

## Comments on Early Intervention Services (EIS)

### Standards of Care

#	Item	Comment	DSHS Response	Resolution
1	Definition: All four components must be present, but Part B funds are to be used for HIV testing only as necessary to supplement, not supplant, existing funding.	Could we use this to fund part of a case manager's time if they refer out for HIV testing and do the other 3 parts of EIS?	Usually a case manager is involved after the client is known to be HIV positive. However, if there is an instance where there is a need to refer someone for testing and link them to care, then this is the appropriate service category to charge their time.	
2	Services: <ul style="list-style-type: none"><li>• Testing</li></ul>	A lot of our providers have questions about paying for testing. The thought is that an HIV test with a positive result is fine and allowable because the person is HIV+ and therefore eligible for services, but a negative test result is problematic because that is not an allowable cost under RW –	If other funding sources for testing are unavailable then EIS can be used to fund testing. However, as stated by HRSA, Part B funds can only be used to supplement. Documentation at the agency level is required to support this.	

		is this correct?		
3	Agency policies and procedures: Requires monitoring and reporting on the number of HIV tests conducted and the number of positives found	How is this done?	Agency can determine how best to report on the number of HIV tests conducted as part of EIS. ARIES will be updated to track these in the future.	
4	Eligibility information will be obtained from the referral source and will include:	Add HIV positivity	Will add	
5	Eligibility	Add preference of contact for the client as do not want to breach.	Contacting a client is not considered a breach.	
6	Payor of last resort	What an acceptable form of documentation to show this? Is this just an acknowledgement by the staff member or are other sources listed proven to be unavailable?	In this case, it is important for the agency/provider to document that other funds are not available for testing and therefore RW funds are being used. This is not an individual payor of last resort -- if this is	

			confusing, we can reword.	
--	--	--	------------------------------	--