Questions and Answers from the BEI EI-Hub Webinar “Attachments in NYEIS/EI-Hub and Record Retention” on April 20, 2020

Q: Can you please summarize the presentation?

Response: This presentation summarized Early Intervention Program record retention requirements and informed system users that if they have not already retained original or copies of the documents (attachments) that are currently uploaded in NYEIS, they will have until March 31, 2021 to retrieve the attachments from NYEIS to fulfill their record retention responsibilities. The new EI-Hub will allow providers to access and upload new documents for children from the Go-Live date moving forward. Child information and data will be migrated into the new system. However, consistent with the terms of the RFP and resultant contract, documents (attachments) currently in NYEIS will not be loaded into the EI-Hub. As stated in the presentation, system users are required to keep documents for their records for many reasons. The new EI-Hub can house documents to facilitate communications among municipalities and providers. Providers must retain the child record, including attachments, in their records for at least the number of years required to meet Medicaid requirements and for additional years to comport with their respective professional practice acts.

Session Notes:

1. Will there be the capability to attach service notes? Will EI-Hub have a place where we keep our documentation/notes?

   Response: Yes, the EI-Hub will allow the recording of service logs and session notes. However, the functionality to enter notes, log services and upload files/attachments does not replace record-keeping requirements or change record-keeping responsibilities of early intervention program providers and municipalities. Providers must retain the child record, including attachments, in their records for at least the number of years required to meet Medicaid requirements and for additional years to comport with their respective professional practice acts.

2. Can we type the session notes in EI-Hub and then download right away?
   Response: Users will have the ability to print information they have entered into the EI-Hub and documents uploaded will be available for download.

3. Will there be a place to take ongoing service coordination (OSC) documentation?
   Response: There will be functionality for entering notes/contacts that will be viewable by other users who have access to the child’s information, however the functionality in the EI-Hub to log sessions, record notes and upload attachments/files does not replace record-keeping requirements or change record-keeping responsibilities of early intervention program providers and municipalities. Providers must retain the child record, including attachments, in their records for at least the number of years required to meet Medicaid requirements and for additional years to comport with their respective professional practice acts.

   Inputting of Service Coordination (Initial and/or Ongoing) case notes is anticipated to be included in the initial launch. Please note that during the webinar it was stated that service coordination notes would not be available however, the Bureau of Early Intervention has confirmed with the EI-Hub vendor, PCG, that the system solution does include the functionality for recording service coordination case notes as part of the service logging component.

4. Will it be mandatory to input session notes electronically?

   Response: Providers who are currently manually entering claims into the data system, will need to use the session logging module in the EI-Hub, as logging of services will create a claim for billing. Submission of sessions notes will not be required by the New York State Department of Health (the Department) in the EI-Hub, but providers will be able to add session notes. Providers who currently have an electronic system for recording service logs, session notes and claiming who are submitting electronic claim files into the EI data system can continue to do so. When available, the EI-Hub companion guide for submitting electronic files will be disseminated via the Bureau's electronic mailing list.

5. Will we be able to make notes about insurance issues and authorization issues directly in EI-Hub?
   Response: There will be functionality for entering notes/contacts that will be viewable by other users who have access to the child's information on the child information tab in the EI-Hub. This functionality will provide a means to record contacts for municipalities and providers involved in the child's case to share information. However, it does not replace Early Intervention Program (EIP) requirements to follow-up on insurance or authorization issues. Modifications to insurance and authorization information will still need to be appropriately updated in the data system.

6. Can session notes be immediately inputted after a session?
   Response: The EI-Hub will be accessible via the Health Commerce System (HCS), therefore an internet connection is needed to log into the EI-Hub. If logged into the HCS and utilizing the service logging module, the service log could be entered at the end of service provision or the session note could be created after the service has been delivered.

7. Are electronic signatures for session notes be acceptable?
   a. Will EI-Hub have capability for parents to sign consents, electronically? If not, can this be considered?
   b. What about signature on notes, will the system allow electronic signature?

   Response: For clarity, session notes and service logs are two different things. EIP regulations explain that providers must maintain original signed and dated session notes and a service log signed by the parent or caregiver which documents that the service was received by the child on the date and the period of time as recorded by the provider. Providers must sign session notes; the parent/caregiver must sign the service log.

   The Department is working with the EI-Hub vendor to determine acceptability of electronic signatures including signatures required on consent forms, service logs, sessions notes, etc. for municipalities, providers and families. More information will be forthcoming.

8. Why should we upload session note information if it cannot be used for audit purposes other than communication between providers?
   Response: Information can be uploaded into the system to easily exchange information between parties involved with the child in the EIP. Localities may, at their discretion, require that information be uploaded into the EI data system as electronic uploads are available immediately, thereby reducing the need to copy/mail paper materials, reliance on mail and allowing for a faster exchange of information.

9. If you have a current system for session note logging for service provision, can you continue to use your own system? Or will session notes have to be done in the EI-Hub?
   Response: Providers who currently have an electronic system for recording service logs, sessions notes and claiming who are submitting electronic claim files into the EI data system can continue to do so. When available, the EI-Hub companion guide for submitting electronic files will be disseminated via the Bureau's electronic mailing list.

10. Can users delete an attachment as is the case with NYEIS?
    Response: There will be a limited set of system users with appropriate access rights in a high-level provider role or municipal role who will have the ability to delete attachments in the EI-Hub.

11. Can we learn the capabilities and detail of how accessing and using session notes will work?
    Response: Yes, there will be comprehensive training for users on all system functions.

12. Can "Case notes" be used for DOH audit purposes?
    Response: The Department's monitoring process does not include a review of attachments or notes entered into the data system. This functionality in the EI-Hub does not replace record-keeping requirements or change record-keeping responsibilities of Early Intervention Program providers and municipalities.

Session Notes and Billing:

1. We are a larger agency, our office manager processes billing and needs to upload our session notes for our staff members, is this possible?
   Response: The Department and EI-Hub vendor, PCG, are finalizing user roles and security. It is intended that there will be a provider user role within the provider of record that will have the capability to input service logs, session notes, etc. on behalf of the rendering provider. There is not functionality to upload session notes in the EI-Hub, however, if your agency currently submits claims electronically via an 837, the EI-Hub will be able to accept a properly formatted 837 file in order to upload claims.

2. Will SC progress notes linked to billing/claiming?
   Response: The service logging module in the EI-Hub has the functionality to log services which is the starting point of a claim as well as enter service coordination case notes. The notes will be viewable in the service logging module and can be printed or downloaded by users based on their role.

3. Will there be any changes to billing/remittances/error file formats?
   Response: Specific system information will be disseminated as development is nearing completion. The EI-Hub will be configured to accept electronic 837 files and will produce remittance and error files. We anticipate that the file format will be similar to the file format of the 837P currently configured in NYEIS with some necessary modifications to the file format that would include additional features. Please refer to the NYEIS 837 Companion Guide available on the Health Commerce System for the current configuration.

4. Will EI billers be provided with access to administrative reports in order to oversee compliance efficiently?
   Response: Yes, the EI-Hub will have the functionality to generate reports.

5. Will EI-Hub be set up for private providers to bill directly?

Response: Yes, for providers currently manually entering claims into NYEIS, the service logging module in EI-Hub will be the portal for initial claim entry.

6. Will independent providers be able to bill ourselves as we do in the EI Portal, without entering our service log into the Hub?
   Response: Providers who are manually entering claims today in the EI Data system will need to utilize the EI-Hub service logging module as the portal for manual claim entry in EI-Hub.

Session Notes and Reports:

1. After session notes have been entered, will there be a report by service coordinators, with a filter with a beginning and end date, that will include the client seen, time in and time out, to use for service coordination claiming?
   Response: The EI-Hub will have a number of reports that will include the data elements requested for service coordination logging and billing. Those reports will be available based on user role; BEI is working with the vendor to clarify the roles and access level.

2. Will we be able to generate reports via EI-Hub? Such as billing/claim reports?
   Response: The EI-Hub will have the functionality to generate reports.

3. Will an agency have the ability to extract documents from the EI-Hub in bulk rather than manually by child?
   Response: In order to protect the health and billing information in the system, the EI-Hub will have limited ability based on user role to download more than one document at a time.

Retention:

1. If an EIP provider logs sessions directly into the EI-Hub, are providers responsible for downloading copies of every session note and maintaining them in their own archive for a minimum of 6 years?
   Response: Yes. The EI-Hub will allow for recording of service logs and session notes. However, the functionality to enter notes, log services and upload files/attachments does not replace record-keeping requirements or change record-keeping responsibilities of early intervention program providers and municipalities. If providers enter session notes into the EI-Hub, there will be functionality to print data entered. Providers will need to ensure they keep a record for a minimum retention in accordance with Medicaid requirements and in accordance with their professional practice acts, which may have longer record retention requirements.

2. Why do we need to still print out information for a "hard copy" chart if everything is being kept electronically? All the printing does not seem very environmentally friendly.
   a. Is the only reason we are going to still be printing hard copies for audit purposes?

   Response: The EIP data system is a set of data points to support overall management of the statewide Early Intervention Program (EIP) and reporting to the federal Office of Special Education Programs (OSEP). It is also utilized to assist with local management of the EIP and as a conduit for billing/claiming. It is not a municipal or provider record and does not replace record-keeping requirements or change record-keeping responsibilities. Providers and municipal users will have the ability to print information entered, download attachment files, as well as have reports available that can be printed or saved as a PDF file if a provider utilizes their own electronic record repository.

3. How long will documents be kept in the EI-Hub?
Response: The attachment retention period has not yet been defined for files uploaded in the EI-Hub however, it is anticipated that attached files will be purged from the EI-Hub after the child's record is closed. The purpose of uploaded attachments is to facilitate communication among team members during the time the child is active in the EIP.

4. With regard to the EI Retention policy for independents (special instruction providers) can we shred documents including assessments, session notes, IFSP, etc. after 6 years from the last billing date?
Response: Providers will need to ensure they keep a record for a minimum retention in accordance with Medicaid requirements (for a period of six years from the date the care, services or supplies were furnished or billed, whichever is later) and in accordance with their professional practice acts, which may have longer record retention requirements.

5. Can you clarify which entity must keep child records until the child turns 21?
Response: This applies to municipal records, however, providers will need to ensure they keep a record for a minimum retention in accordance with Medicaid requirements (for a period of six years from the date the care, services or supplies were furnished or billed, whichever is later) and in accordance with their professional practice acts, which may have longer record retention requirements.

Access and Roles:

1. Regarding attachments, is it only EI providers that would have access or will any health agencies have access, for example a doctor's office could upload a script if the provider requests one?
Response: Only EIP municipalities and Department-approved early intervention providers will have access to the EI-Hub.

2. Will a municipality be able to access an attachment/document if needed, once access to NYEIS has been eliminated?
Response: NYEIS will only be accessible for approximately 6-months after the EI-Hub go-live date. After that time, NYEIS will be decommissioned and users will no longer be able to access NYEIS, NYEIS data and/or attachments.

3. Will everyone assigned to a case have access to attachments after a child leaves the EIP?
    a. Will we have access to closed case records and attached files?
    b. Will we have access to child documents after they age out?
    c. Currently cases are closed once a child ages out and we no longer have access to it. Will that still be the case?
    d. Will an agency have full access to close cases, not just to the notes uploaded?

    Response: Security roles and access are still being finalized. Access to attachments is expected to be during the time period in which providers are serving a child and for a limited time for billing/claiming purposes. Attachments in the EI-Hub is not a municipal or provider record and does not replace record-keeping requirements or change record-keeping responsibilities.

4. Will agency subcontractors have individual log-in?
Response: All Early Intervention state-approved providers, rendering providers, evaluators, service coordinators, and municipalities will receive a log-in and utilize the EI-Hub to record all

aspects of a child's involvement in the EIP. These entities will need to review the updated roles/definitions and assign personnel accordingly.

5. Will the current providers need to be added into the EI-Hub?
   Response: Provider data currently in NYEIS will be migrated to the EI-Hub.

6. Will current users/roles in NYEIS be migrated to the EI-Hub or will all users have to enroll again and roles added?
   Response: The EI-Hub Project Team will be working to migrate user accounts. However, the number of user roles available will be consolidated in the EI-Hub and there will be functionality for users to have multiple roles. Agencies, EI providers and municipalities will need to review the updated roles/definitions and assign personnel accordingly.

7. Can supervisors have better access to children's cases (i.e., SC supervisors)
   a. For oversight roles, will users be able to pull caseloads for Service Coordination or providers and individual service providers such as OTs, PTs, etc.?

   Response: Th EI-Hub will give varying access to individuals based on the role each individual has within their municipality or agency. .

General:

1. What about IFSP documents that were created and housed in NYEIS?
   a. Will the IFSP created be a full IFSP where we can fill it in electronically and have a family sign right on the IFSP in the EI-Hub?

   Response: Documents uploaded in NYEIS will not be migrated to the EI-Hub. For documents initiated in the EI-Hub, additional information will be forthcoming regarding electronic signatures.

2. Will there be a place designated to share strategies on an ongoing basis with other users?
   Response: Yes, there will be functionality for entering notes/contacts that will be viewable by other users who have access to the child's information.

3. Will the EI-Hub be separated from NYEIS?
   Response: The EI-Hub will be a replacement to the NYEIS data system. The EI-Hub will be accessed through the Health Commerce System (HCS) and will be composed of five modules: Case Management, Fiscal (EI Billing), Provider Management and Enrollment, Service Logging, and the Learning Management System (LMS).

4. Will current children be migrated or will only new children appear in EI-Hub?
   Response: Yes, existing child data will be migrated to the EI-Hub.

5. When will the EI-Hub Be fully executed?
   Response: Roll-out of the EI-Hub is anticipated in October 2020.

6. What is the website for the EI-Hub?
   Response: The EI-Hub will be accessed through the Health Commerce System (HCS). Further details will be released as we get closer to launch.

7. Will there be a greater limit as to the size of attachments in EI-Hub?
   Response: No, the file limit size will be the same.

8. Will the EI-Hub be accessed through the Health Commerce System?
   Response: Yes.

9. Please explain the term RFP.
   Response: RFP stands for Request for Proposal, and it is the State's mechanism for making a formal request for proposals that will provide solutions to a state agency's identified need. RFP #17744 – Support for the Operational Management of the Early Intervention Program – was released August 17, 2018. An award was made to Public Consulting Group (PCG) with a contract being executed August 6, 2019.

10. Will there be future webinars to teach us how to navigate EI-Hub?
    Response: Yes, there is a comprehensive training plan and users will have ample opportunities to participate.

11. Can you speak to anticipated reporting capabilities?
    Response: The EI-Hub will have reports available for users. Details will be disseminated once finalized.

12. Will the system have a message board so we can communicate with EIO/Ds?
    Response: There will be functionality for entering notes/contacts that will be viewable by other users who have access to the child's information.

13. What are the differences between NYEIS and the EI-Hub?
    a. Why did EI make the change from NYEIS to EI-Hub?

    Response: NYEIS software and hardware are running on outdated platforms. Additionally, there has been stakeholder input received from municipalities and providers that a unified system is desirable. Training will be provided for users.

14. What type of training will health home agencies receive from the State for the EI-Hub?
    Response: Health Homes who are also EI approved providers will have the opportunity to participate in EI-Hub training as will all other EI providers.

15. We currently can't see the evaluation after it is submitted, will that change?
    Response: Yes, that will change. Evaluators will have access to view submitted evaluations.

16. Will old authorization information be migrated?
    Response: Yes, all service authorization data will be migrated.

17. Will there be evening hours to ask questions?
    Response: The PCG call center will be available Monday – Friday from 7:00 AM to 7:00 PM.

18. Will all documents need to be in PDF format?
    Response: Yes, attachment files will need to be in PDF format.

19. Can we start using EI-Hub to do all our transactions?
    Response: The EI-Hub will be a replacement to the NYEIS data system. The EI-Hub will be accessed through the Health Commerce System (HCS) and will be composed of five modules:

Case Management, Fiscal (EI Billing), Provider Management and Enrollment, Service Logging, and the Learning Management System (LMS). It is planned to be launched in October of 2020.

20. Will there be any form create/template tool in the EI-Hub?
Response: The EI-Hub will have templates available that will pre-fill data from demographic data entered in the system.

21. IT Question – Will EI-Hub have an API for integrate with our systems using Web services?
Response: BEI is working with the EI-Hub vender (PCG) to create a CSV format file that will share child and service authorization information to providers with third-party systems. The vendor is already working with the top five third-party vendors for NY EI on what is needed for their systems.

22. Do we need to register for this?
Response: Further details regarding access to the EI-Hub will be disseminated as we move closer to launch.

23. When uploading a new prescription with a new International Classification of Diseases (ICD) code, will we be able to add new ICD codes to child's record?
Response: The EI-Hub will have the functionality to record diagnostic codes. The current ICD codes in NYEIS will be migrated to the EI-Hub. There will continue to be a process for providers to request additional ICD codes needed for billing purposes.

24. You mentioned Stakeholder Survey responders included a few parents. Will the parents have access to attachments and records in the EI-Hub?
Response: Parents/caregivers are integral stakeholders and receive EIP communications. However, for privacy and security reasons, access to the EI-Hub will be limited to approved early intervention providers, provider agencies and municipal staff. The EI-Hub will, however, be equipped with enhanced reporting capabilities. Authorized provider and municipal users will be able to generate and print reports and templates specifically intended for families. In addition, families will continue to have access to evaluations and other documentation created and maintained by EI providers furnishing early intervention services to their child.

25. Will the system have any capability to allow medical practices to make a referral right into the system?
Response: No, the EI-Hub will be limited to early intervention providers, provider agencies and municipal staff.

Additional Questions:

Thank you again for participating in the webinar and submitting questions. If you did not see an answer to your specific question among these questions and answers or you have further questions, please submit them to EIHub@health.ny.gov.