

Component 10 Personnel Development and Standards

Authority: IDEA Sections [1432](#), [1435](#)
34 CFR Sections [303.13](#), [303.34](#), [303.118](#), [303.119](#), [303.510](#)
Florida Statutes [391.301](#), [391.308](#), [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> <p>A. Training paraprofessionals and primary referral sources with respect to the basic components of early intervention available in Florida,</p> <p>B. Training personnel to implement innovative strategies and activities for the recruitment and retention of Early Intervention service (EIS) providers,</p> <p>C. Promoting the preparation of EIS providers who are fully and appropriately qualified to provide early intervention services, and</p> <p>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</p>	<p>20 U.S.C. §1435(a)(8) 34 CFR §303.118 391.301(4)(f), F.S. Operations Guide 10.1.1</p>



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	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) Operations Guide 10.1.2
	10.1.3 Reserved	
	10.1.4 The ESSO will ensure the Local Early Steps (LES) make focused efforts to recruit and hire or contract with appropriately and adequately trained personnel to provide early intervention services to eligible children in their service area.	34 CFR §303.119 391.308(2)(e), F.S. Policy 6.1.1
	10.1.5 Early intervention services must be provided by qualified personnel , including: A. Speech-language pathologists , B. Audiologists , C. Occupational therapists , D. Physical therapists , E. Psychologists , F. Social workers G. Nurses , H. Registered Dietitians, I. Nutrition Counselors, J. Family therapists, K. Pediatricians and other physicians for diagnostic and evaluation purposes, and L. Infant and Toddler Developmental Specialists (ITDS)	20 U.S.C. §1432(4)(F) 34 CFR §303.13(c) 34 CFR 303.13 (d) 391.308(2)(d), F.S. 391.308(4)(d), F.S. Florida Medicaid Early Intervention Services Coverage Policy, page 3
10.2.0 Local Early Steps (LES) Requirements		
Policy		Reference/Related Documents



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	<p>10.2.1</p> <p>A. 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> <p>B. Each LES may elect to require additional training beyond the minimum training standards set forth by ESSO.</p> <p>C. Each LES must have agreements with their providers that, at a minimum, stipulate: roles and responsibilities, general requirements, enrollment as an Early Steps Provider, training requirements, timelines and claims and billing practices. In addition, provider agreements must stipulate that providers do the following when a family misses a second consecutive appointment without advance notice:</p> <ol style="list-style-type: none"> 1. Contact the family’s service coordinator within 5 days of the second missed appointment, 2. Work with the family’s service coordinator to re-establish services or to end services due to unsuccessful attempts to contact, and 3. Document any missed appointments and follow-up activity in the provider’s record for the child. 	<p>Policy Handbook 4.2.6 Operations Guide 10.2.1 Operations Guide 6.1.3.C</p>
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10.3.0 General Requirements for Provider Application and Approval

	Policy	Reference/Related Documents
	<p>10.3.1 Every prospective Early Steps provider must submit an application to each Local Early Steps (LES) serving the county or counties in which they desire to provide services requesting to be approved as an Early Steps provider.</p>	
	<p>10.3.2 Each Early Steps provider must submit an application to Medicaid in their appropriate discipline(s) before providing services to infants and toddlers in Early Steps.</p>	
	<p>10.3.3 Except as specified in Policy 10.3.5, both independent providers and providers who are employees of a LES must be approved as an individual provider by the LES order to serve Early Steps children in the service area.</p>	
	<p>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 and have contracts or agreements for service provision with the LES. All providers must be approved by the LES.</p>	
	<p>10.3.5 LES will use providers who are not enrolled in the Early Steps Data System only when the family's insurance policy requires use of</p>	<p>Operations Guide</p>



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	a specific provider who is not enrolled.	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 one of the following education requirements: A. 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, or B. An equivalent degree based on transcript review, or C. 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, or D. 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



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	<p>10.4.5 All service coordinators must complete the following prior to being assigned an individual caseload:</p> <p>The service coordinator apprenticeship training found at www.train.org/florida/welcome,</p> <p>A. The Early Steps orientation modules training modules found at http://www.cms-kids.com/providers/early_steps/Training/Orientation/Orientation.html,</p> <p>B. An apprenticeship under the supervision of an experienced, approved Early Steps Service Coordinator within 90 days of their hire date as verified via the apprenticeship and attestation checklist (unless meeting the specifications in 10.4.6 below), and</p> <p>C. Pass a clear background screening as documented by the following:</p> <ol style="list-style-type: none"> 1. A valid active Medicaid provider number, or 2. A copy of a clear Level II background screen less than 5 years old. 	
	<p>10.4.6 Service coordinators are not required to complete the apprenticeship, apprenticeship training, or Early Steps orientation modules if the following conditions are met:</p> <p>A. Employed as a service coordinator in Florida’s Early Steps system within the past 3 years, and</p> <p>B. Employed as a service coordinator for at least one year.</p>	
	<p>10.4.7 To comply with payor of last resort 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.</p>	<p>34 CFR §303.34(c) 34 CFR §303.510 Operations Guide 10.4.7</p>
	<p>10.4.8 The LES must maintain documentation of each service coordinator’s:</p> <ol style="list-style-type: none"> A. Qualifications, B. Employment record, C. Completion of apprenticeship training, D. Completed Service Coordinator Apprentice Checklist, E. Completed Early Steps orientation modules, and F. Completed Service Coordinator Attestation Checklist as 	<p>393.0655, F.S.</p>



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	submitted to Medicaid Provider Enrollment.	
	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 Healthcare Professional (LHCP) Personnel Standards		
Policy		Reference/Related Documents
	<p>10.5.1</p> <p>A. All licensed therapists must follow the supervision requirements of their licensure when serving children under the auspices of the Early Steps system.</p> <p>B. All licensed providers must provide the following items:</p> <ol style="list-style-type: none"> 1. Copy of Form W9(s) for each pay to/remit practice affiliation (solo/group/hospital) to ensure accurate claims payment, 2. Copy of current Curriculum Vitae documenting previous five (5) year work/educational history in a month/year timeline, with explanation of any gaps longer than 90 days in employment, 3. Copy of Social Security card, 4. Copy of current, valid Professional license if currently licensed to practice in the State of Florida, 5. And if NOT licensed to practice in the State of Florida, documentation of compliance with any current registration requirements of the applicable licensing boards. 6. Individual National Provider Identification (NPI) number, 7. Copy of any Specialty Certificates, Certification, or degrees, 8. Copy of current professional liability insurance coverage, 9. Summary of professional liability claim(s) pending or filed against you within the past five years, 10. Summary of Medicaid and Medicare sanctions within the past five years, 11. Level II Security Background investigation pursuant to Florida Statute Chapter 435 standards completed within the past 12 months (exceptions are APRN, PA, RN), 12. Copy of Practice Protocols established and signed by both the credentialed supervising physician and the applicant (APRN & PA only), 13. Current malpractice coverage in accordance to the Florida Statute Practice Act or bond that complies with the physician's 	<p>Operations Guide 10.5.1</p>



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	<p>relevant Practice Act in the Florida Statutes,</p> <p>14. Documentation of early intervention experience, and</p> <p>15. Documentation of Early Steps Orientation Modules completed.</p> <p>C. The LES will maintain a provider file containing the required documentation listed on the Early Steps Provider Attestation Checklist or ensure access to the provider file for local and state monitoring.</p>	
	<p>10.5.2</p> <p>A. Licensed healthcare professionals must have one year of early intervention experience.</p> <p>B. One year of experience for a licensed non-physician provider is 1,600 hours of post-degree professional, degree specific hands-on experience with children from birth up to sixty months of age who have special needs or developmental delays. Volunteer work is not considered professional experience for enrollment requirements.</p>	
	<p>10.5.3</p> <p>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 prior to serving Early Steps children without a mentor.</p> <p>B. Mentors must be 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> <p>D. The mentorship must be completed within one year of its initiation.</p>	
	<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
	<p>10.5.5 Individual providers may enroll as an early intervention provider in only one of the professions listed in Chapter 4-3 of the Florida Medicaid Early Intervention Services Coverage Policy Handbook, even if they hold licenses in more than one of those professions. An early intervention provider may not be enrolled simultaneously as both an Infant Toddler Developmental Specialist and a licensed healthcare professional.</p>	



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	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 Non-licensed providers who can provide services to infants and toddlers in the Early Steps Program are: A. Infant and Toddler Developmental Specialists (ITDS) , and B. Board Certified Associate Behavior Analysts (BCABA)	
	10.6.2 A. The Early Steps Provider Attestation Checklist must be used to document the items listed in 10.6.2.B and maintained in the provider file. B. In order to be approved for initial certification, ITDSs must provide the following documentation: <ol style="list-style-type: none"> 1. Copy of diploma or transcripts <ol style="list-style-type: none"> a. A bachelor's degree or higher from an accredited college or university in early childhood education or early childhood/special education, child and family development, family life specialist, communication sciences, psychology, or social work. <ol style="list-style-type: none"> i. The LES should verify that university accreditation is met by checking the following website: http://ope.ed.gov/accreditation/Search.aspx. If the college or university is not listed on the website, verification of accreditation by another organization must be included in the certification packet. ii. (or) An equivalent degree based on transcript review, which would generally consist of at least 18 hours in one of the fields listed above, iii. (or) A bachelor's degree or higher with a degree in Rehabilitation with coursework related to serving the visually impaired OR a bachelor's degree as a teacher for the visually impaired AND a minimum of 9 hours of coursework specific to infant and toddlers or a certificate of completion of VIISA or INSITE training. 	Operations Guide 10.6.2



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	<ul style="list-style-type: none"> iv. (or) A bachelor’s degree or higher in Communication disorders, audiology or deaf studies AND a minimum of 9 hours of coursework specific to infants and toddlers who are deaf and hard of hearing or a certificate of completion of SKI-HI or INSITE training, v. (or) An out-of-field degree from an accredited college or University. <p>2. Documentation of professional/post-degree experience</p> <ul style="list-style-type: none"> b. An ITDS applicant with an in-field or equivalent degree must provide documentation of at least one year of post-degree professional experience in early intervention using the Early Steps Certification of Experience form. <p>3. Verification of one of the following:</p> <ul style="list-style-type: none"> a. The applicant has successfully completed the university ITDS coursework at an approved university as documented by a university letter or transcripts, b. (or) The applicant has completed the six ITDS online modules. <p>C. All non-licensed providers must provide the following items to the LES prior to providing services:</p> <ul style="list-style-type: none"> 1. Copy of Form W9(s) for each pay to/remit practice affiliation (solo/group/hospital) to ensure accurate claims payment, 2. Copy of work history documenting previous five (5) year work/educational history in a month/year timeline, with explanation of any gaps longer than 90 days in employment, 3. Copy of Social Security card, 4. Copy of any Specialty Certifications, 5. Copy of current professional liability insurance coverage, 6. Summary of professional liability claim(s) pending or filed against you within the past five years, 7. Summary of Medicaid and Medicare sanctions within the past five years, 8. Level II Security Background investigation pursuant to Florida Statute Chapter 435 standards completed 	
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	<p>within the past 12 months,</p> <p>9. Copy of required education from accredited University/College,</p> <p>10. Documentation of University Coursework equivalent or ITDS modules completed, and</p> <p>11. Documentation of Early Steps Orientation Modules completed.</p>	
	<p>10.6.3</p> <p>A. Each LES will determine:</p> <ol style="list-style-type: none"> 1. If it will require ITDS providers to complete a mentorship program, 2. If so, which ITDS providers must complete the mentorship, and 3. The timelines for completing the activities outlined in the ES Mentorship Documentation Form. <p>B. Each ITDS completing a mentorship must:</p> <ol style="list-style-type: none"> 1. Have an ITDS certificate, and 2. Be a certified Early Steps provider before beginning the mentorship. <p>C. LESs 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>Operations Guide 10.6.3</p>
	<p>10.6.4 The ITDS certificate is required to apply online for enrollment in Medicaid. To obtain an ITDS certificate from the Local Early Steps, all the following requirements must be met:</p> <ol style="list-style-type: none"> A. Documentation that degree requirements have been fulfilled, B. Documentation of required professional experience, C. Documentation of ITDS university coursework or ITDS modules completed, D. Documentation of Early Steps Orientation modules completed, and E. Completed Early Steps Provider Attestation Checklist. 	<p>Operations Guide 10.6.4</p>



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	<p>10.6.5 All ITDSs must renew their ITDS certification every three years from the date of their last certification. Such renewal will include:</p> <p>A. Completion of a minimum of 24 hours of continuing education within the previous three-year period related to infant and toddler development or family engagement with caregivers of children under 36 months of age. Hours of continuing education may include:</p> <ol style="list-style-type: none"> 1. Continuing Education Units (CEUs) in relevant classes, and/or 2. In-service hours. <p>B. Documentation of all CEUs and/or in-service hours on the Early Steps ITDS Recertification Form and Continuing Education Credits or In-Service Hours Form.</p>	<p>Operations Guide 10.6.5</p>
	<p>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 Early Steps Provider Supervision form as part of the Early Steps application and approval process.</p>	
10.7.0 Dual Enrollment		
Policy		Reference/Related Documents
	<p>10.7.1 An individual provider can be dually enrolled in Early Steps 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 the Florida Medicaid Early Intervention Services Coverage and Limitations Handbook.</p>	<p>Policy Handbook 10.5.5 Policy Handbook 10.6.4</p>



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