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**FAQS 3.20.20 COVID-19 Webinar with DDA, Counties and Providers**

**\**Updated 4.24.20***

**Billing process**

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.

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” (professional development) “Infrastructure” (organizational development) and “start-up” within the invoice coversheet or other document you complete with the monthly billing data.

**Time Limited (Remote) Billable Activities**

1. Q: **What are time-limited 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 typically billable activities.

1. Q: **What are time-limited hours and how are they 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 Column I of the COVID-19 tracking sheet.

1. Q: **Should column J and the service tab equal total support hours billed on the monthly billing?**

 A: Yes.

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: **How are the average client hours for Fiscal Year 20 calculated?**

 A: DDA will be providing data to counties with the average support hours for each client July 2019-Jan 2020, which will be 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.

1. Q: **How do we calculate average hours if the client is new to service in February/March or just completed intensive training with DVR and was scheduled to start county service in March?**

A: As long as a CSA is in place and long-term services have been approved, the base hours (by acuity) may be used for individuals new to service who were not working. For people who were or are working, the average support hours for the last month in ITS or in February (up to the max hours authorized in the CSA) may be used for the average. There may be other exceptional circumstances. Talk to your county coordinator.

1. Q: **What if the client recently switched service categories? How is the average calculated?**

A: The average hours for the most current service category should be used. (If the client were in IE July-November and in CI December-January, the last two months of service when in CI would be averaged.) Reviewing data against your own records is recommended.

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. 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: **What if the client was not working and had opted out of service in February (or in months prior) but still appears on the billing, do they still go on this spreadsheet?**

A: No. If a client declined or exited services and was not billed on the February billing, or you were not anticipating billing for March, they should not be included.

**Staff Professional Development and Training Tracking**

1. Q: **What are these hours?**

 A: They are the hours staff will use for professional development/training time to further their client support services. The POTENTIAL hours an agency may request are calculated on the service tabs for IE, GSE, and CI.

1. Q: **How are these hours calculated?**

 A: The potential hours an agency can request for a client is the difference between the average hours typically provided to the client (July-June) and the actual typical and time-limited hours provided to the client for the month. The actual hours an agency may request depend on whether or not the agency can provide sufficient documentation of staff time on TAB E of the tracking spreadsheet.

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

A: Direct staff support hours that are related to client services and benefit clients. When staff are engaged in any of the following, they should track hours on TAB E of the tracking spreadsheet:

* Personnel development (mandatory training, other professional development, in-service training)
* Organizational development (peer mentoring or planning)
* Client file update and review (CARF/Audit preparation, electronic/paper files updates)
* Customer satisfaction surveys and quality assurance activities
* Chamber of Commerce/Rotary Club/leadership meetings.

**Written Guidance for staff should be developed to prioritize engagement in the above activities.**

1. Q: **What if the above activities are insufficient to make up the difference in direct support staff hours lost due to COVID-19?**

A: If the above activities have been exhausted, agencies may document paid direct support staff time (not engaged in service activities) resulting from COVID-19 as long as they are being paid by the agency. These include sick leave (including time for quarantine and isolation) paid time off due to insufficient work and lack of childcare. There is no need to indicate whether the individual has actually been diagnosed with COVID-19. **This time will not be reimbursable past April 10, 2020 at this point, but if retainer funds become available, the state will need backup support in order to reimburse.**

1. Q: **Will we be paid for all of the hours we document on TAB E column F 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 (staff professional development/training tracking) 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: **At what rate would start-up staff tracking be reimbursed?**

A: The hourly rate is attached to the service each client is authorized for, specific to your county.

1. Q: **Is there documentation we need to provide for anything coded on TAB E on the staff professional development and t training spreadsheet?**

A: Staff training logs should reflect any training indicated. We recommend that agencies provide each staff their own tracking sheet, which can be summarized at the end of the month, and maintained with other agency records.

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.

* Have there been recent changes such as a net increase or decrease in clients?
* Has there been a recent increase/decrease in the client authorization due to a change in support needs?
* Was there a new job obtained recently?

For most agencies, once the average hours are finalized the negatives generated by hours provided above the average should remain. The county, at its discretion, may use the negative numbers as a lever to achieve the July-January monthly billing average for the agency. The county must consider other increases within the County and its annual budget in this decision.  Removing the negatives will increase the number of staff hours on TAB E that the agency must document.

The provider and county should also consider, are the “greater than-average hours” justified? i.e. Are there log notes (that meet either the typical or remote definitions) that support these hours?

**Other Clarification**

1. Q: **Is there a way to reduce our work and not have a breakout by hours/client in start-up on TAB A? And to pay us up to the loss, but not over it and to have that automated?**

A: No. Federal funders will require per client documentation.

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 to amend the spreadsheet as needed.

1. Q: **If the Chamber and Rotary meetings go online, as well as guest presenters, can that count as staff professional development and training time?**

A: Yes.

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

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

1. Q: **What could be included under the activity description “COVID-19-related time/leave” on the staff-tracking sheet?**

A: Time that staff are at home on leave due to illness, quarantine or isolation, are unable to work due to lack of child care (related to COVID-19) , or there is insufficient work to make up lost hours. (After other personnel and organizational development hours have been exhausted.) Please do **not** specify if staff have been diagnosed with COVID-19 under activity description. NOTE: This is not reimbursable at this time.

1. Q: **Updating client electronic files is allowable, but is going through old paper files and shredding also allowable?**

A: Yes.

1. **Q: What about clients who are non-verbal? How do we provide remote service for them**? **How can we train by phone without being near the client? What about for clients who have been laid off?**

A: Providers need to develop guidance for staff and troubleshoot these challenges on their own. When appropriate consult the county. Be creative. Would the client benefit from technology? Do they need assistance applying for unemployment? Do they need help understanding how benefits will be impacted by unemployment? Will video or phone check-ins help keep them engaged? What activities and schedule are they keeping at home to stay ready to re-enter the workforce?

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

A: DVR may be a resource for technology. Talk to the DDA case manager because other options maybe available. Talk to a county coordinator to request technical assistance.

1. **Q: Will this support continue through the duration of the pandemic?**

A: Yes, if things change we will communicate that. Evidence for loss of revenue will need to be tracked for future retainer payment if approved.

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.

1. Q: **Does updating/revamping forms used for client info gathering qualify as a billable activity (i.e. improving our Discovery form)?**

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.

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

A: Unemployment benefits would affect SSI because it is counted as unearned income. Supporting a client 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.