or Preschool EI supervisor with attachments of a copy of the following documents:
 - a. Protocol for Preparing and Conducting Verification Review
 - b. Early Intervention Management Verification Tool: Verification Requirements
 - c. Self Verification Tool: Policies/Procedures and Worksheets
 - d. Child Record Review
 - e. Observation Tool
 - f. Chairperson's Worksheet and Scoring Summary
 - g. Child Record Review Summary
 - The verification chairperson will organize and schedule, in collaboration with the Infant/Toddler or Preschool EI program, the entrance and exit conferences held on the first and last day of the verification visit, arranging the times, locations and participants.
3. Sixty (60) calendar days in advance of the onsite verification visit, the verification chairperson will provide the Infant/Toddler or Preschool EI program with a list of the randomly selected children's names whose files will be reviewed. The chairperson should use EIRS/PELICAN or Penn Data to review the records in this sample to determine how well they fulfill the requirements of the range of types of situations that should be reviewed. Especially, make sure there is a minimum of 5% sampling of children enrolled in the waiver for Infant/Toddler programs (5% of the total number of children enrolled in the waiver in this program). **Note for Preschool:** Review Preschool program calendar prior to selecting records to be reviewed. If there is a break in their calendar, add the length of the break to the 60 days prior to review by which the list of records must be sent to Preschool program. Currently, calendars are submitted as part of special education plan.
4. Provide the program with the data sets specified in the self verification document.
5. The verification chairperson will discuss and schedule the observations with the Infant/Toddler or Preschool EI program. The types of observations are:
 - a. Initial Contact
 - b. IFSP/IEP development
 - c. Evaluation/reevaluation
 - d. Service delivery

e. Transition meeting

Verification Team and Infant/Toddler or Preschool EI Program Responsibilities

Participate in EI management verification training:

OCDEL staff will provide training twice annually for all new supervisors, coordinators and EITA staff. Infant/Toddler or Preschool EI leadership staff must attend training in the year the program will be reviewed, or one wishes to be a peer reviewer.

Joining a team as a peer reviewer is an excellent way to

- learn more about the federal and state EI requirements as well as Pennsylvania's EI forms,
- network with other teachers, therapists, service coordinators, supervisors, and program directors, and
- see what other Infant/Toddler or Preschool EI programs are doing in their programs.

Infant/Toddler or Preschool EI Program Responsibilities

1. Preparations For Onsite Verification

- As you prepare for the onsite visit, work with your **verification chairperson** to obtain answers to questions that arise. The verification chairperson may or may not be your EI advisor, however questions should be addressed to the chairperson.
- Secure a large room for the OCDEL team to use as a workroom during the time the team is onsite. The verification team will need a lot of table space per person. The OCDEL team usually consists of approximately 5-10 people. Address security issues regarding entrance to buildings and overnight storage of records.
- Organize and schedule, with the OCDEL verification team, the entrance and exit conferences held on the first and last day of the onsite verification process, including times, locations and participants.
- Directions – In order to assist the reviewers with travel between the Infant/Toddler or Preschool EI program workroom and the sites that will be visited, directions will be needed. Provide OCDEL with directions to the verification team workroom and a street map of the area. Directions will also be needed to each of the observation sites that will be visited by the verification team. If feasible, arrange to have local staff available to transport/guide the verification team onsite visits.
- **For each of the files that will be reviewed, ensure that the complete record, including service delivery and progress monitoring documentation, is available at the location where the verification team will be working.** If some documents are typically kept in other locations, please collect them!

2. Self Verification – To be completed and sent to the verification chairperson 15 calendar

- Use current documents: Make sure you are using the current version of the verification instrument and complete the required data worksheets.
- Complete the required self review of child records and complete the Child Record Review for each one.

All information must be complete and submitted on time. Contact your Verification Chairperson if you have questions.

- The Infant/Toddler or Preschool EI program report on the annual monitoring of their providers and the plan of correction from each provider.
- EIRS /PELICAN or Penn Data
 - Review EIRS/PELICAN or Penn Data information to:
 - Compare EIRS/PELICAN or Penn Data to identify any changes in performance since the last verification
 - Review late IFSPs or IEPs
 - Review settings where services are delivered
- The Infant/Toddler or Preschool EI program should have ~~available~~ all of the required policies and procedures outlined in the self assessment process available onsite.
- All materials used by the Infant/Toddler or Preschool EI team to complete the Self Verification, including the remaining materials needed by the chairperson to confirm that the Self Verification is complete, should be available onsite during the verification visit

3. Record Review Process— To be completed and sent to OCDEL 15 calendar days before the onsite verification visit

- The chairperson will send the Infant/Toddler or Preschool EI program a list of randomly selected children’s names 60 days in advance of the verification visit. This list represents 5% (or minimum of 5, maximum of 30) of the program’s active (IT) or aggregate (PS) children to be reviewed by the Infant/Toddler or Preschool EI program staff prior to the verification visit. Half of the records selected will be reviewed by the verification team during their visit. The local program shall also choose for review by the verification team an additional 2.5 percent of records that provide examples of the variety of service options in the Infant/Toddler or Preschool EI program. These records should be available onsite for the verification team.
- **OCDEL staff can choose to review more records as appropriate for the Infant/Toddler or Preschool EI program. All sections of the child’s record must be reviewed.**
- For Infant/Toddler EI programs: Children’s records that are reviewed must include the records of at least five percent (5%) of the children whose services are funded through the Infants/Toddlers and Family Waiver. These records can also satisfy some of the criteria listed below.
- Infant/Toddler or Preschool EI program will ensure that the child record sample includes various criteria such as:
 - Various disability categories, including low incidence diagnoses, including vision, hearing, or medically fragile, if possible
 - Various Early Intervention environments

- A balance of children from all counties within the Infant/Toddler or Preschool EI program's catchment area
 - Variety of children ages
 - Been in Early Intervention for less than one year
 - Been in Early Intervention for more than one year
 - Been involved in complaint investigations, conflict resolution, mediation, and/or due process
 - Different service coordinators and/or providers as appropriate
 - Different funding sources (e.g., M.A., waiver, etc.)
 - Transitioning to Preschool EI or other community services
 - Eligible to transition to school age services
 - Discharged/ no longer eligible
 - Child who does not receive services in a natural or least restrictive environment
 - Been evaluated but found not eligible
 - Been evaluated and only eligible for tracking (Infant/Toddler only)
4. List of Infant/Toddler or Preschool EI documents to be sent to your verification chairperson upon completion of the Self Verification and 15 calendar days prior to the onsite verification
 - Child record review summary
 - Self verification worksheets and supplemental materials
 - EIRS/PELICAN or Penn Data worksheets
 - A Summary of the previous provider monitoring reports and corrective action Plans.
 5. Materials used in the Self Verification that must be available when the team comes on-site but DO NOT need to be sent to your verification chairperson in advance:
 - The child record review forms from your self verification
 - The required policies and procedures outlined in the self verification process
 - Any and all of the provider contracts
 - Documentation that all contracted providers meet qualifications for their positions and pre-service and annual training requirements. 2% of employee and contracted personnel records of annual training requirements and 100% of records for new personnel (employed within current fiscal year) will be reviewed by the verification team.
 6. Setting up observations
 - Work with the verification chairperson to make assignments in advance for verification team members to conduct the observations.
 - The Infant/Toddler or Preschool EI program should designate the staff who will guide the verification team members to the sites of the observations.
 - The verification team must observe two service delivery sessions. All other observations are encouraged but the program is not required to include all possibilities.
 - **Make sure that the files of the children who will be observed are available to the verification team as soon as they arrive at the program so that the members who will conduct the observations have the opportunity to review the children's files.**

II. Onsite Verification

Verification Chairperson Responsibilities

1. Materials to take to the verification meeting:
 - List of all current OCDEL EI announcements
 - Most recent applicable data reports
 - Current EIRS/PELICAN and/or Penndata reports that apply to program being reviewed
 - MA revenue/claims comparison reports that apply to program being reviewed
 - Allocation data (all funding sources) from OCDEL that apply to program being reviewed
 - Enough copies of record review documents for all records to be reviewed
 - Observation documents for all observations to be conducted
 - Extra pencils
 - Post-it notes and sticky flags
 - Calculator
 - Stapler
 - Paper for taking notes
 - Copies of all 7 verification documents: it is recommended that the verification team chairperson take another several copies of the requirements in case some team members do not bring them.
2. The verification chairperson will conduct the introductory meeting with the Infant/Toddler or Preschool Early Intervention supervisor/coordinator and other appropriate personnel including administration and fiscal staff. The Infant/Toddler or Preschool EI program can determine the staff who will attend. The verification chairperson will discuss the plan for the verification visit, how children's records were selected, establish the schedule for observations and visits to providers, discuss the Infant/Toddler or Preschool EI program's Self Review and EIRS/PELICAN or Penn Data, etc. If not already finalized during the preparation process, the chairperson makes assignments for review team members to conduct the observations.
3. The verification chairperson compiles the information gathered by other members of the verification team and completes the Chairperson's Worksheet and Scoring Summary. Child Record Review Worksheets should each be assigned a number (1 to total number reviewed), and those numbers should be correlated to the team members that assisted in the review to simplify answering any questions that arise later.
4. The verification chairperson conducts a closing meeting for the Infant/Toddler or Preschool EI program team in order to supply an informal overview of the findings of the verification process.
 - The verification chairperson and the Infant/Toddler or Preschool EI program supervisor determine other participants in the meetings.
 - The closing meeting should occur at the conclusion of the onsite verification visit.

Verification Team Member Responsibilities

1. Team members will attend the introductory meeting to learn about the local program's structure and priorities.
2. Team members conduct the Child Record Reviews.
3. Team members conduct the observations (using the Observation Tool).

- Observation information is used to supplement information found in the child record review and other verification activities.
 - Additional feedback on observations is shared during the exit meeting.
4. The team members carefully check the documentation to be returned to the verification chairperson.
 5. Daily consensus meeting—Discussion among verification team members about the findings of the reviewers. Verify that all members are interpreting documentation in the same way
 6. Team members discuss with the chairperson prior to the closing meeting the information they will share with the Infant/Toddler or Preschool EI program during the closing meeting.
 7. Team members attend the closing meeting to provide comments about their findings.

Infant/Toddler or Preschool EI Program Responsibilities

1. The Infant/Toddler or Preschool EI program will be asked to briefly provide an overview of the agency during the opening meeting. This information enables the team members to understand the specific Infant/Toddler or Preschool EI program's child records and settings where children receive services and supports. Any unique aspects of the program should be explained, including demographics that impact the program's service delivery, collaborative enterprises or quality management approaches.
2. The Infant/Toddler or Preschool EI program coordinator/supervisor will be available to discuss issues and/or provide documentation to the chairperson as needed.
3. The Infant/Toddler or Preschool EI program will provide directions or travel with team members to the sites of the observations.
4. The Infant/Toddler or Preschool EI program coordinator/supervisor will attend the closing meeting and, with the verification chairperson, determine who else will attend that meeting.

III. Following Verification

Verification Chairperson Responsibilities

1. Verification Report Issued

- Within 45 calendar days after the closing meeting, the verification chairperson will send the Infant/Toddler or Preschool EI program the verification report which includes:
 - Cover Letter
 - Chairperson's Worksheet and Scoring Summary
 - Requirements/Format for the Management Verification Improvement Plan
 - If the program requests, provide any other documentation from the verification review that would answer the program's questions. (Which records were out of compliance, which observation, etc?)

2. Within 30 days of the issuance of the verification report, the verification chairperson will convene a meeting with the program and the assigned EITA consultant to review verification results, create an improvement plan, and revise the EITA technical assistance plan.

3. Verification Improvement Plans (VIPs)

- BEIS EI Advisors acting as verification chairpersons are to utilize the following protocol to ensure that a consistent approach is applied statewide in the verification improvement plan process. The following will be implemented immediately following the issuance of the VIP from an Infant/Toddler or Preschool EI program.
- The program has 45 days from the issuance of the Verification Report to submit the VIP to the verification chairperson. The objective of improvement plans is to address all areas that did not meet the requirements of the program. Combining the elements (ITEMS) and improvement activities should be encouraged and documented on the improvement plan. This will ensure that areas are being addressed and eliminate repetitive elements.
- The program has 12 months from the issuance of the verification report to correct all items that did not meet requirements. This date is applicable even if a submission extension was granted to the program because of a denial to their improvement plan. This date cannot be exceeded.
- Programs are to combine into their VIP any activities that are already occurring to address any low performer status. These activities need to be included in the VIP so that only one improvement plan needs to be managed.
- Various methods may be considered when completing validations of the programs. Each program will be advised as to how the validation will occur. The validation can be onsite or the validation will occur using other methods, such a sharing of evidence/data electronically and/or conference calls. Not all programs will need to be validated by an

Approval/Denial: The Chairperson has 15 days to approve or deny the VIP.

Approval: The Chairperson will:

- receive the VIP from the program
- review the document and ensure that it adequately addresses the areas of improvement noted in the Verification Report
- forward to BEIS for approval and issuance of the approval letter

Denial: The Chairperson will:

- determine that the VIP does not meet the criteria for approval
- ensure that examples are given and detailed instruction is provided regarding what changes are needed to the document
- forward to BEIS for issuance of the denial letter
- The program has 15 days to return the revised VIP to the EI advisor. When the revised plan is received it will go through the VIP approval process.
- Once approved this will serve as the VIP for that program and will be implemented by the program.

VIP Implementation/Tracking: The Verification Chairperson will:

- ensure that the EITA staffs keep the EI advisor as apprised of scheduled trainings and topics to be covered.
- participate in as many of the improvement activities/trainings as possible
- keep in contact with the program and gather documentation to support current and future closure of the VIP elements
- track activities on the VIP to ensure that they are completed

Validation: (Close out of completed VIP) The Verification Chairperson will:

- schedule the validation with the program

- this will occur within the 12 month improvement period; usually between 6-9 months, but no later than 10 months after the issuance of the verification report
- advise the program if the validation will be onsite or if the validation will occur using other methods, such as sharing of evidence and or conference calls
- use the VIP to document that activities were completed and the types of evidence used to close each element
- summarize in a letter the findings of the validation, and close out all elements on the VIP
- forward letter to BEIS for issuance
- **All improvement activities must be completed within 365 days from the date the report is issued**

Validation: (VIP not completed) The Chairperson will:

- summarize in a letter those elements that are not completed
- Specific target dates must be developed so that the re-validation and closure of these elements occurs before the 12 month deadline expires
- set up a schedule of re-validation in the letter to ensure that new target dates were met
- attach to the letter the VIP detailing the element and the document the findings that show the elements that are not corrected
- forward letter to BEIS for issuance

If re-validation yields no improvement or correction to elements identified in the first validation the Chairperson will:

- a determination will be made by BEIS and may include the following:
 1. a re-verification team visit as soon as possible
 2. rigorous reporting on a monthly basis
 3. sanctions

All improvement activities must be completed within 365 days from the date of the issuance of the report

Infant/Toddler or Preschool EI Program Responsibilities

1. For any verification finding that is less than “Fully Meets Requirements” for an indicator, a Management Verification Improvement Plan must be developed. The Infant/Toddler or Preschool EI program’s Improvement Plan shall include activities to address any indicator that had a finding of less than “Fully Meets Requirements.”
2. Within 30 days of receipt of the verification report, participate in a meeting with the verification chairperson, EITA consultant, and others who the programs wishes to include to review verification results, create an improvement plan, and revise the EITA technical assistance plan. **The Management Verification Improvement Plan must identify the steps to be taken to correct all items in which the requirements were less than fully met. The timelines are not to exceed 365 days from the issuance of the verification report.** If an improvement plan is needed and if it is not finalized and approved during this meeting, the Infant/Toddler or Preschool EI program must submit their improvement plan to the chairperson for approval within 45 calendar days of the date of issuance of the verification report.
3. Once OCDEL reviews the Management Verification Improvement Plan, if changes are needed in the Improvement Plan, the Infant/Toddler or Preschool EI program must make the needed changes and resubmit to OCDEL within 15 calendar days.
4. When all corrective activities have been completed, Infant/Toddler or Preschool EI program team provides OCDEL with documentation of the activities as specified in the Management Verification Improvement Plan. It is important that the Infant/Toddler or Preschool EI program completes the activities in the Improvement Plan and supplies OCDEL with the verifying documentation as soon as possible but no later than 365 days from the issuance of the report. Be sure the documentation clearly identifies which indicator(s) the documentation satisfies and that the documentation addresses ALL components of the activities. It is advisable to submit this documentation as it is accomplished so that OCDEL has time to respond and the EI program has time to make any required adjustments before the end of the timeline in the Improvement Plan.