Education Medicaid Updates: Extended School Year and Fall 2020

Purpose

The purpose of this document is to provide guidance to Medicaid Clerks and supervisory union staff who have question about School-Based Health Services program requirement heading into the 2020-2021 school year. The document discusses Extended School Year (Summer) service questions, fall IEP expectations, new documentation log questions, and DXC billing questions. Medicaid Clerks or supervisory union staff who have additional questions should contact their assigned Education Medicaid Specialist or the Medicaid Unit Administrator, Jessica Robinson at jessica.robinson@vermont.gov

Extended School Year Services

Q1: Can we use Extended School Year (ESY) services that are found on the IEP and/or DLP?

Yes, you can use ESY/Summer services that appear either on the DLP or IEP. The AOE's Memo: Extended School Year Services Summer 2020 states that "There needs to be a clear delineation between service details for ESY in-person services, and service details for ESY remote services written into the IEP or DLP ESY plan."

And that if ESY/Summer services are on the DLP that "The DLP requirements for ESY are the same as during the school year…. It [the DLP] must include the educational placement, mode of delivery of services, service description, frequency, duration, service provider and group size. Parental agreement must also be documented."

Q2: Can we bill ESY Services?

Yes, if all the service detail information is available, including but not limited to:

1. ESY dates of service on the cover page of IEP or included in the DLP
2. ESY services on the IEP service page or DLP (listing mode of delivery of service, service description, frequency, duration, service provider and group size.)
3. If the mode of delivery of service has changed from in-person to remote there needs to be clear delineation. It must be clear if the ESY service is in-person or remote.
4. If there is a change to ESY services for any reason (including mode of delivery), all IEP amendment paperwork must be on file. For DLP's this includes evidence of parental consent.

Q3. Are there any changes to the way we bill ESY services in the DXC system?

No, you will want to follow the ESY billing requirements from the School-Based Health Services Manual. Use the dates of ESY services that are listed in the IEP/DLP.

If the ESY services are a hybrid of in-person and remote services, please reference the DXC Billing Hybrid Service section at the end of this document.

Fall IEP Expectations

Q4. Our SU is still using DLP's from spring 2020 for ESY services. Can we use the DLP for fall 2020 services, starting in September 2020?

No, guidance from the AOE, Considerations for IEPs Fall 2020, states that districts will need to discontinue the use of DLPs at the beginning of the 2020-21 school year. The expectation is that 2020-2021 services will be listed in an IEP.

Q5. The AOE guidance references hybrid services and remote/virtual services. Are these two service types the same as "Telemedicine" services for Medicaid?

Yes, according to the Vermont Department of Health Access (DVHA) website, telemedicine is real-time, audio-video or audio communication tools that connect providers and patients in different locations when possible.

Telemedicine and remote/virtual services are the same thing for the purpose of SBHS Medicaid billing.

Hybrid services indicates a combination of both in-person and remote/virtual services. The remote/virtual services would be considered telemedicine.

Q6. What should we look for on IEP's for 2020-2021 when it comes to how services should be listed?

Considerations for IEPs Fall 2020 makes it clear that the IEP expectations are that:

> *Service pages should reflect options for remote learning, in a similar format to the completion of a Service Page for Extended School Year (ESY) services. For example, if you include ESY services as a separate page, you should include remote/hybrid learning as a separate page which includes the services that would be used in remote or hybrid learning.*

For Medicaid billing purposes this means that you need to see a clear delineation between services intended to be provided in-person and services intended to be provided remote/virtually.

Q7. What if we see an IEP which has all services listed as "across all locations", but there is no clear delineation between in-person and remote/virtual services?

[Considerations for IEPs Fall 2020](#) is clear that there needs to be some distinction between which services are intended to be in-person and which services are intended to be provided in a remote/virtual environment. It states:

> *"If the district is adopting a hybrid model (some in-person, some remote) for reopening in the fall, the IEP team must address the services and supports which are required for both in-person and remote learning. This can be accomplished by identifying remote/in-person services within the service pages"*

If there is no clear delineation, then those services should not be billed to Medicaid at this time.

Fall 2020 Documentation Log Questions

Q8. There are new documentation logs which now include a notes section for remote/virtual telemedicine requirements. Can these logs be used for all services, both in-person and remote?

Yes, you should be using the DAT, Related Services, and Personal Care logs with the footer July 2020 at the bottom.

If the service is in-person, no telemedicine notes are required.

Q9. What if there are math services listed as both in-person and as a remote service? The mode of delivery, duration and frequency are all different.

The SBHS requirements have not changed. For DAT and Related Services each separate line of the IEP should have a separate log associated with it. The clerk must ensure that each DAT and Related Services log contains only one IEP service performed by one provider.

DXC Billing Hybrid Services

Q10. If a student is receiving hybrid services, a combination of in-person and virtual, what Place of Service (POS) code should be used to bill in the DXC software?

- If you are going to be billing logs for in-person services only on the LOC - the Place of Service (POS) in the DXC billing software should be listed as 03.

- If you are going to be billing logs with both in-person AND remote/virtual services on the LOC - the Place of Services (POS) in the DXC billing software should be listed as 03.
- If you are going to be billing ONLY virtual/remote documentation logs on the LOC - the Place of Service (POS) in the DXC billing software should be listed as 02 – Telehealth.
- IEP and Eval Claims – the Place of Service (POS) in the DXC billing software should be listed as 03.

CAUTION: You cannot bill for multiple details with differing POS codes. For example, you would not be able to bill March 2020 (POS 03) and April 2020 (POS 02) LOC's on the same claim.

CAUTION: You cannot include April 2020 or May/June 2020 (POS 02) LOC claims as multiple details with the IEP and/or Eval claims (POS 03)