

January 20, 2022

Department of Developmental Services
Legislation, Regulations and Public Affairs
RE: Early Intervention Amendments
1215 O Street
Sacramento, CA 95814

RE: Notice of Proposed Rulemaking Early Start Services

To Whom it May Concern:

The Association of Regional Center Agencies (ARCA) represents the network of regional centers that advocate on behalf of and coordinate services for nearly 400,000 Californians with developmental disabilities and their families. Currently, regional centers support approximately 50,000 infants and toddlers through the Early Start program.

With regard to the proposed regulations to Section 52000, Title 17, CCR, ARCA's comments are as follows:

Section 52000 (b)(6):

ARCA commends the Department for proposing the amendment to align Section 52000, Title 17, CCR definition of Early Intervention services, for assistive technology services with Part C of IDEA (20 U.S.C. Sec. 1431). ARCA is in full support of the proposal as it would bring clarity to parents/caregivers, regional centers, and service providers of the intent of the service.

Section 52000 (b)(23):

ARCA is concerned about the proposed additional language to Section 52000 regarding "health services" which states "Such services also include consultation by physicians with other service providers concerning the special health care needs of infants and toddlers with disabilities that will need to be addressed in the course of providing early intervention services." ARCA's concern is that the general term "consultation with a physician" may require Early Start programs to fund medical appointments with medical specialists that are outside of the insurance network (i.e., second opinions). In addition, unlike the current language which is very specific regarding "health services", the proposed additional language is vague enough that it could lead to funding requests for health care outside of the scope of early intervention services and not related to the eligible condition for Early Start.

ARCA recommends changing the proposed language to state “Such services also include consultation by physicians with other service providers concerning the special health care needs of infants and toddlers with disabilities that will need to be addressed in the course of providing early intervention services but are not purely surgical or medical in nature.”

Thank you for the opportunity to comment on the NPRM regarding early intervention services. If you have any questions regarding this input, please do not hesitate to contact Sidney Jackson in our office at sjackson@arcanet.org or (916) 446-7961.

Sincerely,

/s/

Amy Westling

Executive Director