

## Planning for the Use of Video Conferencing for Early Intervention Home Visits during the COVID-19 Pandemic

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**Author's note:** Whether referred to as tele-intervention, tele-health, tele-practice, tele-therapy, tele-EI or other labels, using video conferencing to deliver IDEA Part C early intervention (EI) home visiting services is not a new idea; many EI programs across the country have been doing so successfully for many years. In addition, video conferencing has been used for many years by EI programs for team meetings, coaching, supervision, professional development activities, individualized planning meetings, family-to-family support, and other purposes. DO NOT DELAY: whether or not your program has been using video conferencing, because of the challenges presented by the COVID-19 pandemic, **ALL** EI programs should be using video conferencing and relate technologies in order to continue providing EI services and supports to families. The purpose of this document is to suggest key topics to be addressed and provide information and resources to assist in planning how to use video conferencing for home visiting.

**Compliance with HIPAA, IDEA, Section 504 of the Rehabilitation Act, and Title II of the Americans with Disabilities Act are not barriers:**

- “A covered health care provider that wants to use audio or video communication technology to provide telehealth to patients during the COVID-19 nationwide public health emergency can use any non-public facing remote communication product that is available to communicate with patients. OCR is exercising its enforcement discretion to not impose penalties for noncompliance with the HIPAA Rules in connection with the good faith provision of telehealth using such non-public facing audio or video communication products during the COVID-19 nationwide public health emergency. This exercise of discretion applies to telehealth provided for any reason, regardless of whether the telehealth service is related to the diagnosis and treatment of health conditions related to COVID-19.” Read more: <https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>
- “At the outset, OCR and OSERS must address a serious misunderstanding that has recently circulated within the educational community. As school districts nationwide take necessary steps to protect the health and safety of their students, many are moving to virtual or online education (distance instruction). Some educators, however, have been reluctant to provide any distance instruction because they believe that federal disability law presents insurmountable barriers to remote education. This is simply not true. We remind schools they should not opt to close or decline to provide distance instruction, at the expense of students, to address matters pertaining to services for students with disabilities. Rather, school systems must make local decisions that take into consideration the health, safety, and well-being of all their students and staff. **To be clear: ensuring compliance with the Individuals with Disabilities Education Act (IDEA), † Section 504 of the Rehabilitation Act (Section 504), and Title II of the Americans with Disabilities Act should not prevent any school from offering educational programs through distance instruction.**

“The Department encourages parents, educators, and administrators to collaborate creatively to continue to meet the needs of students with disabilities. Consider practices such as distance instruction, teletherapy and tele-intervention, meetings held on digital platforms, online options for data tracking, and documentation. In addition, there are low-tech strategies that can provide for an exchange of curriculum-based resources, instructional packets, projects, and written assignments.” Read more: [https://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/Supple%20Fact%20Sheet%203.21.20%20FINAL.pdf?utm\\_content=&utm\\_medium=email&utm\\_name=&utm\\_source=govdelivery&utm\\_term=](https://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/Supple%20Fact%20Sheet%203.21.20%20FINAL.pdf?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=)

- “Additionally, if the lead agency or EIS provider determines that face-to-face Part C services should not be provided for a period of time, then the EIS provider or service coordinator may consult with the parent through a teleconference or other alternative method (such as e-mail or video conference), consistent with privacy interests, to provide consultative services, guidance, and advice as needed. However, determining how to provide Part C services in a manner that is consistent with the most updated public health and safety guidance is left to the discretion of the lead agency and the EIS program and provider serving a particular child and family.” Read more: <https://sites.ed.gov/idea/files/qa-covid-19-03-12-2020.pdf>

**Are there other regulations or standards that need to be addressed? Consider:**

- state agencies
- local agencies
- local programs
- disciplinary groups or professional associations
- funders

**Some key questions related to reimbursement:**

- How are home visits that use video conferencing billable/reimbursable?
- How do you need to label the use of video conferencing in order for it to be reimbursable (e.g., using the term telehealth for Medicaid reimbursement)?
- What documentation is required for home visits that use video conferencing?
- Who pays for costs associated with video conferencing, platforms, equipment?
- Which community partners can be engaged to partner in leveraging resources?

**Equipment/software/licensing/bandwidth resources:**

- What equipment do home visitors and families need to have in order to participate:
  - For conferencing (e.g., smart phone, tablet, laptop, desktop)
  - For mounting or stabilizing devices
  - For providing or boosting Wi-Fi (e.g., Hotspots)
- What software do home visitors and families need to have in order to participate?
- How much bandwidth do home visitors and families need to have in order to participate?
- Essential question: how to provide services to families who do not have access to or cannot afford to participate in video conferences (e.g., devices, internet)?
- FREE RESOURCES:
  - Many locations are reporting that after contacting their local cable/internet companies, the local companies are agreeing to provide free internet to educators and families with students for 60 days.
  - During the COVID-19 pandemic, in some areas, local Internet providers have announced that they are providing two to three months of free internet access and telephone service to selected households, e.g., those with students or people who are 60 or older.
  - In some areas, Xfinity Wi-Fi hotspots may be available to anyone who needs them for free – including non-Xfinity Internet subscribers. For a map of Xfinity Wi-Fi hotspots, visit [www.xfinity.com/wifi](http://www.xfinity.com/wifi). Once at a hotspot, consumers should select the “xfinitywifi” network name in the list of available hotspots and then launch a browser.

- ZOOM: Support during the COVID-19 pandemic This site is here to help you most effectively use Zoom as we all navigate the coronavirus pandemic: <https://zoom.us/docs/en-us/covid19.html>
- K-12 School Verification Form: Zoom is temporarily lifting the 40-minute time limit on free Basic accounts for schools affected by the Coronavirus. Here's how to get access for your school: [https://zoom.us/docs/ent/school-verification.html?fbclid=IwAR3hgjxZOEWbWsA6\\_77ca5jxFTuVYqTowM-k9dVtSCod1oSknJjD72EG-4](https://zoom.us/docs/ent/school-verification.html?fbclid=IwAR3hgjxZOEWbWsA6_77ca5jxFTuVYqTowM-k9dVtSCod1oSknJjD72EG-4)
- B & H Teleconferencing Products: [https://www.bhphotovideo.com/c/browse/teleconferencing/ci/46676?utm\\_medium=Email%201795039&utm\\_campaign=Promotion&utm\\_source=Working-From-Home%20200319&utm\\_content=Retail&utm\\_term=Teleconferencing&encEmail=5D53BA2FB5776B5E3CD15CD6A793268BB23D005B916B966D0D1929E429D1EE21](https://www.bhphotovideo.com/c/browse/teleconferencing/ci/46676?utm_medium=Email%201795039&utm_campaign=Promotion&utm_source=Working-From-Home%20200319&utm_content=Retail&utm_term=Teleconferencing&encEmail=5D53BA2FB5776B5E3CD15CD6A793268BB23D005B916B966D0D1929E429D1EE21)

**Skills sets that state staff, consultants, coaches, and practitioners might need to master:**

- Selecting and using the video conferencing platform
- Technical considerations
- Environmental considerations
- Interactional considerations
- Teaching and coaching families and colleagues how to use the platform
- Adapting the evidence-based model or framework used to deliver F2F visits to visits delivered via video conferencing
- Expanding the range of supports provided to families during the pandemic
- Evaluating the use of video conferencing for home visits

**Desirable features of video conferencing platforms for EI home visiting:**

- Affordable (no cost to families)
- Able to be used on all kinds of devices: smart phones, tablets, laptops, desktop computers
- Can accommodate the number of people you need to include on a given call
- Calls can be long enough to meet your needs (some free programs have time limits)
- Dependable – low rate of dropped audio and video
- Low latency
- Easy to install and use
- Easy to teach others how to use
- VoIP (Voice over Internet Protocol) capability
- Security features
- Privacy controls
- Desktop sharing
- Multiple parties can participate
- Recordable sessions: this is a very valuable feature for families, practitioners, and for coaches and supervisors

A couple of important notes:

- Be cautious about using platforms supported by advertisements; some ads might be inappropriate for children, families, and staff.

- As recently announced by HHS and the USDOE/OSERS, you do not need to use a video conferencing platform that advertises as being HIPAA-complaint (i.e., issues a Business Associate Agreement), **BUT**...do not use video conferencing applications that are public facing, such as Facebook Live, Twitch, TikTok, for video conferencing with families.

### **Video conferencing applications:**

Here is a quick list of platforms that enable video conferencing. Some are dedicated video conferencing applications where others are web conferencing platforms that include video conferencing as an optional feature. As you see, it is a large list, but please don't be intimidated by the size of this list. I personally prefer Zoom because it has all of the features that I think are important for our field. But other platforms can work fine, they just might not have all of the features that I think are desirable for home visiting. Zoom <https://zoom.us/>

Cisco WebEx <https://www.webex.com/>

Microsoft Teams <https://products.office.com/en-us/microsoft-teams/online-meeting-solutions>

Google G Suite Hangouts Meet <https://gsuite.google.com/product>

Adobe Connect <https://www.adobe.com>

Bluejeans <https://www.bluejeans.com/>

8 x8 <https://www.8x8.com>

GoToMeeting <https://www.gotomeeting.com>

GoToWebinar <https://www.gotomeeting.com/webinar>

UberConference <https://www.uberconference.co>

Fuze <https://www.fuze.com/>

Join.me <https://www.join.me/>

Lifesize <https://www.lifesize.com>

LogMeIn <https://www.logmein.com>

Pexip <https://www.pexip.com/>

Starleaf <https://www.starleaf.com/>

Apple FaceTime: <https://support.apple.com/en-us/HT204380>

Facebook Messenger Video Chat: <https://www.facebook.com/help/messenger-app/>

Skype: <https://www.skype.com/en/>

### **Many video conferencing platforms advertise HIPAA-compliant versions, including:**

Zoom for Healthcare <https://zoom.us/healthcare>

Vidyo <https://www.vidyo.com/>

Skype for Business <https://www.skype.com/en/business/>

Updox <https://www.updox.com/>

VSee <https://vsee.com/>

Doxy.me <https://doxy.me/>

Note: some video conferencing platforms have been reported to have offered free services to programs during the pandemic, e.g., Cisco WebEx, Vidyo.

## Some Relevant Resources:

- The [ECTA Center](https://ectacenter.org/topics/disaster/coronavirus.asp) will serve as a hub for IDEA early childhood best practices and alternate models for providing early intervention and preschool special education and related services, including through distance services and supports. They will be collaborating with OSEP and other TA partners to provide the most current and relevant information via the new and growing page on the Coronavirus: <https://ectacenter.org/topics/disaster/coronavirus.asp>
- Questions and Answers on Providing Services to Children with Disabilities during The Coronavirus Disease 2019 Outbreak March 2020: <https://sites.ed.gov/idea/files/qa-covid-19-03-12-2020.pdf>
- Notification of Enforcement Discretion for telehealth remote communications during the COVID-19 nationwide public health emergency: <https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>
- March 21, 2020 Supplemental Fact Sheet Addressing the Risk of COVID-19 in Preschool, Elementary and Secondary Schools While Serving Children with Disabilities: [https://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/Supple%20Fact%20Sheet%203.21.20%20FINAL.pdf?utm\\_content=&utm\\_medium=email&utm\\_name=&utm\\_source=govdelivery&utm\\_term=](https://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/Supple%20Fact%20Sheet%203.21.20%20FINAL.pdf?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=)
- FERPA and the Coronavirus Disease 2019 (COVID-19): <https://studentprivacy.ed.gov/resources/ferpa-and-coronavirus-disease-2019-covid-19>
- STUDENT PRIVACY POLICY OFFICE FERPA and Virtual Learning Related Resources March 2020: [https://studentprivacy.ed.gov/sites/default/files/resource\\_document/file/FERPA%20%20Virtual%20Learning%20032020\\_FINAL.pdf](https://studentprivacy.ed.gov/sites/default/files/resource_document/file/FERPA%20%20Virtual%20Learning%20032020_FINAL.pdf)
- STUDENT PRIVACY POLICY OFFICE FERPA & Coronavirus Disease 2019 (COVID-19) Frequently Asked Questions (FAQs) March 2020: [https://studentprivacy.ed.gov/sites/default/files/resource\\_document/file/FERPA%20and%20Coronavirus%200Frequently%20Asked%20Questions.pdf](https://studentprivacy.ed.gov/sites/default/files/resource_document/file/FERPA%20and%20Coronavirus%200Frequently%20Asked%20Questions.pdf)
- Protecting Student Privacy While Using Online Educational Services: Requirements and Best Practices: [https://studentprivacy.ed.gov/sites/default/files/resource\\_document/file/Student%20Privacy%20and%20Online%20Educational%20Services%20%28February%202014%29\\_0.pdf](https://studentprivacy.ed.gov/sites/default/files/resource_document/file/Student%20Privacy%20and%20Online%20Educational%20Services%20%28February%202014%29_0.pdf)
- Protecting Student Privacy While Using Online Educational Services: Model Terms of Service: [https://studentprivacy.ed.gov/sites/default/files/resource\\_document/file/TOS\\_Guidance\\_Mar2016.pdf](https://studentprivacy.ed.gov/sites/default/files/resource_document/file/TOS_Guidance_Mar2016.pdf)
- Medicaid.gov Telemedicine: <https://www.medicaid.gov/medicaid/benefits/telemedicine/index.html>
- Medicaid State Plan Fee-for-Service Payments for Services Delivered Via Telehealth: <https://www.medicaid.gov/medicaid/benefits/downloads/medicaid-telehealth-services.pdf>
- The Center for Connected Health Policy, State Telehealth Laws and Reimbursement Policies: <https://www.cchpca.org/telehealth-policy/telehealth-medicare-and-state-policy>
- HealthIT.gov: <https://www.healthit.gov/telehealth>
- OCR has published a bulletin advising covered entities of further flexibilities available to them as well as obligations that remain in effect under HIPAA as they respond to crises or emergencies at <https://www.hhs.gov/sites/default/files/february-2020-hipaa-and-novel-coronavirus.pdf> - PDF.
- COVID-19 ("Coronavirus") Information and Resources for Schools and School Personnel: <https://www.ed.gov/coronavirus?src=feature>
- TI 101 Learning Courses: [http://www.infantheating.org/ti101/?mc\\_cid=8ed289f195&mc\\_eid=9733c11e80](http://www.infantheating.org/ti101/?mc_cid=8ed289f195&mc_eid=9733c11e80)

- The Early Childhood Personnel Center (ECPC): [https://ecpcta.org/covid-19-resources/?mc\\_cid=8ed289f195&mc\\_eid=9733c11e80#](https://ecpcta.org/covid-19-resources/?mc_cid=8ed289f195&mc_eid=9733c11e80#)
- Mental Health and COVID-19 – Information and Resources: <https://mhanational.org/covid19>
- OCR Short Webinar on Online Education and Website Accessibility: <https://www.youtube.com/watch?v=DCMLk4cES6A>
- March 12, 2020 Fact Sheet: Impact of COVID-19 on Assessments and Accountability under the Elementary and Secondary Education Act: <https://oese.ed.gov/files/2020/03/COVID-19-OESE-FINAL-3.12.20.pdf>
- CEC Resources for Teaching Remotely: [https://www.cec.sped.org/Tools-and-Resources/Resources-for-Teaching-Remotely?utm\\_source=cec&utm\\_medium=email&utm\\_campaign=default&zs=bkpdW1&zl=N0kc6](https://www.cec.sped.org/Tools-and-Resources/Resources-for-Teaching-Remotely?utm_source=cec&utm_medium=email&utm_campaign=default&zs=bkpdW1&zl=N0kc6)
- American Telemedicine Association (ATA): <https://www.americantelemed.org/>

## Illustrations of Video Conferencing in Action

### Illustrations of using video conferencing for early intervention home visits and team meetings:

<http://ddc.ohio.gov/video-ei-series>

- Using Video and Video Conferencing to Enable Team Meetings over Distances
- Using FaceTime to Enhance Team Collaboration
- A Virtual Home Visit with Liam's Family
- A Virtual Co-Visit with Straton's Family

### Illustrations of using video conferencing for coaching:

<https://www.cdd.unm.edu/ecln/FIT/fit-focus-video-library.html>

- Using Video Technology to Enhance Coaching In Early Intervention

### Illustration of using video conferencing to enable early intervention team meetings:

<https://vimeo.com/398369975/52ba0d803f>

- Using Technology to Enable Early Intervention Team Meetings

### Illustrations of using video conferencing to virtually include children in preschool classrooms:

- Ruairi Goes To Preschool: [http://www.cde.state.co.us/resultsmatter/RMVideoSeries\\_PracticesHereAndThere.htm#top](http://www.cde.state.co.us/resultsmatter/RMVideoSeries_PracticesHereAndThere.htm#top)
- Collaborating to Support Aiden: [http://www.cde.state.co.us/resultsmatter/RMVideoSeries\\_PracticesHereAndThere.htm#top](http://www.cde.state.co.us/resultsmatter/RMVideoSeries_PracticesHereAndThere.htm#top)
- Getty's Window To Inclusion: The Chance To Be Just Like Any Other Kid: <http://draccess.org/videolibrary/>
- Getty's Door To Inclusion: <http://draccess.org/videolibrary/>

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