



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF BEHAVIORAL HEALTH AND DEVELOPMENTAL SERVICES

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COMMISSIONER

To: Local System Managers

From: Catherine Hancock, Early Intervention Administrator

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Subj: Policy Change – Texting as Preferred Method of Contact

Following a request by local system managers, the Department of Behavioral Health and Developmental Services (DBHDS) and the Department of Medical Assistance Services (DMAS) worked together to review and reconsider the policy disallowing texting as an option for a family's preferred method of contact under the Early Intervention Targeted Case Management program. **I am pleased to announce that we have revised the policy and, effective immediately, families may choose texting as their preferred method of contact for the targeted case management (service coordination) contacts that are required with families every three months.** Please note the following requirements that must be met in order to offer and use texting as the preferred method of contact:

- The service coordinator may only offer texting as an option if she has the capability to receive and send texts.
- Texting may only be used if the family selects texting as their preferred method of contact and signs the *Permission for Texting* form (attached), which notifies the family that there may be some level of risk that the information in the text may be read by a third party. The *Permission for Texting* form must be kept in the child's Early Intervention Record.
- The communication that occurs via texting must constitute service coordination. Sending a text to the family to ask how things are going and getting a reply of "Fine" is not service coordination. That is true for contacts via email, phone, or in person as well. The job of service coordination does not change based on the preferred method of contact. For that reason, contact notes must substantiate that the communication between the service coordinator and the family is substantive and does constitute actual service coordination.
- The service coordinator must either print out and attach a copy of the texts to the contact note or include in the note a thorough summary of the communication.
- If, at any point, it becomes clear that texting is not a viable method of communication with a particular family, then the service coordinator needs to work with the family to identify a different method of contact.

Since recent revisions to the Infant & Toddler Connection of Virginia Practice Manual required extensive re-printing of the manual, we are not revising the manual to update the texting policy at this time. This memo serves as your official notice of and policy statement regarding the change. The information on

the next pages show the primary changes related to texting that will be made with the next Practice Manual update.

If you have any questions regarding the new texting policy, please contact your Technical Assistance Consultant. We hope that the new policy better accommodates family preferences and facilitates timely and effective communication between service coordinators and families. Please share this memo and attachments with providers in your local system.

# Revisions related to texting that will be made with the next Practice Manual update

## Chapter 4 - Intake

Document in the contact note for the intake visit the family's preferred method of contact (face to face, phone, email or text) for the service coordination family contacts that are required every three months. The following requirements must be met in order to offer and use texting as the preferred method of contact:

- The service coordinator may only offer texting as an option if she has the capability to receive and send texts.
- Texting may only be used if the family selects texting as their preferred method of contact and signs the *Permission for Texting* form, which notifies the family that there may be some level of risk that the information in the text may be read by a third party. The *Permission for Texting* form must be kept in the child's Early Intervention Record.
- The communication that occurs via texting must constitute service coordination. Sending a text to the family to ask how things are going and getting a reply of "Fine" is not service coordination. That is true for contacts via email, phone, or in person as well. The job of service coordination does not change based on the preferred method of contact. For that reason, contact notes must substantiate that the communication between the service coordinator and the family is substantive and does constitute actual service coordination.
- The service coordinator must either print out and attach a copy of the texts to the contact note or include in the note a thorough summary of the communication.
- If, at any point, it becomes clear that texting is not a viable method of communication with a particular family, then the service coordinator needs to work with the family to identify a different method of contact.

## Chapter 8 - Service Delivery

- a. Make at least one direct contact with the family every three (3) calendar months. Such contacts shall be person-centered with the choice of contact method determined by the family (face-to-face, phone, email or text; ~~but text messaging is not an allowable contact method~~). The following requirements must be met in order to offer and use texting as the preferred method of contact:
- The service coordinator may only offer texting as an option if she has the capability to receive and send texts.
  - Texting may only be used if the family selects texting as their preferred method of contact and signs the *Permission for Texting* form, which notifies the family that there may be some level of risk that the information in the text may be read by a third party. The *Permission for Texting* form must be kept in the child's Early Intervention Record.
  - The communication that occurs via texting must constitute service coordination. Sending a text to the family to ask how things are going and getting a reply of "Fine" is not service coordination. That is true for contacts via email, phone, or in person as well. The job of service coordination does not change based on the preferred method of contact. For that reason, contact notes must substantiate that the communication between the service coordinator and the family is substantive and does constitute actual service coordination.
  - The service coordinator must either print out and attach a copy of the texts to the contact note or include in the note a thorough summary of the communication.
  - If, at any point, it becomes clear that texting is not a viable method of communication with a particular family, then the service coordinator needs to work with the family to identify a different method of contact.

The contacts must begin no later than the next month after the month that the initial IFSP is signed, and the 3-calendar-month period restarts after each contact (i.e., if the service

coordinator contacts the family on October 7 and November 10, then the next contact must be made no later than the last day of February).

- b. Provide at least one of the allowable activities listed in the “EI TCM Allowable Activities” text box in Chapter 11 with the child, the family, service providers, or other organizations on behalf of the child/family in each month for which EI TCM billing occurs. The contact must be relevant to the child/family needs and IFSP. If the family’s preferred method of contact (face to face, phone, email or text) for the family contacts that are required every three months changes, document the family’s new preference in a contact note. *If the family’s new choice is texting, then obtain family signature on the [Permission for Texting](#) form.*

## Chapter 11 – Finance

- f. At a minimum, a phone, email, [text](#), or a face-to-face contact with the family must occur every three calendar months, or there must be documented attempts of such contacts. Three-calendar months does not mean every 90 days, nor does it mean quarterly. The contacts must begin no later than the next month after the month that the initial IFSP is signed, and the 3-calendar-month period restarts after each contact (i.e., if the service coordinator contacts the family on October 7 and November 10, then the next contact must be made no later than the last day of February).
- The family’s preferred method of contact must be documented. This can be documented in a contact note for the intake visit and any time the family’s preference changes. (see Chapter 9 for more information about documentation requirements).
  - [The following requirements must be met in order to offer and use texting as the preferred method of contact:](#)
    - [The service coordinator may only offer texting as an option if she has the capability to receive and send texts.](#)
    - [Texting may only be used if the family selects texting as their preferred method of contact and signs the \*Permission for Texting\* form, which notifies the family that there may be some level of risk that the information in the text may be read by a third party. The \*Permission for Texting\* form must be kept in the child’s Early Intervention Record.](#)
    - [The communication that occurs via texting must constitute service coordination. Sending a text to the family to ask how things are going and getting a reply of “Fine” is not service coordination. That is true for contacts via email, phone, or in person as well. The job of service coordination does not change based on the preferred method of contact. For that reason, contact notes must substantiate that the communication between the service coordinator and the family is substantive and does constitute actual service coordination.](#)
    - [The service coordinator must either print out and attach a copy of the texts to the contact note or include in the note a thorough summary of the communication.](#)
    - [If, at any point, it becomes clear that texting is not a viable method of communication with a particular family, then the service coordinator needs to work with the family to identify a different method of contact.](#)
    - [The provider may not bill for a month in which the only activity was attempted contacts with the family, but these attempted contacts within the three calendar month period will prevent the provider from losing all billing during the three calendar month period \(e.g., they could bill for another month in that](#)

period during which an allowable activity was completed even though their attempts to make the required contact with the family by phone, email or face-to-face every three calendar months were unsuccessful)