North Carolina Infant-Toddler Program
Procedural Guidance

Reference: Procedural Safeguards Policy

Adoptions

Introduction

A child served by the Infant-Toddler program will sometimes be adopted while enrolled in the program. This procedural guidance document describes the activities and responsibilities of CDSAs when a child served by the program is adopted.

Adoptions Procedural Guidance

When an adoption occurs, in order to protect the birth identity of a child and the identity of the birth family, all records on file with the court, a service provider, or the state must be retained permanently and sealed when the adoption becomes final. It is the CDSA's responsibility to ensure that any report or other information released after an adoption becomes final is edited to exclude the name, address, or other information that could reasonably be expected to lead directly to the identity of an adoptee at birth or an adoptee's parent at birth or other members of the adoptee's biological family.

The following procedure must be followed by all Infant-Toddler Program service providers when an adoption occurs:

- It is the responsibility of the Early Intervention Service Coordinator (EISC) to notify the Medical Records staff at their CDSA about the pending adoption of a child as soon as the EISC learns of it. It is the responsibility of the CDSA to notify all relevant service providers of a child's adoption, remind them of record requirements related to adoptions, and provide assistance to the service providers in meeting the requirements in this procedural document, as needed. In instances where the family is having difficulty providing or has refused to provide a copy of the adoption decree, the EISC can attest in a progress note that they have seen the adoption decree. The progress note should include the child's new name, name of their new legal guardian(s), the date the adoption was finalized, and all efforts to obtain a copy of the decree. The EISC should continue to make efforts to obtain a copy of the adoption decree from the family.
- A copy of the "Decree of Adoption" signed by the judge must be obtained by the EI Service Coordinator and uploaded into Legal Documents folder in BEES so that there is legal documentation that the adoption has been finalized. The date and decree number must be on the decree.
- The date the adoption is finalized is a key date within the adoption process. Once a copy of the adoption decree is obtained, all documentation prior to this date must be filed in the original chart. All documentation on and after this date is to be filed in a new chart with the child's new name.

- The final progress note in the existing record (e.g., the pre-adoptive record) must state that the adoption has been finalized, a copy of the adoption decree has been placed in the record, and the record is being closed. All billing for services prior to the date the adoption was finalized should be billed in the child's pre-adoptive name.

- For children who were enrolled prior to BEES and who have a paper record: The child's name may not appear on the outside of the file. The outside of the file is to be marked as sealed pre-adoption records so that CDSA and state archives staff are informed that the file cannot be opened without court order and that rules pertaining to retention of pre-adoption records apply to the file. All information that is in the existing record at the time of adoption stays in the closed record and remains in the child's pre-adoptive name. The original chart should not be sealed until a copy of the adoption decree has been received.

- In BEES: Complete all documentation and billing under pre-adoptive name.
  - All service logs need to be entered and **paid/finalized** in the pre-adoptive record prior to any changes to the pre-adoptive record.
  - Child's pre-adoptive name should be entered into **Nickname** field on the Demographic screen.
  - On the Demographic screen, change name on pre-adoption BEES Child ID to **First Name**-*Sealed* and **Last Name**-*Adoption Records*. **(Reminder, no name changes can occur unless all service logs are entered and claims are paid/finalized.)**
  - From File Upload Screen, download the following forms and redact identifying information from forms to prepare for upload into new adoptive record:
    - Referral Update Form
    - Initial IFSP
    - Most recent IFSP
    - Medical records that obtain to eligibility if determined eligible through Established Condition
    - Meeting invitation for most recent IFSP meeting
  - End Date all services on the Planned Services screen.
  - Exit Child using Adoption reason in dropdown on Transition/Exit screen.

- An entirely new and separate Infant-Toddler Program record must be opened in the child's adoptive name.
  - Re-register the child in BEES using the new adoptive name. BEES will generate a new CNDS ID number and child ID if the new adoptive name is not found in the CNDS system.
    1. If child was enrolled when adoption occurred, complete the following steps:
       - Use original referral date and referral source
       - Use original evaluation and eligibility information and dates
       - Use original COS dates and information
       - If using the original referral date information, enter the child's initial IFSP information with minimal information (only required fields)

- Enter most recent IFSP as Annual to restart the clock. Complete all applicable screens in BEES for this IFSP.
- If applicable, complete IFSP review with adoptive parents
- Update all Authorizations to Disclose Health Information
- Update Insurance Information Worksheet and Financial Data Collection form, as applicable
- Update the Financial Support screen according to insurance worksheet and permission to bill received.
- File Upload: Update redacted documents from pre-adoptive record into applicable file category

2. If child is in open referral when adoption occurs, complete the following steps:
   - Use original referral date and referral source
   - Use original evaluation and eligibility information and dates if completed prior to adoption
   - Use original COS information and dates if completed prior to adoption
   - Update Insurance Information Worksheet and Financial Data Collection form, as applicable
   - Update the Financial Support screen according to insurance worksheet and permission to bill is received

3. Enter all appropriate payors in Planned Services and continue with either step 4 or 5 below as appropriate.

4. For clients who do not have Medicaid:
   - Services can be approved and billed to either private insurance or family pay as appropriate.

5. For Medicaid Clients:
   - No services should be approved on Claims Entered Awaiting Approval until Medicaid record is updated and steps 6 or 7 are completed.
   - Once Medicaid updates their records and the adoptive name/CNDS is established, see scenarios 6 and 7 below.

6. **Medicaid keeps same CNDS and changes only the child's name**-
   - Step 1: Create CNDS ID for pre-adoptive record
     - Utilize internal CDSA adoption tracking log to obtain next available Adoption CNDS ID. The naming convention for made-up CNDS specific to pre-adoption records must mirror the format of a standard CNDS ID—9 digits followed by 1 alpha character. Each CDSA has been assigned their alpha character and will need to track Adoption CNDS IDs internally to avoid duplication. *See alpha character chart at the end of this guidance.*

- Step 2: Pre-Adoptive BEES record—Child Management Screen; SA user
    - Go to **Update CNDS Number**. Change the CNDS ID to the made-up Adoption CNDS ID and click on ***Update CNDS Number*** (CRITICAL – before doing this step, all billing under the pre-adoptive name must be paid/finalized or you will encounter billing errors).
    - Go to **Flag a child record to be included or excluded in the NC ITP File**. Select ***Exclude*** and click ***Save Include or Exclude Decision***. This step will prevent the made up CNDS ID from being reported to NCTracks.
- Step 3: Adoptive BEES record—Child Management Screen; SA user
    - Go to **Update CNDS Number**. Change the CNDS ID to the Medicaid/CNDS ID number and click on ***Update CNDS Number***. *(This step cannot be completed until Step 2 is completed, as BEES does not allow duplicate CNDS IDs.)*
- Step 4: Adoptive BEES record—Approve held billing
    - All previously held services under the adoptive name may now be approved on Claims Entered Awaiting Approval. If any claims had been inadvertently approved and billed to Medicaid, receiving a denial, those claims can now be resubmitted.

7. **Medicaid changes CNDS number**:
    - Step 1: State Administrator searches by Child ID
    - Step 2: Go to Child Management - **Update CNDS Number**. Change CNDS ID to new number and click on ***Update CNDS Number***.
    - Step 3: Approve held billing. All previously held services under the adoptive name may now be approved on Claims Entered Awaiting Approval. If any claims had been inadvertently approved and billed to Medicaid, receiving a denial, those claims can now be resubmitted.

8. Once the new record is created, the pre-adoption record is to be sealed and archived.

    - It is not necessary to state in the new record that the child has been adopted; however, this may be included as appropriate (e.g., a report may state that medical history is unknown because the child was adopted.)

    - All documentation from the point in time at which the service provider has legal proof that the adoption has been finalized must be in the child's new name only.

    - The service provider must establish some internal mechanism for cross-referencing the two records that exist on a child so that information from the old record may be retrieved at a later date, if necessary. This cross-referencing must be placed on the log of assigned record numbers that is kept by the service provider or in some other internal listing of clients, but never in the child's new record. If the service provider has any questions about how to complete these tasks, they should contact the child's CDSA.

9. Other Information Regarding Medicaid Billing for ITP Providers:
    - ITP providers should have their own internal processes on billing for adopted children, following Medicaid guidance. Any Provider Monthly Summaries must reflect the child's adopted name, regardless if the provider billed under the old name while waiting for Medicaid to update their record.
    - Choice PA has provided the following information related to Medicaid Prior Authorizations (PAs) as it relates to adoptions:
        - The Medicaid PA is specific to the CNDS ID. Providers can bill under that PA as long as the claim reflects the same CNDS ID and the name as it appears on the Medicaid record.
        - No new PA is required if the Medicaid ID remains the same; authorization follows the ID. If the CNDS ID changes, the Medicaid caseworker will merge the files and all PAs become one file under the new ID; a new PA is not required.
        - If Medicaid PA needs to be renewed before Medicaid updates the name on the client record, the name and ID submitted on the authorization request must match what is listed on the Medicaid file in NCTracks.
        - If Choice PA requests a copy of the IFSP from the provider before the Medicaid record is updated, the provider can include an explanation on the header section of the PA request page to let them know the child has been adopted and the IFSP reflects the newly adopted name. There is no need to make mention of the pre-adoptive name or place the pre-adoptive name on the IFSP.

CDSA Alpha Characters for Adoption CNDS IDs – Should be the ending alpha character in the made-up Adoption CNDS ID:

Blue Ridge	A
Cape Fear	B
Concord	C
Durham	D
Elizabeth City	E
Greensboro	F
Greenville	G
Mecklenburg	H
Morganton/Hickory	I
New Bern	J
Raleigh	K
Rocky Mount	L
Sandhills	M
Shelby	N
Western	O
Winston-Salem	P