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**Adult Services FAQS 3.20.20**

**COVID-19 Webinar with DDA, Counties and Providers**

***Updated 2.2021***

**Purpose Statement**

## The purpose of this document is to provide clarity on the COVID-19 tracking process and the updated guidance put out by DDA on 1/1/2021. COVID-19 tracking hours will be available for the duration of the pandemic and DDA will communicate any updated information as it becomes available. The following Budgeting Accounting Reporting System (BARS) definitions are those approved by DDA effective 1/1/21 to support COVID-19 billing activities and are referenced throughout the document:

# **BARS .31: “Training”**: To increase the job related skills and knowledge of staff, providers, volunteers, or interning students in the provision of services to people with developmental disabilities. Also to enhance program related skills of board or advisory board members.

# **BARS .41: “Community Information and Education”**: Activities to inform and/or educate the general public about developmental disabilities and related services. These may include information and referral services; activities aimed at promoting public awareness and involvement; and community consultation, capacity building and organization activities.

**Guidelines for Amending the COVID-19 billing**

* New clients will be added to the COVID-19 billing at the base if not working (regardless of the CSA level) and at the authorized CSA level if they are working.  Clients new to CI services or switching from IE to CI will be authorized at the authorized CI level.
* Clients who are terminated from services will be removed from the COVID-19 billing, (reducing the hours and amount billable on the COVID-19 spreadsheet.)
* Prior Approval/Exception to Rule (PA/ETRs) hours will continue to be extended, unless the client has been terminated from their job or the employer is no longer in business.  The assumption is that PA/ETRs may be necessary to help the provider maintain their billing average.

**Frequently Asked Questions**

1. **Q: What is the purpose of the COVID-19 tracking sheet?**

A: To document direct staff hours that are typically billable or provided remotely and staff hours in training/development. When providers are providing remote services they are still required to submit a COVID-19 tracking spreadsheet even if they are not accessing COVID-19 billing.

1. **Q: How were the average client hours for Fiscal Year 20 calculated?**

A: DDA provided data to counties with the average support hours for each client July 2019-Jan 2020, which was shared with providers. Months with zero support hours have been eliminated from the average. There may be circumstances where the provider needs to amend the average based on special circumstances. Talk to your county coordinator/liaison.

1. **Q: The staff professional development and training hours have been approved for staff who provide direct support, but can managers also bill their time?**

A: Hours that are typically committed to direct client support and are provided by the manager or administrator can be included.

1. **Q:** **Will this spreadsheet replace our typical monthly billing report?**

A: No, this will be in addition.

1. **Q:** **Is this a monthly sheet, or will we continue to enter running data in this sheet over the next few months?**

A: The workbook must be completed and saved for each month. (You can copy the previous month’s sheet and amend.)

1. **Q: How will we invoice the staff training/development hours?**

A: Your county will add lines for training (BARS .31), professional development (BARS .31), and quality assurance time to prepare for county reviews (BARS .41) within the invoice coversheet or other document you complete with the monthly billing data. Please note that quality assurance time to prepare for county reviews should be negotiated with your county prior to billing.

1. **Q:** **What documentation is required to request professional development and training hours?**

A: Please see the [DDA COVID-19 Billable Activities Guidance document](https://www.dshs.wa.gov/sites/default/files/DDA/dda/documents/covid-19/COVID-19%20Billable%20Activities%20Guidance.docx) for guidance and if still unsure contact your county.

1. **Q:** **What are time-limited remote hours?**

A: Client-specific hours that would typically be done in-person (onsite in the community), but for a limited time may occur remotely by either phone or video. Examples include discovery with the client and informational interview with an employer. Agencies should develop guidance for staff to maximize their time in these and other typically billable activities.

1. **Q:** **How are time-limited remote hours documented?**

A: Client log notes should clearly delineate typical billable activities from time-limited remote activities. How to label them is up to the agency, as long as they are consistent and remote time is evident when monitored. These hours should be classified in the appropriate phase in the log notes and should be included in hours billed on the month billing. In addition, these hours will be detailed in the COVID-19 tracking sheet.

1. **Q: What resources are available for clients who might benefit from technology during this process?**

A: If technology is needed to access remote services talk to the DDA case manager. Assistive Technology has been added to all Waivers during the pandemic **IF** the need is specific to needing to access remote services. For individuals who need technology to obtain or maintain their job, DVR may be a resource. Talk to a county coordinator/liaison to request technical assistance. Accessing Assistive Technology during COVID examples:



1. **Q: If the client has no wages or work hours for the month (but was in paid employment prior to March) where should typical and remote hours be documented within the phases on the monthly billing?**

A: Hours should be documented in either job prep or job development, whichever is most appropriate. If no wages and work hours are documented, job-coaching hours if entered will create an error in the billing system.

1. **Q: What do we use for the “service in date” and “service out date” in column D and E of the service tab?**

A: The “date out” is the date the client (guardian/employer/residential) reported the client **would not be participating** in community activities, business was closed, etc. The “date out” may not mean that services have stopped. This date may stay the same for the duration of the pandemic (even if you are billing remote or other activities on the client’s behalf.) The *“day back in for the month”* may be left blank if it is unknown, reflect the date the individual reports that they will be back (which could be in the next month) OR the date they re-engage with services. Track this as best you can. We know that clients may be in and out of quarantine. Make sure you keep details within the log notes for clarity.

1. **Q:** **If a client was in DVR intensive training, placement or other contract, can those hours be billed under typical or time-limited hours?**

A: No, only hours billable to DDA should be entered. DVR needs to provide guidance on billing for participants who have an open plan with DVR.

1. **Q: Will we be paid for all of the hours we document on TAB E of the tracking spreadsheet?**

A: The agency will be paid UP TO the total hours documented on the service tabs, summarized on TAB A. Hours provided on TAB E provide back-up justification for professional development and training hours.

1. **Q: What if the agency has documented fewer hours on TAB E than the hours calculated on the service tabs? (B, C, D)**

A: The hours in Column N of the service tabs must be reduced to equal the total hours documented in TAB E. Remove hours from individual clients, rather than from the total (which is locked.) Agencies may reduce hours from lower hourly service types (such as CI) in order to maximize their hourly reimbursement.

1. **Q: The agency provided OVER the average hours which creates a negative number in Column “N” of the COVID-19 tracking program tabs. What do we do with the negative number?**

A: Ultimately, payment of the TOTAL AVERAGE HOURS REFLECTED AT THE BOTTOM OF **COLUMN G** is the goal of the COVID-19 tracking and reimbursement process. That total is achieved by calculating the balance of hours needed across all clients (COLUMN N) in Column G after typical/remote hours billed (COLUMN J) have been removed. Hours provided above the average are typically balanced out by other clients who received below the average.   The county and provider should agree upon changes made to client average hours on the tracking sheet, so that averages reflect, to the greatest extent possible, agency trends in the number of clients served and level of services provided.

1. **Q: Do the staff professional development and training hours earned in one month need to be used in that same month or can they be carried from month to month?**

A: Yes, they must be used in the same month.

1. **Q: What if I need more lines to document than are available in the spreadsheet?**

A: Work with your county coordinator/liaison to amend the spreadsheet as needed.

1. **Q: Health and Human Services (Federal) will waive penalties related to HIPAA rule violations, connected with good faith implementation of telehealth. Does that waiver apply to us? (use of Zoom, Hangout Meet, etc., without HIPAA level security)**

A: Each agency needs to make its own decision and provide guidance for staff on content appropriate for use with use of unsecured technology. DDA/counties will follow federal guidance. [Click here](https://www.hhs.gov/about/news/2020/03/20/ocr-issues-guidance-on-telehealth-remote-communications-following-its-notification-of-enforcement-discretion.html) for more information from HHS.

1. **Q: Can we work through DDA to get (subject matter expert) approval, as an individual or agency, for courses we can teach and offer all agencies, allowing SME pay, as well as, attendees?**

A: No. Counties are responsible to qualify providers, including training/community information and education, ITA and TA providers. If you are interested in becoming a SME, you may also contact WISE or Service Alternatives who are DDA’s two subcontracted technical assistance organizations.

1. **Q: If your staff participate in professional training, will the agency be reimbursed for the cost of the training plus the staff's time to complete the training?**

A: Staff time to participate in training would be documented in TAB E. The cost of the training itself would not be covered unless your county reimburses for training costs. Talk with your county coordinator/liaison.

1. **Q:** **Does preparing for an upcoming county monitoring count as a billable activity?**

A: It can, if being performed by a direct support staff or a manager who provides direct client supports which are typically billed within the month. Talk to your county coordinator/liaison

1. **Q:** **Will unemployment income affect SSI?**

A: Unemployment benefits would affect SSI because it is counted as unearned income. [Supporting a client](https://www.benefitu.org/) to understand these impacts could be tracked as a typical billable activity in the log notes.

1. **Q:** **Can we bill for assisting a client with applying for unemployment?**

A: Yes, This may be tracked as a typical billable activity but may affect SSI, so the provider may want to refer to a resource for help.

1. **Q:** **Are employment services considered an essential service, if supporting a client in a job that has been defined by the governor as essential?**

A: Yes.

**Questions from 1/14/2021 DDA webinar on COVID-19 Billing:**

