

Parent Rights Agreement (PRA) – Comprehensive FAQ

This FAQ summarizes common questions about the Parent Rights Agreement (PRA) and reflects the intent and requirements of the updated form and its annotations.

Questions about Early Intervention procedure should be directed to EI program Supervisors. The annotated PRA can be found using this weblink:

<https://www.pattan.net/Forms/Parent-Rights-Agreement-Annotated>

General Questions

There is no longer an N/A option, how do I document items on the PRA that do not apply to the activities I am completing?

Not all sections of the PRA will be addressed during each meeting or activity conducted with the family. If the section does not apply to the activities that are being completed, leave it blank.

Do I need to provide prior written notice to schedule activities?

No. Prior written notice is required before a program proposes, or declines, to initiate or change activities such as screening, evaluation, plan development, or service delivery. Prior written notice isn't required to schedule or coordinate a meeting or activity. Prior written notice needs to be provided before the meeting or activity is conducted, but not before it is scheduled or coordinated. The prior written notice can be provided right before the activity/meeting begins.

Do I have to complete a separate PRA for each activity when multiple activities occur during a visit?

No. Multiple activities can be documented on one PRA. Complete all applicable sections of the PRA and ask the parent to check the appropriate boxes and sign on the last page. Separate signed PRAs are only needed when activities occur at different times.

Do families need to sign multiple times when multiple activities occur during the visit?

No. Families sign one PRA, even if multiple activities occur during the same meeting.

How should meetings that are not included on the PRA be documented?

The PRA only contains activities that require prior written notice or consent under IDEA. If no activity requiring consent is proposed, a PRA is not required.

Screening & Referral Activities

What box should be checked if screening is not completed during a visit?

None. The PRA screening boxes should only be checked when a screening is being *proposed*. If no screening is proposed, leave the section blank.

Do we need a PRA when implementing an ASQ on a Tracking Plan?

No. The ASQ implementation is documented in the Tracking Plan for infants and toddlers enrolled in at-risk Tracking.

Do we need a PRA when implementing an ASQ as part of screening during the initial contact process?

A PRA is required whenever the program is *proposing* a screening and needs written parental consent. If a current screening is already available, a new PRA is not required.

How do I document consent received when completing an initial ASQ remotely?

Obtain verbal consent and document it on the PRA. Ensure the PRA is signed as soon as possible.

Where do I document the results of the screening in writing on the PRA?

It is the local program's decision regarding how to meet the requirement to notify the parent in writing of the results of the screening. However, when a child proceeds with an Evaluation, the screening results should be incorporated into the Evaluation Report. Conversely, if a parent does not consent to proceed with an Evaluation, the results may be incorporated into a letter to the family indicating their child's record will be closed. Check with your local program to determine how they have decided to document the screening results in writing.

Do I need to document on the PRA a screening that was completed by another entity (e.g. pediatrician, childcare provider, etc.) and provided to the EI program?

No. You would not document a screening that was completed by another entity on the PRA. The PRA is only used in situations where the Early Intervention program is proposing to conduct the screening of the child.

Evaluation / MDE / Eligibility Determination

When do I need to seek consent for the evaluation?

Written consent is needed for the evaluation. Consent can be obtained at any time PRIOR to the evaluation. This could be a date before the evaluation or immediately

before the scheduled evaluation begins. Consent is not needed to schedule an evaluation.

How do I document Prior Written Notice and consent for an initial evaluation?

Under the Multidisciplinary Evaluation section of the PRA, check “The Infant Toddler Early Intervention program is proposing a multidisciplinary evaluation of the child” and check the “Initial evaluation” box. Prompt the parent to check the box below that in the “To be completed by the parent(s)” section indicating they either consent or decline. If the parent declines, they can document the reason on the PRA but this is optional.

What box should be checked for a re-evaluation from Tracking (Initial or Annual)?

The PRA only includes “Initial” and “Annual”. Programs must follow local policy and the specifics of the situation to determine which applies. There is no separate “re-evaluation from Tracking” box.

How do I document the child’s eligibility?

In the Multidisciplinary Evaluation section of the PRA, under “The child’s eligibility determination based on the evaluation is as follows:”, check either “Your child is not eligible for Early Intervention services, and an Individualized Family Service Plan (IFSP) meeting will not occur”, or “Your child is eligible for Early Intervention services and an IFSP meeting will occur”.

How does a parent document on the PRA that they disagree with their child’s eligibility determination?

If the child is found not eligible and the parent disagrees, direct the parent to the Dispute Resolution Options section of the PRA so that they can request an option to resolve the issue.

Which eligibility box applies if the child is eligible but the parent declines IFSP or chooses Tracking?

In the Multidisciplinary Evaluation section, check the eligibility determination box “Your child is eligible for Early Intervention services and an IFSP meeting will occur.”.

In the IFSP and Plan Meeting Development Section, check the following box: “The Infant Toddler Early Intervention Program is proposing to initiate the development or revision of the Individualized Family Service Plan through an IFSP meeting.” and “Initial IFSP development”.

If the Parent choice is to decline the IFSP meeting, then they select “I/We decline an IFSP meeting for my child who has been determined eligible for Early Intervention services.” and optionally write that they choose to participate in Tracking.

In the Tracking Services section check the following box: “The Infant Toddler Early Intervention program is proposing tracking services for the child.”

The family will document consent to tracking services in the Tracking Services section.

It is allowable to propose multiple activities in the same PRA.

If a family declines an MDE and also declines Tracking Services after the initial contact, do we still have to send them the PRA so the family can officially decline tracking services?

Yes.

What does “Identification” mean in the section about program changes?

It refers to the identification of the child as eligible or not eligible for EI services.

Tracking

Do families in Tracking require a new PRA for each contact?

No. A PRA is only required when a new activity requiring consent is proposed. Making contact with a family enrolled in tracking does not require consent.

How do I document when a child is not eligible for Early Intervention but is eligible for tracking?

In the Multidisciplinary Evaluation section of the PRA, check “Your child is not eligible for Early Intervention services, and an Individualized Family Service Plan (IFSP) meeting will not occur.” In the Tracking Services section of the PRA, check “The Infant Toddler Early Intervention program is proposing tracking services for the child.” Prompt the parent to complete their section under Tracking Services indicating if they provide their consent or if they decline tracking.

IFSP Reviews, Revisions & Meetings

Is a PRA required for a 6-month review if no changes are made?

No. A PRA is required when proposing or declining an activity that requires consent.

Is a PRA needed if the only change to the IFSP is related to outcomes?

No. A PRA is not required to add, remove or change an outcome.

Do PRAs need to be signed before meetings are scheduled or only at the meeting?

A PRA is not required to coordinate or schedule a meeting. The PRA is signed prior to the start of the activity requiring consent.

Is a PRA required for updating progress?

A PRA is not required for updating progress.

Services—Adding, Changing, Ending & Documentation

Do I need to list the added, changed, or ended services on the PRA?

No. The changes are documented in the IFSP revision.

How do I document on the PRA when services are added, ended, or there are changes to the frequency/duration?

A PRA is required to document changes. Under the Change in the Provision of Early Intervention Services or Eligibility section of the PRA, check “The Infant Toddler Early Intervention Program is proposing the following” and “Change in the Early Intervention services for the child and family on the IFSP”. The parent would then indicate if they consent or decline the changes in the section to be completed by the parent.

How do we document when a family declines services?

Families may decline any or all services. Their decision must be documented on the PRA. If the parent declines the initiation of all services on the IFSP, they would check “I/we decline the initiation of all Early Intervention services for my child and family” in the Initiation of Early Intervention services section of the PRA. Optionally, the parent can include a reason why they are declining the initiation of services.

If the parent declines the initiation of only some services on the IFSP, they should check “I/We am/are providing consent for the initiation of Early Intervention services on the IFSP (Select One): Only the following services identified on the IFSP” in the Initiation of Early Intervention Services or Eligibility section of the PRA. The parent should then write in the services that they are consenting to.

If the parent is declining a change to services after the initiation of Early Intervention services, they should check “I/We decline the changes in Early Intervention services for my child and family.”

What is the difference between the sections “Initiation of Early Intervention Services” and “Change in the Provision of Early Intervention Services or Eligibility”?

The “Initiation of Early Intervention Services” is used only when obtaining consent for the services initially planned on the IFSP.

At the initial IFSP meeting, check “The Infant Toddler Early Intervention Program is proposing to initiate Early Intervention services for the child and family identified on the IFSP” under the Initiation of Early Intervention Services section and direct the parent to

indicate their consent for all of the services, some of the services, or to decline the initiation of services.

The “Change in Provision Early Intervention Services or Eligibility” is only used when adding new services to the IFSP after the Initial IFSP or when making a change to the services on the IFSP.

When adding new services or making changes to the services, check “The Infant Toddler Early Intervention Program is proposing the following” and “Change in the Early Intervention services for the child and family on the IFSP” and direct the parent to indicate either “I/We am/are providing consent for changes in Early Intervention services for my child and family” or “I/We decline the changes in Early Intervention services for my child and family”.

How do we document when a parent withdraws their child from Early Intervention?

A PRA is not needed when the parent indicates that they would like to withdraw their child from Early Intervention. The program should document the parent's request to withdraw their child from EI in Service Coordination Notes and close the child's record in PELICAN-EI with the closure reason 'Withdrawn by Parent/Guardian'. If the local EI program chooses, they may also document that the parent requested to withdraw their child from EI in a letter sent to the parent, however, this isn't required. Review your local program procedures to determine how to document requests from a parent to withdraw their child from EI.

PRA Workflow

Are parents required to receive a copy of the PRA?

Yes. Families must receive a copy of the PRA. Parents must also receive a copy of the Procedural Safeguards Notice every time they sign the PRA.

Can the PRA be simplified to two pages maximum?

No changes may be made to content of the document.

Permitted Signers of the PRA

Who is permitted to sign the Parent Rights Agreement?

The PRA is permitted to be signed by anyone who meets the definition of “parent” under §303.27.

Location Changes

If a child's services change between different home and community locations, is a new PRA required?

No.

Roles & Responsibilities

What is the role of EI provider agencies regarding PRA completion?

Providers of Early Intervention services have no role in PRA completion. The Service Coordinator is the only person that facilitates the completion of the PRA.

Dispute Resolution Options and Procedural Safeguards

How should a family document that they do not request any dispute resolution options?

If the parent is not requesting any dispute resolution options under the Dispute Resolution Options section of the PRA, it is ok for them to leave that section blank. However, if a parent indicates that they decline to provide consent to any option that is proposed by the EI program, the SC has a responsibility to point parents to this section and explain the options that are available to them to resolve the issue. It is up to the parent to decide if they would like to request any of the options. If the parent does request an option on the PRA, it is the SC's responsibility to provide them with information on how to access that option.

Does a family need to respond to the final question in the Dispute Resolution Options section, even when the family does not request one of the four Dispute Resolution options?

Yes. The parents should be provided with the opportunity to check Yes or No under the Dispute Resolution Options section of the PRA to document that they received or did not receive the Procedural Safeguards Notice.