

Periodic Review of the Individualized Family Service Plan (IFSP) and Annual Meeting to Evaluate the IFSP

Introduction

There are three required processes regarding IFSPs:

- Meeting to develop the Initial IFSP
- Periodic Review of the IFSP (A Periodic Review may be less formal than a Meeting to develop the Initial IFSP or an Annual Meeting to Evaluate the IFSP. Formats for Periodic Reviews fall on a continuum from as informal as an email exchange or phone call to as formal as a face-to-face meeting. A Periodic Review is not required to be a face-to-face meeting.)
- Annual Meeting to Evaluate the IFSP (An Annual Meeting to Evaluate the IFSP is more formal than a Periodic Review and must be a face-to-face meeting.)

This document addresses the Periodic Review of the IFSP and the Annual Meeting to Evaluate the IFSP. The following guidance will provide procedures for making changes to an IFSP including:

- Types of changes allowed;
- Formats;
- Participants; and
- Procedural safeguards.

Overview

Progress toward IFSP outcomes must be reviewed at least every six months. This may take place as a Periodic Review, or during an Annual Meeting to Evaluate the IFSP. A local service area always has the option to conduct an Annual Meeting to Evaluate the IFSP in place of a Periodic Review. It may be appropriate to conduct an Annual Meeting to Evaluate the IFSP instead of a Periodic Review if there are likely to be significant changes to the IFSP or if nearing the due date for an Annual Meeting to Evaluate the IFSP.

The table below indicates various circumstances that trigger the need for a Periodic Review or an Annual Meeting to Evaluate the IFSP.

Circumstance	Process
If six months have elapsed since the previous Periodic Review, Initial IFSP Meeting or Annual Meeting to Evaluate the IFSP,	Then a Periodic Review is required, unless an Annual Meeting to Evaluate the IFSP is conducted instead.
If a parent requests the IFSP team to reconvene,	Then a Periodic Review is required, unless an Annual Meeting to Evaluate the IFSP is conducted instead.
If major changes have occurred in family priorities, concerns or resources,	Then a Periodic Review is required, unless an Annual Meeting to Evaluate the IFSP is conducted instead.
If an outcome needs to be revised or added,	Then a Periodic Review is required, unless an Annual Meeting to Evaluate the IFSP is conducted instead.
If one or more service needs a change in: <ul style="list-style-type: none"> ● Frequency; ● Intensity; ● Duration; ● Method; or ● Location, 	Then a Periodic Review is required, unless an Annual Meeting to Evaluate the IFSP is conducted instead. Parental signature is required.
If a service needs to be added or ended,	Then a Periodic Review is required, unless an Annual Meeting to Evaluate the IFSP is conducted instead. Parental signature is required.
If a Transition Plan is due,	Then a Periodic Review is required, unless the Transition Plan is developed during an Initial IFSP Meeting or Annual Meeting to Evaluate the IFSP. Parental signature is needed if services are added.
If a Transition Conference is due,	Then a Periodic Review may be combined with the Transition Conference, as long as the

Circumstance	Process
	requirements of both the Periodic Review and Transition Conference are met.
If twelve months have elapsed since the previous Initial IFSP Meeting or Annual Meeting to Evaluate the IFSP,	Then an Annual Meeting to Evaluate the IFSP is required. Parental signature is required.

Periodic Review of the IFSP

Regulatory Requirements related to Periodic Review

The regulatory requirements for Periodic Review, accessibility and convenience of meetings, and parental consent as found at 34CFR303.342(b)(d)(e) are summarized below.

Periodic Review

A Periodic Review of the IFSP for a child and the child's family must be conducted every six months or more frequently if conditions warrant, or if the family requests such a review.

A Periodic Review of the IFSP must be held at least every six months for the following purposes:

- determine the degree to which progress toward achieving the outcomes is being made; and
- whether modification or revision of the results, outcomes or early intervention services is necessary.

A Periodic Review may be carried out by a meeting or by another means that is acceptable to the parents and other participants.

A Periodic Review must be conducted:

- In settings and at times that are convenient for the family; and
- In the native language of the family or other mode of communication used by the family, unless it is clearly not feasible to do so.

Accessibility and Convenience of Meetings

Meeting arrangements must be made with, and written meeting notice provided to, the family and other participants early enough before the meeting date to ensure that they will be able to attend.

Parental Consent

If changes are made to the IFSP at the periodic review, the contents of the IFSP must be fully explained to the parents and informed written consent must be obtained prior to the provision of early intervention services described in the IFSP. Each early intervention service must be provided as soon as possible after the parent provides consent for that service.

Guidance for Periodic Reviews

Purpose of Periodic Review

The purpose of a Periodic Review is to determine the degree to which progress is being made toward achieving all outcomes on the IFSP. If the review results in a decision that modifications or revisions of the outcomes or early intervention services are necessary, these changes will be reflected on the IFSP.

When Periodic Review is Needed

Progress toward IFSP outcomes must be reviewed at least every six months. This will typically take place as a Periodic Review. Periodic Reviews may also be conducted more frequently than every six months if conditions warrant or if the family requests a review.

Each time an IFSP is reviewed the clock starts again on the requirement that the IFSP be reviewed at least every six months, but does not change the due date for a complete evaluation of the IFSP on at least an annual basis. For example, if an IFSP developed in January is reviewed in March, then it must be reviewed again in September (i.e., six months from March) rather than waiting nine months for when the Annual Meeting to Evaluate the IFSP is due.

Essentially, each time a Periodic Review is completed the clock starts again on the requirement that IFSPs be reviewed at least every six months; however, this does not change the date for a complete evaluation of the IFSP on at least an annual basis. Each time an Annual Meeting to Evaluate the IFSP is completed, the clock starts again for both a Periodic Review and an Annual Meeting to Evaluate the IFSP.

Required Participants for Periodic Review

The Service Coordinator, along with the family identifies who should participate in the Periodic Review.

Required participants in the Periodic Review must include [34CFR303.343(a)]:

- The parent or parents of the child.
- Other family members, as requested by a parent, if feasible to do so.
- An advocate or person outside the family, if a parent requests that the person participate.
- The Service Coordinator designated to be responsible for implementing the IFSP.

If conditions warrant, provisions must be made for the participation of the following:

- A person or persons directly involved in conducting the evaluations and assessments; and
- Persons who will be providing early intervention services to the child and family as appropriate.

Consideration of participants should include all agencies providing direct and ongoing services and others as the family requests. All providers should be made aware that a Periodic Review is being scheduled. When it is anticipated that an outcome or service may be changed, providers involved with addressing that outcome or providing that service should participate in the Periodic Review.

For a Periodic Review, persons directly involved in conducting evaluations or assessments are not required to participate unless a condition warrants. If ongoing assessment indicates a need for changes to outcomes or services, or if there has been a recent evaluation completed which indicates such a need, it may warrant the participation of the evaluator.

Documentation must be kept regarding who participated in the Periodic Review, whether in person or through other means.

Formats Allowed for Periodic Reviews

Periodic Reviews are often less formal than Meetings to Develop the Initial IFSP or Annual Meetings to Evaluate the IFSP. Formats for Periodic Reviews fall on a continuum from as informal as an email exchange or phone call to as formal as a face-to-face meeting. Periodic Reviews may be carried out by a face-to-face meeting or by another means if acceptable to the parents and other participants. Other possible ways for conducting Periodic Reviews may include videoconferencing, conference calls, mail, e-mail or other electronic processes. When selecting the format or level of formality for the Periodic Review, consideration should be given to the extent of new information and expected modifications. When completing the transition plan during a Periodic Review, the Periodic Review must be conducted as a meeting to allow for conversation.

When conditions do warrant participation by persons directly involved in conducting evaluations or assessments, one of these alternative methods of participating must be followed if the person conducting the assessments or evaluation is unable to attend in person [34CFR303.343(b)]:

- Participating in a telephone conference call;
- Having a knowledgeable authorized representative attend the Periodic review; or
- Making pertinent records available for the Periodic Review.

It is important to remember that no matter how formal or informal of a means is selected for conducting the Periodic Review, it is a required IFSP process and as a result all procedural safeguards related to IFSP development and review must be met. The required procedural safeguards are noted in section headings throughout this document.

Accessibility of Periodic Review (Procedural Safeguard)

The Service Coordinator must schedule the periodic IFSP review in a format, setting and at a time that is convenient for the family. The Periodic Review must also be conducted in the native language of the family or other mode of communication used by the family, unless it is clearly not feasible to do so.

Invitation/Written Meeting Notice (Procedural Safeguard)

The Service Coordinator completes the Invitation/Written Meeting Notice and sends to all identified Periodic Review participants, no matter the format selected for the Periodic Review.

There is no required number of days an Invitation/Written Meeting Notice must be provided in advance of the Periodic Review. Family centered and collaborative practices indicate notice is timely enough to allow participation. In “writing” could include use of a paper meeting notice, email or text message that contains all the essential information of the written meeting notice.

Documentation of the Invitation/Written Meeting Notice must be kept.

Review and Modification of the IFSP

During the Periodic Review, the Service Coordinator facilitates participation of the family and other IFSP team members in the team discussion.

The Periodic Review participants review and modify the IFSP by:

- Determining progress towards achieving outcomes, based upon ongoing assessment and other pertinent information.
- Determining the effectiveness of activities and services to achieve the outcomes.
- Determining needed changes to the IFSP to enhance the child's development and the family's capacity to meet their child's needs.
- Modifying the current IFSP to reflect the changes that are determined to be necessary.

Any providers not participating directly in the Periodic Review, may provide ongoing assessment or other pertinent information to the Service Coordinator in advance.

For a child in the transition window, a transition plan may be developed during the Periodic Review if not already done during a Meeting to develop the Initial IFSP or an Annual Meeting to Evaluate the IFSP. A Transition Conference, may be combined with the Periodic Review as long as the requirements of each are met. A Transition Conference can be held separate from a Periodic Review or Annual Meeting to Evaluate the IFSP. Please see the transition section of the Implementation Manual for further guidance on the transition requirements.

This review and any resulting changes must be documented on the IFSP.

Prior Written Notice (PWN) (Procedural Safeguard)

PWN is needed during a Periodic Review when:

- The IFSP team proposes any change(s) in the service (specific service, length, duration, frequency, intensity or method of service delivery) and/or placement (service location) from what was reflected on the current IFSP.
- A parent declines a placement or service that *Early On* proposed; therefore, it is not included in the service section of the IFSP.
- A change in service and/or placement is requested or discussed, but refused by *Early On*.

If no changes to placement or services are proposed or refused during the Periodic Review, PWN is not needed. PWN is not necessary for a change to IFSP outcomes.

Written Parental Consent (Procedural Safeguard)

The contents of the IFSP must be fully explained to a parent and informed written consent from a parent must be obtained prior to the provision of early intervention services described in the IFSP. If there has been a change in services or a service added during the Periodic Review, a new parent signature is required on the IFSP. If there is no change in the IFSP services, a signature is not required.

Any new service added to an IFSP is held to the 30 calendar-day timeline for providing timely services.

Copy of IFSP for Parent (Procedural Safeguard)

A copy of the updated IFSP must be provided to the parent at no cost as soon as possible after the Periodic Review.

Annual Meeting to Evaluate the IFSP

Regulatory Requirements related to Annual Meeting to Evaluate the IFSP

The regulatory requirements for the Annual Meeting to Evaluate the IFSP, accessibility and convenience of meetings, and parental consent as found at 34CFR303.342(c)(d)(e) are summarized below.

Annual Meeting to Evaluate the IFSP

A meeting must be conducted on at least an annual basis to evaluate and revise, as appropriate, the IFSP for a child and the child's family. The results of any current evaluations and other information available from the ongoing assessments of the child and family must be used in determining early intervention services that are needed and will be provided.

An Annual Meeting to Evaluate the IFSP must be conducted:

- In settings and at times that are convenient for the family; and
- In the native language of the family or other mode of communication used by the family, unless it is clearly not feasible to do so.

Accessibility and Convenience of Meetings

Meeting arrangements must be made with, and written notice provided to, the family and other participants early enough before the meeting date to ensure that they will be able to attend.

Parental Consent

The contents of the IFSP must be fully explained to the parents and informed written consent must be obtained prior to the provision of early intervention services described in the IFSP. Each early intervention service must be provided as soon as possible after the parent provides consent for that service, as required in §303.344(f)(1).

Guidance for Annual Meetings to Evaluate the IFSP

Purpose of Annual Meeting to Evaluate the IFSP

The purpose of the Annual Meeting to Evaluate the IFSP is to evaluate and revise, as appropriate, the IFSP for a child and the child's family. The requirement is to conduct an evaluation of the IFSP, not an evaluation of the child.

In fulfilling this requirement, providers should be regularly monitoring a child's progress to maintain current information in all developmental areas. This ongoing assessment information is used at the Annual Meeting to Evaluate the IFSP.

A multidisciplinary evaluation of the child is rarely necessary or appropriate at the time of the Annual Meeting to Evaluate the IFSP. The Annual Meeting to Evaluate the IFSP is not held to determine if the child remains eligible; eligibility was determined at the initial IFSP meeting. The child remains eligible until age three unless the child and the child's family have met all early intervention outcomes and data suggests early intervention supports and services are no longer needed. In

this instance, an evaluation of the child may be appropriate to verify and document that the child no longer meets the eligibility criteria. An evaluation of the child may also be appropriate if there is a new concern that warrants evaluation and may impact the child's eligibility for *Early On Only* vs *Early On* with MMSE services.

Required Participants at an Annual Meeting to Evaluate the IFSP

Each Annual Meeting to Evaluate the IFSP must include the following participants [34CFR303.343(a)]:

- The parent or parents of the child.
- Other family members, as requested by a parent, if feasible to do so.
- An advocate or person outside the family, if a parent requests that the person participate.
- The Service Coordinator designated by the agency to be responsible for implementing the IFSP.
- A person or persons directly involved in conducting the evaluations and assessments.
- Persons who will be providing early intervention services to the child and family as appropriate.

The development of the Annual IFSP must include input from a multidisciplinary team which is two or more individuals from separate disciplines or professions. One of these individuals must be the Service Coordinator. [34CFR303.24(b)]

Formats Allowed for the Annual Meeting to Evaluate the IFSP

Annual Meetings to Evaluate the IFSP must be carried out by means of a face-to-face meeting.

For the participation of a professional who has been directly involved in conducting evaluations, assessments, or medical diagnoses and who is unable to attend the IFSP meeting, arrangements must be made for the person's involvement through other means including:

- Participating in a telephone conference call;
- Having a knowledgeable authorized representative attend the meeting; or
- Making pertinent records available at the meeting.

Accessibility of the Annual Meeting to Evaluate the IFSP (Procedural Safeguard)

The Service Coordinator must schedule the Annual Meeting to Evaluate the IFSP in a setting and at a time that is convenient for the family. The Annual Meeting to Evaluate the IFSP must also be conducted in the native language of the family or other mode of communication used by the family, unless it is clearly not feasible to do so.

Invitation/Written Meeting Notice (Procedural Safeguard)

The Service Coordinator completes the Invitation/Written Meeting Notice and sends to parents, other participants requested by the parents and to all IFSP team members. There is no required number of days an Invitation/Written Meeting Notice must be provided in advance of the Annual Meeting to Evaluate the IFSP.

Family centered and collaborative practices indicate notice is timely enough to allow participation. In “writing” could include use of a paper meeting notice, email or text message that contains all the essential information of a written meeting notice.

Documentation of the Invitation/Written Meeting Notice must be kept.

Team Discussion to Evaluate and Revise the IFSP

During the Annual Meeting to Evaluate the IFSP, the Service Coordinator facilitates participation of the family and other IFSP team members in the team discussion.

The Annual Meeting to Evaluate the IFSP participants evaluate and revise the IFSP by:

- Verifying and updating demographic information;
- With approval of the parents, reviewing and updating the family information regarding resources, priorities, and concerns;
- Reviewing and updating the child’s present level of development based upon:
 - Any recent evaluation, if completed;
 - Ongoing assessment of child and family;
 - Child assessment tool or child anchoring tool, if completed;
 - Vision, hearing and health status, as appropriate;
 - Professional observations; and
 - Parent input.
- Determining progress toward achieving the outcomes;
- Determining the effectiveness of activities and services to achieve the outcomes;
- Determining needed changes to the IFSP to enhance the child’s development and the family’s capacity to meet their child’s needs.
- Developing a revised IFSP.

For a child in the transition window, a Transition Plan may be developed as part of the Annual Meeting to Evaluate the IFSP if not already included within an Initial IFSP or added during a Periodic Review. A Transition Conference, may be combined with the Annual Meeting to Evaluate the IFSP if the requirements of each are met. A Transition Conference can be held separately from a Periodic Review or Annual Meeting to Evaluate the IFSP. Please see the transition section of the Implementation Manual for further guidance on the transition requirements.

This evaluation of the IFSP and any resulting changes must be documented on the Annual IFSP.

Reviewing and Updating Present Levels of Development

Developmental growth for infants and toddlers can be significant in just a few months; therefore, present levels of development from one Initial or Annual IFSP cannot be carried over to another Annual IFSP without review.

The present level of development section of the IFSP provides a picture of how the child’s current abilities and challenges in all areas of development affect his/her ability to participate in family and community life. The IFSP Team should briefly summarize the child’s functional skills in each developmental area by listing what they know about the child’s strengths and needs demonstrated through everyday

routines and activities.

Examples of functional skills may include:

- Maggie is able to finger feed herself Cheerios;
- Brian crawls across the room to obtain a toy of interest to him;
- Paige points her finger to indicate which snack she would prefer; or
- Savona loves the cash register toy, but gets frustrated when she can't get the coin in the slot.

Tools that could be used to assist in obtaining information on a child's functional skills include:

- Colorado Larimer County Age Anchoring Resources
- Maryland's Part C Age-Anchored Early Learning
- Measurement of Engagement, Independence and Social Relationships (MEISR) – COS Tool
- North Dakota Early Childhood Outcomes Process Age Expectation Developmental Milestones - Quick Reference
- Rhode Island Early Intervention Child Outcomes Guidance Document by Age

While a standard deviation, percent delay or age range is needed for eligibility determination under developmental delay, these are not indicators of present level of development. Evaluation tools are often limited in the functional information they provide to help determine the present level of development.

Vision, hearing, and health status are reviewed and revised as appropriate.

It is an *Early On* best practice to not duplicate collection of existing information. Information that has been collected within the past three months for a child under 18 months or information collected within the past six months for child 18 months or older should be used in this review.

Prior Written Notice (PWN) (Procedural Safeguard)

PWN is needed during an Annual Meeting to Evaluate the IFSP when:

- The IFSP team proposes any change(s) in the service (specific service, length, duration, frequency, intensity and method of service delivery) and/or placement (service location) from what was reflected on the current IFSP.
- A parent declines a placement or service that *Early On* proposed; therefore, it is not included in the service section of the IFSP.
- A change in service and/or placement is requested or discussed, but refused by *Early On*.

If no changes to placement or services are proposed or refused during the Annual Meeting to Evaluate the IFSP, PWN is not needed.

Written Parental Consent (Procedural Safeguard)

The contents of the IFSP must be fully explained to a parent and informed written consent from a parent must be obtained prior to the provision of early intervention services described in the IFSP. A signature of the parent is required on an Annual Meeting to Evaluate the IFSP.

Any new service added to an IFSP is held to the 30 calendar-day timeline for

providing timely services.

Copy of IFSP for Parent (Procedural Safeguard)

A copy of the updated IFSP must be provided to the parent at no cost as soon as possible after the Annual Meeting to Evaluate the IFSP.

Changes Allowed Without a Meeting

Some changes can happen without holding a Periodic Review or Annual Meeting to Evaluate the IFSP. The following changes can be made to a child's record at any time, without amending the IFSP:

- Demographics;
- Name changes of child or parent;
- Address change;
- Service Coordinator - parents must be notified of this change; or
- Payor - because Michigan has no fee for service to the parent the payor doesn't directly impact the parent.

These changes would also need to be documented during the next Periodic Review or Annual Meeting to Evaluate the IFSP.