

Oregon's Extended School Closure EI/ECSE Medicaid Guidance

Frequently Asked Questions
Regarding EI/ECSE and Medicaid
Billing

April 2020



Introduction

This Q and A document is intended as a supplement to the New [EI/ECSE SDI Toolkit](#). The EI/ECSE SDI Toolkit should be read first and this Q and A should then be referenced to answer any other Medicaid Billing questions.

- 1. When administering a Distance Learning Plan (DLP), are the services described in the current IFSP sufficient to bill Medicaid for the DLP telehealth services?** For the most part, the IFSP does not need to be amended... The service coordinator will discuss with the parents, through a Distance Learning Plan (DLP), what services will occur and what methods will be used. In a majority of IFSPs, if the decisions documented in the DLP aligns with what is documented on the IFSP, the IFSP services continue to be billable to Medicaid. Please note that the ability to bill Medicaid should not drive changes to a student's IFSP. Please see [New EI/ECSE SDI Toolkit](#) for more information.
- 2. Do we need to change the IFSP if the IFSP indicates group therapy and the DLP indicates individual services?** The IFSP does not need to be changed. Bill Medicaid as a group of one child as you would bill the service if all but one child were absent from the group.
- 3. Do we need to change the IFSP if the IFSP documents individual services and the DLP indicates group therapy?** Yes. [See the New EI/ECSE SDI Toolkit](#).
- 4. What if the DLP indicates a change in frequency but not total time in a month? For example: The IFSP says therapy is one time a month for 30 minutes and the new DLP indicates three times a month for 10 minutes each time.** There is no need to update the IFSP. See the [New EI/ECSE Distance Learning Toolkit](#). During this state of emergency as it relates to billing Medicaid 30 min 1 x per month as written on an IFSP, document information for each 10 minute session within one service log entry, and bill for the prescribed 30 minutes on the final date the 30 minutes of total service was completed. Data capture systems validate services billed to Medicaid as they are written on the IFSP. If the IFSP states 30 min 2 X per month you can only bill 30 min 2 x per month.
- 5. What if the DLP calls for less total monthly time than the IFSP cover page?** No change is needed since you are not exceeding the total monthly time proposed in the IFSP.
- 6. What if the DLP calls for more time than the IFSP Cover page?** The IFSP would need to be amended to include this increase in therapy time.

7. **If the IFSP is written using a more broad explanation of services, such as “Speech and Language Services”, do the services agreed upon in the DLP mean the IFSP has to be amended?** No changes are needed to the IFSP. However, using a broad description of services such as “Speech and Language Services”, may pose a validation issue with your vendor submitter data capture used to bill Medicaid.

8. **What is the difference between a therapist coaching a parent and parent consultation?** A therapist coaching a parent is when a therapist is working with the parent and child, in person or virtually coaching by demonstrating the correct application to safely perform a therapeutic exercise, using manual therapy and other common treatment methods, to restore mobility or for a developmental delay to provide more natural movement to facilitate healing and restore/increase function, where the parent works directly with the child and the therapist coaches the parent in real time. Parent consultation is communication provided by a therapist within the scope of practice, following up with the parent when there is no interaction with the child in real time what is working or not working. It is also providing technical assistance as part of coordinated care for a covered health service for Medicaid-eligible child related to a specific health service on the child’s individualized family service plan (IFSP).

9. **How are parent coaching and parent consultation billed to Medicaid?** Parent coaching is an individual direct service and is billed to Medicaid as an individual service. Parent consultation is communication provided by a therapist within the scope of practice to follow up with a parent/guardian when there is no interaction with the child in real time regarding what is working or not working and to provide technical assistance. This is billed as coordinated care for a covered health service for a Medicaid-eligible child related to a specific health service on the child’s individualized family service plan (IFSP).

10. **How do we obtain consent for telehealth services?** Each licensing board has rules governing the provision of services via telehealth, including the requirement that consent to receive services through telehealth is obtained. The ODE has created provider-specific guidance documents related to the provision of telehealth for EI/ECSE and K-12 programs (see next question). We recommend review of the rules and the creation of procedures for obtaining consent that are in alignment with both licensing board rules and the EI/ECSE contracting ESD, school district, or university. Consent for telehealth may be obtained at the same time consent is obtained for all children through the DLP. Telehealth would be documented in the DLP, in a Prior Written Notice (PWN), and in therapy logs or treatment notes, and a copy of the DLP and PWN would be sent to the parents. Parents could then respond and either grant or deny consent.

- 11. Where can I find the FAQs for telehealth from ODE and the various health-licensing boards?** These FAQs can be found in the following webpage links:
- A. [Speech and Language Pathology](#)
 - B. [Physical Therapy](#)
 - C. [Occupational Therapy](#)
 - D. [School Nurse](#)
- 12. Where can I find COVID-19 resources for regular education?** A variety of COVID-19 resources can be found on this ODE [webpage](#).
- 13. Where can I find COVID-19 resources for EI/ECSE and k-12 special education?** A variety of COVID-19 EI/ECSE and K-12 special education resources can be found on this ODE [webpage](#).
- 14. Whom do I contact if I have additional questions about a COVID-19 EI/ECSE DLP vs. the IFSP?** Begin with your EI/ECSE coordinator. If you need further guidance, submit your questions and concerns to your ODE county contact.