



# Practice Manual

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## Chapter 1: Missouri First Steps Infrastructure

**Missouri Department of Elementary and Secondary Education  
Office of Special Education  
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# 1

## MISSOURI FIRST STEPS INFRASTRUCTURE

First Steps is Missouri’s early intervention system for infants and toddlers, birth to age three, who have developmental delays or a diagnosed condition associated with developmental disabilities or a high probability of developmental disabilities.

The First Steps program operates statewide and conducts regional activities in accordance with various federal and state regulations. This chapter focuses on the infrastructure and components of the First Steps system.

### SECTION I: REGULATIONS

*Missouri Part C State Plan (34 CFR Part 303)*

The Individuals with Disabilities Education Act (IDEA) is the nation’s special education law. IDEA provides federal funding to assist states in providing educational opportunities to students age five to 21 years. Part C of IDEA is the section of the law that provides for early intervention services to infants and toddlers with disabilities, birth to age three.

#### A. Federal Regulations

The purpose of Part C of IDEA is to ensure systems and structures are in place at the state level to implement and maintain a comprehensive, coordinated, multidisciplinary, interagency program of early intervention services for infants and toddlers and their families.

The federal regulations are rules that guide the implementation of Part C of IDEA. The federal regulations incorporate the minimum requirements from the IDEA law and are the basis for establishing a state’s minimal requirements for compliance.

Federal funds are provided to each state based on census numbers of children, birth to three, in the state’s general population. These funds assist states in operating a comprehensive statewide program of early intervention services.

A link to the *Federal Regulations of Part C of IDEA* is available from the First Steps website (see Chapter 1 Links).

## B. State Regulations

Using the federal regulations as a guide, each state participating in Part C of IDEA must develop state rules which specify how Part C will be implemented in the state.

### 1. Missouri State Plan for Part C – First Steps

In Missouri, the Part C system is called the First Steps program. The Missouri *State Plan for Part C – First Steps* (see Chapter 1 Links), commonly referred to as “state regulations,” outlines how Missouri meets the federal regulations.

Some of the federal regulations that Missouri must incorporate into the State Plan for Part C – First Steps include the following:

- A public awareness program;
- A comprehensive child find system;
- Development and implementation of parental rights;
- Evaluation and assessment procedures;
- A state definition of developmental delay;
- Development, review and evaluation of the Individualized Family Service Plan (IFSP) and service coordination;
- Appropriate early intervention services that are based on scientifically based research, to the extent practical and available;
- General administration, supervision, and monitoring of the early intervention system;
- Reimbursement procedures which include the timely reimbursement of funds used under Part C of IDEA; and
- The establishment of a State Interagency Coordinating Council (SICC).

### 2. Missouri Part C Compliance Standards and Indicators

To ensure federal and state regulations are followed, the Department of Elementary and Secondary Education (DESE) established the *Missouri Part C Compliance Standards and Indicators* (see Chapter 1 Links). This document is used in the annual monitoring of the System Points of Entry (SPOEs) on implementation of the federal regulations and the Missouri State Plan for Part C – First Steps.

The compliance standards and indicators document is organized according to the early intervention process, from referral to First Steps through transition out of First Steps. Each step in the process includes the requirements (e.g., actions, timelines) for compliance.

## SECTION II: OPERATIONS

### *Missouri Part C State Plan Section II (34 CFR 303.111 – 303.126)*

The Governor of each state assigns a lead agency to establish and oversee the operations and initiatives which support the state's early intervention system. DESE has been designated the lead agency responsible for implementing Part C of IDEA in Missouri. The Office of Special Education, a division of DESE, oversees the federal and state regulations that govern the First Steps program (see the *Office of Special Education Organizational Chart* in Chapter 1 Documents).

The Office of Special Education operates the First Steps program primarily through two contracts: one for the SPOE offices to conduct service coordination activities and one for a Central Finance Office (CFO) to enroll and pay providers, as well as other fiscal management activities.

#### **A. Lead Agency**

As the lead agency, DESE is responsible for employing staff to oversee the First Steps program. In the Office of Special Education, the Early Intervention section employs the primary staff who implement and monitor the First Steps program. This section consists of a Coordinator, five regional Area Directors, two Compliance staff and an Administrative Assistant.

#### **1. Jefferson City Staff**

The Coordinator, Compliance staff and Administrative Assistant are located in the Office of Special Education in Jefferson City, Missouri.

##### **a) Coordinator**

The Coordinator oversees the implementation of the regulations, contractual obligations and coordinates with multiple state agencies including other sections at DESE. The Coordinator is also responsible for the supervision of the regional Area Directors, Compliance staff and Administrative Assistant.

##### **b) Compliance Staff**

Compliance staff conduct annual compliance monitoring of SPOEs and early intervention providers and are responsible for investigating child complaints related to the First Steps system in all ten SPOE regions.

### c) **Administrative Assistant**

The administrative assistant routes questions and phone calls to appropriate staff, takes minutes at state meetings, maintains the First Steps website, and other activities that assist the First Steps state staff.

## 2. **Regional Staff**

The Area Directors are located in regional offices around the state. Each Area Director oversees two SPOE offices and provides guidance on best practice related to early intervention, contract oversight, technical assistance, provider training and billing support. The *Missouri First Steps SPOE Regions Area Directors Map* (see Chapter 1 Documents) provides contact information and coverage areas for each Area Director.

### **B. System Point of Entry**

DESE contracts with agencies to operate ten SPOE offices for service coordination and related activities. The *Missouri First Steps System Point of Entry Regions Map* (see Chapter 1 Documents) provides contact information for each region. The SPOE is responsible for administering the First Steps program at a regional level, which includes the following contractual responsibilities:

- Manage day to day operations of the First Steps program
- Develop and implement plans for SPOE personnel that will allow staff to be knowledgeable of the First Steps program.
- Conduct annual observations of Service Coordinator activities
- Educate primary referral sources on appropriate referrals
- Receive and process referrals
- Complete the intake process and eligibility determination
- Facilitate IFSP meetings and complete the IFSP document; including transition activities
- Maintain both an electronic and paper record for each child referred or transferred, regardless of the child's status
- Resolve any problems regarding the operations of the SPOE

## C. SPOE Staff

SPOE staff members include one SPOE Director per region and numerous Service Coordinators, including a Lead Service Coordinator and/or Team Coordinator. The SPOE office staff may also include a secretary, data entry and temporary personnel as outlined in the contract. Each staff member plays a critical role in ensuring the SPOE operates efficiently and meets all contract requirements.

### 1. SPOE Director

The SPOE Director manages the day-to-day operations of the region including supervising personnel, assisting families of eligible children, working with enrolled providers, collaborating with school districts, and networking with community partners. The SPOE Director and Area Director meet regularly to review SPOE data and discuss administrative activities in order to plan training and professional development for the region.

### 2. Service Coordinator

The SPOE agency is responsible for employing all Service Coordinators for the First Steps program. The SPOE agency must identify Service Coordinators who meet the minimum qualifications as outlined in the Personnel Standards for First Steps Providers (see Service Provider Manual Chapter 1: Provider Enrollment). The Service Coordinator must complete all required First Steps module training prior to being assigned a caseload.

Regardless of the specific duties, all Service Coordinators need skills to organize information effectively, manage time efficiently and communicate clearly with families and providers. Service Coordinators should be knowledgeable of First Steps compliance, best practices in early intervention and data entry. For more information on service coordination, see Chapter 8 Early Intervention Services.

#### a) Lead Service Coordinator

The SPOE may designate a Lead Service Coordinator to provide assistance to the SPOE Director with oversight and training of Service Coordinators, in addition to carrying a caseload.

#### b) Team Coordinator

The SPOE may designate a Service Coordinator to be a Team Coordinator to assist with provider recruitment, training, Early Intervention (EI) examiners, and Early Intervention Teams (EIT) and provider complaints within the region.

### 3. Additional Office Staff

Each SPOE office has at least one secretary who provides assistance to the SPOE Director and customer support activities. The SPOE may also have data entry staff who support the region with maintaining children's records, including filing, electronic and paper record keeping, and document preparation. Additionally, the SPOE may also employ temporary personnel as determined annually by DESE to support the region with various tasks including record keeping or destruction.

#### D. Providers

The SPOE is responsible for locating a sufficient number of providers in order to meet the necessary services for children and families in the region. If there are not enough providers enrolled in First Steps, the SPOE may consider subcontracting with providers outside of First Steps. Additionally, the SPOE Director works with the Area Director to identify ongoing provider training needs within the region. For more information on provider service types, see Chapter 8 Early Intervention Services.

#### ➤ Early Intervention Teams

The SPOE utilizes the state identified transdisciplinary service delivery model known as EIT to ensure early intervention services are available and accessible throughout the region. The EIT consists of at least one Service Coordinator, Physical Therapist, Occupational Therapist, Speech Language Pathologist and Special Instructor who collaborate as a team to support children and families within their natural environment.

Children and families may need services from disciplines other than those represented on the EIT. These providers are referred to as Ancillary Providers. Some examples of Ancillary Providers are applied behavior analysts (ABA), audiologists, dieticians, and social workers.

For more information on EIT, see Chapter 7 Early Intervention Teams.

#### E. Central Finance Office

DESE contracts with the CFO to perform the following responsibilities for First Steps:

##### 1. First Steps Provider Enrollment and Account Maintenance

The CFO enrolls First Steps service providers who meet the criteria for qualified personnel as identified in state regulations. Providers are required to sign an agreement to provide services in accordance with First Steps rules and regulations. This agreement is maintained by the CFO.

Upon successful enrollment as a First Steps provider, the CFO conducts regular reviews of provider accounts to ensure providers continue to meet the criteria as qualified personnel, including completion of module training, a review of provider licensure, liability insurance and criminal history checks.

The CFO develops and maintains a list of all active service providers who are qualified to deliver services for First Steps. This list is referred to as the *Service Provider Matrix* (see Chapter 1 Links).

## **2. Child Data System**

The CFO maintains a web-based child data system, known as *WebSPOE* (see Chapter 1 Links). WebSPOE contains information about referral, intake, eligibility determination and IFSP development and implementation. Data is entered in real-time and is accessible based on a user-level access in order to maintain privacy. Service Coordinators, service providers, SPOE Directors and DESE staff all have different access levels in WebSPOE.

WebSPOE is compliance-driven, meaning it requires critical data items and conducts edit checks on data to help ensure accuracy. WebSPOE is compliant with both Family Educational Rights and Privacy Act (FERPA) and Health Insurance Portability and Accountability Act (HIPAA) privacy rules.

## **3. Fiscal Management**

The CFO processes provider claims for delivered services, travel or mileage and pays providers based on the rate schedule outlined in the state regulations. The CFO seeks reimbursement for delivered services from applicable funding sources (i.e., Medicaid and private insurance) on an individual child basis. The CFO also processes family cost participation monthly statements and collects fees. For more information about insurance and family cost participation, see Chapter 5 System of Payments.

## SECTION III: COORDINATING COUNCILS

*Missouri Part C State Plan Sections V, VI and VII (34 CFR 303.301, 303.302 and 303.600)*

Part C of IDEA requires the establishment of a SICC to support and promote early intervention services, and to collaborate with other state agencies, public agencies, and families. Additionally, DESE encourages the SPOEs to create or participate in a similar council at a regional level known as a Regional Interagency Coordinating Council (RICC).

### **A. State Interagency Coordinating Council**

As required under Part C of IDEA, the Governor appoints members to the SICC which include, but are not limited to, First Steps parents, public or private service providers, DESE staff, Head Start staff, state legislators, and other state staff involved in early childhood programs.

The required duties of the SICC are to advise and assist DESE in the performance of the First Steps program, including finances, service delivery, child find and transition activities. The SICC is also required to assist DESE in the preparation of an application for federal funds and annual performance reports. The SICC must prepare and submit an annual report to the Governor and to the U.S. Department of Education on the status of children with disabilities and their families in First Steps.

SICC meetings are open and accessible to the public and participation from the public is encouraged. All SICC meeting dates, minutes and handouts are posted on the First Steps website.

### **B. Regional Interagency Coordinating Council**

While RICCs are not required by federal or state regulations, DESE has determined regional councils are beneficial to ensure collaboration and coordination between programs that serve young children and families. SPOE regions who choose to utilize an RICC may create their own SPOE led council, participate in an outside or existing council or have a combination of their own council and an outside/existing council.

The RICC is responsible for assisting the SPOE with local child find efforts, public awareness activities and determining the effectiveness of the First Steps system within the region. The SPOE may request the Service Coordinator participate as part of the RICC council along with stakeholders representing various community partnerships such as school districts, hospitals and medical community, state agencies, providers, and families of children with disabilities.

## SECTION IV: FUNDING THE FIRST STEPS PROGRAM

*Missouri Part C State Plan Section XVII and XVIII. (34 CFR 303.500 through 303.521)*

As the lead agency, DESE's responsibility includes the identification and coordination of all available public and private resources to support the First Steps program, which consists of the following funding sources:

- State Funds;
- Federal IDEA Part C Funds;
- Federal IDEA Part B Funds;
- Family Cost Participation Fees;
- Private Health Insurance; and
- Public Insurance (MO HealthNet/Medicaid).

First Steps is primarily funded through state and federal dollars. State dollars are general revenue funds from the state government specifically allocated for the First Steps program each year by the legislature. Federal dollars are special education funds from IDEA for Part C (birth to age three) and Part B (ages 3 to 21). The U.S. Department of Education distributes federal dollars to the State of Missouri each year.

Missouri law requires families of eligible children in First Steps to pay a monthly fee (i.e., family cost participation) in order to receive First Steps services, unless the family does not have the ability to pay. The monthly fee is based on the family's household size and income level.

Additionally, Missouri law requires private insurance carriers to help pay for the cost of First Steps services by either making a one-time payment to First Steps each year or by reimbursing DESE for the direct services (i.e., Assistive Technology, Occupational Therapy, Physical Therapy and Speech-Language Pathology) delivered to children and families in First Steps.

DESE has an interagency agreement with the Department of Social Services, MO HealthNet Division (MHD) that allows MHD to reimburse DESE for direct services (i.e., Assistive Technology, Audiology, Counseling, Developmental Assessment, Health Services, Nursing, Occupational Therapy, Physical Therapy, Psychological Services, Speech-Language Pathology, Social Work and Vision Services) delivered to children in First Steps who are also eligible and participating in MO HealthNet/Medicaid.

Together these various funding sources create a system of payments for the First Steps program. For more information on the System of Payments, see Chapter 5.

## SECTION V: DATA COLLECTION, REPORTING AND UTILIZATION

*Missouri Part C State Plan Section XXI. (34 CFR 303.124 and 303.700 through 303.702)*

DESE must collect and provide data as required by the U.S. Department of Education, Office of Special Education Programs. The data is entered into WebSPOE by the SPOE and compiled by the CFO on a regular basis or upon request by DESE.

### A. Federal Reporting

The U.S. Department of Education, Office of Special Education Programs (OSEP) requires each state to develop a Part C State Performance Plan (SPP) that describes key indicators and the targets for performance on each indicator. Each year, DESE sends an Annual Performance Report (APR) to OSEP that describes the First Steps performance for that year and progress toward meeting the SPP targets.

In turn, DESE provides an annual report to each SPOE that outlines their performance on each indicator of the APR. This report is called Public Reporting by SPOE Region. The SPOE and Area Directors utilize this data report to identify whether local improvement activities are needed to improve performance in the region.

For more information on the *Part C State Performance Plan/Annual Performance Report and Public Reporting*, see Chapter 1 Links.

### B. State and Regional Reporting

A regular data summary, known as the *SPOE Data Report* (see Chapter 1 Links), is posted monthly on the First Steps website by DESE staff. The summary includes state and regional data about referrals, eligibility reasons and child count.

This report is frequently used at the state and local levels by Area Directors, SPOE Directors, and RICC members to determine trends that may require immediate technical assistance or targeted child find activities. This report may also be used for a variety of other program purposes.

Additionally, there are several annual reports posted on the First Steps website (see Chapter 1 Links), including:

- Survey Reports (includes family survey results)
- Financial Reports (includes state and regional cost per child)
- Other Reports (includes newborn hearing screening information)