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CDS Administrative Letter: Number 36

TO: CDS Contract Providers, CDS Regional Sites

FROM: Roy Fowler, CDS State Director

DATE: November 16, 2017

UPDATED: January 22, 2018

RE: Service Log Entry Expectation

In the review of the first year of CINC implementation, CDS has identified a significant issue with regard to the timely completion of service logs and the claim submissions associated with those service logs and the timely entry of evaluation reports. In many cases, several months have elapsed between the evaluation/delivery of a service and the completion of an evaluation/service log/claim submission. This significant delay creates several challenges including:

- 1. The increased likelihood that service log content may be inaccurate.
- 2. Decreased availability, to other IEP/IFSP team members, of timely information regarding evaluation results, strategies, and progress.
- 3. Decreased ability of case managers/service coordinators to monitor/ensure that services have been implemented and that they are occurring at the frequency and intensity identified on the IEP/IFSP.
- 4. Limited availability of data for the purposes of CDS budget planning and monitoring.

To address the issue of delayed service log completion and claim submission, CDS will begin enforcing the "30 day" clause of Rider B of the contract:

"Service logs must be entered in CINC within 30 days of service delivery regardless of pay source."

CDS recognizes that some providers may be inordinately challenged, due to billing work flow, to accommodate the 30-day requirement. Therefore, this requirement will be extended to 45 days from the date of service delivery. For further detail on this process can be found in the CDS Billing Manual and CINC training materials.

Beginning March 15, 2018, CDS will enforce a 45-day window from the date of service delivery. Once implemented, service logs and associated claims submitted more than 45 days after the date of service delivery will be individually reviewed and must include a valid reason for lateness.

Failure to comply with the above timeline and the terms of the CDS Agreement to Purchase Services (contract) may result in non-payment or reduction of payment for services.

CDS appreciates your cooperation on this matter.