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September 25, 2020

Subject: State of Emergency Billing

Dear ACRC Service Providers,

On March 4, 2020, Governor Gavin Newsom declared a State of Emergency for California, as a result of the global COVID-19 outbreak (otherwise being referred to as Coronavirus). This memo provides updated guidance due to a newly released Directive, dated August 31, 2020, 2020, that contains additional specific requirements for those seeking to bill for nonresidential services during the State of Emergency. Here is the latest order with the original orders before it:

August 31, 2020 Directive can be found here [Directive](#)

All DDS Directives regarding COVID-19 can be found here: [DDS Directives COVID-19](#)

Residential Providers (Community Care Facilities, Intermediate Care Facilities)

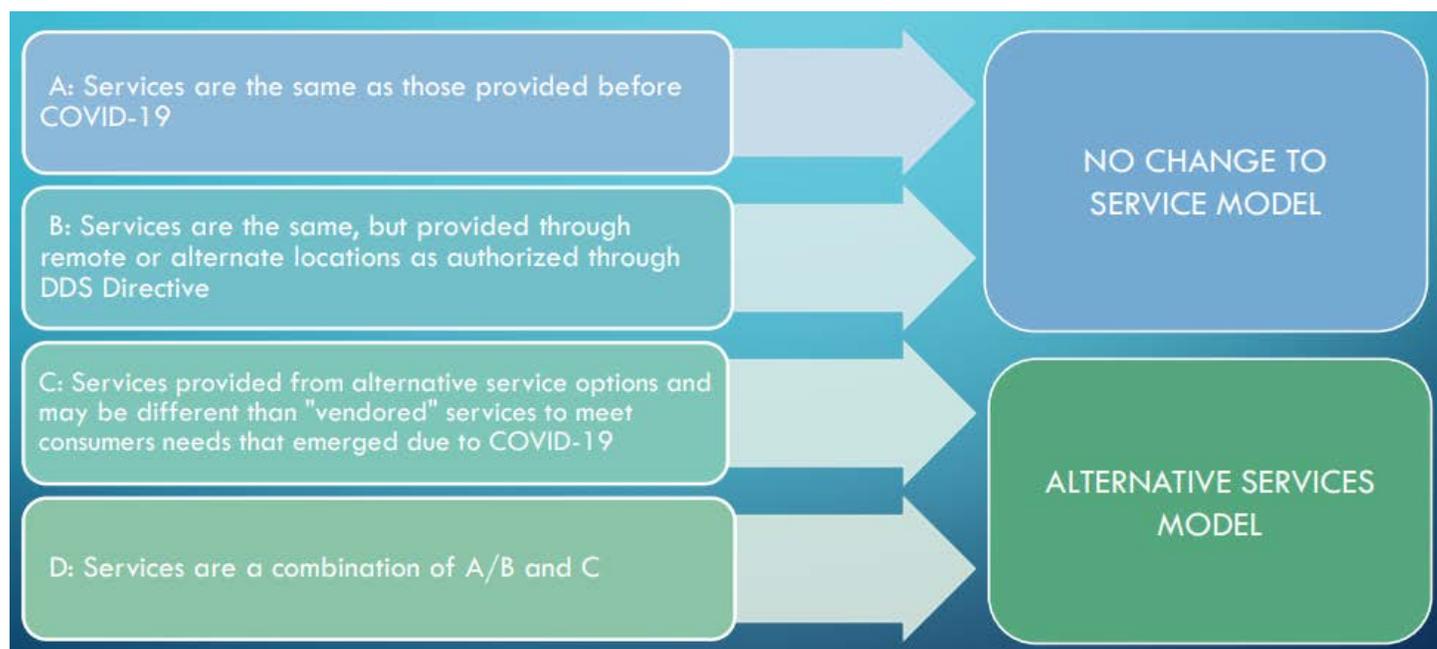
In the event that additional hours were needed to assist persons served due to COVID-19, please contact the Service Coordinator for authorization. As needed, ACRC will fund for supplemental staffing in residential facilities to support care providers assisting with clients remotely communicating with other service providers, work and school. Please maintain all proper support and documentation to support the increase in hours.

Nonresidential Service Providers

Absence/Retainer Payments Replaced by Alternative Services

Per DDS Directive, effective September 1, 2020 **nonresidential service providers may no longer bill for absence/retainer** funds from the regional center. With the September 2, 2020 Directive DDS created a new Alternative Services delivery model. DDS created this new model to “meet the individual needs of consumers, sustain the state’s developmental services provider network, and continue receipt of federal reimbursement for services provided to consumers during the COVID-19 State of Emergency.”

DDS has provided guidance to determine if a nonresidential service provider is offering Traditional, Traditional with Remote Services, or Alternative Services.



DDS indicated in their Directive that **Alternative Services do not apply** to the following:

- A. Services to a consumer that are able to continue as they did before the COVID-19 State of Emergency that meet the needs of the consumer; or
- B. Services to a consumer that are able to continue as they did before the COVID-19 State of Emergency via remote delivery or in alternate locations that meet the needs of the consumer. Refer to Department-issued [Directive \(March 18, 2020\)](#) regarding the provision of services via remote delivery or in alternate locations.

Traditional Nonresidential Services Billing

Nonresidential Service Providers who have no change to their service model as outlined in **A & B above should bill for direct hours only**, as outlined in your vendorization. Vendors seeking to bill under the Alternative Services Model should follow the steps below.

Alternative Service Billing

Certification Statement – DDS new Directive requires service providers to submit Certification Statements to the regional center. ACRC has clarified that **any Certification Statements that were submitted without using the current format are invalid**. The new Certification Statement can be completed and transmitted by clicking this link: [Enclosure A Certification Statement](#). Please note due to the large volume of providers submitting Certification Statements we ask **all nonresidential providers planning to bill for Alternative Services to please use the SignNow link** provided to submit your Certification Statement to the regional center. **These must be completed prior to submitting September 2020 billing in order to receive payment.**

Billing for Nonresidential Alternative Services for **September and October 2020 (At a later date, ACRC will release updated guidance for billing from November 2020 onward)**

- a. Providers shall use the current authorized rate and each consumer's average monthly attendance over the prior 12 months ending February 2020 for each consumer who received Alternative Services and the provider complied with Section V of the [Directive](#).
- b. Providers shall not submit reimbursement claims for consumers who did not receive services.

What if I am a program vendored after the March 2020 State of Emergency was declared?

For hourly rate vendors – Multiply the number of daily hours clients would, absent the State of Emergency, spend in your program by the number of billable days in September (22) or October (22). For example, 6 daily hours multiplied by 22 billable days = 132 hours of Alternative Services that can be billed in the month of September or October 2020.

For daily rate vendors – You may bill for the maximum number of billable days in the months of September and October.

What if I begin providing services to a new client and there is no historic monthly average attendance data to base the billing on?

For daily rate vendors, you may bill for the maximum number of billable days in the months of September and October.

For hourly rate vendors you may bill for your average client monthly attendance. Average client monthly attendance can be determined by adding up your total number of hours billed from March 2019 – February 2020 (for example, 700), then dividing that number by your total monthly billed clients for the same time period. *If you served no clients in one of those 12 months, that month must be omitted from the equation.* Using the example of 700 total hours from March 2019 – February 2020 divided by the total monthly billed clients (35) leads to an average of 20 hours per client during the twelve months preceding the State of Emergency.

Supplemental instructions are attached for Transportation Service Providers.

Discontinuation of Services

If after conducting an assessment regarding a client's interest in participating in Alternative Services, the client wishes to discontinue services, please email the assigned Service Coordinator. Authorizations will be ended effective September 30, 2020 for clients that decline Alternative Services.

Payment

We also want to reiterate ACRC's long standing practice and publicized billing payment timelines of the 15th of the month if you have submitted your E-Billing invoice by the 8th calendar day of the month. Otherwise, all other payments will be by the last business day of the month. Please note payments may take up to two business days for the Electronic Funds Transmission to process with your bank. On occasion, ACRC may process payments earlier than

the 15th, but this should not be understood as a basis for future payment timings. The fact you receive payment early one month does not assure the same timing may happen the next month. The only guarantee that we can provide is based on the two payment dates mentioned.

General Notes

Directives related to offsetting billing against any additional federal funds received are still in effect as stated in ACRC's June 19, 2020 billing memo.

No other billing for non-residential absences/cancelations are allowable, other than waivers of the Lanterman Act or the California Code of Regulations, Title 17 explicitly stated in a DDS Directive (i.e. bed holds for residential facilities described in the April 15, 2020 DDS Directive).

This guidance is subject to change based on direction from the State of California.

Thank you for taking precautionary measures and assisting our persons served to remain safe and healthy during this critical time. If you have any questions on the application of DDS' Directives, please contact your CSS specialist. If you have any SOE invoice billing status questions, please email POS@altaregional.org.

Sincerely,

Original signed by
Iqbal Ahmad
Chief Financial Officer

Original signed by
John W. Decker
Director of Community Services & Supports

Enclosure: **Transportation Service Providers with Service Hours and Service Miles Authorization Contracts**

Transportation Service Providers with Service Hours and Service Miles Authorization Contracts

Transportation service providers (provider) that typically bill their total monthly service hours or total miles rendered based on a contract service authorization, may bill for the months of September – October 2020 for alternative services provided to clients in accordance with the DDS Directive dated August 31, 2020. Considering the provider typically tracked service delivery on an individual client tracking authorization but billed for services in total by month on a contract authorization, this memo intends to provide a billing method that a provider shall follow for billing for alternative services.

STEP 1-3: The provider shall take their total billed contract hours or miles for each month from February 2019 through February 2020 and divide by the total billed clients for the same time period to arrive at an average individual client units authorizations billed each month (for example: 700 total contract hours billed for the 12-month period for a total an average of 30 authorized clients served resulting in 23.33 average hours per client).

STEP 4: Once the provider has received confirmation from the clients that have agreed to receive alternative services delivery, the provider shall take these respective clients and multiply by the average number of units per client. This will calculate the total alternative service billable units.

STEP 5: Enter the alternative service billable units onto your E-Billing invoice. The system will multiply your alternative service billable units by your authorized reimbursement rate to determine your reimbursement.

This method is only specific for transportation providers that utilize vehicle service hours or total contract service miles that are billed on a contract authorization line. In addition, provider may only bill for alternative services once the provider has sufficiently completed Parts II (Certification) and Part V (Alternative Services Implementation) of DDS' August 31, 2020 directive.

See Example on next page

5 Steps are Illustrated in the following example:

	<u>Vehicle Service Hours</u>		<u>Service Miles Contract</u>	
STEP 1	700	Total hours in March 2019 - Feb 2020	5000	Total miles in March 2019 - Feb 2020
		<u>Authorized Clients Served</u>		<u>Authorized Clients Served</u>
STEP 2	30	March 2019	30	March 2019
	25	April 2019	25	April 2019
	35	May 2019	35	May 2019
	22	June 2019	22	June 2019
	36	July 2019	36	July 2019
	36	August 2019	36	August 2019
	37	September 2019	37	September 2019
	37	October 2019	37	October 2019
	40	November 2019	40	November 2019
	40	December 2019	40	December 2019
	45	January 2019	45	January 2019
	45	February 2019	45	February 2019
	<u>428.00</u>	Total Billed Clients	<u>428.00</u>	Total Billed Clients
STEP 3	700	billed total hours for 12 month period	5000	billed total miles for 12 month period
	<u>428.00</u>	Total Billed Clients	<u>428.00</u>	Total Billed Clients
	1.64	average hours per client	11.68	average miles per client
STEP 4	10	Clients Agree for alternative services	10	Clients Agree for alternative services
	<u>1.64</u>	average hours per client	<u>11.68</u>	average miles per client
	16.36	Alternative Service Billable Units	116.82	Alternative Service Billable Units
STEP 5	16.36	Enter in EB Invoice on Auth Contract Line	116.82	Enter in EB Invoice on Auth Contract Line