



Deidre S. Gifford, MD, MPH, Commissioner

Effective Date: March 16, 2020
Contact: Ginny Mahoney (860) 424-5145

TO: Birth to Three Providers

RE: CMAP COVID 19 Response – Bulletin 6 – Emergency Remote Early Intervention Services

As an interim measure in response to the Governor’s recent declaration of a public health emergency as the result of the outbreak of COVID-19 (coronavirus), the Department of Social Services (DSS) is temporarily taking steps to eliminate obstacles to beneficiaries accessing care. This includes changes related to Birth to Three services as specified below, effective for dates of service from March 16, 2020 until DSS has notified providers in writing that the state has deemed COVID-19 no longer to be a public health emergency or DSS otherwise determines in writing that some or all of these specific measures are no longer needed to help protect the public health (the “Temporary Effective Period”).

During the Temporary Effective Period, DSS is authorizing Connecticut Medical Assistance Program (CMAP) coverage of **remote Early Intervention Services (EIS) to the full extent authorized in the Office of Early Childhood (OEC) COVID-19 Interim Remote Early Intervention (EI) Procedure**, which is attached to this bulletin and is also posted at this link: <https://www.birth23.org/providers/provider-resources/procedures>. OEC’s Interim Remote EI Procedure substantially expands coverable Remote EIS during the Temporary Effective Period.

This bulletin is DSS’s written authorization for Birth to Three providers to render these specified services in settings other than in-person (in compliance with the OEC COVID-

19 Interim Remote EI Procedure), in accordance with section 17b-262-1116(7) of the DSS operational policy, which has the force of regulation pursuant to section 17b-10 of the Connecticut General Statutes.

These actions are part of the broader effort to ensure that all HUSKY beneficiaries – particularly those at high-risk of complications from the COVID-19 virus – have access to the benefits that can help keep them healthy while helping to contain the spread of this virus. To keep up to date with the latest information from the state, resources, and guidance related to COVID-19, please visit the ct.gov/coronavirus Web site.

For questions about billing or if further assistance is needed to access the fee schedules on the CMAP Web site, please contact the Provider Assistance Center, Monday through Friday from 8:00 a.m. to 5:00 p.m. at 1-800-842-8440.

Posting Instructions:

Policy transmittals can be downloaded from the CMAP Web site at www.ctdssmap.com.

Distribution:

This policy transmittal is being distributed to providers of the CMAP by DXC Technology.

Responsible Unit:

DSS, Division of Health Services, Medical
Policy and Regulations, Ginny Mahoney,
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Date Issued: March 2020

Title: COVID-19 Interim Remote Early Intervention

Purpose: To define the standards and requirements for providing Early Intervention Services (EIS) remotely, due to the COVID-19 public health emergency.

Overview

Except as otherwise specifically modified below, all EIS Programs must follow the Remote EI procedure posted on Birth23.org.

Interim Remote EI Exceptions

Effective for dates of service from March 16, 2020 until the Office of Early Childhood (OEC) has notified providers in writing that the COVID-19 (Coronavirus) public health emergency has concluded, the following components of the Remote EI Procedure are waived or revised as follows:

- Practitioners may provide all coverable EIS services via Remote EI, consistent with other applicable requirements;
- Prior Authorization to provide EIS via Remote EI from the OEC is not required;
- Remote EI does not need to be listed in the IFSP;
- Audio-Only Telephone Remote EI is permissible only in accordance with the following:
 - Developmental Evaluations: For a child with an applicable diagnosed condition supported by sufficient medical records, the eligibility determination portion of an evaluation may be provided using audio-only telephone if audio-visual communication is not available.
 - Assessments: Audio-only telephone is not permissible for assessments.
 - IFSP Planning: IFSP planning, including meetings with the IFSP team to review or revise an IFSP, may be provided via audio-only telephone as appropriate at any time.
 - Early Intervention Treatment Services (EITS): If a child's family does not have access to video-conferencing capability, for a limited number of visits, EITS can be provided via audio-only phone for the Program to help the family access audio-video communication. Synchronous audio-video communication is the preferred method for remote EITS. In extenuating circumstances where a family is unable to use audio-visual communication, audio-only phone EITS is permissible for a more extended period of time with prior written approval from OEC on a case by case basis.
- Parental Consent on Form 5-2 must be obtained within one week of the first Remote EI service and may be obtained through appropriate electronic means;
- The requirement for a Birth to Three practitioners to have one year of prior experience providing EITS before performing Remote EI is not required;
- In-person visits during the month are not required; and
- The distance requirement that would otherwise apply to Remote EI is waived.

Appendix A:

List of OEC approves Applications for Remote EI

Overview

All EITS Programs must follow the Remote EI procedure posted on [Birth23.org](https://www.birth23.org). It is essential to note that just because the software has a HIPAA compliant option, that does not mean that all versions of that software are HIPAA compliant (i.e., Zoom has a medical subscription, which is the **only** HIPAA compliant version).

If a Business Associate Agreement (BAA) is required, that is appropriate for HIPAA.

HIPAA addresses the need for both encryption and the use of any data collected.

- Am Well - <https://business.amwell.com/>
- Clocktree - <https://www.clocktree.com/>
- Doxy.me - <https://doxy.me/>
- GoToMeeting - <https://www.gotomeeting.com/>
- Mega Meeting - <https://www.megameeting.com>
- MS Team - <https://products.office.com/>
- Simple Practice - <https://www.simplepractice.com/>
- VSee - <https://vsee.com/>
- Zoom for Healthcare - <https://zoom.us/healthcare>

If DSS publishes a provider bulletin about this B23 programs are required to also follow that guidance.

As of 03/19/2020 10:17 am- this list will continue to be updated as new applications are approved.