Medicaid School-Based Services

Frequently Asked Questions (FAQs) Regarding Telemedicine Flexibilities for School Districts, Private, and Charter Schools During COVID-19

Updates are highlighted

Schools

1) Does the telemedicine guidance also apply to school districts, private, and charter schools?

Yes, the Agency will provide reimbursement for covered therapy and behavioral health services using telemedicine for enrolled school district, private, and charter schools during the state of emergency. Please see the below March 31, 2020 Telemedicine Guidance for School-Based Services:



Telemedicine Guidance for School

2) Do providers need to indicate in the documentation if a service was delivered via telemedicine?

Yes, documentation regarding the use of telemedicine must be included in the progress notes for each encounter with a recipient. All other documentation requirements for the service must be met as described in the coverage policy.

3) Will Florida Medicaid reimburse for services delivered via telemedicine during the summer?

Yes, Florida Medicaid will reimburse for services delivered via telemedicine for the duration of the emergency. Extended school year services must be indicated on the students IEP and plan of care.

Timeline

4) When can schools provide services using telemedicine?

On March 9, 2020, Governor Ron DeSantis issued Executive Order Number 20-52 declaring a state of emergency related to the 2019 novel coronavirus (COVID-19). Flexibilities for services began on March 9, 2020 and will continue until further notice.

5) When do these flexibilities expire?

All flexibilities enacted under the Medicaid program during the COVID-19 state of emergency will continue until further notice, as detailed in the May 1, 2020 provider alert.

Coding, Billing, and Reimbursement

6) Will schools receive the same reimbursement for services delivered via telemedicine as they do for in-person delivery?

Yes, the Agency is reimbursing the fee schedule rates for services delivered via telemedicine.

7) Will schools have additional time to submit claims for services delivered during the emergency period?

The Agency has not extended the timeframe for schools to submit claims. Schools continue to have 12 months to submit claims to the Agency.

8) When billing for claims, do schools need to add the GT modifier to every procedure code for services delivered via telemedicine?

Yes, providers will need to add the GT modifier to claims in order to be reimbursed for services delivered via telemedicine.

9) Which procedure codes should schools use when billing for calendar year 2020 school- based behavioral health services?

Providers must use the behavioral health codes and any accompanying modifier(s) that are listed on the 2019 Medicaid Certified School Match Programs Fee Schedule.

10) If a school district has submitted claims for behavioral health services delivered in 2020 using codes on the 2020 draft fee schedule, will it need to resubmit the claims to the Agency?

Yes, these claims will need to be resubmitted using procedure codes listed on the 2019 fee schedule.

11) When billing for audio-only behavioral health services, do schools need to add the CR modifier to every procedure code?

Yes, providers must append the CR modifier to claims in order to be reimbursed for behavioral health services delivered via audio-only communications.

12) If any claims were not paid during the state of emergency, what can schools do?

If any school needs individualized assistance with fee-for-service claims, including inquires and processing issue resolution, they may call provider support at 1-877-254-1055.

If schools submitted their claims prior to system updates for COVID-19, schools should resubmit their claims.

Consent

- 13) Does each child need written consent to receive services using telemedicine?

 Consent is not necessary when telemedicine is utilized by students who are learning remotely. Schools should refer to the Florida Department of Education for any other consent requirements.
- 14) If the student is over the age of 18, do they need a parent present for telemedicine to be billable to Medicaid?

Please refer to the response above.

15) When students are on campus receiving telemedicine services, is written consent required?

When a child is receiving services on campus, parents must have a choice and be informed regarding their options for face-to-face or telemedicine services. The option to opt in or out of the service using telemedicine should be made available. Schools should provide a reasonable deadline for parents to opt out of telemedicine services to ensure timeliness of service provision.

Group Services

16) Can students who have group therapy listed in their IEP or plan of care receive therapy via telemedicine during the emergency?

Yes, group therapy service is now an approved service that can be provided via telemedicine.

17) What group services are billable using telemedicine?

School-based providers may render occupational, physical, speech-language pathology, and behavioral health group services during the state of emergency.

Behavioral Health Audio-Only Services

18) Can schools provide behavioral health services using audio-only communication?

Yes, the Agency will permit school-based providers to utilize audio-only communication for behavioral health services.

19) Can schools provide group behavioral health services using audio-only communication?

Yes, the Agency will permit school-based providers to utilize audio-only communication for group behavioral health services.

20) Can schools provide services using audio-only if video capability is available?

No. Florida Medicaid will only reimburse schools for behavioral health services if video capability is not available, and the services can only be provided telephonically. This

modality must be used as a last resort, and the provider must document that the enrollee did not have access to audio and video technology necessary for the service to be fully provided via telemedicine.

Provider Clarifications

21) Can therapy assistants deliver school-based services via telemedicine?

SLP assistants may deliver services via telemedicine provided they are doing so in accordance with their scope of practice. If any questions arise regarding supervision or scope of services, please refer to Department of Health and the Florida Board of Speech-Language Pathology and Audiology for further guidance.

At this time, there has been no additional guidance on Physical Therapy Assistants or Occupational Therapy Assistants ability to provide services via telemedicine from their boards.

22) Is there a specific software the Agency requires for telemedicine?

The Agency does not recommend any specific software for telemedicine. However, all software utilized for telemedicine services must be compliant with the Health Insurance Portability and Accountability Act (HIPAA).

23) Is HIPAA required for audio-only communication when delivery behavioral health services?

Yes, providers must comply with HIPAA regulations when delivering services using audio-only communication.

24) Has the date for reenrollment as school providers been extended so that we can continue to claim for services?

No, the timeline for school districts cannot be extended as the revalidation deadline was January 10. If any school needs individualized assistance, please notify the Agency by emailing Cynthia.Joseph@ahca.myflorida.com.

25) Can schools provide therapy services using audio-only communication?

No, schools cannot use audio-only communication to deliver therapy services.