

COVID-19 Interim Billing Guidance for Day Services

March 24, 2020

Interim Billing Guidance for Providers of Day Habilitation, Prevocational and Day Treatment Services Regarding Emergency Response to COVID-19

This document provides temporary billing guidance for OPWDD certified providers of Day Habilitation, Prevocational and Day Treatment services as it relates to the COVID-19 emergency response efforts. Effective with the March 18, 2020 suspension of these Day Habilitation, Day Treatment, and Prevocational Services, the following flexibility is available to providers to ensure continuation of services to the extent possible and to allow agencies to reassign staff to provide essential services to individuals with intellectual and developmental disabilities. This guidance will govern claims for service dates of March 18, 2020 through March 31, 2020. Further direction will be forthcoming to provide longer-term billing guidance.

Retainer Day Payments for Day Habilitation and Prevocational Services Providers

Effective March 18, 2020, Day Habilitation, Prevocational Services and Day Treatment providers may bill Medicaid for *retainer day payments* for individuals who:

- Are authorized by OPWDD to receive Day Habilitation, Prevocational and/or Day Treatment services from your agency; and
- Were actively receiving Day Habilitation, Prevocational and/or Day Treatment services from your agency at the time of the mandated temporary suspension of services.

Retainer day payments may be billed to Medicaid in accordance with the individual's existing schedule for participating in your agency's Day Habilitation, Prevocational and/or Day Treatment services. For example, if your agency normally provided a full unit of Day Habilitation on Monday, Wednesday and Friday each week, your agency may bill no more than three (3) full units of retainer Day Habilitation payments.

Claim Submission for Retainer Day Payments

Retainer day payments are billed as follow:

- Use <u>existing</u> Provider ID for Day Habilitation, Prevocational and/or Day Treatment services;
- Use <u>existing</u> rate codes for half and/or full units of Day Habilitation, Supplemental Day Habilitation, site-based Prevocational and/or Day Treatment services; and the existing <u>rate code</u> for 15-minute units of community-based Prevocational Services;
- Use existing locator code, and
- Use revenue code: "0180 Leave of Absence."

The Revenue Code of 0180 identifies that the claim is for a Retainer day and that the agency may not have service documentation as required in Administrative Memorandum (ADM):

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Group Day Habilitation Service and Supplemental Group Day Habilitation Documentation Requirements 2006-01, Prevocational Services 2017-03, and Day Treatment Billing Standards 2008-02.

Supporting Families During the COVID-19 Emergency

OPWDD expects that Day Habilitation, Prevocational and Day Treatment services providers continue to support individuals and their families during this crisis and to use the revenue from the Retainer day payments to support these efforts. Day Habilitation, Prevocational and Day Treatment services providers have the flexibility to determine how best to safely support the individuals and families that they serve. For example, providers may elect to provide face-to-face services, to have staff engage the individual using the telephone or other technology, or other non-face-to-face supports (i.e., delivery of food or essential supplies). These supports to individuals and families do not need to be provided on each day a retainer day is billed but should at least be provided on a weekly basis or more frequently if needed.

Further Guidance and Next Steps

OPWDD is working the federal Centers for Medicare and Medicaid Services (CMS) on a mechanism to provide the greatest degree of flexibility to continue funding during the suspension of Day Habilitation, Day Treatment and Prevocational services. Additional guidance will be forthcoming, but agencies are encouraged to re-assign current staff to provide essential services to the individuals and families that you serve.

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