

Michigan System of Payments Policy for Part C of the Individuals with Disabilities Education Act (IDEA)

Under federal law for Part C of IDEA, a System of Payments must address core components to detail how services will be paid for in its early intervention system for infants and toddlers. Michigan's System of Payments includes the core components as outlined below. Each year you will receive a copy of the System of Payments Policy along with the Michigan *Early On*® Procedural Safeguards to provide guidance on how to address any questions or concerns you may have regarding this System of Payments policy.

1. Core Early Intervention Services are provided at **no cost** to the family as mandated by federal regulations.

- Screening, identification and referral
- Evaluation
- Assessment
- Development and review of the Individualized Family Service Plan (IFSP)
- Service coordination
- Procedure safeguards and other components under subparts D, E, and F of the IDEA part C regulations in 34 CFR Part 303.
- All special education and related services for eligible children under the Michigan Administrative Rules for Special Education and state law that may address: 1) Autism; 2) Deaf-blindness; 3) Developmental delay; 4) Emotional impairment; 5) Hearing impairment, including deafness; 6) Physical impairment; 7) Cognitive Impairment; 8) Other health impairments; 9) Speech or language impairment; 10) Traumatic brain injury; 11) Visual impairment (including blindness) and any related services such as: 1) Transportation; 2) Speech pathology; 3) Audiology; 4) Psychological services (including psychotherapy); 5) Physical therapy; 6) Occupational therapy; 7) Social work services; 8) Medical services for the purpose of diagnosing and evaluating the child; 9) Assistive technology devices or services; 10) Orientation and mobility services; or 11) Interpreting services.

2. Michigan Medicaid School-Based Services with parent consent for eligible children with an Individualized Family Service Plan as detailed in the state Medicaid Provider Manual. Michigan Medicaid School-Based Services may include such services as: Occupational Therapy; Physical therapy; Speech and Language; Orientation and Mobility; Assistive technology services; Psychological/social work; Evaluations; Developmental testing; Nursing; Personal care; and Transportation.

- 3. Payor of Last Resort:** Michigan *Early On* assures funds available under Part C of the IDEA shall be used in a manner consistent with use of public benefits or insurance or private insurance to pay for Part C services and the System of Payments (34 CFR §§ 303.520 and 303.521) and will assist families to access all available federal, state, and local resources that provide payment for other services and supports.

The early intervention services under Part C of the IDEA are provided with written notification, does not require a family to sign up for Medicaid to receive services under this part, and are not provided unless parent consent is obtained. Not providing parent consent will not impact a family's receipt of Part C services.

(Co-payments/Deductibles: Co-payments for other services that are not Part C services provided through collaborating state and local programs may occur as specified under the policies of the specific agency (e.g., Michigan Department of Community Health-Public Health's MI Child program which is the State Child Health Insurance Program charges a \$10.00 monthly fee per family.))

- 4. Private insurance will not be accessed for Part C services delivered by the intermediate school districts.** Intermediate school districts are not approved entities to bill private insurance. Services provided by the intermediate school districts are provided at the expense of the agency.
- 5. Public Benefits or public insurance:** Parental consent is required prior to accessing such benefits (Medicaid) to pay for Part C services. Annual written notification of accessing the public benefits and/or public insurance is provided to the family by the local intermediate school district. This notification explains the requirement to obtain parent consent prior to disclosing personally identifiable information to Michigan Medicaid for billing purposes and an explanation that not providing consent does not impact the receipt of early intervention services. In addition, families with public benefits will not be charged disproportionately more than any other participating families.
- 6.** Parents are provided their procedural safeguards and a copy of this System of Payments Policy each time an *Early On* provider proposes, or refuses, to initiate or change the identification, evaluation, or placement of their child or the provision of early intervention services to their child and/or family. That is, parents are provided their procedural safeguards with each prior written notice. The procedural safeguards may be used for guidance on resolving any issues under this System of Payments policy or any other issue regarding the early intervention system. Families that wish to dispute a matter under the System of Payments may participate in mediation, request a due process hearing, file a State complaint, and use other safeguards established by the state. Your consent permitting *Early On* to bill Medicaid will not prevent your child or any other Medicaid-eligible individual in your family from receiving the medical care they are receiving now or will receive in the future.