



## Department of Health

**KATHY HOCHUL**  
Governor

**JAMES V. McDONALD, M.D., M.P.H.**  
Commissioner

**MEGAN E. BALDWIN**  
Acting Executive Deputy Commissioner

August 3, 2023

Nadine Morrell  
Audit Director  
Division of State Government Accountability  
NYS Office of the State Comptroller  
110 State Street, 11th Floor  
Albany, New York 12236  
nmorrell@osc.ny.gov

Dear Ms. Morell:

Pursuant to the provisions of Section 170 of New York State Executive Law, I hereby transmit to you a copy of the New York State Department of Health's comments related to the Office of the State Comptroller's final audit report 2021-S-25 entitled, "Oversight of the Early Intervention Program."

Please feel free to contact Mischa Sogut, Assistant Commissioner for Governmental Affairs, at (518) 473-1124 or [mischa.sogut@health.ny.gov](mailto:mischa.sogut@health.ny.gov), with any questions.

Sincerely,

Megan E. Baldwin  
Acting Executive Deputy Commissioner

Enclosure

cc: Mischa Sogut

**Department of Health  
Comments on the  
Office of the State Comptroller's  
Final Audit Report 2021-S-25 entitled,  
"Oversight of the Early Intervention Program"**

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The following are the Department of Health's (Department) comments in response to the Office of the State Comptroller's (OSC) Final Audit Report 2021-S-25 entitled, "Oversight of the Early Intervention Program," issued on February 28, 2023.

**General Comments:**

The following comments address specific statements made in the final audit report. Further examination from the Department's Bureau of Early Intervention (BEI) does not support these findings, and BEI's suggested corrections are set forth below.

**Audit Findings and Recommendations (page 9, 3<sup>rd</sup> bullet)**

"Of the approximately 95,000 children with an approved IFSP, almost 48,000 (51%) did not receive all types of therapeutic services to which they were entitled."

**Response**

Correction: Of the nearly 95,000 children with an approved IFSP, **10,112 (10.6%)** did not receive all types of therapeutic services to which they were entitled.

(BEI looked closer at the 48,000 (50.1%) children; 47,580 children to be exact. These 47,580 children each had some service authorization(s) without any service claimed in the data submitted to OSC. Of the 47,580 children, 36,067 did receive all types of therapeutic services to which they were entitled based on the NYEIS data as of March 27, 2023. These children did not receive services under some authorizations but did receive service types under other authorizations. For example, child A had two authorizations for Physical Therapy (PT). One of the PT authorizations did not have any service claimed against it and therefore this child was included in the 47,580 children. However, child A did receive physical therapies claimed to the other PT authorization in NYEIS (see child IDs #697800 and #555670 as examples).

For the remaining 11,513 children, 1,401 children's authorizations are considered invalid because they had the same start and end dates, or the authorized start date was after the end date. When a service authorization is approved in the system and requires modification, an Early Intervention Official/Designee determines the service authorization start and end dates. However, the authorization cannot be removed from the system. Setting the start and end date equal to each other is the method used to flag if a service is not valid. Additionally, if a start date is set after an end date, the authorization is not valid as there is no ability to deliver a service within the time frame set or enter a claim. Therefore, there were 10,112 (10.6%) children who did not receive all types of therapeutic services to which they were entitled.

Of these 10,112 children who did not receive all service types authorized, 2,254 (22.3%) children received at least 75% of the service types authorized, 7,334 (72.5%) children received at least 50%, and 2,226 (22.0%) children did not receive any services authorized.

**Audit Findings and Recommendations (page 9, 4<sup>th</sup> bullet)**

“Of the nearly 48,000 children, about 3,000 (6%) did not receive any of the therapeutic services authorized on their IFSP...”

**Response**

Correction: Of the nearly 48,000 children with an approved IFSP, **about 2,200 (4.6%)** did not receive any of the therapeutic services authorized on their IFSP.

As reported above, 2,226 children did not receive any of the therapeutic services authorized on their IFSP.

**Completion and Timeliness of MDEs (page 10, 2<sup>nd</sup> paragraph)**

“The remaining 23 children (21%) never received an MDE.”

**Response**

Correction: The remaining **22 children (20.4%)** never received an MDE. One of the children had an MDE on August 29, 2022, after BEI submitted the data to OSC in February 2022.

**Timeliness of Therapeutic Program Services (page 11, 2<sup>nd</sup> paragraph)**

“Eight of the 34 children (24%) in our sample who were eligible for the Program did not receive any of the therapeutic services on their IFSP....”

**Response**

Correction: **Two** of the 34 children **(5.9%)** in our sample who were eligible for the Program did not receive any of the therapeutic services on their IFSP.

Four of the eight children mentioned above were eligible but did not have an IFSP on file because parents refused services or moved to a different county. Two of the eight children had a service authorization amendment added to their IFSP, and the children received services under these amended service authorizations after BEI submitted the data to OSC in February 2022. Therefore, two of the eight children did not receive any of the therapeutic services on their IFSP.

## **Timeliness of Therapeutic Program Services (page 11, 2<sup>nd</sup> paragraph)**

“...and seven other children (21%) did not begin therapeutic services within 30 days of their initial IFSP.”

### **Response**

Correction: and **five other children (14.7%)** did not begin therapeutic services within 30 days of their initial IFSP.

Two of the seven children had a service authorization amendment added to their IFSP after the last response to the audit, and the services under these amended service authorizations were delivered timely.

**State Comptroller's Comment** – We appreciate the Department reviewing the data throughout the final report; however, we disagree that corrections are needed. The changes requested are based on information received by the Department after our audit was completed. Our findings and conclusions are based on data provided and verified by the Department as of February 2022. Further, for several months throughout the audit, the Department was given numerous opportunities to comment and correct our findings and methodology. Based on the Department's previous feedback and where appropriate, we edited the draft and final reports.

### **Audit Recommendation Responses:**

#### **Recommendation #1**

Take steps to identify and understand the reasons why some children are not benefiting from the services they are entitled to and why services are not always provided on time. Based on the results, develop and implement strategies to improve participation and timely provision of Program services.

#### **Response #1**

Early Intervention is a voluntary program. Enrollment in Child Find by the municipality, or a referral for further screening or evaluation, requires parental consent. Parents have the right to elect or decline to enroll their child in the Program and have the right to close out the referral at any time. Parents also have the right to accept or reject some, or all Early Intervention services recommended for their child and family. In addition, parents have the right to withdraw their consent at any time, for any reason.

The Department's Bureau of Early Intervention focuses its annual data collection and analysis efforts on data required by the federal overseers of the Part C Early Intervention Program. In addition to this data, as part of the Department's larger initiative to reduce disparities/enhance equity in service delivery systems, the Department's Bureau of Early Intervention undertook an extensive data analysis of disparities in the Program and is actively working with its Early Intervention Coordinating

Council (EICC) and stakeholders on strategies to reduce identified disparities in service delivery. The Department agrees that seeking information from parents regarding the reason(s) they elected to decline to pursue a multidisciplinary evaluation after referral to the Program or declined services for which their child was found eligible would provide important insight toward reducing disparities and enhancing Child Find activities. While participation in the Program is voluntary on the part of families, the Department will work with counties and other partners to learn more from families who do not pursue Early Intervention services or who discontinue services and use this information to improve Program service delivery.

Additionally, lack of provider capacity is a significant factor affecting timeliness of Early Intervention service delivery. The Department and EICC recognize this and have convened the State EICC's Provider Capacity Workforce Taskforce and Rate Setting Taskforce to work on solutions. The Department is engaged in or will pursue the activities outlined below, which are intended to improve provider capacity and ensure that children and families receive Early Intervention services to which they are entitled:

- Implementing recommendations of the State EICC's Provider Capacity Workforce Taskforce, such as decreasing the required experience hours for individual approval and promoting competency areas for the delivery of family centered Program evaluations and services.
- The Department published a notice of proposed rulemaking for the New York State Early Intervention Program in the September 28, 2022 issue of the New York State Register. The Department proposed revisions to amend Subpart 69-4 including the State EICC's Provider Capacity Workforce Taskforce's recommended reduction from 1,600 to 1,000 hours of experience required for individual provider approval. This change, which is intended to improve provider capacity, would be effective when regulations are adopted.
- Implementing a promotional campaign which will focus on increasing services in underserved areas and outreach/recruitment of providers (students who may be interested in the field of early intervention as well as licensed and/or certified professionals).
- To ensure that there are sufficient providers to deliver all services to children in a timely manner, the Bureau of Early Intervention launched a statewide Early Intervention Provider Recruitment Campaign from November 28, 2022 to February 28, 2023. This campaign allowed the Department to advertise on social media sites, billboards, bus stops, and in journals relevant to the provider types needed for the Program. Our provider recruitment advertisements were also sent to the 88,451 individuals who work in a healthcare profession through the NYS Department of Labor list serve. In addition, we have placed advertisements in ten NYS newsletters for relevant providers during 2023 and 2024. We are currently in the process of developing a video for potential providers which will describe eligibility requirements, the application process, etc.

- To ensure that all families are aware of the Program, the Bureau of Early Intervention is currently creating an Early Intervention Family Campaign to inform families of the population we serve and the services that the Program provides. This campaign will contain advertisements on social media, as well as in the community. The campaign will prioritize areas with a high percentage of children with late enrollment and in areas with racial disparities in enrollment.
- Early Intervention staff are attending State conferences for professional organizations (e.g., New York State Speech-Language-Hearing Association, New York State Occupational Therapy Association) to promote and recruit Early Intervention providers.
- Partnering with municipal officials to enhance provider outreach at the local level as municipalities know the population and service needs best.
- Two brochures (one for future providers, such as college graduates, and one for current licensed and certified professionals) were developed by the Department to assist with provider recruitment. The brochures have been posted on the Department's website and are available for order through the NYS Department of Health Publication Request process. On February 13, 2023, an email with links to these brochures was sent to municipal officials along with other stakeholders via the Department's BEI email listserv. The municipalities can utilize this resource for recruitment activities at the local level.
- Revising regulations to add in four new licensed professionals (mental health practitioners).
- The Department published a notice of proposed rulemaking for the New York State Early Intervention Program in the September 28, 2022 issue of the New York State Register. The Department proposed revisions to amend Subpart 69-4 which include the addition of four new professionals including NYS licensed creative arts therapists, NYS licensed marriage and family therapists, NYS licensed mental health counselors, and NYS licensed psychoanalysts. This change is dependent on adoption of the proposed regulations and launch of the new data system.
- Implementing a new statewide data system which will enable licensed behavior analysts and certified behavior analyst assistants to deliver services in the Program.
- Other necessary steps to effectuate this change have been completed, including Medicaid State Plan amendment 18-0039, approved by the Centers for Medicare and Medicaid Services in June 2019, and updated Program regulations, adopted December 5, 2018, which added licensed behavior analysts and certified behavior analyst assistants to the list of qualified early intervention service providers.
- Participating in national groups focused on increasing the provider workforce.

- Connecting with families via the Department’s Bureau of Early Intervention EI Families Facebook Group and EI Families listserv. The Facebook Group has over 1,050 members.
- Collaborating with families and furthering their leadership and advocacy skills through the Department sponsored Parents as Partners training. Through this contract, the Family Initiatives Coordination Services Project Coordinator connects with families of young children with disabilities in the community and provides resources and information on the Program. There is also a dedicated website, EIFamilies.com, which provides resources and information on a variety of topics for families, including how to make a referral to the Program, what services are available, how to work with your IFSP team, and how to advocate for their child.
- Promoting the Program to families and sharing how to make a referral to the Program, through a short video vignette titled, “Welcome to the Early Intervention Program.” This video is shared with the EI Families Facebook Group, via the EI Families listserv, posted to the families’ page on the Department’s Bureau of Early Intervention webpage, and is available on the NYSDOH NY-YouTube channel. In the future, it will be added to the EI Families website.
- The Department is working collaboratively with the EICC Rate Setting Task Force to develop recommendations for the Department regarding the current rate methodology. The EICC Rate Setting Task Force will base their recommendations on analysis of data regarding socioeconomic status, region, race/ethnicity, language, access to services, and impact on agencies and the workforce of the Early Intervention Program. The objective will be to ensure the rates are equitable, efficient, and cost effective.
- Develop training opportunities (e.g., recorded WebEx presentations) for interested providers and current providers on the following topics “How to Become an Early Intervention Program Provider” and “Requirements for Approved Early Intervention Program Providers.” These trainings will cover information about the requirements for applicants, how to apply, and important information for approved providers which highlight some of the important information in the provider Agreement, how to stay engaged with the Department and active in the Program, and training resources.
- The Department is actively working to develop a presentation titled “How to Become an Early Intervention Program Provider” for individuals who are interested in learning more about how they can deliver Program services. The goal of this presentation is to spark interest in becoming an early intervention service provider. The video will clarify which professionals are eligible to deliver services to children in the Program and how they would apply. This presentation will be recorded and posted on the Department’s Early Intervention Program website.

Explore additional opportunities to increase internship opportunities in the Program, including engaging the State Education Department and higher education institutions. The Department continues to explore additional opportunities to increase Program

internships, including engaging the State Education Department and higher education institutions. Currently, the NYS Early Intervention Coordinating Council (EICC) Workforce Capacity Task Force is working to increase the opportunities for field work placements and internships in Early Intervention settings by:

Developing the competency areas which identify the areas of practice needed to deliver Program services. The competency areas have been disseminated to academic partners by municipal governments, who have begun integrating the competency areas into their curricula, including field work placements in early intervention settings as part of graduate programs. The EICC Workforce Capacity Task Force has also created a companion document to assist graduate programs with implementation of the competency areas, which includes a focus on fieldwork placements and internships. The Department anticipates releasing this document in 2023.

The Bureau of Early Intervention, in partnership with the EICC Workforce Capacity Task Force and the NYC Early Intervention Program, engaged the NYC Early Childhood Research Network, which expressed interest in funding a research project to review the Clinical Practice Acts across disciplines, make recommendations about gaps in fieldwork placements, and identify opportunities for inclusion of the competencies.

Survey current providers, many of whom work part time, to request their input about the amount of time they work in the Program and what would increase their interest to deliver more Early Intervention services as well as suggestions for provider retention and recruitment; and explore additional opportunities to increase the Early Intervention workforce.

The Department conducted an analysis of billing information for the current provider workforce to determine the average amount of time that rendering providers are delivering Program services. A rendering provider is the individual that is delivering direct services to an Early Intervention Program child or family member. Rendering Providers could be Department approved individuals or employees of Department approved agencies. The Department has determined that a majority of the rendering providers are not working full-time in the Program. The Department will survey current providers to request their input about the amount of time they work in the Program and what would increase their interest to deliver more Early Intervention services as well as suggestions for provider retention and recruitment.

On August 9, 2022, the Department emailed a survey conducted by The National Institute for Early Education Research (NIEER) to 9,445 approved individual Program providers and 505 approved agencies. The goal of this national survey was to collect information from the early childhood special education workforce to better support special educators and early interventionists. NIEER is evaluating the information and anticipates that they will send NYS the aggregated results in July 2023. Information collected from this research will be shared with the Bureau of Early Intervention to assist in addressing a variety of provider topics including provider recruitment, retention, and training needs.



## **Recommendation #2**

Develop and include more specific goals, tasks, and/or objectives on future municipal workplans related to Child Find's public awareness and outreach.

## **Response #2**

The statewide Early Intervention Program and the duties of the Department's Bureau of Early Intervention and the counties, as local administrators of the Program, underwent substantial changes in 2013 with the addition of the State Fiscal Agent (SFA). The SFA shifted management of the fiscal aspects of the Program, which had been a municipal responsibility, to the State. At the same time, municipalities retained substantial responsibilities as local administrators of the statewide Program. Although municipal workplans currently include Child Find activities, based on the audit findings, the Department will add specificity to municipal workplans to leverage current successful county practices and ensure a more uniform approach to promotion of the Program across the State.

In addition to incorporating goals, tasks, and objectives related to public awareness and outreach activities, the Department will reissue previously issued guidance to all counties to provide comprehensive technical assistance on policies and procedures for required Child Find activities.

Additional technical assistance, including a list of resources and partners, will be developed for local administrators of the Program to support coordination with other programs to locate and identify children at risk for developmental delays. The Department will continue to collaborate with its many early childhood partners, such as the State Education Department, the Office of Children and Families, the Council on Children and Families, and others to promote the Program and identify children birth to three years that are at-risk for developmental delays.

The Department will also provide greater specificity in municipal workplans on municipal responsibilities in connection with local follow-up on findings from State monitoring of Early Intervention providers. Monitoring indicators will be developed to align with any new requirements that are developed in addition to the currently existing indicator (11).

In the last submitted Annual Performance Report (APR) posted at [https://www.health.ny.gov/community/infants\\_children/early\\_intervention/docs/annual\\_performance\\_2020.pdf](https://www.health.ny.gov/community/infants_children/early_intervention/docs/annual_performance_2020.pdf), the Department set the targets for the next five program years on indicators 5 Child Find (Birth to One) on page 26 and 6 Child Find (Birth to Three) on page 28 as a proxy to evaluate and monitor the Child Find component of the Program. The same targets apply to all municipalities. Both indicators are part of the local performance determinations that the Department issues to each municipality every year.

Upon review of the data, the Department will work with municipalities when they have met their performance benchmarks and will strengthen our delivery of targeted technical assistance to those municipalities who have not met their targets.

Municipalities are required to comply with Early Intervention regulations and follow guidance issued by the Department regarding Public Awareness and Child Find. The workplans include Child Find activities and have been kept general to afford the municipalities flexibility in how they accomplish the tasks. To foster consistency across the State, the Department has developed outreach materials for municipalities to use to increase public awareness about the Program. The Department developed five videos that can be shared with stakeholders, including parents, to promote the Program; several feature families who have participated in the Program and speak languages other than English. The Department also has brochures (e.g., Early Help Makes a Difference, Early Intervention Steps: A Parent's Basic Guide to the Early Intervention Program) that can be shared with families of young children who may be eligible for the Program. The Department continues to develop outreach materials for parents, including infographics, postcards, and short video vignettes, among others.

Municipalities are also required to have Local Early Intervention Coordinating Council (LEICC) meetings to provide a forum for understanding community needs related to the Program. Given the marked variability among counties in NYS, as evidenced through the Early Intervention Program State Systemic Improvement Plan projects in which counties have engaged, setting benchmarks such as number of public outreach events or percentage of children referred may result in arbitrary obligations which do not provide actionable insight regarding the effectiveness of the programs. However, the Department will consider requiring counties to report on their outreach activities and share successes on bi-monthly county calls. Early Intervention is a voluntary program and loss to follow up for at-risk children occurs despite efforts by local administrators.

The Department's Bureau of Early Intervention will collaborate with the Department's Bureau of Perinatal, Reproductive, and Sexual Health (BPRASH) group that supports the State's birthing hospitals. BPRASH conducts regular calls and holds webinars and training sessions for birthing hospitals and their labor and delivery staff. The training will include specific information about the requirements to refer infants to municipal Child Find programs and relevant contact information.

In order to improve the State's oversight of the local health departments' administration of their programs, the Department is revising the municipalities workplan in the Early Intervention administrative grant contract. The workplan will include a new requirement for municipalities to provide an annual report describing the activities undertaken in the prior year with regard to public awareness of the Program, child find, family-centered services, child and family outcomes, service delivery including transportation and respite services and transition of children to the Committee on Preschool Special Education under Part B of Individuals with Disabilities Education Act (IDEA).

### **Recommendation #3**

Take steps to better understand disparities in access to Program services, including those identified in the Department's August 2021 report on race and ethnicity as well as those commonly known by municipal officials, and develop an action plan to improve equitable access to Program services.

### **Response #3**

In addition to taking the initiative to develop the report on race and ethnicity in the Early Intervention Program, the Department has begun to discuss the findings of the report and potential solutions with counties. The Department analyzed the race and ethnicity report data by county for three program years: 2017-18, 2018-19, and 2019-20. The Department worked with NYS Association of County Health Officials (NYSACHO) to issue the county race and ethnicity report to each county for review during the annual statewide Early Intervention virtual meeting with all counties on October 19-20, 2022. The Department instructed the counties to review their own report and will provide technical assistance for counties to take actions addressing the local racial and ethnic disparities.

The Department's Bureau of Early Intervention also sponsored Health and Equitable Communities Training from the Institute for Public Health Innovation (PHI) for counties during the NYSACHO virtual all-county meeting. The Department's Bureau of Early Intervention analyzed Early Intervention enrollment at the zip code level, factoring in race and ethnicity. Based on the analysis, the Bureau of Early Intervention identified areas with low program enrollment among Non-Hispanic Black children compared to the overall population. The Bureau of Early Intervention shared this data with the Department's Public Affairs Group (PAG), to focus the social media campaign on these identified zip codes to promote the Early Intervention Program to the families in these areas.

The Department has developed several trainings to enhance family-centered practices in early intervention service delivery for Early Intervention providers, including Working With Diverse Families (WWDF) and Cultural and Linguistic Competency.

#### **WWDF in the Early Intervention Program**

This training provides participants with the knowledge and tools needed to establish a partnership with each family with whom they work, while ensuring an equitable and family-centered experience. This training focuses on empowering families to actively participate in all aspects of the Early Intervention Program. Included are federal and State resources to assist providers in making appropriate referrals for families to programs and support services, both within and outside of the Program.

#### **Cultural and Linguistic Competency**

This training was developed to ensure providers exercise cultural and linguistic competency in their practice. Cultural and linguistic competency increases access to and acceptability of care, improves quality of care, and reduces disparities in outcomes for racially and ethnically diverse populations.

To reduce racial disparities in access to Program services, it is crucial to ensure that all families in NYS are aware of the Program, who is eligible, and what is offered. To achieve this goal, the Bureau of Early Intervention is creating the Early Intervention Family campaign which will advertise in areas with a high percentage of children with

late enrollment and in areas with racial disparities in enrollment.

Bureau of Early Intervention staff participate in the IDEA Part C Early Intervention Program Racial Equity Community of practice, formed by the Early Childhood Technical Assistance Center, to collaborate and learn how to promote practices that center on racial equity in statewide early intervention systems, by recognizing and exposing systemic bias and racism, and identifying and implementing tangible strategies to work towards equitable IDEA Part C Early Intervention programs, practices, and outcomes for families.

The total number of stakeholders that completed the WWDF training from October 2021 to January 2023 was 673.

#### **Recommendation #4**

Routinely verify the accuracy of the provider directory to ensure families have access to provider information that is accurate and useful.

#### **Response #4**

Efforts to remove providers no longer delivering Early Intervention services from the Central Directory began in 2019 and are ongoing. Early Intervention providers are required to notify the Department of a change in their status (e.g., adding a service to their provider approval or removing one, or stopping Early Intervention service delivery). Counties, as local administrators of the Program, also notify the Department when they become aware of a provider who plans to discontinue Early Intervention services.

The Department remains committed to ensuring that the Central Directory provides accurate information to service coordinators and municipalities. Service coordinators locate and assign the service providers to fulfill the IFSP. Parents have the right to select the agency to conduct the multidisciplinary evaluation and their ongoing service coordinator, if determined their child is eligible for continued services through the Program. Municipalities are responsible for creating lists of multidisciplinary evaluation providers and ongoing service coordinator agencies to provide to families to assist with this selection. Service coordinators utilize the Central Directory and NYEIS to identify and assign service providers based on the services identified on the child's IFSP.

NYEIS is updated immediately when a provider is newly approved, the Department will update the Central Directory posting monthly to ensure that the service coordinators and municipalities have the most accurate and up to date information more frequently.

The Department will utilize data reports to identify providers who have not delivered Early Intervention services within the past two years and contact these providers regarding their interest and availability to deliver Early Intervention services. The new data system (EI-HUB) also includes a requirement that will inform the Department of a provider who has not had any services assigned in two years. If the provider is no longer available to deliver Early Intervention services, the provider will be informed that

they need to withdraw their approval and re-apply in the future. EI-Hub will also require providers to identify the specific service type(s) and the county(s) that they are available. This change will improve the accuracy of the information regarding each service type available in each county.

The Department is now posting to the Central Directory every month to ensure that service coordinators, municipalities, and families have the most accurate and up-to-date information. The Central Directory includes the date that it was last updated. The updates include the addition of newly approved providers, changes to existing providers' approval based on processed amendments, and the removal of providers due to withdrawn or expired agreements. We encourage regular review of the Central Directory. To that end, the Department is now sending an email via the BEI listserv every time that the Central Directory is updated to ensure stakeholders are aware.

We have made the following updates to the spreadsheet titled "Individuals with Basic Agreements (XLSX) - filterable list":

References to "Pending Agreement" have been removed as there are no longer providers with this approval status.

Column U titled "Service delivered in the last 12 months (Y/N)" was added. This column indicates if the individual provider has actively delivered Program services within 12 months of the Central Directory "updated date" as identified by claim data. This column is dependent on claim data so if a provider has delivered services, but a claim has not been entered into the data system for that service, then this column will display an "N." This new column will allow agencies and counties to identify providers who have been actively delivering Program services for possible recruitment opportunities that are available with their agencies or counties.

Approved individuals who have allowed their Agreement to expire have been removed.

### **Recommendation #5**

Work with the EI-HUB contractor to expedite release of the new system as soon as practicable. Ensure that municipalities are properly prepared to use EI-HUB and that all essential functionality is operational before NYEIS is decommissioned. Continue to coordinate with counties after implementation to ensure EI-HUB functionality meets their needs.

### **Response #5**

The Department continues to work closely with the EI-Hub vendor in preparation for the release of EI-Hub, and has a robust communication strategy, designed to support organizational change management (OCM), in place to inform Early Intervention stakeholders, including the EICC, counties and Early Intervention service providers, about system development progress. The Department agrees that this system needs to be released as soon as practicable and recognizes this need must be balanced with

ensuring child and provider data is migrated accurately and successfully in a way that protects the integrity of the data. Post-launch training and technical assistance for municipalities and Early Intervention service providers are part of the Department's overall OCM communication plan. Specific activities the Department has undertaken to date to engage Early Intervention stakeholders and prepare for launch of the EI-Hub are outlined below.

Municipal and provider users participated in component testing of the EI-Hub solution over the last eighteen months, providing an opportunity to test the system and give further feedback to the Department on system functionality. There will be an additional user acceptance testing (UAT) period in the project schedule prior to system go-live. The Department has included the NYSACHO, which serves as a conduit between the Department and the counties, on EI-HUB communications to county stakeholders and invited them to participate in EI-HUB system demonstrations. In addition, EI-Hub progress has been discussed on bi-monthly All County calls facilitated by NYSACHO, updates to stakeholders on the EICC, periodic e-mail announcements via the Early Intervention Program electronic mailing lists as well as a newsletter. The Department will continue these efforts.

The EI-Hub vendor provided system demonstrations to the EICC as well as directly to municipalities at All-County Conference Calls and Meetings. A series of live system demonstrations were presented to users that included multiple components of the EI-Hub solution. There is also a dedicated Learning Management System (LMS) as part of the EI-Hub solution that includes historical communications, recordings of live sessions, transition resources, FAQs, training materials, and system videos. In addition, there will be trainings prior to go-live and additional material available, including user guides and job-aids. The Hub Club is a newsletter that focuses on the latest information on the transition from NYEIS to the EI-Hub. Hub Club issues are released to all individuals on the Early Intervention Program electronic mailing list and are also posted to the Department's Bureau of Early Intervention webpage and the EI-Hub LMS. The first issue was released in February 2020 and the 25th issue was released in September 2022. "Transition Update" emails were implemented as another means for delivering information and sharing resources related to the EI-Hub launch with Early Intervention Program stakeholders. These emails are also disseminated via the Early Intervention Program electronic mailing list and are posted on the LMS. The first edition of the "Transition Update" was released in December 2021 and, thus far, nine editions have been released to our shareholders, the most recent in February 2023.

Fifteen Transition Series Live Session demonstrations, including the Sandbox kickoff demonstration, have been provided to end users and stakeholders since January 2022. These demonstrations have covered a variety of topics focused on showing the functionality of the EI-Hub. Topics have ranged from how to navigate the EI-Hub, to how to enter referrals, how to initiate an IFSP, and understanding the functionality of the EI-Billing component of EI-Hub. To address other areas of need as expressed by stakeholders, additional live sessions have been provided over the course of the Spring and Summer to address topics such as Session Notes, Service Logging, and a high-level overview of the transition to the EI-Hub providing information as to why the

transition is happening and an overview of the system components. Additional sessions will be held prior to the launch of the EI-Hub to discuss other topics such as the new waiver process. All sessions are recorded and available for viewing on the LMS along with the slides and FAQs from each session.

In August of 2022, an EI-Hub sandbox environment was released for municipalities and providers to begin training and learning the new system. The Sandbox environment allows participants to gain hands-on experience while working through some of the different components of the EI-Hub before it is launched. With the support of written training job aids, eLearning modules, and training videos, cohorts comprised of municipal staff, agency and independent providers working together to complete the basic functions of moving a child through the Program (the backward “S”) and the life cycle of a claim will be created in each municipality. The Sandbox will continue to be available to system users prior to the launch of the EI-Hub.

Included as part of the Sandbox is a feedback survey that users can complete at any time to provide feedback directly to the EI Hub Project Team about functionality in the system and recommendations. Recently, the EI Hub Project Team released a Sandbox feedback document which details comments submitted by users and responses from the EI Hub Project Team. This Sandbox feedback document will be updated periodically with new comments from users.

The Department will maintain and expand these activities as transition to EI-Hub approaches.

The initial launch of the EI Hub, planned for 2023, is not intended to be the final version of the EI Hub. The Department is committed to continued engagement with end users at the municipal level and with providers to continuously enhance the EI Hub. A series of system releases will be delivered based on feedback received from users.