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Statewide Parent Advocacy Network, Inc.

Family Voices comments on the Proposed Early Intervention System Single Point of Entry-Model II

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We are writing concerning the proposed Early Intervention System Single Point of Entry (SPOE) using Model II (referral through eligibility). Family Voices is a national network on behalf of children with special healthcare needs and our NJ Chapter is housed at the Statewide Parent Advocacy Network, NJ's federally funded Parent Training and Information Center. I am also writing as a parent, former SICC member and committee chair, and current member of the family advisement committee.

According to the NJ state webpage on early intervention, the Regional Early Intervention Collaboratives (REICs) “*provide technical assistance to families, early intervention programs and professionals, and ensure the protection of family rights*”. If the collaboratives become the entry point for early intervention, we see this as a conflict of interest.

The importance of the existing single point of entry utilizing Special Child Health Services (SCHS) is outlined in various places in the NJ Early Intervention System Part C State Performance Plan (SPP). On page 28 (reiterated on pages 32 and 35) it states “NJ has a comprehensive public awareness and child find system including a county based system point of entry that has existed for over twenty years through the Special Child Health Services Case Management Units. A statewide list of SCHS-CMUs is disseminated to all primary referral sources through the NJ Dept. of Education Child Find Project; Resources, the Central Directory maintained by the NJ Dept. of Human Services, Division of Disability Services; and the REICs. NJ is one of a handful of States nationwide that has a systemic linkage between its Special Child Health Services Registry and the provision of immediate case management services...This process ensures timely referrals to Part C service coordinators housed within the case management units.” We agree with the concerns stated during public comment at the SICC on 1/25 by the representative of SCHS that this ensures knowledge of local resources (both EI and other) and families would fall through the cracks if this referral process was changed.

We are particularly concerned with the process of informal dispute resolution if the REICs become the SPOE as a direct conflict of interest. Again, according to the SPP on page 52 (reiterated on pages 54 and 57) it states, "Link the REIC data regarding informal complaints by families resolved at the regional level with the state procedural safeguards database." How can families resolve disputes neutrally with the same entity that is the SPOE?

It was also mentioned at the 1/25 SICC meeting that the Early Intervention System (EIS) Stakeholder Task Force specifically recommended against the REICs providing services. Some discussion was held if this was outdated because not all of the recommendations of the original '98 task force were implemented. However, some of the same individuals that signed off on the task force recommendations are still current REIC or SICC representatives. Further, the recommendations are sound and were approved by the Commissioner. For example, depending upon the pending NJ early intervention regulations, the task force recommendation (page 10) on correction of age for prematurity is currently being considered ten years later. It is noted (page 11) in the task force recommendations that besides serving as the SPOE, "service coordination...includes - informing families of the availability of advocacy services" again a conflict of interest if the REICs serve as the SPOE. Of particular concern is page 15 of the stakeholders task force paper stating "Separate funding contracts shall be written for (1) initial child and family evaluation/initial assessment and (2) service delivery. Contractors' proposals must address *how they would eliminate conflicts of interest* between evaluation, IFSP development and implementation of services.... Each REIC shall develop an evaluation/assessment plan that address standards and *conflict of interest*" – points which remain valid. Still another direct conflict is the concept (page 30 of task force recommendations) "REICs shall make recommendations regarding allocation of funds based on data from *monitoring and other quality assurance* processes." Besides the obvious financial conflict, how can REICs "monitor" and perform "quality assurance" under the proposed circumstances? Is early intervention moving to a self-assessment/monitoring model? It further states "A process shall be developed consistent with existing state grant management procedures to ensure the opportunity for timely conflict resolution between all parties, including appeal by applicants/grantees/REICs."

Although we support the establishment of the workgroup to study the conflict of interest in developing Model II, we are concerned that this workgroup consists solely of the SICC, REICs, providers, service coordinators, and lead agency with no input from families or advocacy groups. We are deeply concerned that family rights will be undermined. Also, the financial conflict of interest is particularly important in light of the fact the NJ EIS has changed to a family cost share model.

Thank you for the opportunity to comment on the proposed Early Intervention System Single Point of Entry utilizing Model II.

Sincerely,

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