

# North Carolina Infant-Toddler Program Procedural Guidance

Reference: Procedural Safeguards Policy

## *Records Transfers between CDSAs for Enrolled Children*

### Introduction

A child enrolled in the N.C. Infant and Toddler Program (ITP) will sometimes move from the catchment area of one Children’s Developmental Services Agency (CDSA) to another while continuing ITP enrollment. This is considered a transfer within the program, and special efforts by the involved CDSAs related to records and data must be taken to promote a smooth transition to the new CDSA where the child and family will continue to receive the ITP services specified by the IFSP. Every effort must be made by both the sending and receiving CDSA to minimize disruption in services.

This procedure describes the necessary responsibilities and steps the CDSAs involved in coordinating the transfer of records and data for an enrolled child moving from one CDSA (**sending CDSA**) to another CDSA (**receiving CDSA**) must take to ensure continuity. An abbreviated checklist for the **sending CDSA** and the **receiving CDSA** is included at the end of this procedure as Attachments 1 and 2, respectively.

This procedure only applies to transfers between CDSAs of children who are already enrolled in the ITP. For guidance on transfers for children still in the referral process but not yet enrolled, please see the ITP’s Referral Process procedures.

### Procedure

1. CDSA Contact for Transferring Records. Each CDSA must identify an individual to serve as the *records contact person* for the agency. The records contact person from the **sending CDSA** will be responsible for coordinating the transfer of records with the records contact person from the **receiving CDSA** to ensure that the information needed to continue the child’s services in the new catchment area is available and timely. To identify the CDSA records contact person, a CDSA should refer to the Records Transfer Contact List that is maintained by the EI Section (Section) and shared with CDSAs as updates occur. The list includes the name of each CDSA records contact person and his or her phone number and email address. **Note:** If a CDSA needs to update the Records Transfer Contact List, it should send the change request to the EI Section.
2. Notification of Transfer. The **sending CDSA** must inform the **receiving CDSA** about the child and provide the **receiving CDSA** written documentation of the child’s eligibility for the program. This is accomplished by sending the **receiving CDSA** a copy of the child’s “*NC ITP Referral Form*” (*with appropriate updates*), a copy of the child’s “*NC ITP Eligibility Determination Documentation Form*”, a printout of the child’s diagnoses from HIS (or ECHO for the Mecklenburg CDSA), and a copy of the child’s current Individualized Family Service Plan (IFSP).

3. Record/Information Sharing. The child’s original records are to be kept at the **sending CDSA**. A **copy of the child’s CDSA records** (financial, service, and child outcome summary-COS) shall follow the child to the new CDSA.

- **Financial Records** include copies of the “*Financial Data Collection Form*,” “*Insurance Information Worksheet*,” and the “*Financial Review and Hardship Adjustment Application*.” The **sending CDSA** must provide the **receiving CDSA** timely copies of these financial records and should be available to answer questions from the **receiving CDSA** about the family’s *Sliding Fee Scale (SFS) determination*. The family’s personal financial information (e.g., pay stubs, tax forms) that was submitted to the **sending CDSA** for the purpose of SFS determination is confidential and has a time limited purpose. Copies of personal financial information must not be released to any entity, including other CDSAs, without parental request and written consent.

The **receiving CDSA** is to make a notation in the child’s financial record that the family’s SFS percentage was determined prior to transfer and that the original financial documents are maintained by the **sending CDSA**. The **receiving CDSA** must obtain new financial information from the family and update the SFS determination: 1) when the family’s financial situation has changed, 2) when it is time for the family’s annual SFS review, and 3) when the child has moved to the catchment area to live with a new family that will have financial responsibility for the child. In a case such as this, the **receiving CDSA** must have the new family complete all financial forms.

- **Service records** include copies of all client records created on the child including but not limited to the referral form, all evaluations, determination of eligibility documentation, IFSPs (including all IFSP reviews), service notes, and provider notes. If available, send the **receiving CDSA** copies of current assessment tools and data collected to monitor the child’s ongoing development and progress. Medical records received from other agencies or providers are not to be sent to the **receiving CDSA** unless specifically requested.
- **Child Outcome Summary (COS)**: The **sending CDSA** must provide a printed copy of the initial COS to the **receiving CDSA**. The **sending CDSA** may print the initial COS from the *Chart View of the child’s record in HIS*.
- **Assistive Technology Loan Records** include copies of the Assistive Technology Loan Agreement forms and the Assistive Technology Return/Transfer forms for any equipment being used by the child at the time of transfer. The sending CDSA must provide a printed copy of the initial Assistive Technology Loan Agreement form and the Assistive Technology Return/Transfer forms, to place in the child’s record.

The **sending CDSA** is responsible for entering the initial COS for enrolled children into HIS before the child transfers to the new catchment area. The **receiving CDSA** should not re-enter the initial COS into HIS.

4. Assignment of Service Coordinator. The **receiving CDSA** must ensure the designation of a Service Coordinator, who will see that the IFSP is updated with the family to reflect service delivery in the new catchment area and ensure that the service coordinator assignment is entered into HIS.

5. Individualized Family Service Plan (IFSP). A child’s eligibility and enrollment status in the NC ITP program does not change when a family moves to a different county or catchment area within North Carolina.
  - a) To best facilitate continuation of services in the new catchment area, the **sending CDSA** must ensure that the IFSP is current and that it outlines the ongoing services that the family should continue to receive in the new catchment area.
    - The **sending CDSA** should end date all services on the EI Services screen in HIS to ensure that the child is no longer recorded in HIS as actively receiving the service at the **sending CDSA**.
    - For each service that should be continued at the **receiving CDSA**, the **sending CDSA** should enter “Transferred to XXXX CDSA on XX/XX/XXXX in the “end date” fields on the paper copy of the IFSP.  
  
This indicates that the service is no longer being provided by the **sending CDSA**, but it is not being “ended”.
  - b) The **receiving CDSA** will be given a current IFSP by the **sending CDSA** and the CDSA should begin services as soon as possible.
  - c) The **receiving CDSA** should update the IFSP to include new service providers and other changes, as appropriate once the child is established in the new CDSA. (See Section 6 below for instruction on entering the IFSP and EI services into HIS).
  
6. Data System. Follow the instructions below to address the data entry requirements for children who are transferring:
  - a) **Sending CDSA:** In addition to writing an exit progress note in HIS, the **sending CDSA** must exit the child in HIS using the **ITP Transition/Exit module**. Enter an exit reason of "Transferred to Another CDSA." If the Local Educational Agency (LEA) has been notified about the child, this data must also be entered into HIS on the left-hand side of the ITP Transition/Exit screen.
  - b) **Receiving CDSA:**
    - The **receiving CDSA** must complete the **Registration module** to get the client into its CDSA system and root system code (RSC) in HIS.
    - The **receiving CDSA** should also **open a referral** for the child in HIS using the **Incoming Referrals** module. This referral will not be treated as a new referral for 45-day tracking purposes. However, the CDSA will need to enter **referral source data** as follows: Referral Source Type = Other Referral Source and Referral Source Category = Other CDSA. The **referral date** should be the date that the **receiving CDSA** receives a copy of the child’s “NC ITP Referral Form” (with appropriate updates) and a copy of the child’s “NC ITP Eligibility Determination Documentation Form” from the **sending CDSA**.
    - The **receiving CDSA** will also need to complete the **Reason for Closure** field in the **Incoming Referrals** module. This will help the program monitor the status of children who transfer between CDSAs.

- For children whose families follow through and continue with ITP services in the new catchment area, the closure reason for the referral in the **Incoming Referrals** module will be “IFSP Developed.”
  - For other children who do not continue services with the **receiving CDSA**, select the closure reason that best fits the situation.
- Other HIS modules that are completed for new referrals are also required for transfers, such as *Assign Service Coordinator, Caseload Assignment (if using), Cross Episode Financial Eligibility, Financial Investigation, and other modules necessary for documenting the provision of services and billing for services.*
  - For the **Evaluation/Assessment module in HIS**, select the evaluation type “Subsequent.” Complete the required values (in red) based on the child’s initial eligibility (which was determined by the **sending CDSA**), including start date, evaluation date, and eligibility determination date. When searching for staff name use Practitioner ID “999” (Default Practitioner) for both fields. This will indicate that the staff at the **receiving CDSA** did not determine program eligibility for the child (See Figure 1, *Example of HIS Evaluation/Assessment Documentation for Receiving CDSA*).

The screenshot shows a web-based form for 'Evaluation/Assessment Documentation for Receiving CDSA'. The form is divided into several sections:

- Evaluation/Assessment Type:** Radio buttons for 'Initial' and 'Subsequent' (selected).
- Start Date:** Date field set to 08/27/2014.
- Draft/Pending Approval/Final:** Radio buttons for 'Draft' (selected), 'Pending Approval', and 'Final'.
- Reviewing Staff:** A dropdown menu.
- Evaluation Complete:** Radio buttons for 'Yes' (selected) and 'No'.
- Eligibility Determined by:** Fields for Staff 1 and Staff 2, both containing 'PRACTITIONER,DEFAULT (000999)'. Fields for Staff 3 and Staff 4 are empty.
- Date Evaluation Completed:** Date field set to 08/27/2014.
- Eligible:** Radio buttons for 'Yes' (selected) and 'No'.
- Eligibility Determination Date:** Date field set to 08/27/2014.
- Eligibility Category:** A list box containing 'Developmental Delay' and 'Established Condition'.

**Figure 1: Example of HIS Evaluation/Assessment Documentation for Receiving CDSA**

- For children whose families agree to services at the **receiving CDSA**, enter the **IFSP** as either an “*Other Revision*” or as an “*Annual*” or “*Semi-Annual*” review if either of these is due when the child transfers to the **receiving CDSA**. Continue to calculate the **next review date** based on the **date of the initial IFSP**, which was developed by the IFSP team at the **sending CDSA**.
- When entering **services** that are being continued, the **receiving CDSA** must use the **original service start date** from the **sending CDSA**’s IFSP. Since continuing services were started by the **sending CDSA**, the 30-day timeline does not apply to these services for the **receiving CDSA**; however, the **receiving CDSA** must start the continuing services as soon as possible to minimize disruption of the plan. For any new services added to the IFSP by the **receiving CDSA**, the 30-day timeline still applies.

TOPIC	CHECKLIST FOR THE <i>SENDING</i> CDSA WHEN TRANSFERRING AN ENROLLED CHILD TO ANOTHER CDSA WITHIN NORTH CAROLINA
Notifying the <b>Receiving CDSA</b> of Transfer	<ul style="list-style-type: none"> <li>□ Send copies of the child’s referral form (with appropriate updates), completed NC ITP Eligibility Determination Documentation form, a printout of the child’s diagnoses, and current IFSP to the <b>receiving CDSA</b>.</li> </ul>
IFSP	<ul style="list-style-type: none"> <li>□ Ensure that the child’s IFSP is current and includes all of the services that the family plans to continue after transferring to the <b>receiving CDSA</b>.</li> </ul>
EI Services	<ul style="list-style-type: none"> <li>□ Ensure that all continuing services are noted as “transferred to XXXX CDSA on XX/XX/XXXX in the “end date” field(s) on the <u>paper copy</u> of the IFSP. Ensure ALL services on the EI Services screen in HIS are end dated in <b>sending CDSA’s</b> Root System Code.</li> </ul>
Initial COS	<ul style="list-style-type: none"> <li>□ Ensure that the child’s initial COS is complete and is entered into HIS.</li> <li>□ Make a copy of the child’s initial COS for the <b>receiving CDSA</b>. This can be accomplished by printing a copy from HIS Chart View or by making a copy of the paper version of the initial COS.</li> <li>□ Do <u>not</u> prepare an exit COS for a child who is transferring to another CDSA. The <b>receiving CDSA</b> will complete the exit COS when the child discharges from the program.</li> </ul>
Records Contact	<ul style="list-style-type: none"> <li>□ Coordinate the secure transfer of records and data to the <b>receiving CDSA</b> with the CDSA’s records contact person. Refer to the <u>Records Transfer Contact List</u> to identify the records contact person at the <b>receiving CDSA</b>. If you do not have the Records Transfer Contact List, contact the EI Section to obtain a copy.</li> </ul>
Transferring Records to the <b>Receiving CDSA</b>	<ul style="list-style-type: none"> <li>□ Keep the child’s original records at the <b>sending CDSA</b>. Do <u>not</u> transfer them to the <b>receiving CDSA</b>.</li> <li>□ Do <u>not</u> release copies of the family’s personal financial information (e.g., pay stubs, tax forms) to any entity, including to other CDSAs, without parental request and written consent.</li> <li>□ Do <u>not</u> release copies of medical records received from other agencies or providers unless specifically requested. <u>Note</u>: This does not apply to developmental and specialty evaluations that were used to determine program eligibility and to develop the child’s IFSP.</li> <li>□ Send a <u>copy</u> of the child’s records (financial, service, and COS) to the <b>receiving CDSA</b>:               <ul style="list-style-type: none"> <li>○ <b>Financial Records</b> include copies of the “Financial Data Collection Form,” “Insurance Information Worksheet,” and the “Financial Review and Hardship Adjustment Application.”</li> <li>○ <b>Service records</b> include copies of all client records created on the child, including but not limited to the referral form, all evaluations, determination of eligibility documentation form, IFSPs (including all IFSP reviews), service notes, provider notes, and other relevant records such as current assessment tools and data that have been collected to monitor the child’s development and progress. Also include a printout of the Accounting of Disclosures screen from HIS if used.</li> <li>○ <b>Initial COS</b> – ensure that the initial COS is entered into HIS, and that a paper copy of the initial COS is copied or printed from HIS Chart View and sent to <b>receiving CDSA</b>.</li> <li>○ <b>Assistive Technology records include copies of the Assistive Technology Loan Agreement forms and the Assistive Technology Return/Transfer forms for any equipment being used by the child at the time of transfer. Although the EISC is to submit the completed Return/Transfer form to JIRDC, copies of these documents should be sent to the receiving CDSA to be placed in the child’s record.</b></li> </ul> </li> </ul>

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TOPIC	CHECKLIST FOR THE <i>SENDING</i> CDSA WHEN TRANSFERRING AN ENROLLED CHILD TO ANOTHER CDSA WITHIN NORTH CAROLINA
Exiting the Child in HIS	<ul style="list-style-type: none"> <li data-bbox="321 264 1511 365">□ Ensure that all relevant and available data have been entered into HIS, e.g., LEA notification, TPC date, transition plan date, service start dates and end dates, reasons for delay, service notes, IFSP and IFSP review data, initial COS data, evaluation and assessment data, service coordinator assignments, etc.</li> <li data-bbox="321 390 1511 457">□ Exit the child in HIS with an exit reason of "<i>Transferred to Another CDSA.</i>" <u>Note:</u> Include this same exit reason in the child's exit progress note and include the name of the <b>receiving CDSA</b>.</li> </ul>

TOPIC	CHECKLIST FOR THE RECEIVING CDSA
Notification of Transfer	<ul style="list-style-type: none"> <li>□ Receive notification of transfer from the <b>sending CDSA</b>.               <ul style="list-style-type: none"> <li>○ This is accomplished when the <b>sending CDSA</b> provides the <b>receiving CDSA</b> a copy of the child’s “NC ITP Referral Form” (with appropriate updates), a copy of the child’s “NC ITP Eligibility Determination Documentation Form,” a printout of the child’s diagnoses, the child’s current “IFSP”, and any other relevant documentation.</li> </ul> </li> </ul>
Records Contact	<ul style="list-style-type: none"> <li>□ Coordinate the transfer of records and data with the <b>sending CDSA</b>’s records contact person. Refer to the <b>Records Transfer Contact List</b> to identify the records contact person at the <b>sending CDSA</b>. If you do not have the Records Transfer Contact List, contact the EI Section for a copy.</li> </ul>
Records Transfer	<ul style="list-style-type: none"> <li>□ Receive a <u>copy</u> of the child’s records (financial, service, and COS) from the <b>sending CDSA</b>, and set-up record keeping according to local procedures:               <ul style="list-style-type: none"> <li>○ <b>Financial Records</b> include copies of the “Financial Data Collection Form,” “Insurance Information Worksheet,” and the “Financial Review and Hardship Adjustment Application.” Original financial documents collected at the time of enrollment and any annual updated documents are confidential and will be held by the <b>sending CDSA</b>, unless there is a request and parent consent.</li> <li>○ <b>Service records</b> include copies of all client records created on the child, including but not limited to the referral form, all evaluations, determination of eligibility documentation form, IFSPs (including all IFSP reviews), service notes, provider notes, and other relevant records such as completed ongoing assessment tools and data. <b>Initial COS</b> – The <b>sending CDSA</b> will enter the initial COS into HIS under its own root system code (RSC) and will provide a printed copy of the initial COS to the <b>receiving CDSA</b>. The <b>receiving CDSA</b> should <u>not</u> re-enter the initial COS into HIS.</li> </ul> </li> </ul>
Financial Records & SFS Determination	<ul style="list-style-type: none"> <li>□ Make a notation in the child’s financial record that the family’s SFS percentage was determined prior to transfer and that the original financial documents were maintained by the <b>sending CDSA</b>.               <ul style="list-style-type: none"> <li>○ The <b>receiving CDSA</b> must obtain new financial information and update the SFS determination:                   <ol style="list-style-type: none"> <li>1) when the family’s financial situation has changed,</li> <li>2) when it is time for the family’s annual SFS review, and</li> <li>3) when the child has moved to the catchment area to live with a new family that will have financial responsibility for the child. In a case such as this, the <b>receiving CDSA</b> must have the new family complete all financial forms.</li> </ol> </li> </ul> </li> </ul>
EISC Assignment	<ul style="list-style-type: none"> <li>□ Designate a Service Coordinator who will see that the IFSP is updated with the family to reflect service delivery in the new catchment area. Enter the assigned Service Coordinator into HIS using the <i>Assign Service Coordinator</i> module.</li> </ul>
IFSP Update & Continuing Services	<ul style="list-style-type: none"> <li>□ Update the IFSP to include new service providers and other changes, as appropriate. Enter the required IFSP and service data into HIS using the IFSP module and the EI Services module, respectively.               <ul style="list-style-type: none"> <li>○ Begin services as soon as possible. Since continuing services were started at the <b>sending CDSA</b>, the 30- day timeline does not apply to these services; however, the <b>receiving CDSA</b> must start the continuing services as soon as possible to minimize disruption of the plan. In the <i>EI Services</i> module, select <b>No Delay</b> for an ongoing service started by the <b>sending CDSA</b>.</li> <li>○ For any new services added to the IFSP by the <b>receiving CDSA</b>, the 30-day timeline still applies and, if needed, an appropriate response should be selected from the <i>Reason for Delay</i> drop-down menu in the EI Services module of HIS for these new service(s).</li> </ul> </li> </ul>

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TOPIC	CHECKLIST FOR THE RECEIVING CDSA
HIS Data Entry	<ul style="list-style-type: none"> <li>□ Complete the <i>Registration</i> module in HIS.</li> <li>□ Open a referral in HIS for the child using the <i>Incoming Referrals</i> module. <ul style="list-style-type: none"> <li>○ The transfer is <u>not</u> considered a new referral for 45-day tracking purposes. The <i>Referral Date</i> should be the date that the <b>receiving CDSA</b> is notified about the transfer (i.e., receives the referral form and NCITP Eligibility Determination Documentation form from the <b>sending CDSA</b>).</li> <li>○ Enter the referral source information as follows: <i>Referral Source Type</i> = “Other Referral Source;” <i>Referral Source Category</i> = “Other CDSA.”</li> <li>○ Enter the <i>Reason for Closure</i> as “IFSP Developed.” For other children who do not continue services with the <b>receiving CDSA</b>, select the closure reason that best fits the situation.</li> </ul> </li> <li>□ Complete the <i>Evaluation/Assessment</i> module in HIS. <ul style="list-style-type: none"> <li>○ Select the <i>Evaluation Type</i>, “Subsequent.”</li> <li>○ Complete the required values (in red) based on the child’s initial eligibility (which was determined by the <b>sending CDSA</b>), including start date, evaluation date, and eligibility determination date.</li> <li>○ When searching for <i>Staff Name</i> use Practitioner ID “999” (Default Practitioner) for both fields. This will indicate that the staff at the <b>receiving CDSA</b> did not determine program eligibility for the child.</li> </ul> </li> <li>□ Enter all required IFSP data into HIS using the <i>IFSP</i> module. <ul style="list-style-type: none"> <li>○ Select the <i>IFSP Type</i> as either an “Other Revision” or as an “Annual” or “Semi-Annual” review if either of these is due when the child transfers to the <b>receiving CDSA</b>.</li> <li>○ Continue to calculate the <i>Next Review Date</i> based on the date of the <u>initial</u> IFSP, which was developed by the IFSP team at the <b>sending CDSA</b>.</li> <li>○ The <i>Plan Signature Date</i> is the date that the <b>receiving CDSA</b> and the child’s family sign the updated IFSP.</li> <li>○ <u>Note</u>: Do not re-enter the initial IFSP and IFSP reviews that were completed by the <b>sending CDSA</b>. That information already would have been entered into HIS by the <b>sending CDSA</b>.</li> </ul> </li> <li>□ Enter all required ITP service data in HIS using the <i>EI Services</i> module. <ul style="list-style-type: none"> <li>○ When entering services that are being continued, the <b>receiving CDSA</b> must use the original service start date from the <b>sending CDSA</b>’s IFSP.</li> </ul> </li> <li>□ Initial COS. <ul style="list-style-type: none"> <li>○ Do <u>not</u> re-enter the initial COS in HIS. This should have been entered by the <b>sending CDSA</b> under its own root system code.</li> </ul> </li> <li>□ Other HIS modules that are typically completed for new referrals are also required, such as Assign Service Coordinator, Caseload Assignment (if using), Medical Diagnosis, Cross Episode Financial Eligibility, Financial Investigation, and any other modules necessary for providing and billing services.</li> </ul>