

## Education Medicaid Billing Affected by Continuity of Learning FAQ

The intent of this document is to help answer some questions about Medicaid billing periods affected by the Continuity of Learning (COL) plan implementation.

### 1. When can we bill March 2020 services?

- a. The Medicaid team is working with the AOE leadership to ensure that the billing days align with the AOE guidance and state recommendations. Please do not bill March claims at this time. We will provide more details as soon as we have them.

### 2. How do I know if a Special Education service is going to be billable as Telemedicine?

- a. The service needs to be provided directly to a student through an approved telemedicine audio-visual communication tool. Clerks and case managers can use the Telemedicine Eligibility Check list as a tool to confirm if a service is billable.

### 3. What documentation needs to be in the Medicaid file to support Telemedicine services and billed claims?

- a. Please reference [Virtual Special Education Services Reimbursable Through Medicaid FAQ](#) which directly addresses AOE guidance, how to update a student IEP and Service during the COL period, what needs to be on documentation logs and in the Medicaid file, and how to determine if listed IEP service details are acceptable to be used for Medicaid billing.

### 4. The SU/SD had providers working during the March 19, 2020 – April 10, 2020 time period, when school buildings were closed and students were not in attendance. There were IEP and Evals completed during this time. Can we bill for these IEP and Evals?

- a. Do not bill these yet until the March and April calendars are confirmed. However, you should speak with your Education Medicaid Specialist about your SU/SD calendar to confirm if the period of March 19, 2020 – April 10, 2020 were considered full workdays for providers. At this time, if they were considered full workdays - Yes, the IEP and Evals are eligible for reimbursement. If the paperwork is completed per program standards, the IEP and Eval claims can be billed, once the March and April calendars are confirmed.
- b. For the COL time period of April 13, 2020- end of the school year 2020, school is considered officially back in session. Therefore, normal program processes for IEP and Evals should be followed.

### Contact Information:

If you have questions about this document or would like additional information please contact:  
Jessica Robinson, Education Medicaid Unit Administrator, at [jessica.robinson@vermont.gov](mailto:jessica.robinson@vermont.gov).

5. **The SU/SD is missing Paraprofessional signatures on logs for a billing period(s) prior to April 2020. Can the Special Education Director or a Case Manager sign for the paraprofessional?**
- No, as the Continuity of Learning plan is in place for the remainder of the FY19-20 school year a system should be put into place to communicate with paraprofessionals who are still SU/SD employees who have provided and are still expected to provide services to students. The system for signatures should include supports for getting paraprofessionals Medicaid logs for signature, getting logs to the Case Managers for signature, and the return of the logs to the Medicaid clerk for billing claims. If you have a paraprofessional who is no longer an SU employee or would like help creating a system, please contact the Medicaid Unit Administrator.
6. **What if a student doesn't/didn't receive direct services after March 18, 2020, but there were Case Management hours logged? Can an SU/SD bill Case Management only for these students?**
- No, you cannot bill a case management only claim for a student who did not access direct academic services at the Supervisory Union or School District. For a case management only claim to be billed, there must be an IEP service being billed to Medicaid by another agency (see: [Memo: Continuation of Learning; School Calendars; Attendance](#)).
7. **Is it acceptable for the case managers to complete the "Fill and Sign" on the Adobe version of the logs?**
- No as Adobe "Fill and Sign" does not meet electronic signature requirements. Refer to page 155 of the School-Based Health Services manual. There are three requirements for Professional Providers and one additional requirement for paraprofessional providers for electronic signatures to be valid for Medicaid billing:
    - A signed electronic signature agreement on file with the SU **(All)**
    - A secure username/password system or signature program for logging in to ensure the signature is unique to the provider **(All)**
    - When printed, the log needs to indicate it was signed electronically **(All)**
    - Para documents must be transferred electronically to their supervisor for signature **(Para only)**
8. **Can paraprofessionals sign their logs electronically?**
- See question #7

This information in this document is subject to change as more guidance is received from the Federal Government, Vermont state and other involved parties. As information is received and more questions are asked this document will be updated and redistributed for reference.