


Component 10 Personnel Development and Standards

Authority: IDEA Sections [632](#), [635](#)
34 CFR Sections [303.13](#), [303.34](#), [303.118](#), [303.119](#), [303.510](#)
Florida Statutes [393.0655](#)

Intent: The Early Steps state system must maintain a comprehensive system of personnel development. These policies are intended to ensure that personnel necessary to provide early intervention services are appropriately and adequately prepared and trained, including the establishment and maintenance of qualifications that are consistent with any state-approved or recognized certification, licensing, registration, or other comparable requirements that apply to the area in which such personnel are providing early intervention services.

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10.1.0 General Requirements		
	Policy	Reference/Related Documents
	<p>10.1.1 The Early Steps State Office (ESSO) will provide a comprehensive training system that includes the following:</p> <ul style="list-style-type: none"> A. Training paraprofessionals and primary referral sources with respect to the basic components of early intervention available in Florida. B. Training personnel to implement innovative strategies and activities for the recruitment and retention of Early Intervention service (EIS) providers C. Promoting the preparation of EIS providers who are fully and appropriately qualified to provide early intervention services. 	<p>IDEA §635(a)(8) 34 CFR §303.118 Operations Guide 10.1.1</p>



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	D. Training personnel to coordinate transition services for infants and toddlers with disabilities who are transitioning from an early intervention service program under Part C of the IDEA to a preschool program under 619 of IDEA or a Head Start, Early Head Start, elementary school program or other program under Part B of the IDEA.	
	10.1.2 ESSO must have policies and procedures that ensure that the personnel needed to meet the requirements of IDEA Part C are appropriately and adequately prepared and trained.	34 CFR §303.119(a)
	10.1.3 RESERVED	
	10.1.4 ESSO will make focused efforts to recruit and hire appropriately and adequately trained personnel to provide early intervention services to eligible children in geographic areas of the state where there is a shortage of personnel to meet these qualifications.	34 CFR §303.119
	10.1.5 Early intervention services must be provided by qualified personnel, including: A. Special educators, including teachers of children with hearing impairments and teachers of children with visual impairments B. Speech-language pathologists C. Audiologists D. Occupational therapists E. Physical therapists F. Psychologists G. Social workers H. Nurses I. Registered dietitians J. Family therapists K. Vision specialists , including ophthalmologists	IDEA §632(4)(F) 34 CFR §303.13(c) Medicaid Early Intervention Services Coverage and Limitations Handbook, page 1-3



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	<p>and optometrists</p> <p>L. Orientation and mobility specialists</p> <p>M. Pediatricians and other physicians for diagnostic and evaluation purposes</p> <p>N. Infant and Toddler Developmental Specialists (ITDS)</p>	
10.2.0 Local Early Steps (LES) Requirements		
Policy		Reference/Related Documents
	<p>10.2.1 Each Local Early Steps (LES) must coordinate and/or provide training at the local level and liaison and work in conjunction with ESSO per contract requirements.</p>	Operations Guide 10.2.1
10.3.0 General Requirements for Provider Application and Approval		
Policy		Reference/Related Documents
	<p>10.3.1 Every prospective Early Steps provider must complete an online application, have an individual email address, and be approved as an individual provider within one of the following provider classes in the Children's Medical Services (CMS) Provider Management system:</p> <p>A. Physician and Dentist</p> <p>B. Licensed Non-physician Healthcare Professional</p> <p>C. Non-licensed Healthcare Professional</p>	Operations Guide 10.3.1 www.cmskidsproviders.com
	10.3.2 Reserved	
	10.3.3 Both independent providers and providers who are employees of a LES must enroll in the CMS Provider Management System with an Early Steps specialty in order to serve Early Steps children.	
	10.3.4 Except as specified in Policy 10.3.5 , the LES will use only those providers who have active provider records in the Early Steps Data System , are enrolled in the CMS Provider Management system and have contracts or agreements for service provision with the LES.	



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	The LES will enter into contracts or agreements only with providers who are enrolled in the CMS Provider Management system.	
	10.3.5 LES will use providers who are not enrolled in the CMS Provider Management system only when: <ul style="list-style-type: none"> A. The family's insurance policy requires use of a specific provider who is not enrolled, or B. The IFSP team authorizes a service for which there is no available enrolled provider. 	Operations Guide 10.3.5
10.4.0 Service Coordinator Requirements		
Policy		Reference/Related Documents
	10.4.1 Individuals providing service coordination must apply for employment at their Local Early Steps office or have a contract with a Local Early Steps in order to provide services to Early Steps eligible infants and toddlers and their families.	
	10.4.2 The LES Service Coordinator Attestation checklist will be completed by the LES to verify that an applicant meets the Early Steps service coordinator requirements.	Operations Guide 10.4.2
	10.4.3 A service coordinator must meet the following education requirements: Bachelor's degree or higher from an accredited university with an emphasis in the areas of psychology, social work, health education, interdisciplinary sociology, early childhood, child development or special education. The following exceptions apply: <ul style="list-style-type: none"> A. An equivalent degree based on transcript review. B. An out-of-field degree with a minimum of three years documented experience with young children and families in a teaching, case management or counseling role, or with individuals with special needs and/or developmental delays of any age in a case management role. 	



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	C. A registered nurse without a bachelor's degree, but with a minimum of three years experience in the same areas required for those with an out-of field degree.	
	10.4.4 Service coordinators with a degree as specified in Policy Handbook 10.4.3 must document a minimum of one year professional experience with young children and families in a teaching, case management or counseling role, or with individuals with special needs and/or developmental delays of any age in a case management role prior to approval as an Early Steps Service Coordinator.	Operations Guide 10.4.4
	10.4.5 Service coordinators must complete the Early Steps on-line orientation modules prior to approval as an Early Steps service coordinator .	
	10.4.6 All service coordinators must complete an apprenticeship prior to being assigned an individual caseload. A. The apprenticeship must be completed within 90 days of the service coordinator's hire date. B. For those service coordinators who meet the educational requirements in Policy Handbook 10.4.3 but cannot document one year experience, an extended apprenticeship must be completed within 120 days of their hire date. C. A service coordinator completing their apprenticeship must do so under the supervision of an experienced, approved Early Steps Service Coordinator. D. Service coordinators are not required to complete the apprenticeship if the following conditions are met: 1. They were employed as a service coordinator in Florida's Early Steps system within the past 5 years, and 2. They were employed in that role for at least one year	Operations Guide 10.4.6
	10.4.7 To comply with payor of last resort	34 CFR §303.34(c)



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	requirements, a service coordinator must be enrolled in Medicaid Targeted Case Management (TCM) in order to serve Medicaid children and seek reimbursement for services provided under Medicaid. Use of the term “service coordination” does not preclude the services actually being categorized as case management or covered by another payor of last resort such as Medicaid.	34 CFR §303.510 Operations Guide 10.4.7
	10.4.8 Documentation of a clear background screen is required for service coordinators prior to being assigned an individual caseload in the Early Steps system. This may be documented in one of the following ways: A. Having a valid active Medicaid provider number. B. Having a copy of a clear Level II background screen that is less than 5 years old.	393.0655, F.S.
	10.4.9 A service coordinator who meets the requirements for a licensed healthcare professional or non-licensed healthcare professional may dually enroll as a service coordinator and direct service provider.	
10.5.0 Licensed Non-Physician Healthcare Professional (LHCP) Personnel Standards		
Policy		Reference/Related Documents
	10.5.1 All licensed healthcare professionals must follow the requirements and participation criteria set forth in the CMS Provider Handbook Licensed Non-Physician Healthcare Professionals as long as they are not in conflict with Early Steps policies and guidelines.	Operations Guide 10.5.1
	10.5.2 A. Licensed healthcare professionals without the required one year of early intervention experience must complete the ES mentorship requirements and the ES Mentorship Documentation Form .	



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	<p>B. Mentors must be of the same discipline as the person being mentored.</p> <p>C. Mentoring will be monitored at the local level with oversight through contract management reviews.</p>	
	10.5.3 Reserved	
	<p>10.5.4 Therapy Assistants and Speech Language Pathologists with provisional licenses must:</p> <p>A. Follow the supervision requirements of their licensure when serving children under the auspices of the Early Steps system.</p> <p>B. Provide information regarding their supervising therapist on the Early Steps Provider Supervision form as part of the Early Steps application and approval process.</p>	Operations Guide 10.5.4
	10.5.5 Individual providers may enroll as an early intervention provider in only one of the professions listed in Chapter 1 of the Medicaid Early Intervention Services Coverage and Limitations Handbook , even if they hold licenses in more than one of those professions.	
	10.5.6 Speech therapy, physical therapy and occupational therapy assistants may not serve as a Primary Service Provider (PSP)	
10.6.0 Non-Licensed Healthcare Professional Personnel Standards		
Policy		Reference/Related Documents
	10.6.1 All non-licensed healthcare professionals must follow the requirements and participation criteria set forth in the CMS Provider Handbook - Non-licensed Healthcare Professionals as long as they are not in conflict with Early Steps policies and guidelines.	Operations Guide 10.6.1
	<p>10.6.2</p> <p>A. Each LES will determine:</p> <ol style="list-style-type: none"> 1. if it will maintain a mentorship program; 	Operations Guide 10.6.2



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	<p>2. if so, those ITDS providers who must complete the mentorship; and</p> <p>3. the timelines for completing the activities outlined in the Early Steps Mentorship Documentation Form.</p> <p>B. Each ITDS completing a mentorship must:</p> <ol style="list-style-type: none"> 1. have an ITDS certificate; and 2. be an approved CMS provider before beginning the mentorship. <p>C. Local Early Steps with ITDS mentorship requirements must:</p> <ol style="list-style-type: none"> 1. use the Early Steps Mentorship Documentation form; and 2. monitor all ITDS mentorship activities at the local level. 	
	<p>10.6.3 The ITDS certificate is required to apply online for enrollment in the CMS Provider Management System and Medicaid Provider Enrollment.</p> <p>A. To obtain an ITDS certificate, all of the following requirements must be met:</p> <ol style="list-style-type: none"> 1. Documentation that degree requirements have been fulfilled. 2. Documentation of one year of professional experience. 3. Completion of university coursework, or a highly qualified designation, or an ITDS Workforce Hardship Waiver. 	<p>Operations Guide 10.6.3</p> <p>CMS Provider Handbook - Non-licensed Healthcare Professionals</p>
	<p>10.6.4 All providers in the non-licensed healthcare professional provider class may dually apply and be approved as an ITDS, if all requirements for ITDS approval are met.</p>	<p>Operations Guide 10.6.4</p>
	<p>10.6.5 ESSO will implement an ITDS Workforce Hardship Waiver process to ensure an adequate workforce to meet the requirements of IDEA, Part C. The ITDS Workforce Hardship Waiver review process supplements and does not replace the provider enrollment process using the ITDS personnel standards outlined in the CMS</p>	<p>Operations Guide 10.6.5</p> <p>34 CFR §303.119</p> <p>www.cms-kids.com, Providers tab</p>



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	<u>Provider Handbook - Non-licensed Healthcare Professionals.</u>	
	10.6.6 Board Certified Associate Behavior Analysts (BCABA) must be supervised by a Board Certified Behavior Analyst (BCBA) and must provide information regarding their supervising BCBA on the <u>Early Steps Provider Supervision form</u> as part of the <u>Early Steps</u> application and approval process.	
10.7.0 Dual Enrollment		
Policy		Reference/Related Documents
	10.7.1 An individual provider can be dually enrolled in the <u>CMS Provider Management System</u> if the requirements for both provider types are met. The exception is that individual providers may enroll as an early intervention provider in only one of the professions listed in Chapter 1 of the <u>Medicaid Early Intervention Services Coverage and Limitations Handbook</u> .	<u>Policy Handbook 10.5.5</u> <u>Policy Handbook 10.6.4</u>



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