

## EARLY INTERVENTION COMMUNITY PARTNERS' ASSOCIATION - EICPA

Dear Chair Denis, Vice-Chair Carlton, and fellow members of the Interim Finance Committee,

I am writing on behalf of the Early Intervention Community Providers Association (EICPA), which is a trade association representing the majority of providers in the community who offer services to children birth to age three in need of early intervention services. The EICPA would like to express our concerns about ARPA Work Programs #45 and #46 under agenda item D shown below.

Currently members of the EIPCA include; Therapy Management Group, Capability Health and Human Services, Foundation for Positively Kids and Advanced Pediatric Therapy.

***45. Office of the Governor - COVID-19 Relief Programs - FY 2023 Transfer of \$199,200 from the Loss Revenue Reserves category to the American Rescue Plan Act (ARPA) State Agency Allocations category to support an allocation to the Department of Health and Human Services, Aging and Disability Services Division to evaluate the Nevada Early Intervention Services system to incorporate best practices into the system. Requires Interim Finance approval since the amount transferred to the ARPA State Agency Allocations category exceeds \$75,000. RELATES TO ITEM D.46. Work Program #23FR132796***

***46. Department of Health and Human Services - Aging and Disability Services - Early Intervention Services - FY 2023 Addition of \$199,200 in federal American Rescue Plan Act (ARPA), Coronavirus State Fiscal Recovery Funds transferred from the COVID-19 Relief Programs account to evaluate the Nevada Early Intervention Services (NEIS) system to incorporate best practices into the system. Requires Interim Finance approval since the amount added to the ARPA Analysis of NEIS System category exceeds \$75,000. RELATES TO ITEM D.45. Work Program #23FRF32082***

*Work Program Summary provided to EICPA by ADSD:*

*Nevada Early Intervention Services (NEIS) will utilize a consultant to bring an expert level of knowledge and best practices to ensure Nevada is utilizing a proactive service delivery model to meet the needs of children birth to age three within the NEIS system. A recent provider rate study helped Aging and Disability Services Division (ADSD) and NEIS recognize how provider rates and system costs are substantially influenced by the systems design. ADSD is interested in evaluating the current structure of the NEIS system to support potential changes to policies, practices, and contracts. The consultant will describe how the design of Nevada's system, such as the division of the program caseload between contractors and ADSD, has an impact on program costs and provider sustainability.*



## EARLY INTERVENTION COMMUNITY PARTNERS' ASSOCIATION - EICPA

As noted in the Work Program Summary provided by the ADSD, the Agency has already paid for and received a provider rate study completed this past summer by Health Management Associates/Burns & Associates (HMA/Burns). A copy of the summary documents of this study are attached for review.

The EICPA is concerned that yet another study of the Early Intervention Services program is being requested when the findings of the HMA/Burns study have not been implemented. The HMA/Burns study includes two key findings. First, that the rate paid by ADSD to Community Providers is not adequate to meet program requirements. The HMA/Burns study recommends the monthly case rate be increased from \$565 to \$795 in urban service areas and to \$1,024 in rural service areas. The second significant recommendation in the HMA/Burns study is that they recommend maintaining Nevada's existing case rate approach as it minimizes administrative burden, supports a team-based model, and offers predictability of revenue to providers and cost to the program.

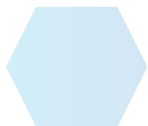
EICPA was hopeful that ADSD would include the rate increases recommended in the HMA/Burns study in their Agency Request budget, however, after reviewing the budget documents posted over this past weekend, we are disappointed to see that rate increases have not been included/recommended.

The financial situation of the Early Intervention Community Providers is dire. We need fiscal help now and cannot wait for a system study to be completed. The EICPA recognizes that the rate study previously completed and the newly requested system study are not commensurate and can be implemented within different budgets. In closing, ADSD has the information needed to move forward with EI program improvement and stability. Consequently, the EICPA would recommend that adequately funding the community partners per the HMA/Burns & Associates Rate Study Final Report should be implemented prior to any study or change to the EI system.

Thank you for your consideration of our recommendation.

Sincerely

Robert Burns, MEd., OTR/L  
President, Early Intervention Community Providers Assn.  
Managing Director  
Therapy Management Group



# EARLY INTERVENTION COMMUNITY PARTNERS' ASSOCIATION - EICPA

## *BOARD OF DIRECTORS*

Robert Burns, Therapy Management Group

Julie Ortiz, Advanced Pediatric Therapies

Diane Ross, The Continuum

Lisa Manning, Capability Health

Fred Schultz, The Positively Kids Foundation