SUMMARY OF COVID-19 POLICY MODIFICATIONS

PERIOD COVERED - JUNE 01, 2020 TO JUNE 25, 2020

This summary of modifications is designed to guide the review of new and revised content published at https://gadbhdd.policystat.com as it relates to each iteration of the COVID-19 2020: DBHDD Community Developmental Disability Services Policy Modifications policy. This policy was instated during the COVID-19 coronavirus pandemic, while the State of Georgia declared a Public Health Emergency.

The responsibility for thorough review of the policy content remains with the Provider.

Policy Date	Policy Item #	Original Policy Impacted by the Modification	Summary of Modification	
6/01/2020	3.	Criminal History Record Check for Individual Provider Applicants, 04-111 Criminal History Record Check for Individual	This change reflects the continuation of delayed fingerprinting if fingerprinting services are not yet available (reopened) in the provider's area.	
	4.	Provider Applicants, 04-111	No change to attachments.	
	1.	NOW and COMP Waivers for Community Developmental Disability Services, 02-1202	Amendment to Appendix K Operational Guidelines for	
6/23/2020		Provider Manual for Community Developmental Disability Providers	the NOW and COMP Waiver Programs Response to COVID-19 Pandemic, version 3.0.	
	1.	DBHDD PolicyStat Policies NOW and COMP Waivers for Community	Amendment to Appendix K Operational Guidelines for	
6 10 T 10 00 0		Developmental Disability Services, 02-1202	the NOW and COMP Waiver Programs Response to COVID-19 Pandemic, version 3.1.	
6/25/2020		Provider Manual for Community Developmental Disability Providers		
		DBHDD PolicyStat Policies		



VERSION 8

COVID-19 2020: DBHDD Community Developmental Disability Services Policy Modifications

EFFECTIVE 6/1/2020



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Georgia Department of Behavioral Health & Developmental Disabilities

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Chapter: DD Community Services

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COVID-19 2020: DBHDD Community Developmental Disability Services Policy Modifications - 6/1/2020

EFFECTIVE IMMEDIATELY

APPLICABILITY

DBHDD Providers of Community **Developmental Disability** Services

POLICY

In response to the continued transmission of COVID-19, where necessary new measures are in effect to minimize community spread of the virus, and to assist in the continued delivery of community developmental disability services.

Modifications as described in this policy refers to the restriction, enhancement, relaxation, and partial or full suspension of existing policies in PolicyStat, <u>Provider Manual for Community</u> <u>Developmental Disability Providers</u>, or <u>Provider Manual for Community Developmental Disability Providers of State-Funded Developmental Disability Services</u> as applicable to the service. This policy includes full details of the alternate requirement(s) or procedures.

The following temporary modifications to the policies listed below are pertinent to community developmental disability services, effective immediately. Please refer to the full policy via the hyperlink, noting the alternate requirements applicable until further notice.

This policy will be updated as necessary. This policy remains in effect until the Governor of the State of Georgia lifts the Emergency Declaration.

1. The "Appendix K: Operational Guidelines for the NOW and COMP Waiver Programs Response to COVID-19 Pandemic" permits temporary modifications for the services detailed in Appendix K, Appendix K Attachment 1, and Appendix K Attachment 2 (attached below). The purpose of this guidance document is to provide additional information to providers of traditional waiver services and families who opt to participant direct services. The guidance within this document is temporary until otherwise notified by DBHDD and DCH. This guidance supersedes only conflicting guidance in the NOW and

- <u>COMP Waivers for Community Developmental Disability Services, 02-1202, Provider Manual for Community Developmental Disability Providers, and DBHDD PolicyStat policies.</u>
- 2. **Temporary suspension** of the site inspection requirement for developmental disability provider enrollment, per Recruitment and Application to Become a Provider of Developmental Disability Services, 02-701 is permitted as follows:
 - a. Site inspections for Community Residential Alternative Host Home sites are suspended. Host Home applications will remain in pending status until site inspections resume.
- 3. A *partial suspension* of the fingerprinting requirement described in <u>Criminal History</u> <u>Record Check for DBHDD Network Provider Applicants, 04-104</u> as follows **only if** fingerprinting services are not available in your area:
 - a. DBHDD's Provider Network must have each person subject to Policy 04-104 complete the "Network Provider Applicant Attestation," **Attachment A** to this policy, instead of completing the fingerprint based background check stipulated in Policy 04-104.
 - b. Within sixty (60) days of cessation of the Public Health Emergency, all persons who signed the Network Provider Applicant Attestation instead of completing the fingerprint based background check must complete a fingerprint based background check as required by Policy 04-104. The provider is responsible for sending any person who signed the Network Provider Applicant Attestation for a fingerprint based background check.
 - c. The provider is also responsible for sending to DBHDD's Criminal History Background Check (CHBC) section each signed Network Provider Applicant Attestation, while retaining a copy in the applicant's personnel file. The provider must send the signed and dated Attestation to CHBC, and acknowledge receipt of an email from CHBC confirming acceptance of the Attestation, before the applicant begins working. The Individual Assessment process set forth in section D of Policy 04-104 does not apply to persons who sign the Network Provider Applicant Attestation.
 - d. The Attestation cannot be used by Network Provider Applicants who were fingerprinted for a fingerprint based background check within sixty (60) days prior to the declaration of the Public Health Emergency.
- 4. A *partial suspension* of the fingerprinting requirement described in <u>Criminal History Record Check for Individual Provider Applicants</u>, 04-111 is permitted as follows **only if fingerprinting services are not available in your area**:
 - a. All applicants who are subject to Policy 04-111 must complete the "Individual Provider Attestation," **Attachment B** to this policy, instead of completing the fingerprint based background check documented in Policy 04-111.
 - b. Within sixty (60) days of cessation of the Public Health Emergency, all applicants who signed the Individual Provider Attestation instead of completing the fingerprint based background check must complete a fingerprint based background check as required by Policy 04-111.
 - c. DBHDD Provider Enrollment is responsible for sending to DBHDD's Criminal History Background Check (CHBC) section all signed Individual Provider Attestations and for acknowledging receipt of an email from CHBC confirming acceptance of the Attestation, before the Individual Provider Applicant can be considered eligible. The Individual

- Assessment process set forth in Part D of Policy 04-111 does not apply to applicants who sign the Individual Provider Attestation.
- d. The Attestation cannot be used by Individual Provider Applicants who were fingerprinted for a fingerprint based background check within sixty (60) days prior to the declaration of the Public Health Emergency.

DBHDD sincerely appreciates your compliance with these measures throughout this Public Health Emergency.

Attachments

A - COVID-19 2020 - Attestation of Absence of Barrier Crimes Data & Cover Letter 4/23/2020.docx Appendix K Attachment 1 - NOW and COMP Provider Spreadsheet 4/22/2020

Appendix K Attachment 2 - Simplified AS Request Sheet 4/20/2020

Appendix K Operational Guidelines for the NOW and COMP Waiver Programs Response to COVID-19 Pandemic, 4/30/2020 Version 2.0

B - COVID-19 2020 - Attestation of Absence of Barrier Crimes Data & Cover Letter 4/23/2020.docx

Approval Signatures

Approver	Date
Anné Akili, Psy.D.: Director, Policy Management	6/1/2020
Ron Wakefield: Director, Division of Developmental Disabilities	6/1/2020
Anné Akili, Psy.D.: Director, Policy Management	6/1/2020

DBHDD Division of Developmental Disabilities

Appendix K: Operational Guidelines for the NOW and COMP Waiver Programs



Version 2.0

Released: 04.30.2020

Section A. Overview & Purpose

Overview: The Georgia Department of Behavioral Health and Developmental Disabilities (DBHDD) and the Georgia Department of Community Health (DCH) submitted an Appendix K to the Centers for Medicare and Medicaid Services (CMS) in order to request necessary flexibilities to service delivery during the COVID-19 public health emergency. The changes outlined in Appendix K for the NOW and COMP waivers are **temporary** policy allowances, **temporary** rate increases for target services, and **temporary** retainer payments for specific services, effective March 1, 2020. Georgia intends to withdraw the Appendix K when systems, services, and the ability to travel freely are less restricted. At the conclusion of the state of emergency, pre-emergency service plans will be reimplemented unless the individual has experienced a change in condition or circumstance that requires reassessment and development of a new service plan.

Purpose: The purpose of this guir dditional informati raditional waiver services and to provid aucun. families who opt to participan erwise notified by DBHDD vidance thin this document ect services. The emporary until and DCH. This guidance supe des only conflicting the NOW and CON nanuals, DD Coi unity Standards Manual, idanc and DBHDD Policy Stat Polic

Section B: Appendix K Chart At a Glance - "X" indicates provisions for the waiver service

Waiver Service	Telehealth Options	Provider Retainer Options	Family Caregiver Hire Options	Exceed Service Limitations	Provided in Alternative Settings	Increase Rate
Community Living support (Basic and Extended)		Х	X	X	X- including out of state and acute care settings	
Respite (in home and out of home)			X	Х	X – including out of state	
Community Access		X -only app ble for DBHDD transcribed riders	Х		Х	
Specialized Medical Supplies				X		
Additional Staffing					X	
Nursing Services	X- RN only					X- LPN only
Support Coordination	X					Х
Intensive Support Coordination	Х					
Fiscal Intermediary						Х
Community Residential Alternative		X				
Behavioral Supports Services	X					
Prevocational Services		Х				
Adult Occupational Therapy	X					
Adult Physical Therapy	X					
Adult Speech and Language	X – exceptions					
Therapy	noted below					
Supported Employment	X- limited scope	X				

C. General Provider Guidance

C.1 Background checks for any function that requires face-to-face action or availability of third-party vendors will be temporarily suspended for the duration that Appendix K is effective for all waiver services in the event the provider is unable to complete a background check. Within sixty (60) days of the termination of Appendix K, background checks will need to be completed retroactively for all employees who were hired while Appendix K was effective and according to policy.

C.2 Required staffing ratios for an individual as outlined in the individual's Individual Service plan, may be modified to allow the individual to receive services in safe and accessible environments if the individual's needs are still being met. Documentation must include staffing ratios, justify the decrease in ratio and verify how the individual's health and safety needs are being met.

C.3 State certification survey staff will postpone on-site provider certification and other reviews for provider agencies and individual providers rendering NOW and COMP services use to belien the rendering NOW and COMP services use to belien the rendering NOW and COMP services use to belien the rendering NOW and COMP services use to belien the rendering NOW and COMP services use to belien the rendering NOW and COMP services use to believe the rendering NOW and COMP services use to believe the rendering NOW and COMP services use to be a service use to be a ser

C.4 The annual DMA-7 assessme equirements will . ispend or all individuals whi ppendix K is eff e unless required otherwise by another governmental agency. re are no requireme nodific ns to the DMA -6. Th egional Field Offi nd/or Support Coordination (ISP) (SC) agency will document, in t ndividualized service e contact with the in dual, legal guardia applicable, and team to discuss the extension, as well a e projected date that DMA vill be completed, wl can be no later th the individual's subsequent birthday.

C.5 Telehealth Guidance: The sta mporarily auth es, durin e time that the Appe x K is effective It Occupational Therapy Services, Adult Physical Therapy Serv speech and Servi ort Services, Support Coordination, Supported Employment (limited scope), and registered nurse (RN) oversight to be provided using telehealth or other telephonic means. All licensed providers must abide by training requirements established by their governing professional licensing boards. For provision of Behavior Support services, there are currently no CEU requirements for telehealth training by The Behavior Analysis Certification Board (BACB), or other non-board-certified behavior support service providers that render this service. The Behavior Analysis Certification Board has issued guidance that has been included in the Reference Section of this document. Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth.

C.6 Family Caregiver Option: Several services, as indicated in Section B above, list an option for Family Caregivers to **temporarily** render specific services. Family Caregiver hire option is applicable to both traditionally enrolled provider families as well as families who opt to participant direct their services. A family caregiver hire shall only render services in lieu of a regular staff member (as defined in section C.7 below) and not in conjunction with a regular staff member. As specified in the NOW and COMP Manual Part II Section 902, a Family Caregiver hire is defined as an individual's family member, by blood or marriage, who is aged 18 years or older, who may be reimbursed for providing services when there are

extenuating circumstances (family is defined as a person who is related by blood within the third degree of consanguinity by blood, adoption, or marriage. Third degree of consanguinity include mother, father, grandmother, grandfather, great grandfather, great grandmother, sister, brother, daughter, son, granddaughter, grandson, great granddaughter, great grandson, aunt, uncle, niece, or nephew. The provider network may hire family caregivers to provide Community Living Supports, Community Access and/or Respite Services in lieu of existing provider staff if the provider is unable to render the service due to health and safety concerns for either the provider staff or the individual. In the event a provider hires a family caregiver to render the service when provider staff is unable to provide a service, providers may bill both the retainer and for actual service delivery. The family caregiver hire start day may begin after there is documented evidence that the regular provider staff are no longer rendering services and no sooner than the effective date of the Appendix K. MMIS billing system does not permit the same procedure code to be billed at the same time of the day. While the Appendix K is effective, providers are temporarily permitted to bill a retainer and the family caregiver hire on the same day, however the time that service and retainer are billed for may not overlap and may not exceed the approved service units on the individual of the Authorization. Training requirements specific to family caregiver hire can be found in section C.9 of this document.

event that the provic ividual under other comparable C.7 Retainer Specifications-Reta red in t s not serving the payments are auti services with regular staff men s of the provider. The ment will be authori at the level, dura and amount as outlined in the ainer prior authorization in place as ebruary 29, 2020. Ret t exceed 30 consecu days. Providers s ld submit claims for only ers ca ed in the individual's be billed when the scheduled days and units as sp The i ner option should o ovider is retaining (maintaining the staff's employment for) all and support staff)red ed to resume that ticular service for the ployees (including a histrat individual(s) whose retainer is be hilled. Service re be billed for staff w employment * rovider/employer is not ers may maintaining.

As used in this guidance, the term "regular staff member" means a staff member who meets <u>all</u> of the following criteria:

- (i) the staff member would normally be rendering services to an individual served by the provider agency; and
- (ii) due to the COVID-19 Emergency, the staff member either
 - (a) is temporarily not rendering services to the individual due to the COVID-19 Emergency, or

- (b) is temporarily rendering to the individual a different type of service than the service the staff member usually renders, at another service setting <u>operated by the same provider agency</u>¹, and the provider agency is not otherwise being reimbursed (e.g. through Additional Staffing rates) for the different service temporarily rendered by that staff member; and
- (iii) the staff member continues to be employed by the provider and is expected to resume rendering services to the individual after the expiration of the COVID-19 Emergency.

For each individual who is temporarily not being served by the provider's regular staff members, the provider must document in the individual's record certain information in order for the provider to be eligible for retainer payments for the regular staff who would normally serve that individual. For each regular staff member who is temporarily not serving the individual, the provider must document in the individual's record:

- 1. Name of the regular staff member;
- 2. Date on which the staff m ary absence in rendering services in the site where the staff member would normally render services in rendering services in the site where the staff member would normally render services.
- endering services at 1 3. Reason for the staff nber's temporary al id reasons may include, but are ce fro service site (note er agency's services to al have temporarily not limited to, that pro e indi ed due to the CO 19 Emergency, or (if applicable) that provid gency has temporaril ed fa caregiver(s) to serve e individual in lieu egular staff);
- 4. If applicable, the dat which the staff mer r result rendering services the individual;
- 5. The specific dates on warprior to the standard sence, the staff mer range was schedule render services to the individual any of the services for which as were required to the staff mer range was schedule render services to the individual and services for which are services for which are services to the individual and services for which are services to the individual and services for which are services to the individual and services for which are services to the individual and services for which are services to the individual and services for which are services for
- 6. For each of the dates identified in (5) above, the number and type of authorized service units the staff member would have been delivering to the individual, in accordance with the ISP in effect for the individual on February 29, 2020.

C.8 Documentation Requirements- All providers must continue to adhere to documentation requirements set forth in Part II and Part III Policies and Procedures for the COMP and NOW Waiver General Manual. Providers must document for each encounter when providers have hired a

¹ For example, an individual who would normally spend daytime hours at a Community Access (CA) site operated by a provider might, due to the COVID-19 Emergency, now be spending daytime hours at a Community Residential Alternative (CRA) site operated by the same provider. The provider might utilize staff from the CA site as staff at the CRA site during those hours. Retainer payments could be authorized for those staff, in accordance with this guidance. The primary intention of such authorization is to allow the individual to continue being served by the same staff members who would normally be rendering services to the individual.

family caregiver hire to render a service. Providers must document at each encounter when services are rendered via telehealth or other telephonic means using 02 P.O.S. (Place of Service). Providers must document each service delivery when billing a retainer. Representatives for Participant-direction model must adhere to all applicable documentation requirements. The specificity of such services, including amount, duration, and scope, will be added to the ISP as soon as possible, but no later than 30 business days after service initiation, ISPs should be written to reflect the date that service delivery began. The ISP must be signed by the individual or legal guardian. Supporting notes should identify each procedure code separately and how many units are being billed for each. Documentation to support clinically assessed need must be indicated in the Supporting notes.

IDD-C Version Change Provisions- the below table represents actions that require and do not require a version change to be submitted through IDD-Connects. Providers are to request services not related to Appendix K through existing DBHDD policies 02-443 and 02-444 through the assigned Support Coordination Agency.

Actions Requirigues Cha.	y Version Change
Add of any type of service	Rate Increase for censed practical se (LPN), Fiscal Intermediary,
	Support Coordi on- temporary in se will be automated in IDD-
	Connects
Change in Provider Agency	Change in loca of service deliver
Increase in units beyond the standardized increase in a orizat	Telehealth – Presers are to continue bill the same procedural
for all services that include far caregiver hire and r ner	code for telehe and use the 02 F 3. (place of service)
allowances within Appendix K (c nunity Access + lional,	
Community Living Supports, Respit	
	Goai(s) - Modification of Person-Centered Goal(s) do not require a
	version change and can be documented in support notes
	Retainer payments billing (when staff are not delivering service but
	are being retained to resume service delivery after Appendix K is no
	longer effective)

C.9 Training Requirements- In lieu of face-to-face training, DBHDD suspends required face-to-face training for newly hired staff during the time that the Appendix K is effective. Family members serving as reimbursed Family Caregivers hires who have experience delivering required care will be supported, as needed, by provider agency supervisory staff telephonically or electronically and have modified training requirements as specified below. Newly hired regular staff with a minimum of 1-year experience with individuals with I/DD will be supervised telephonically or

electronically and those with no previous experience will be provided electronic video training by agency supervisory staff. Every effort should be made to complete training requirements when possible. Training requirements for any function that requires face-to-face action or availability of third-party vendors will be temporarily suspended for the duration that Appendix K is effective for all waiver services in the event the provider is unable to complete a training. Providers must continue to document all annual training completed with staff, contractors or consultants and document when a training cannot be completed with specific rationale. After Appendix K is no longer effective, trainings will be required to be completed within a timeframe which will be communicated to providers in subsequent communication from DBHDD.

The state modifies required trainings for new Family Caregiver hires. All trainings below are required to be provided by the provider agency to the family caregiver hire within ten (10) days via telephonically or electronically:

- 1. The purpose, scope of servic and treath offered including re rocedures;
- 2. HIPAA and Confidentiality adividual info. on, both tten and spoken;
- 3. Rights and Responsibilit of individuals;
- 4. Requirements for recogning and mandatory realing sected abuse, neglect exploitation of an dividual;
- 5. Medical, physical, bef pral and social needs chara istics of the individuerved; and
- Techniques of Standar hiversal Precautions t clude:
 - Preventative sures to minimize r of infect is disease transmissi
 - Use of Persona tection Equipm (PPE); S is Safety (with sharp tainers dispose according to state and local regulated medical with the sharp tainers dispose according to state and local regulated medical with the sharp tainers dispose according to state and local regulated medical with the sharp tainers dispose according to state and local regulated medical with the sharp tainers dispose according to state and local regulated medical with the sharp tainers dispose according to state and local regulated medical with the sharp tainers dispose according to state and local regulated medical with the sharp tainers dispose according to state and local regulated medical with the sharp tainers dispose according to state and local regulated medical with the sharp tainers dispose according to state and local regulated medical with the sharp tainers dispose according to state and local regulated medical with the sharp tainers dispose according to the
 - Environmental Controls for cleaning and disinfecting work surfaces;
 - Skills Guides for handwashing, cleaning up spills, gloves use, and what to do with contaminated supplies;
 - Respiratory Hygiene/Cough Etiquettes for cough, congestion, runny nose or increase production of respiratory secretions; and Approaches to individual education to include incident reporting and follow-up.

C.10 Incident Reporting Requirements- DBHDD maintains data on COVID-19 cases involving individuals receiving services and staff. Effective Tuesday March 24, 2020, the Department is using Image, DBHDD's incident management system, for reporting. DBHDD Behavioral Health and Intellectual and Developmental Disabilities Providers have access to, have received training (available here) on, and have experience entering critical incidents directly into Image for incidents involving individuals receiving services. DBHDD has added three incident type codes to Image to assist in the tracking of coronavirus' (COVID-19) impact on the individuals we serve, and provider staff. These are in addition to the usual incident reporting requirements outlined in Policy 04-106.

Section D. Service Specific Guidance

Service	Service Specific Guidance			
D.1	The state temporarily authorizes, during the time that the Appendix K is effective, retainer payments for Community			
Community	Residential Alternative in the event the individual is hospitalized or in an alternate care setting due to health and safety			
Residential	concerns related to the COVID-19 Emergency. Retainer payments will only be authorized for the amount, frequency and			
Alternative	duration listed on the individuals ISP/prior authorization (PA) on February 29, 2020.			
(CRA)				
	Notification Guidance- The Regional Field Office (via email to the I&E manager and RSA) and SC Agency must be			
	immediately notified when an individual is moved. Please include "COVID-19 MOVE" in the email subject header.			
	Documentatio r .uance- Provice are to do lent retainer service very in the "C -19 NOW & COMP Provider			
	Spreadsheet" _=e Section G for rence.			
	Billing Cuid. South a ratain and are a local the annual days and beginning the sign of the			
	Billing Guid: - For the retainer produce of use the procedure of authorized on the ior authorization. Retainers			
	cannot exce 0 consecutive days. F ders ald submit claims for y scheduled days units as specified in the individual's			
	ilidividual S I			
D.2	The state temp. 'v authorizes ong the till hat the Appendix K i fective, retain syments for Community Living			
Community	Support Services to address the condered due eme ayments will only be authorized for			
Living Support	the frequency listed on the individual's ISP/PA on February 29, 2020. The state temporarily authorizes, during the time that			
Services Basic	the Appendix K is effective, providers to exceed the cap limitations for Community Living Services that can be rendered via			
and Extended	traditional provider, participant directed services, and/or a combination with live-in caregiver.			
(CLS)				
	Documentation Guidance- Providers are to document retainer service delivery and list of family caregiver hire by way of the			
	"COVID-19 NOW & COMP Provider Spreadsheet" – see Section G for reference.			
	Billing Guidance: Providers should bill the existing service procedure codes on the prior authorization when billing for a retainer and/or services delivered by a family caregiver hire.			
	If a provider bills the retainer fee on the same day that a family caregiver hire renders the service, the units for each must			
	be aggregated together and billed as one claim line. For example, the family caregiver hire delivers 1 hour (four 15 min			
	units) of service and the provider bills for 1 hour (four 15 min units) of retainer, one claim line for 8 units of service should			

	be billed. Supporting notes should identify that both services are being delivered and how many units are being billed for each. Retainers cannot exceed 30 consecutive days. Providers should submit claims for only scheduled days and units as specified in the individual's ISP.		
D.3 Supported Employment (SE)	The state temporarily authorizes, during the time that the Appendix K is effective, retainer payments for Supported Employment Services in the event the provider is unable to render a service due to health and safety concerns for either the individual or the provider. The retainer payment will be authorized at the level, duration and amount as outlined in the ISP/PA on February 29, 2020.		
	DBHDD is granting increased flexibility and accommodation in the way supported employment are delivered. Below are a few of the measures: Remote Job Coaching Condix K is in effective production of the condition of the measures. Remote Job Coaching Condition of the measures: Remote Job Coaching Condition of the production of the measures. Remote Job Coaching Condition of the product of the measures. Remote Job Coaching Condition of the product of the measures. This may include the teleworking of the product of the support needs of the initial and may not the product of the support needs of the initial and may not the product of the product of the support needs of the initial and may not the product of the support needs of the initial and may not the product of the support needs of the initial and may not the product of the support needs of the initial and may not the product of the support needs of the initial and may not the product of the support needs of the initial and may not the product of the support needs of the initial and may not the product of the support needs of the initial and may not the support needs of the s		
D.4 Prevocational Services	Prevocational services providers will be authorized for retainer payments in the event that the provider is not serving the individual under other comparable services or using differential staff such as family caregivers hires to provide service. The retainer payment will be authorized at the level, duration and amount as outlined in the ISP/PA on February 29, 2020. Billing Guidance- For the retainer procedure code, providers should use the procedure codes as authorized on the prior authorization. Retainers cannot exceed 30 consecutive days. Providers should submit claims for only scheduled days and units as specified in the individual's ISP.		

D.5 Community Access (CA)	The state temporarily authorizes, during the time that the Appendix K is effective, retainer payments for Community Access Services, for traditional providers only, for services that cannot be rendered due to national state of emergency. Retainer payments will only be authorized through agency delivered services using the frequency listed on the individual's ISP/PA on February 29, 2020 and cannot exceed 6 hours a day and 5 days a week.			
	Note: Community Access includes both Community Access Group (CAG) and Community Access Individual (CAI) Services.			
	Documentation Guidance - Providers are to document retainer service delivery and a list of hired family caregivers in the "COVID-19 NOW&COMP Provider Spreadsheet" – see Section G for reference.			
	Billing Guidance: Provided bill the existing service procedure controlled bill the existing service procedure controlled bill the existing service procedure controlled billing for a retainer and/or controlled billing for a family caregiver hire. If a provided billing for a giver hire. If a provided billing for a giver hire. If a provided billing for a family caregiver hire set and for each must be against for a four 15 min units) or controlled billing for a giver hire. If a provided billed billed as one claim line. For vice and the provided billing for a giver hire. If a provided billed billing for a giver hire. If a provided billed billing for a giver hire. If a provided billed billing for a giver hire. If a provided billed billed billed billed billed as one claim line. For vice and the provided be billed by conting notes should be billed. So cannot exceed a provided by controlled billing for a giver hire. If a provided billed billed. So cannot exceed a provided by controlled billed			
D.6 Support Coordination	The state temp ily authorizes, ig the till hat the Appendix K i fective, SC pro s to render services telephonically or health mea re als emporary rate increase from \$152.88 to \$175.00 per manual per month.			
(SC)	Documentation Guidance- Telephonic service delivery is acceptable during the time that Appendix K is effective. Telecommunications applications (e.g. SKYPE/Facetime/Duo/ZOOM) are not required, but encouraged where possible and in accordance with governing privacy regulations. Residences that have computers or similar electronic devices should use a telecommunication application at minimum for ISP meetings, but preferably all contacts when possible. Support coordinators s should send providers and families a copy of the IQOMR template (see Section G) when possible to help prepare for contacts. SC Support Notes: A comprehensive support note must be entered by the Support Coordinator for all regular required contacts with the individual, with the exception of the completion of the quarterly (IQOMR) Individual Quality Outcome Measures Review. Contacts should focus on health and safety concerns. All support notes are entered into the online case management system within three (3) business days of the contact.			

Billing Guidance- Rate Increase- Providers will need to adjust claims for the rate increase once the rate has been adjusted in the billing system- Providers will be notified by DBHDD once the rate has been increased in the billing system. Providers may only adjust claims beginning March 1, 2020 (the effective date of Appendix K). Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth. The state temporarily authorizes, during the time that the Appendix K is effective, Intensive SC providers to render services D.7 Intensive telephonically and through other telehealth means. Support Coordination **Documentation Guidance-** Telephonic is an acceptable mode of service delivery. Telecommunications applications (e.g. SKYPE/Facetime/Duo/ZOOM) is not required but encouraged where possible. SC staff are not to require provider staff to (ISC) anferencing. R ences that have com use personal phones delectronic devices should use a telecommunica+i plication nimum fo meetings, but prefe ly dii contacc en possible. SCs should send providers and ilies a copy of the OMR tel ate (see Section G) w possible to her epare for contacts. SC Support hensive support no tered by the Suppor ordinator for all i ired contacts to the Notes: A cor nust be individual du times outside comp n of t quarterly (IQOMR) In dual Quality Outc Measures Review. Contacts she consider focus areas ealth safety. All support es are entered int e online case management system with ree (3) business days er the nt. Billing Guidan ervices delivere ephonic should be billed using he Place of Servi (POS) code '02' for telehealth. The State temporarily authorizes, during the time that the Appendix K is enective, providers to exceed the SMS cap D.8 Specialized limitation. The NOW and COMP waiver programs authorize funds for goods and services that are not covered by the Medical Medicaid State Plan or those instances in which an individual's need exceeds State Plan coverage limits and exceptions to Supplies (SMS) the coverage limits are not available. Note this may include Personal Protective Equipment (PPE), as applicable. For individuals with SMS on their current PA, the cap has been increased. Prescriptions will not be required for the duration that Appendix K is effective, however providers must document how supplies are directly related to a waiver individual's diagnosis or disability-related condition. Providers may not bill when SMS/PPE has been donated or obtained through other means. For Individuals without SMS on their existing PA, all other sources of PPE must be exhausted prior to the request for SMS to be added to an ISP.

D.9 In Home and Out of Home Respite	The state temporarily authorizes, during the time that the Appendix K is effective, providers to exceed the cap limitations for In Home and Out of Home Respite Services that can be rendered via traditional provider, participant directed services, and/or a live-in caregiver. Documentation Guidance- Providers are to document a list of family caregivers hires in the "COVID-19 NOW & COMP Provider Spreadsheet" – see Section G for reference. Billing Guidance- Use procedure code as authorized on prior authorization.		
D.10 Additional Staffing	The state temporarily authorizes, during the time that the Appendix K is effective, that Additional Staffing can be delivered on a temporary basic to the settings which include: extended far placement, while placement, while placement in the include: extended far placement, while placement in the include in a revidual service problem in the retainer option for A in a control of the individual service problem in the retainer option for A in a control of the individual in the i		
D.11 Nursing Services	The state temporarily authorizes, during the time that the Appendix K is effective, RN services to be rendered using telehealth, to the extent possible. The state temporarily authorizes, during the time that the Appendix K is effective, a temporary rate increase for LPN services from \$8.75 to \$10.00 per 15-minute unit.		
	Documentation Guidance- RN Services must document each service delivery rendered via telehealth or other telephonic means. In addition to documentation requirements specified in Part II and III of the NOW and COMP Manuals, which		

	includes but is not limited to date time aignature (anadomtic line, decompostation while the Amagnatic V is offective shall			
	includes but is not limited to date, time, signature/credentialing, documentation while the Appendix K is effective shall			
	include the rationale for telehealth or telephonic date of service delivery.			
	Billing Guidance- Use procedure codes as authorized. RN Services delivered telephonically should be billed using the Place			
	of Service (POS) code '02' for telehealth. Rate Increase- providers will need to adjust claims for the rate increase once the			
	rate has been adjusted in the billing system. Providers will be notified by DBHDD once the rate has been increased in the			
	billing system. Providers may only adjust claims beginning March 1, 2020 (the effective date of Appendix K).			
D.12	Note: In addition to the authorization of Appendix K, the NOW waiver was recently amended to align with COMP waiver for			
Behavior	Behavior Support Services. Behavior Support Services Level 1 and Level 2 provisions should be considered for both NOW and			
Support	COMP waiver individuals.			
Services Level	The state temporarily during the till hat the Appendix K i Wand COMP Behavior Support			
1 and Level 2	Services to have realth optic shavior St ort Service providers / providers. via telehealth or other			
	telephonic me .			
	Notification dance The behaviors orts ce provider will contact the designated poor of contact for the			
	agency/hom pregiver to schedule the ealth production. SC will potified of temporal changes in behavior support service deliver options during this till that A indix K is effective. Read easts for additional to the service deliver options during this till that A indix K is effective. Read easts for additional to the service deliver options during this till that A indix K is effective. Read easts for additional to the service deliver options are supported by the service delivers of t			
	services shou e made to the region behaviorallyst.			
	services should be made to the region behave maryst.			
	Documentation Support S rel I a ceach service delivery rendered			
	via telehealth. In addition to documentation requirements specified in Fart II and Fart III of the NOW and COMP General Manuals, which includes but is not limited to date, time, signature/credentialing, documentation while the Appendix K is			
	effective shall include the rationale for telehealth or telephonic date of service delivery. In lieu of face-to-face training for			
	behavior support plans and on-site monitoring of plan implementation, oversight, feedback, and support will be provided			
	via telehealth and/or telephonically with behavior plans, data analysis summaries, and progress notes shared electronically			
	via secure encrypted correspondence with staff and/or families to render services.			
	Billing Guidance : Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth.			
D.13	The state temporarily authorizes, during the time that the Appendix K is effective, all Adult Occupational Therapy Services,			
Adult	Adult Physical Therapy Services, Adult Speech and Language Therapy Services to be provided telehealth or other telephonic			
Occupational	means with the following exceptions: Adult Swallowing/Feeding Therapy; Adult Swallowing/Feeding Therapy self-directed;			
Therapy, Adult				

Physical Therapy, Adult Speech and Language Therapy.	Documentation Guidance- Adult Therapy Providers must document each service delivery rendered via telehealth or other telephonic means. In addition to documentation requirements specified in Part II and Part III of the NOW and COMP General Manuals, which includes but is not limited to date, time, signature/credentialing, documentation while the Appendix K is effective shall include the rationale for telehealth or telephonic date of service delivery. Billing Guidance: Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth.
D.14 Fiscal Intermediary (FI)	During the Appendix K authorization, FIs will have a rate increase from \$75.00 per individual who self-directs per month to \$95.00 per individual per month. Rate Increase- FIs will need to adjust claims for the rate increase once the rate has been adjusted in the billing system. FIs will be notified by DBHDD once the rate has been increased in the billing system. FIs may only adjust claims be such 1, 2020 (the fective date of Appe

Section E. Additional Guidance ecific to Participant Letted (Services

- E.1 PD Trainings- During the pe Appendix K is effect there be no in-person PD nings for new enre es into PD Service delivery tion for this training. If a model. At this time, this trainin n PD : ice Delivery Model. a requirement to en e is no tele-healt Participant needs to temporarily ignate a different son to s e as the personal reg entative during COVID-19 Emergency, DBHDD will consider such requests, and will sider waivi aining rec ments for the newly signated rem cative on a temporary basis.
- E.2 Documentation Requirements- Documentation requirements for services rendered remain intact. DBHDD will continue to monitor service delivery and use of funding. DBHDD will continue to terminate participant directed service delivery option approval and refer suspicious spending and/or activity to the Office of the Inspector General for investigation and prosecution.
- E.3 Family Caregiver hire- During the period Appendix K is effective, DBHDD will temporarily allow for the hiring of family caregivers who live in the home with the individual receiving services through the NOW or COMP waiver. Family Caregiver hire is limited to individuals who are at least 18 years in age with experience delivering required care. The Participant's representative may not serve as a family caregiver hire. During the hiring process, Family Caregiver hires must disclose to the Fiscal Intermediary that they are a Family Caregiver hire, as well as their relationship to the Individual receiving the waiver services. The enrollment packet itself will not be modified, but FI will issue the 'Good to Go' letter using a modified list of essential documents.

E.4 Trainings for Family Caregiver hires – During the period Appendix K is effective, the training requirements for Family Caregivers hired to provide PD services are modified as set forth at section C.9, above.

E.5 Support Coordinator visits - Although Support Coordinators generally will not be making in-home visits while Appendix K is in effect, Participants/Representatives are required to allow in-home visits when requested by Support Coordinators, and to allow telephonic or electronic visits from Support Coordinators.

E.6 Retainer Payments – During the period Appendix K is in effect, retainer payments are available for employees/support workers providing Community Living Support, Community Residential Alternative, Prevocational, and Supported Employment services for Participants receiving PD services. These retainer payments are available as described in the latest version of DBHDD Policy "COVID-19 2020: DBHDD Community Developmental Disability Services Policy Modifications" and in these Operational Guidelines. Retainer payments are available for ing the Participant prior to the COVID-19 Financians (and have been retained by the employees/support workers who had been Participant/Representative to resur avices and COVID-19 nergency), as describ ttachment; retainer payments are IT LITE PURE, not available for family caregiver ed to provide se. s durin e COVID-19 Emerger

E.7 Use of State Back-Up Plan - ring the period Appe K is it ect, the State Back-l lan, which ordina may be used for no more than 1 occasion in any two-month read, may be used in up occasion in any 2-month pe

E.8 PD and Support Coordination SC check-ins and acti a requirement for PI ile Appendix K is ective. SC be completed via s are telehealth or telephonic means ng this crisis. If ar thday falls while Ap dix K is in effect support coordinator will work ividual' with the individual and representa a set up tel conduct the annual I neeting, ISP ether annual or a version change, ₁th mean! will require physical signatures on the page. SC will esen ... signature page via encrypted email, fax, or the US Postal Service to acquire the required signatures. It is the expectation that the individual, representative, and other involved parties all physically sign the signature page and return it to the SC. The signature page is required for an ISP to be processed.

E.9 PD Memorandum of Understanding – To the extent that the provisions of this Operational Guidance and the provisions in the latest version of DBHDD Policy "COVID-19 2020: DBHDD Community Developmental Disability Services Policy Modifications" directly and expressly conflict with the terms of the "PARTICIPANT-DIRECTION OPTION TERMS and CONDITIONS of PARTICIPATION" Memorandum of Understanding, DBHDD's enforcement of those Memorandum of Understanding provisions will be temporarily suspended during the period Appendix K is in effect.

Section F.- Transition Plan and Re-Opening Guidance- to be released at a later date

Section G. References:

- 1. Covid-19 Guidance Information https://dbhdd.georgia.gov/coronavirus-covid-19-information
- 2. Provider Issue Management System (PIMS) https://dbhddapps.dbhdd.ga.gov/PIMS/Default.aspx
- Comprehensive Support Waiver Program and New Options Waiver Program Part II Chapters 600 1200
 https://www.mmis.georgia.gov/portal/Portals/0/StaticContent/Public/ALL/HANDBOOKS/Comprehensive%20Supports%20Waiver%20Program%20and%20New%20Options%20%20Waiver%20Program%20%20Part%20II%20Chapters%20600-1200%2020200107210300.pdf
- 4. Health and Human Services resource link regarding appropriate telehealth platforms for delivery of services https://www.hhs.gov/biranderofessionals/spacial-topics/emergency-managed-notification-enforcement-discretion-telehealth/index.html
- 5. Behavior Analys' rification Board 'ance ht //www.bacb.com/b covid-19-update

Section H. Appendices

H.1 COVID-19 NOW&COMP Pr er Spreadsheet- attac)-19 2020: DBHDD C nunity Developm I Disability Services Policy to C(H.2 Simplified AS Request Sheet COVID-19- attache COVIE 2020: DBHDD Comr ty Development sability Services Policy thorization- helow: H.3 IQOMR Guidance for Support "nation de √ppendix l

Focus Area: Environment			Comments/Actions Needed: Concerns, Barriers, Successes
1	The home/site is accessible to the individual.	Yes	[Control]
2	The individual has access to privacy for personal care.	Yes	[Control

Fo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
3	The individual has a private place in the home to visit with friends or family.	Yes	[Control]
4	The individual has access to privacy for phone discussions with friends or family.	Yes	[Control]
5	The individual has access to receive and view their mail/email privately.	Y	[Control]
6	The individual is able to have private communications with family and friends through other means.	es de la constant de	[Control]
7	The home setting allows the individual the option to have a private bedroom.	Yes	[Control]
8	All assistive technologies are being utilized as planned.	Yes	[Control]
9	All assistive technologies are in good working order.	Yes	[Control]

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes	
10	The individual has adequate clothing to accommodate the individual's needs or preferences/choices.	Yes	[Control]	
11	The individual has adequate food and supplies to accommodate the individual's needs or preferences/choices.	Subjective by SC Could Parbal confirmant w' e waiver cicipant/staff/gua. 1) could be N/A.		
12	The Residential/Day settin is clean according to the individual's needs and preferences.	ould be Yes (by verba ifirma in the waiver in cipant/staff/guz in) It could be Yes (by verba ifirma in the waiver	[Control]	
13	The Residential/Day setting is safe for the individual's needs.	Could be Yes (by verbal confirmation with the waiver participant/staff/guardian) It could be N/A. Subjective by SC	[Control]	

Foo	us Area: Environment Instructions		Comments/Actions Needed: Concerns, Barriers, Successes	
		Subjective by SC Could be Yes (by verbal confirmation with the waiver participant/staff/guardian) It could be N/A.	[Control]	
	cus Area: pearance/Health	\$	Comments/Action eded: Concerns, Barriers ccesses	
	The individual appears healthy. Describe any observations regarding health since the last review.	nce no video confere g, N/A	[Control]	
	The individual appears safe. Describe any observed changes related to safety since the last review.	Since no video conferencing, N/A	[Control]	
	There have been no reported changes in health since the last review.	Yes, based on reports of change.	[Control]	

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
18	The HRST aligns with current health and safety needs.	Yes, based on reports and HRST scores	[Control]
19	The ISP is available to staff on site. If there have been ISP addendums, they are available to staff on site.	Yes, this can be answered if there knowledge it is there – Therap, etc.	[Control]
20	Staff are knowledgeable about all information contained within the individual's ISP.	Y	[Control]
21	Indicated healthcare plans are current and have been reviewed by a nurse within the past year.	c favailable by ap or oth web applications/documentation, would be affirmative as well.	[Control]
22	Indicated healthcare plans are available to staff on site in all applicable settings.	Yes, only if available by Therap or other web-based applications/documentation, would be affirmative as well	[Control]

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes	
23	All staff are knowledgeable about all of the individual's healthcare plans.			
24	Indicated healthcare plans are being implemented.	Yes, if Therap or other web-based applications/documentation, would be affirmmentation as with merwise, N/A.	[Control]	
25	Skilled nursing hours are being provided, as ordered.	herap or other web-b d Yes, herap or other web-b plications/documer on, wo firmative docur ation as we. Otherwise, N/A.	[Control]	
26	All medical/therapeutic appointments have been scheduled and attended.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A.	[Control]	

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes	
27	All follow-up appointments have been scheduled and attended.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A.	[Control]	
28	All physician/clinician recommendations are being followed.	Yes, if Therap or other web-based application, we be anative documentation as therwise, N/A.	[Control]	
29	All prescribed medications are being administered, as ordered, and documented accurately.	es, if Therap or other base plications/documer on, wo firmative docur ation as we. Family and participant can also confirm Med administration. Otherwise, N/A.	[Control]	
30	All required assessments/evaluations have been completed.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A, or Subjective by SC	[Control]	

Foc	cus Area: Environment		Comments/Actions Needed: Concerns, Barriers, Successes	
	The individual has had no hospital admissions, emergency room, or urgent care visits since the last review. Yes, (by verbal confirmation with the waiver participant or guardian, if applicable, or confirmation in Thera or other web-based applications/documentation, would be confirm as well. Provider staff reports of hospital adminocy room, or waive care visits is mative cumentation.			
	If applicable, hospital/ED/urgent care discharge plan instructions have been followed.	es, (by verbal confirm n with aiver participant or go ian, if plicable, or confirm n in Theother web-based approximation at ions/documentation.	[Control]	
Foc	cus Area: Supports and	Select:	Comments/Actions Needed:	
Services			Concerns, Barriers, Successes	
33	The individual's paid staff appear to treat them with respect and dignity.	N/A, unable to assess due to the need for visual confirmation	[Control]	

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes	
34	The individual's natural supports appear to treat them with respect and dignity.	N/A, unable to assess due to the need for visual confirmation	[Control]	
35	Supports and services are being delivered to the individual, as identified in the current ISP.	Yes, for some – some services or supports will be unable to assess due to the need for visual confirmation. Use ————————————————————————————————————	[Control]	
36	The individual is being supported to make progress in achieving their goals (both ISP goals and informally expressed goals). Indicate the status of the individual's progress toward achieving established goals.	es, for most – some go will be nable to assess due to need ual confirmation, Ur Thera reweb-based appropriately with the confirmation as well be affirmation as well	[Control]	
37	There are no needs for additional services/supports at this time.	Yes, in general if there is access to the waiver participant, family, guardian, staff, and access to Therap or other web-based applications/documentation, could be affirmative confirmation as well.	[Control]	

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
		There well could be times when there is not clarity to respond without a face to face evaluation.	
Focus Area: Behavioral & Emotional		Select:	Comments/Actions Needed: Concerns, Barriers, Successes
38 Since the last visit, there are no emerging or continuing behavioral/emotional responses for the individual.		Yer amerarm is access to amily, guardian, if, and to erap or other web-to doplications/document in, core affirmative confirmation as we have a substitute of the could be times to the could be times	[Control]
39	Current supports and behavioral interventions are adequate to prevent engaging external interventions.	Yes, in general if there is access to the family, guardian, staff, or access to Therap or other web-based applications/documentation, could be affirmative confirmation as well. There could be times when there is not clarity to respond without a face to face evaluation.	[Control]

Focus Area: Environment		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
40	The individual has no active Behavioral Support Plan, Crisis Plan, and/or Safety Plan relating to behavioral interventions.	Yes	[Control]
41	If applicable, the plan(s) is/are available on site for staff review.	Yes, in general if there is access to the family guardian, or access to The based cations/docum tion, coraffirmative	[Control]
42	There is evidence of implementation of the Behavioral Support Plan, Crisis Plan, and/or Safety Plan. Staff are knowledgeable about the plan(s) and able to describe how they are implementing the plan.	s, in general if there ccess to family, guardian, ccess to he or other we sed applied the affirmative	[Control]
43	Since the last visit, there have been no needs to access GCAL or the Mobile Crisis Response Team in response to a behavioral	Yes, (by verbal confirmation with the waiver participant, staff, family, or guardian, if applicable, or confirmation in Therap or other web-	[Control]

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
	emergency If GCAL/MCT has been accessed, describe reason, frequency, duration of any admissions, and if discharge recommendations have been followed. If applicable, the BSP/ Safety Plan/ Crisis Plan has been adapted to reflect any new recommendations or interventions needed.		
44	Since the last visit, the individual has had no contact with law enforcement. If they have, describe reason and length of involvement. If applicable, the BSP/ Safety Plan/ Crisis Plan has been	Yes, by verbal confirmation with the waiver participant, staff, family, or guardian, if applicable, or confirmation in Therap or other webbased applications/documentation, would be affirmative documentation.	[Control]

adapted to reflect any new recommendations or interventions needed.		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes	
		Also, staff, family, or guardian, if applicable can note if the BSP/Safety Plan/ Crisis Plan has been adapted to reflect any new recommendations or interventions needed. The anabete when there clarity to respons thout a face evaluation.		
Focus Area: Home/ Community Opportunities		elect:	Concerns, Barriers ccesses	
	The individual has unpaid community connections. If not, describe steps being taken to further develop community connections.		[Control]	
	The individual is receiving services in a setting where he/she has the opportunity to interact with people who do not have disabilities (other than paid staff).	Yes There could be times when there is not clarity to respond without a face to face evaluation.	[Control]	

Foo	us Area: Environment Instructions		Comments/Actions Needed: Concerns, Barriers, Successes	
47	The individual is being offered/provided documented opportunities to participate in activities of choice with non-paid community members.	Yes, There could be times when there is not clarity to respond without a face to face evaluation.	[Control]	
48	The individual has the opportunity to participate in activities he/she enjoys in their home and community. Describe steps being taken to increase opportunities to meet this objective and allow choices to be offered while in services.	ere could be times in there of clarity to respond value out a face evaluation.	[Control]	
49	If desired, the individual is actively supported to seek and/or maintain employment in competitive and integrated settings and/or offered customized opportunities. If applicable, note how he/she is supported to do so. If no,	Yes, There could be times when there is not clarity to respond without a face to face evaluation.	[Control]	

Focus Area: Environment		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
Г	indicate how the issue is being addressed.		
50	The individual has the necessary access to transportation for employment and community activities of his/her choice.	There could be times when there is not clarity to respond without a face to f	[Control]
Foo	cus Area: Financial	ect:	Comments/Action eeded: Concerns, Barriers ccesses
51	There are no barriers in place that limit the individual's access to spend his/her money, as desired.	es, (by verbal confirm in with a niver participant, stall imily, rdian, if applicable or other based and additional applicable of the based and applicable of the based of the participant of the participa	[Control]
Focus Area: Satisfaction		Select:	Comments/Actions Needed: Concerns, Barriers, Successes
	Overall, the individual is satisfied with their life activities since the last review.	Yes, SC may need a face to face to confirm	[Control]

Focus Area: Environment		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes	
53	Overall, the individual is satisfied with their service providers since the last review.	Yes, SC may need a face to face to confirm	[Control]	
54	Overall, the individual is satisfied with the type of services received since the last review.	Yes, yay need a face to se to offirm	[Control]	
55	Overall, the individual is satisfied with their family relationships/natural supports since the last review.	es, S ay need a facece to	[Control]	

Reference IQOMR chart above: Yes – Can be answered. N/A – Not available without visual Confirmation. Due to the critical nature of the work related to COVID-19, if questions within the IQOMR are not tied to health and safety directly or, are not easily responded to by the individual, can be noted as 'Non applicable due to COIVD-19'



VERSION 9

COVID-19 2020: DBHDD Community Developmental Disability Services Policy Modifications

EFFECTIVE 6/23/2020



Current Status: Old PolicyStat ID: 8236948

Georgia Department of Behavioral Health & Developmental Disabilities

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of Developmental Disabilities

Chapter: DD Community Services

Sections:

COVID-19 2020: DBHDD Community Developmental Disability Services Policy Modifications - 6/23/2020

EFFECTIVE IMMEDIATELY

APPLICABILITY

DBHDD Providers of Community **Developmental Disability** Services

POLICY

In response to the continued transmission of COVID-19, where necessary new measures are in effect to minimize community spread of the virus, and to assist in the continued delivery of community developmental disability services.

Modifications as described in this policy refers to the restriction, enhancement, relaxation, and partial or full suspension of existing policies in PolicyStat, <u>Provider Manual for Community</u> <u>Developmental Disability Providers</u>, or <u>Provider Manual for Community Developmental Disability Providers of State-Funded Developmental Disability Services</u> as applicable to the service. This policy includes full details of the alternate requirement(s) or procedures.

The following temporary modifications to the policies listed below are pertinent to community developmental disability services, effective immediately. Please refer to the full policy via the hyperlink, noting the alternate requirements applicable until further notice.

This policy will be updated as necessary. This policy remains in effect until the Governor of the State of Georgia lifts the Emergency Declaration.

1. The "Appendix K: Operational Guidelines for the NOW and COMP Waiver Programs Response to COVID-19 Pandemic" permits temporary modifications for the services detailed in Appendix K, Appendix K Attachment 1, and Appendix K Attachment 2 (attached below). The purpose of this guidance document is to provide additional information to providers of traditional waiver services and families who opt to participant direct services. The guidance within this document is temporary until otherwise notified by DBHDD and DCH. This guidance supersedes only conflicting guidance in the NOW and

- <u>COMP Waivers for Community Developmental Disability Services, 02-1202, Provider Manual for Community Developmental Disability Providers, and DBHDD PolicyStat policies.</u>
- 2. **Temporary suspension** of the site inspection requirement for developmental disability provider enrollment, per <u>Recruitment and Application to Become a Provider of Developmental Disability Services</u>, 02-701 is permitted as follows:
 - a. Site inspections for Community Residential Alternative Host Home sites are suspended. Host Home applications will remain in pending status until site inspections resume.
- 3. A *partial suspension* of the fingerprinting requirement described in <u>Criminal History Record Check for DBHDD Network Provider Applicants</u>, 04-104 as follows **only if fingerprinting services are not available in your area**:
 - a. DBHDD's Provider Network must have each person subject to Policy 04-104 complete the "Network Provider Applicant Attestation," **Attachment A** to this policy, instead of completing the fingerprint based background check stipulated in Policy 04-104.
 - b. Within sixty (60) days of cessation of the Public Health Emergency, all persons who signed the Network Provider Applicant Attestation instead of completing the fingerprint based background check must complete a fingerprint based background check as required by Policy 04-104. The provider is responsible for sending any person who signed the Network Provider Applicant Attestation for a fingerprint based background check.
 - c. The provider is also responsible for sending to DBHDD's Criminal History Background Check (CHBC) section each signed Network Provider Applicant Attestation, while retaining a copy in the applicant's personnel file. The provider must send the signed and dated Attestation to CHBC, and acknowledge receipt of an email from CHBC confirming acceptance of the Attestation, before the applicant begins working. The Individual Assessment process set forth in section D of Policy 04-104 does not apply to persons who sign the Network Provider Applicant Attestation.
 - d. The Attestation cannot be used by Network Provider Applicants who were fingerprinted for a fingerprint based background check within sixty (60) days prior to the declaration of the Public Health Emergency.
- 4. A *partial suspension* of the fingerprinting requirement described in <u>Criminal History Record Check for Individual Provider Applicants</u>, 04-111 is permitted as follows **only if fingerprinting services are not available in your area**:
 - a. All applicants who are subject to Policy 04-111 must complete the "Individual Provider Attestation," **Attachment B** to this policy, instead of completing the fingerprint based background check documented in Policy 04-111.
 - b. Within sixty (60) days of cessation of the Public Health Emergency, all applicants who signed the Individual Provider Attestation instead of completing the fingerprint based background check must complete a fingerprint based background check as required by Policy 04-111.
 - c. DBHDD Provider Enrollment is responsible for sending to DBHDD's Criminal History Background Check (CHBC) section all signed Individual Provider Attestations and for acknowledging receipt of an email from CHBC confirming acceptance of the Attestation, before the Individual Provider Applicant can be considered eligible. The Individual

- Assessment process set forth in Part D of Policy 04-111 does not apply to applicants who sign the Individual Provider Attestation.
- d. The Attestation cannot be used by Individual Provider Applicants who were fingerprinted for a fingerprint based background check within sixty (60) days prior to the declaration of the Public Health Emergency.

DBHDD sincerely appreciates your compliance with these measures throughout this Public Health Emergency.

Attachments

A - COVID-19 2020 - Attestation of Absence of Barrier Crimes Data & Cover Letter 4/23/2020.docx Appendix K Attachment 1 - NOW and COMP Provider Spreadsheet 4/22/2020

Appendix K Attachment 2 - Simplified AS Request Sheet 4/20/2020

Appendix K Operational Guidelines for the NOW and COMP Waiver Programs Response to COVID-19 Pandemic,6/23/2020 Version 3.0

B - COVID-19 2020 - Attestation of Absence of Barrier Crimes Data & Cover Letter 4/23/2020.docx

Approval Signatures

Approver	Date
Anné Akili, Psy.D.: Director, Policy Management	6/23/2020
Ron Wakefield: Director, Division of Developmental Disabilities	6/23/2020
Anné Akili, Psy.D.: Director, Policy Management	6/23/2020

DBHDD Division of Developmental Disabilities

Appendix K: Operational Guidelines for the NOW and COMP Waiver Programs

Response to COVID-19 Pandemic



Version 3.0

Released: 06.23.2020

Section A. Overview & Purpose

Overview: The Georgia Department of Behavioral Health and Developmental Disabilities (DBHDD) and the Georgia Department of Community Health (DCH) submitted an Appendix K to the Centers for Medicare and Medicaid Services (CMS) in order to request necessary flexibilities to service delivery during the COVID-19 public health emergency. The changes outlined in Appendix K for the NOW and COMP waivers are **temporary** policy allowances, **temporary** rate increases for target services, and **temporary** retainer payments for specific services, effective March 1, 2020. Georgia intends to withdraw the Appendix K when systems, services, and the ability to travel freely are less restricted. At the conclusion of the state of emergency, pre-emergency service plans will be reimplemented unless the individual has experienced a change in condition or circumstance that requires reassessment and development of a new service plan.

Purpose: The purpose of this guidance document is to provide additional information to providers of traditional waiver services and families who opt to participant direct services. The guidance within this document is temporary until otherwise notified by DBHDD and DCH. This guidance supersedes only conflicting guidance in the NOW and COMP manuals, DD Community Standards Manual, and DBHDD Policy Stat Policies.

Section B: Appendix K Chart At a Glance - "X" indicates provisions for the waiver service

Waiver Service	Telehealth Options	Provider Retainer Options	Family	Exceed Service	Provided in Alternative	Increase
	Options	Options	Caregiver Hire Options	Limitations	Settings	Rate
		X	X	Х	X- including out	
Community Living support					of state and	
(Basic and Extended)					acute care	
					settings	
Respite (in home and out of			X	X	X – including	
home)					out of state	
Community Access	Х	X -only applicable for	Х	Х	Х	
		DBHDD traditionally				
		enrolled Providers				
Specialized Medical Supplies				X		
Additional Staffing					X	

Nursing Services	X- RN only				X- LPN only
Support Coordination	X				Х
Intensive Support	Х				
Coordination					
Fiscal Intermediary					Х
Community Residential		>	(
Alternative					
Behavioral Supports Services	X				
Prevocational Services	X		(
Adult Occupational Therapy	X				
Adult Physical Therapy	X				
Adult Speech and Language	X – exceptions				
Therapy	noted below				
Supported Employment	X- limited scope		(

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C. General Provider Guidance

- C.1 Background checks for any function that requires face-to-face action or availability of third-party vendors will be temporarily suspended for the duration that Appendix K is effective for all waiver services in the event the provider is unable to complete a background check. Within sixty (60) days of the termination of Appendix K, background checks will need to be completed retroactively for all employees who were hired while Appendix K was effective and according to policy.
- C.2 Required staffing ratios for an individual as outlined in the individual's Individual Service plan, may be modified to allow the individual to receive services in safe and accessible environments if the individual's needs are still being met. Documentation must include staffing ratios, justify the decrease in ratio and verify how the individual's health and safety needs are being met.
- C.3 State certification survey staff will postpone on-site provider certification and other reviews for provider agencies and individual providers rendering NOW and COMP services unless there is cause to believe there may be an immediate jeopardy and/or health and safety concern.
- C.4 The annual DMA-7 assessment requirements will be suspended for all individuals while Appendix K is effective unless required otherwise by another governmental agency. There are no requirement modifications to the DMA -6. The Regional Field Office and/or Support

Coordination (SC) agency will document, in the individualized service plan (ISP), the contact with the individual, legal guardian if applicable, and team to discuss the extension, as well as the projected date that the DMA-7 will be completed, which can be no later than the individual's subsequent birthday.

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C.5 Telehealth Guidance: The state temporarily authorizes, during the time that the Appendix K is effective, Adult Occupational Therapy Services, Adult Physical Therapy Services, most Adult Speech and Language Therapy Services, Behavior Support Services, Support Coordination, Supported Employment (limited scope), Community Access Services, Prevocational Services, and registered nurse (RN) oversight to be provided using telehealth or other telephonic means. All licensed providers must abide by training requirements established by their governing professional licensing boards. For provision of Behavior Support services, there are currently no CEU requirements for telehealth training by The Behavior Analysis Certification Board (BACB), or other non-board-certified behavior support service providers that render this service. The Behavior Analysis Certification Board has issued guidance that has been included in the Reference Section of this document. Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth.

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C.6 Family Caregiver Option: Several services, as indicated in Section B above, list an option for Family Caregivers to temporarily render specific services. Family Caregiver hire option is applicable to both traditionally enrolled provider families as well as families who opt to participant direct their services. A family caregiver hire shall only render services in lieu of a regular staff member (as defined in section C.7 below) and not in conjunction with a regular staff member. As specified in the NOW and COMP Manual Part II Section 902, a Family Caregiver hire is defined as an individual's family member, by blood or marriage, who is aged 18 years or older, who may be reimbursed for providing services when there are extenuating circumstances (family is defined as a person who is related by blood within the third degree of consanguinity by blood, adoption, or marriage. Third degree of consanguinity include mother, father, grandmother, grandfather, great grandfather, great grandmother, sister, brother, daughter, son, granddaughter, grandson, great granddaughter, great grandson, aunt, uncle, niece, or nephew. The provider network may hire family caregivers to provide Community Living Supports, Community Access and/or Respite Services in lieu of existing provider staff if the provider is unable to render the service due to health and safety concerns for either the provider staff or the individual. In the event a provider hires a family caregiver to render the service when provider staff is unable to provide a service, providers may bill both the retainer and for actual service delivery. The family caregiver hire start day may begin after there is documented evidence that the regular provider staff are no longer rendering services and no sooner than the effective date of the Appendix K. MMIS billing system does not permit the same procedure code to be billed at the same time of the day. While the Appendix K is effective, providers are temporarily permitted to bill a retainer and the family caregiver hire on the same day, however the time that service and retainer are billed for may not overlap and may not exceed the approved service units on the individual's Prior Authorization. Training requirements specific to family caregiver hire can be found in section C.9 of this document.

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C.7 Retainer Specifications-Retainer payments are authorized in the event that the provider is not serving the individual under other comparable services with regular staff members of the provider. The retainer payment will be authorized at the level, duration and amount

as outlined in the prior authorization in place as of February 29, 2020. **Initial retainers cannot exceed 30 consecutive days**. After the initial 30 day retainer is billed, the provider may bill for up to seven (7) additional days of retainer, in accordance with the following:

- 1. After the expiration of the initial 30-day retainer period, the regular staff member for whom the retainer was billed must deliver the service to the individual for a minimum of one encounter before the provider can bill any further retainer for that regular staff member.
- 2. An "encounter," for these purposes, is defined as a minimum of two (2) hours of the service, delivered and billed, with a scheduled agenda and a curriculum that addresses the individual's person-centered goals, in accordance with the individual's ISP. The encounter can take place over multiple sessions, if such service delivery is consistent with the individual's ISP and Individual 360; however, such multiple sessions must take place in a single calendar day.
- 3. Once the regular staff member has delivered at least one encounter of service to the individual, the provider may bill for up to seven (7) additional days of retainer for that regular staff member, beginning on the later of (i) the day after the encounter is completed, or (ii) the next day on which the individual would normally receive the service under the individual's ISP (but does not receive the service from that regular staff member). Billing for such additional days of retainer must be done in accordance with the same rules applicable to retainer payments generally.
- 4. If the regular staff member delivers a second or subsequent encounter of service to the individual, the provider may again bill for up to seven (7) additional days of retainer for that regular staff member, consistent with item (3) immediately above.

<u>EXAMPLE 1</u>: Under Individual's ISP, Provider would normally provide Service to Individual on Monday, Wednesday, and Friday of each week. Provider has already billed 30 days of the initial retainer payments for the regular staff member who delivers the Service to Individual. Due to COVID-19 concerns, Provider is now limiting delivery of the Service to Mondays only. That regular staff member delivers two hours of the Service to Individual one Monday (consistent with Individual's ISP). Provider may bill a retainer payment for that regular staff member for the following Wednesday and Friday. The regular staff member delivers two more hours of the Service to Individual the following Monday. Provider may again bill a retainer payment for that regular staff member for the following Wednesday and Friday. Provider may continue billing retainers in this way for as long as the current version of Appendix K remains in effect.

EXAMPLE 2: Under Individual's ISP, Provider would normally provide Service to Individual on Monday, Tuesday, Wednesday, Thursday, and Friday of each week. Provider has already billed 30 days of the initial retainer payment for the regular staff member who delivers the Service to Individual. That regular staff member delivers two hours of the Service to Individual on Monday, June 29 (consistent with Individual's ISP). However, due to COVID-19 concerns, Provider is then unable to deliver the

service to the individual until Monday, July 13. Provider may bill a retainer payment for that regular staff member for up to 7 days beginning on June 30—i.e. for Tuesday (June 30), Wednesday, Thursday, Friday, and the following Monday, Tuesday, and Wednesday (July 8). Provider may not bill a retainer for the following Thursday and Friday (July 9 and 10), because there has been no new service encounter by the regular staff member to support renewal of the retainer. However, if the regular staff member delivers at least two hours of the Service to Individual on the next following Monday (July 13), Provider may again bill for up to 7 additional days of retainer for that regular staff member, beginning on Tuesday (July 14).

5. Encounters for service delivery may be made via telehealth if appropriate and if consistent with the individual's person-centered goals.

Providers should submit claims for only scheduled days and units as authorized in the individual's ISP. The retainer option should only be billed when the provider is retaining (maintaining the staff's employment for) all employees (including administrative and support staff) required to resume that particular service for the individual(s) whose retainer is being billed. Service retainers may not be billed for staff whose employment the provider/employer is not maintaining.

As used in this guidance, the term "regular staff member" means a staff member who meets <u>all</u> of the following criteria:

- (i) the staff member would normally be rendering services to an individual served by the provider agency; and
- (ii) due to the COVID-19 Emergency, the staff member either
 - (a) is temporarily not rendering services to the individual due to the COVID-19 Emergency, or
 - (b) is temporarily rendering to the individual a different type of service than the service the staff member usually renders, at another service setting operated by the same provider agency in and the provider agency is not otherwise being reimbursed (e.g. through Additional Staffing rates) for the different service temporarily rendered by that staff member; and
- (iii) the staff member continues to be employed by the provider and is expected to resume rendering services to the individual after the expiration of the COVID-19 Emergency.

¹ For example, an individual who would normally spend daytime hours at a Community Access (CA) site operated by a provider might, due to the COVID-19 Emergency, now be spending daytime hours at a Community Residential Alternative (CRA) site operated by the same provider. The provider might utilize staff from the CA site as staff at the CRA site during those hours. Retainer payments could be authorized for those staff, in accordance with this guidance. The primary intention of such authorization is to allow the individual to continue being served by the same staff members who would normally be rendering services to the individual.

For each individual who is temporarily not being served by the provider's regular staff members, the provider must document in the individual's record certain information in order for the provider to be eligible for retainer payments for the regular staff who would normally serve that individual. For each regular staff member who is temporarily not serving the individual, the provider must document in the individual's record:

- 1. Name of the regular staff member;
- 2. Date on which the staff member's temporary absence from rendering services to the individual (at the site where the staff member would normally render services) began;
- 3. Reason for the staff member's temporary absence from rendering services at the service site (note: valid reasons may include, but are not limited to, that provider agency's services to the individual have temporarily ceased due to the COVID-19 Emergency, or (if applicable) that provider agency has temporarily hired family caregiver(s) to serve the individual in lieu of regular staff);
- 4. If applicable, the date on which the staff member resumed rendering services to the individual;
- 5. The specific dates on which, prior to the staff member's absence, the staff member was scheduled to render services to the individual any of the services for which retainer payments were requested and authorized; and
- 6. For each of the dates identified in (5) above, the number and type of authorized service units the staff member would have been delivering to the individual, in accordance with the ISP in effect for the individual on February 29, 2020.

C.8 Documentation Requirements- All providers must continue to adhere to documentation requirements set forth in Part II and Part III Policies and Procedures for the COMP and NOW Waiver General Manual. Providers must document for each encounter when providers have hired a family caregiver hire to render a service. Providers must document at each encounter when services are rendered via telehealth or other telephonic means using 02 P.O.S. (Place of Service). Providers must document each service delivery when billing a retainer. Representatives for Participant-direction model must adhere to all applicable documentation requirements. The specificity of such services, including amount, duration, and scope, will be added to the ISP as soon as possible, but no later than 30 business days after service initiation, ISPs should be written to reflect the date that service delivery began. The ISP must be signed by the individual or legal guardian. Supporting notes should identify each procedure code separately and how many units are being billed for each. Documentation to support clinically assessed need must be indicated in the Supporting notes. Documentation of services delivered via telehealth must indicate this service delivery method.

IDD-C Version Change Provisions- the below table represents actions that require and do not require a version change to be submitted through IDD-Connects. Providers are to request services not related to Appendix K through existing DBHDD policies 02-443 and 02-444

Actions Requiring Version Change	Actions NOT Requiring Version Change	
Add of any type of service	Rate Increase for licensed practical nurse (LPN), Fiscal Intermediary,	
	Support Coordination- temporary increase will be automated in	
	IDD-Connects	
Change in Provider Agency	Change in location of service delivery	
Increase in units beyond the standardized increase in authorization	Telehealth – Providers are to continue to bill the same procedural	
for all services that include family caregiver hire and retainer	code for telehealth and use the 02 P.O.S. (place of service)	
allowances within Appendix K (Community Access traditional,		
Community Living Supports, Respite Services)		
	Goal(s) - Modification of Person-Centered Goal(s) do not require a	
	version change and can be documented in support notes	
	Retainer payments billing (when staff are not delivering service but	
	are being retained to resume service delivery after Appendix K is no	
	longer effective)	

C.9 Training Requirements- In lieu of face-to-face training, DBHDD suspends required face-to-face training for newly hired staff during the time that the Appendix K is effective. Family members serving as reimbursed Family Caregivers hires who have experience delivering required care will be supported, as needed, by provider agency supervisory staff telephonically or electronically and have modified training requirements as specified below. Newly hired regular staff with a minimum of 1-year experience with individuals with I/DD will be supervised telephonically or electronically and those with no previous experience will be provided electronic video training by agency supervisory staff. Every effort should be made to complete training requirements when possible. Training requirements for any function that requires face-to-face action or availability of third-party vendors will be temporarily suspended for the duration that Appendix K is effective for all waiver services in the event the provider is unable to complete a training. Providers must continue to document all annual training completed with staff, contractors or consultants and document when a training cannot be completed with specific rationale. After Appendix K is no longer effective, trainings will be required to be completed within a timeframe which will be communicated to providers in subsequent communication from DBHDD.

The state modifies required trainings for new Family Caregiver hires. All trainings below are required to be provided by the provider agency to the family caregiver hire within ten (10) days via telephonically or electronically:

- 1. The purpose, scope of services, supports, care and treatment offered including related policies and procedures;
- 2. HIPAA and Confidentiality of individual information, both written and spoken;
- 3. Rights and Responsibilities of individuals;
- 4. Requirements for recognizing and mandatory reporting suspected abuse, neglect or exploitation of any individual;
- 5. Medical, physical, behavioral and social needs and characteristics of the individuals served; and
- 6. Techniques of Standard Universal Precautions to include:
 - Preventative measures to minimize risk of infectious disease transmission;
 - Use of Personal Protection Equipment (PPE); Sharps Safety (with sharp containers disposed of according to state and local regulated medical waste rules);
 - Environmental Controls for cleaning and disinfecting work surfaces;
 - Skills Guides for handwashing, cleaning up spills, gloves use, and what to do with contaminated supplies;
 - Respiratory Hygiene/Cough Etiquettes for cough, congestion, runny nose or increase production of respiratory secretions; and
 - Approaches to individual education to include incident reporting and follow-up.

C.10 Incident Reporting Requirements- DBHDD maintains data on COVID-19 cases involving individuals receiving services and staff. Effective Tuesday March 24, 2020, the Department is using Image, DBHDD's incident management system, for reporting. DBHDD Behavioral Health and Intellectual and Developmental Disabilities Providers have access to, have received training (available here) on, and have experience entering critical incidents directly into Image for incidents involving individuals receiving services. DBHDD has added three incident type codes to Image to assist in the tracking of coronavirus' (COVID-19) impact on the individuals we serve, and provider staff. These are in addition to the usual incident reporting requirements outlined in Policy 04-106.

Section D. Service Specific Guidance

Service	Service Specific Guidance		
D.1	The state temporarily authorizes, during the time that the Appendix K is effective, retainer payments for Community		
Community	Residential Alternative in the event the individual is hospitalized or in an alternate care setting due to health and safety		
Residential	concerns related to the COVID-19 Emergency. Retainer payments will only be authorized for the amount, frequency and		
Alternative	duration listed on the individuals ISP/prior authorization (PA) on February 29, 2020.		
(CRA)			
	Notification Guidance- The Regional Field Office (via email to the I&E manager and RSA) and SC Agency must be		
	immediately notified when an individual is moved. Please include "COVID-19 MOVE" in the email subject header.		
	Documentation Guidance- Providers are to document retainer service delivery in the "COVID-19 NOW & COMP Provider		
	Spreadsheet" – see Section G for reference.		
	Billing Guidance- For the retainer procedure code, use the procedure code authorized on the prior authorization. Retainers		
	cannot exceed 30 consecutive days. Providers should submit claims for only scheduled days and units as specified in the		
	individual's ISP. See Section C.7 for additional information regarding retainer guidance.		
D.2	The state temporarily authorizes, during the time that the Appendix K is effective, retainer payments for Community Living		
Community	Support Services that cannot be rendered due to national state of emergency. Retainer payments will only be authorized for		
Living Support	the frequency listed on the individual's ISP/PA on February 29, 2020. The state temporarily authorizes, during the time that		
Services Basic	the Appendix K is effective, providers to exceed the cap limitations for Community Living Services that can be rendered via		
and Extended	traditional provider, participant directed services, and/or a combination with live-in caregiver.		
(CLS)	Decumentation Cuidence Draviders are to decument retainer service delivery and list of family caregiver him by way of the		
	Documentation Guidance- Providers are to document retainer service delivery and list of family caregiver hire by way of the "COVID-19 NOW & COMP Provider Spreadsheet" – see Section G for reference.		
	COVID-19 NOW & COMP Provider Spreadsheet — see Section Gift reference.		
Billing Guidance: Providers should bill the existing service procedure codes on the prior authorization vertainer and/or services delivered by a family caregiver hire.			
	be aggregated together and billed as one claim line. For example, the family caregiver hire delivers 1 hour (four 15 min		
	units) of service and the provider bills for 1 hour (four 15 min units) of retainer, one claim line for 8 units of service should		
	be billed. Supporting notes should identify that both services are being delivered and how many units are being billed for		

	each. Retainers cannot exceed 30 consecutive days. Providers should submit claims for only scheduled days and units as specified in the individual's ISP. See Section C.7 for additional information regarding retainer guidance.					
D.3 Supported Employment (SE)	The state temporarily authorizes, during the time that the Appendix K is effective, retainer payments for Supported Employment Services in the event the provider is unable to render a service due to health and safety concerns for either the individual or the provider. The retainer payment will be authorized at the level, duration and amount as outlined in the ISP/PA on February 29, 2020.					
	DBHDD is granting increased flexibility and accommodation in the way supported employment are delivered. Below are a few of the measures: Remote Job Coaching while Appendix K is in effect, required in-person job coaching contacts and supports may temporarily be made remotely (i.e. phone, telehealth). These services (or face to face service if required for immediate health and safety) may be provided to individuals who continue to work during the COVID-19 emergency. This may include teleworking for any business or in person at businesses that remain open. Remote job coaching is subject to the support needs of the individual and may not be appropriate depending on the individual's protocols and health and safety concerns. Classes and training may be delivered remotely temporarily during this time. This may include offering skills training such as resume building, interview skills, self-advocacy skills, assistance to obtain required job certifications such as food handler's cards, assisting with employment goals, technology training, computer skills and other activities intended to promote gaining competitive integrated employment. Billing Guidance- For the retainer procedure code, providers should use the procedure codes as authorized on the prior authorization. Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth. Retainers cannot exceed 30 consecutive days. Providers should submit claims for only scheduled days and units as specified in the individual's ISP. See Section C.7 for additional information regarding retainer guidance.					
D.4 Prevocational Services	Prevocational services providers will be authorized for retainer payments in the event that the provider is not serving the individual under other comparable services or using differential staff such as family caregivers hires to provide service. The retainer payment will be authorized at the level, duration and amount as outlined in the ISP/PA on February 29, 2020. Prevocational Services delivered via telehealth should be billed using the Place of Service (POS) code '02' for telehealth. Video enabled telecommunications applications (e.g. SKPE, ZOOM, Microsoft teams, DUO, etc., as long as these are used in compliance with existing HIPAA requirements) are the preferred method of service delivery when providing services via telehealth. Some examples of Prevocational Services delivered via telehealth may include but are not limited to:					

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What is social distancing,How to properly wash hands,

- How to wear personal protective equipment (PPE) and when does PPE have to be worn;
- What will riding in vehicles with others consist of?;
- Why are you taking my temperature?
- Discussing fears with the group of returning to the day setting?
- Resume building utilizing virtual resume videos and one-pagers to share marketable strengths,
- Career exploration videos based on job interests, and
- Discussion on moving towards competitive integrated employment.

Billing Guidance- For the retainer procedure code, providers should use the procedure codes as authorized on the prior authorization. Retainers cannot exceed 30 consecutive days. Providers should submit claims for only scheduled days and units as specified in the individual's ISP. See Section C.7 for additional information regarding retainer guidance. Prevocational Services delivered via telehealth should be billed using the Place of Service (POS) code '02'.

D.5 Community Access (CA) The state temporarily authorizes, during the time that the Appendix K is effective, retainer payments for Community Access Services, for traditional providers only, for services that cannot be rendered due to national state of emergency. Retainer payments will only be authorized through agency delivered services using the frequency listed on the individual's ISP/PA on February 29, 2020 and cannot exceed 6 hours a day and 5 days a week. Community Access Services delivered via telehealth should be billed using the Place of Service (POS) code '02' for telehealth. Video enabled telecommunications applications (e.g. SKPE, ZOOM, Microsoft teams, DUO, etc., as long as these are used in compliance with existing HIPAA compliance requirements) are the preferred method of service delivery when providing services via telehealth. Some examples of Community Access Services delivered via telehealth may include but are not limited to:

- What is social distancing,
- How to properly wash hands,
- How to wear personal protective equipment (PPE) and when does PPE have to be worn
- What will riding in vehicles with others consist of,
- Why are you taking my temperature,
- Discussing fears with the group of returning to the day setting,
- Virtual exercise classes, and
- Any virtual group instruction/ teaching type opportunities

Note: Community Access includes both Community Access Group (CAG) and Community Access Individual (CAI) Services.

Documentation Guidance- Providers are to document retainer service delivery and a list of hired family caregivers in the "COVID-19 NOW&COMP Provider Spreadsheet" – see Section G for reference.

Billing Guidance: Providers should bill the existing service procedure codes on the prior authorization when billing for a retainer and/or services delivered by a Family Caregiver hire. If a provider bills the retainer fee on the same day that a family caregiver hire delivers the service, the units for each must be aggregated together and billed as one claim line. For example, the family caregiver hire delivers 1 hour (four 15 min units) of service and the provider bills for 1 hour (four 15 min units) of retainer, one claim line for 8 units of service should be billed. Supporting notes should identify that both services are being delivered and how many units are being billed for each. Retainers cannot exceed 30 consecutive days (traditional providers only). Providers should submit claims for only scheduled days and units as specified in the individual's ISP. See Section C.7 for additional information regarding retainer guidance Community Access Services delivered via telehealth should be billed using the Place of Service (POS) code '02'.

D.6 Support Coordination (SC)

The state temporarily authorizes, during the time that the Appendix K is effective, SC providers to render services telephonically or through other telehealth means. SC providers are also authorized for a –temporary rate increase from \$152.88 to \$175.00 per individual per month.

Documentation Guidance- Telephonic service delivery is acceptable during the time that Appendix K is effective. Telecommunications applications (e.g. SKYPE/Facetime/Duo/ZOOM) are not required, but encouraged where possible and in accordance with governing privacy regulations. Residences that have computers or similar electronic devices should use a telecommunication application at minimum for ISP meetings, but preferably all contacts when possible. Support coordinators s should send providers and families a copy of the IQOMR template (see Section G) when possible to help prepare for contacts. SC Support Notes: A comprehensive support note must be entered by the Support Coordinator for all regular required contacts with the individual, with the exception of the completion of the quarterly (IQOMR) Individual Quality Outcome Measures Review. Contacts should focus on health and safety concerns. All support notes are entered into the online case management system within three (3) business days of the contact.

Billing Guidance- Rate Increase- Providers will need to adjust claims for the rate increase once the rate has been adjusted in the billing system- Providers will be notified by DBHDD once the rate has been increased in the billing system. Providers may

	only adjust claims beginning March 1, 2020 (the effective date of Appendix K). Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth.
D.7 Intensive Support Coordination (ISC)	The state temporarily authorizes, during the time that the Appendix K is effective, Intensive SC providers to render services telephonically and through other telehealth means. Documentation Guidance- Telephonic is an acceptable mode of service delivery. Telecommunications applications (e.g. SKYPE/Facetime/Duo/ZOOM) is not required but encouraged where possible. SC staff are not to require provider staff to use personal phones for video conferencing. Residences that have computers or related electronic devices should use a telecommunication application at minimum for ISP meetings, but preferably all contacts when possible. SCs should send providers and families a copy of the IQOMR template (see Section G) when possible to help prepare for contacts. SC Support Notes: A comprehensive support note must be entered by the Support Coordinator for all required contacts to the individual during times outside completion of the quarterly (IQOMR) Individual Quality Outcome Measures Review. Contacts should consider focus areas of health and safety. All support notes are entered into the online case management system within three (3) business days after the event. Billing Guidance- Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth.
D.8 Specialized Medical Supplies (SMS)	The State temporarily authorizes, during the time that the Appendix K is effective, providers to exceed the SMS cap limitation. The NOW and COMP waiver programs authorize funds for goods and services that are not covered by the Medicaid State Plan or those instances in which an individual's need exceeds State Plan coverage limits and exceptions to the coverage limits are not available. Note this may include Personal Protective Equipment (PPE), as applicable. For individuals with SMS on their current PA, the cap has been increased. Prescriptions will not be required for the duration that Appendix K is effective, however providers must document how supplies are directly related to a waiver individual's diagnosis or disability-related condition. Providers may not bill when SMS/PPE has been donated or obtained through other means. For Individuals without SMS on their existing PA, all other sources of PPE must be exhausted prior to the request for SMS to be added to an ISP.

D.9 In Home and Out of Home Respite	The state temporarily authorizes, during the time that the Appendix K is effective, providers to exceed the cap limitations for In Home and Out of Home Respite Services that can be rendered via traditional provider, participant directed services, and/or a live-in caregiver. Documentation Guidance- Providers are to document a list of family caregivers hires in the "COVID-19 NOW & COMP Provider Spreadsheet" – see Section G for reference. Billing Guidance- Use procedure code as authorized on prior authorization.
D.10 Additional Staffing	The state temporarily authorizes, during the time that the Appendix K is effective, that Additional Staffing can be delivered on a temporary basis in alternative settings which include: extended family home, hotel, shelter, or other emergency placement, while Appendix K is effective. The location where the service is being rendered is not necessarily required to be reflected in an individual service plan. There is no retainer option for Additional Staffing. Additional staffing ratios for an individual may be modified to allow the individual to receive services in safe and accessible environments if the individual's needs are still being met. Notification Guidance- CRA providers who are not also providing Community Access/Community Access retainer services to an individual, and who can document the need for additional staff in a CRA setting to cover hours normally covered by Community Access, will need to submit a request through the "Simplified AS Request Sheet for COVID-19" – see Section G for reference. Documentation Guidance- Documentation requirements that specify additional staffing ratios and any modifications to the staffing ratio rendered must be abided by while Appendix K is effective. Billing Guidance- Use procedure code as authorized on prior authorization.
D.11 Nursing Services	The state temporarily authorizes, during the time that the Appendix K is effective, RN services to be rendered using telehealth, to the extent possible. The state temporarily authorizes, during the time that the Appendix K is effective, a temporary rate increase for LPN services from \$8.75 to \$10.00 per 15-minute unit. Documentation Guidance- RN Services must document each service delivery rendered via telehealth or other telephonic means. In addition to documentation requirements specified in Part II and III of the NOW and COMP Manuals, which

	includes but is not limited to date, time, signature/credentialing, documentation while the Appendix K is effective shall include the rationale for telehealth or telephonic date of service delivery.
	Billing Guidance- Use procedure codes as authorized. RN Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth. Rate Increase- providers will need to adjust claims for the rate increase once the rate has been adjusted in the billing system. Providers will be notified by DBHDD once the rate has been increased in the billing system. Providers may only adjust claims beginning March 1, 2020 (the effective date of Appendix K).
D.12 Behavior Support Services Level 1 and Level 2	Note: In addition to the authorization of Appendix K, the NOW waiver was recently amended to align with COMP waiver for Behavior Support Services. Behavior Support Services Level 1 and Level 2 provisions should be considered for both NOW and COMP waiver individuals. The state temporarily authorizes, during the time that the Appendix K is effective, all NOW and COMP Behavior Support Services to have telehealth option. Behavior Support Service providers may provide services via telehealth or other telephonic means.
	Notification Guidance The behavior supports service provider will contact the designated point of contact for the agency/home caregiver to schedule telehealth communication. SC will be notified of temporary changes in behavior support service delivery options during this time that Appendix K is effective. Requests for additional units for behavior support services should be made to the regional behavior analyst.
	Documentation Guidance - Behavior Support Service Providers level I and II must document each service delivery rendered via telehealth. In addition to documentation requirements specified in Part II and Part III of the NOW and COMP General Manuals, which includes but is not limited to date, time, signature/credentialing, documentation while the Appendix K is effective shall include the rationale for telehealth or telephonic date of service delivery. In lieu of face-to-face training for behavior support plans and on-site monitoring of plan implementation, oversight, feedback, and support will be provided via telehealth and/or telephonically with behavior plans, data analysis summaries, and progress notes shared electronically via secure encrypted correspondence with staff and/or families to render services.
	Billing Guidance: Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth.
D.13	The state temporarily authorizes, during the time that the Appendix K is effective, all Adult Occupational Therapy Services,
Adult	Adult Physical Therapy Services, Adult Speech and Language Therapy Services to be provided telehealth or other telephonic
Occupational	means with the following exceptions: Adult Swallowing/Feeding Therapy; Adult Swallowing/Feeding Therapy self-directed;
Therapy, Adult	Adult Swallowing/Feeding Evaluation, Adult Swallowing/Feeding Evaluation self-directed.

Physical	Documentation Guidance - Adult Therapy Providers must document each service delivery rendered via telehealth or other			
Therapy, Adult	telephonic means. In addition to documentation requirements specified in Part II and Part III of the NOW and COMP			
Speech and General Manuals, which includes but is not limited to date, time, signature/credentialing, documentation while				
Language Appendix K is effective shall include the rationale for telehealth or telephonic date of service delivery. Therapy.				
	Billing Guidance : Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth.			
D.14 Fiscal	During the Appendix K authorization, FIs will have a rate increase from \$75.00 per individual who self-directs per month to			
Intermediary \$95.00 per individual per month. Rate Increase- FIs will need to adjust claims for the rate increase once the rate has				
(FI) adjusted in the billing system. FIs will be notified by DBHDD once the rate has been increased in the billing				
	only adjust claims beginning March 1, 2020 (the effective date of Appendix K).			

Section E. Additional Guidance Specific to Participant Directed (PD) Services

E.1 PD Trainings- During the period Appendix K is effective, there will be no in-person PD trainings for new enrollees into PD Service delivery model. At this time, this training is a requirement to enroll in PD Service Delivery Model. There is no tele-health option for this training. If a Participant needs to temporarily designate a different person to serve as the personal representative during the COVID-19 Emergency, DBHDD will consider such requests, and will consider waiving training requirements for the newly-designated representative on a temporary basis.

E.2 Documentation Requirements- Documentation requirements for services rendered remain intact. Documentation of services delivered via telehealth must indicate this service delivery method DBHDD will continue to monitor service delivery and use of funding. DBHDD will continue to terminate participant directed service delivery option approval and refer suspicious spending and/or activity to the Office of the Inspector General for investigation and prosecution.

E.3 Family Caregiver hire- During the period Appendix K is effective, DBHDD will temporarily allow for the hiring of family caregivers who live in the home with the individual receiving services through the NOW or COMP waiver. As specified in the NOW and COMP Manual Part II Section 902, a Family Caregiver hire is defined as an individual's family member, related by blood or marriage, who is aged 18 years or older, who may be reimbursed for providing services when there are extenuating circumstances. "Family member" is defined as a person who is related by blood within the third degree of consanguinity by blood, adoption, or marriage. Third degree of consanguinity includes mother, father, grandmother, grandfather, great grandfather, great grandmother, sister, brother, daughter, son, granddaughter, grandson, great

granddaughter, great grandson, aunt, uncle, niece, or nephew. The Participant's representative or employer of record may not serve as a family caregiver hire. During the hiring process, Family Caregiver hires must disclose to the Fiscal Intermediary that they are a Family Caregiver hire, as well as their relationship to the Individual receiving the waiver services. The enrollment packet itself will not be modified, but FI will issue the 'Good to Go' letter using a modified list of essential documents. Billing for services will not be approved prior to receipt of the 'good to go' letter and must align with the date of hire on the enrollment forms. Enrollment forms cannot be backdated, and services rendered will not be reimbursed for dates prior to the approved hire date by the fiscal agent.

If the individual chooses to appoint a new PD Representative/employer of record, a new Memorandum of Understanding (MOU) must be completed by the newly appointed PD representative/employer of record. The MOU indicates the PD representative is willing and able to take on all the responsibilities of participant-direction and comply with all Medicaid policies. The PD Representative/employer of record position remains an unpaid position. The MOU can be obtained by emailing the DBHDD email box at Participant.Direction@dbhdd.ga.gov to request a copy. The completed MOU will be emailed to DBHDD and DBHDD Central Office PD staff will notify the associated fiscal agent that this step has been completed. The newly appointed PD representative/employer of record must also complete all enrollment paperwork with the fiscal agent and be approved prior to beginning duties. The exiting PD Representative/employer of record can only become an approved family caregiver hire upon completion and approval of the new PD Representative. In addition this family caregiver hire must also complete all enrollment paperwork and receive the 'good to go letter prior to begin service delivery and billing. Billing for the delivery of services must align with the family caregiver hire date and cannot be made retroactive.

E.4 Trainings for Family Caregiver hires – During the period Appendix K is effective, the training requirements for Family Caregivers hired to provide PD services are modified as set forth at section C.9, above.

E.5 Support Coordinator visits - Although Support Coordinators generally will not be making in-home visits while Appendix K is in effect, Participants/Representatives are required to allow in-home visits when requested by Support Coordinators, and to allow telephonic or electronic visits from Support Coordinators.

E.6 Retainer Payments – During the period Appendix K is in effect, retainer payments are available for employees/support workers providing Community Living Support, Community Residential Alternative, Prevocational, and Supported Employment services for Participants receiving PD services. These retainer payments are available as described in the latest version of DBHDD Policy "COVID-19 2020: DBHDD Community Developmental Disability Services Policy Modifications" and in these Operational Guidelines. Retainer payments are available for employees/support workers who had been serving the Participant prior to the COVID-19 Emergency (and have been retained by the Participant/Representative to resume services after the COVID-19 Emergency), as described in the policy and attachment; retainer payments are not available for family caregivers hired to provide services during the COVID-19 Emergency. See Section C.7 for more detail regarding retainer guidance.

E.7 Use of State Back-Up Plan – During the period Appendix K is in effect, the State Back-Up Plan, which ordinarily may be used for no more than 1 occasion in any two-month period, may be used in up to 2 occasions in any 2-month period.

E.8 PD and Support Coordination- SC check-ins and activities are still a requirement for PD while Appendix K is effective. SC be completed via telehealth or telephonic means during this crisis. If an individual's birthday falls while Appendix K is in effect, the support coordinator will work with the individual and representative to set up telehealth means to conduct the annual ISP meeting. ISPs, whether annual or a version change, will require physical signatures on the ISP signature page. SC will work with the representative to send the signature page via encrypted email, fax, or the US Postal Service to acquire the required signatures. It is the expectation that the individual, representative, and other involved parties all physically sign the signature page and return it to the SC. The signature page is required for an ISP to be processed.

E.9 PD Memorandum of Understanding – To the extent that the provisions of this Operational Guidance and the provisions in the latest version of DBHDD Policy "COVID-19 2020: DBHDD Community Developmental Disability Services Policy Modifications" directly and expressly conflict with the terms of the "PARTICIPANT-DIRECTION OPTION TERMS and CONDITIONS of PARTICIPATION" Memorandum of Understanding, DBHDD's enforcement of those Memorandum of Understanding provisions will be temporarily suspended during the period Appendix K is in effect.

E.10 Background checks - Background checks for any function that requires face-to-face action or availability of third party vendors will be temporarily suspended for the duration that Appendix K is effective for all waiver services in the event that the provider is unable to complete a background check. Within sixty (60) days of the termination of Appendix K, background checks will need to be completed retroactively for all employees who were hired while Appendix K was effective and according to the policy.

Section F.- Transition Plan and Re-Opening Guidance - See May 11, 2020 publication of "DBHDD I/DD Community Settings Reopening Initial Recommendations" for resources regarding strategies for day programs re-opening, available on our DBHDD website.

Section G. References:

- 1. Covid-19 Guidance Information https://dbhdd.georgia.gov/coronavirus-covid-19-information
- 2. Provider Issue Management System (PIMS) https://dbhddapps.dbhdd.ga.gov/PIMS/Default.aspx
- 3. Comprehensive Support Waiver Program and New Options Waiver Program Part II Chapters 600 1200

 <a href="https://www.mmis.georgia.gov/portal/Portals/0/StaticContent/Public/ALL/HANDBOOKS/Comprehensive%20Supports%20Waiver%20Program%20and%20New%20Options%20%20Waiver%20Program%20%20Part%20II%20Chapters%206001200%2020200107210300.pdf

- 4. Health and Human Services resource link regarding appropriate telehealth platforms for delivery of services https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html
- 5. Behavior Analysis Certification Board guidance https://www.bacb.com/bacb-covid-19-updates/

Section H. Appendices

H.1 COVID-19 NOW&COMP Provider Spreadsheet- attached to COVID-19 2020: DBHDD Community Developmental Disability Services Policy
H.2 Simplified AS Request Sheet for COVID-19- attached to COVID-19 2020: DBHDD Community Developmental Disability Services Policy
H.3 IQOMR Guidance for Support Coordination during Appendix K authorization- below:

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
1	The home/site is accessible to the individual.	Yes	[Control]
2	The individual has access to privacy for personal care.	Yes	[Control
3	The individual has a private place in the home to visit with friends or family.	Yes	[Control]
4	The individual has access to privacy for phone discussions with friends or family.	Yes	[Control]
5	The individual has access to receive and view their mail/email privately.	Yes	[Control]

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
6	The individual is able to have private communications with family and friends through other means.	Yes	[Control]
7	The home setting allows the individual the option to have a private bedroom.	Yes	[Control]
8	All assistive technologies are being utilized as planned.	Yes	[Control]
9	All assistive technologies are in good working order.	Yes	[Control]
10	The individual has adequate clothing to accommodate the individual's needs or preferences/choices.	Yes	[Control]
11	The individual has adequate food and supplies to accommodate the individual's needs or preferences/choices.	Determined by SC Could be Yes (by verbal confirmation with the waiver participant/staff/guardian) It could be N/A.	

Foc	us Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
	The Residential/Day setting is clean according to the individual's needs and preferences.	Could be Yes (by verbal confirmation with the waiver participant/staff/guardian) It could be N/A. Determined by SC	[Control]
Ш	The Residential/Day setting is safe for the individual's needs.	Could be Yes (by verbal confirmation with the waiver participant/staff/guardian) It could be N/A. Determined by SC	[Control]
14	The Residential/Day setting is appropriate for the individual's needs and preferences.	Determined by SC Could be Yes (by verbal confirmation with the waiver participant/staff/guardian) It could be N/A.	[Control]
	us Area: pearance/Health	Select:	Comments/Actions Needed: Concerns, Barriers, Successes
15	The individual appears healthy. Describe any	Since no video conferencing, N/A	[Control]

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
Г	observations regarding health since the last review.		
16	The individual appears safe. Describe any observed changes related to safety since the last review.	Since no video conferencing, N/A	[Control]
17	There have been no reported changes in health since the last review.	Yes, based on reports of change.	[Control]
18	The HRST aligns with current health and safety needs.	Yes, based on reports and HRST scores	[Control]
19	The ISP is available to staff on site. If there have been ISP addendums, they are available to staff on site.	Yes, this can be answered if there knowledge it is there – Therap, etc.	[Control]
20	Staff are knowledgeable about all information contained within the individual's ISP.	Yes	[Control]
21	Indicated healthcare plans are current and have been	Yes,	[Control]

Foc	us Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
	reviewed by a nurse within the past year.	only if available by Therap or other web-based applications/documentation, would be affirmative as well.	
	Indicated healthcare plans are available to staff on site in all applicable settings.	Yes, only if available by Therap or other web-based applications/documentation, would be affirmative as well	[Control]
23	All staff are knowledgeable about all of the individual's healthcare plans.	Yes, if we know the plans are present.	
24	Indicated healthcare plans are being implemented.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A.	[Control]
25	Skilled nursing hours are being provided, as ordered.	Therap or other web-based Yes, if Therap or other web-based applications/documentation, would	[Control]

Foc	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
		be affirmative documentation as well. Otherwise, N/A.	
26	All medical/therapeutic appointments have been scheduled and attended.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A.	[Control]
27	, , ,	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A.	[Control]
28	All physician/clinician recommendations are being followed.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A.	[Control]
29	All prescribed medications are being administered, as ordered, and documented accurately.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well.	[Control]

Foo	us Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
		Family and participant can also confirm Med administration. Otherwise, N/A.	
30	All required assessments/evaluations have been completed.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A, or Determined by SC	[Control]
31	care visits since the last review.	Yes, (by verbal confirmation with the waiver participant or guardian, if applicable, or confirmation in Therap or other web-based applications/documentation, would be confirm as well. Provider staff reports of hospital admissions, emergency room, or urgent care visits is affirmative	[Control]
32	If applicable, hospital/ED/urgent care discharge plan instructions have been followed.	documentation. Yes, (by verbal confirmation with the waiver participant or guardian, if applicable, or confirmation in Therap or other web-based applications/documentation, would be confirmation as well. Provider	[Control]

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
		staff reports of hospital admissions, emergency room, or urgent care visits is affirmative documentation.	
	cus Area: Supports and vices	Select:	Comments/Actions Needed: Concerns, Barriers, Successes
33	The individual's paid staff appear to treat them with respect and dignity.	N/A, unable to assess due to the need for visual confirmation	[Control]
34	The individual's natural supports appear to treat them with respect and dignity.	N/A, unable to assess due to the need for visual confirmation	[Control]
35	Supports and services are being delivered to the individual, as identified in the current ISP.	Yes, for some – some services or supports will be unable to assess due to the need for visual confirmation, Use of Therap or other web-based applications/documentation, would be affirmative confirmation as well.	[Control]
36	The individual is being supported to make progress in achieving their goals (both ISP goals and informally expressed goals). Indicate the status of the	Yes, for most – some goals will be unable to assess due to the need for visual confirmation, Use of Therap or other web-based applications/documentation, could be affirmative documentation as well	[Control]

Focus Area: Environment		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
	individual's progress toward achieving established goals.		
37	There are no needs for additional services/supports at this time.	Yes, in general if there is access to the waiver participant, family, guardian, staff, and access to Therap or other web-based applications/documentation, could be affirmative confirmation as well. There well could be times when there is not clarity to respond without a face to face evaluation.	[Control]
	cus Area: Behavioral &	Select:	Comments/Actions Needed:
Em	otional		Concerns, Barriers, Successes
38	Since the last visit, there are no emerging or continuing behavioral/emotional responses for the individual.	Yes, in general if there is access to the family, guardian, staff, and to Therap or other web-based applications/documentation, could be affirmative confirmation as well. There could be times when there is not clarity to respond without a face to face evaluation.	[Control]

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes	
39	are adequate to prevent engaging external interventions.	Yes, in general if there is access to the family, guardian, staff, or access to Therap or other web-based applications/documentation, could be affirmative confirmation as well. There could be times when there is not clarity to respond without a face to face evaluation.	[Control]	
40	The individual has no active Behavioral Support Plan, Crisis Plan, and/or Safety Plan relating to behavioral interventions.	Yes	[Control]	
41	staff review.	Yes, in general if there is access to the family, guardian, or access to Therap or other web-based applications/documentation, could be affirmative	[Control]	
42	Behavioral Support Plan, Crisis Plan, and/or Safety	Yes, in general if there is access to the family, guardian, or access to Therap or other web-based applications/documentation, could be affirmative	[Control]	

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
	plan(s) and able to describe how they are implementing the plan.		
43	access GCAL or the Mobile Crisis Response Team in response to a behavioral emergency If GCAL/MCT has been accessed, describe reason, frequency, duration of any admissions, and if discharge recommendations have been followed. If applicable, the BSP/ Safety Plan/ Crisis Plan has been adapted to reflect any new recommendations or	Yes, (by verbal confirmation with the waiver participant, staff, family, or guardian, if applicable, or confirmation in Therap or other webbased applications/documentation, would be affirmative documentation. Frequency could be addresses by staff, family, or guardian. And Yes, if applicable, the BSP/Safety Plan/ Crisis Plan has been adapted to reflect any new recommendations or interventions needed also.	[Control]
		There could be times when there is not clarity to a comprehensive response without a face to face evaluation.	

Fo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
44	Since the last visit, the individual has had no contact with law enforcement. If they have, describe reason and length of involvement. If applicable, the BSP/ Safety Plan/ Crisis Plan has been adapted to reflect any new recommendations or interventions needed.	Yes, by verbal confirmation with the waiver participant, staff, family, or guardian, if applicable, or confirmation in Therap or other webbased applications/documentation, would be affirmative documentation. Also, staff, family, or guardian, if applicable can note if the BSP/Safety Plan/Crisis Plan has been adapted to reflect any new recommendations or interventions needed. There could be times when there is not clarity to respond without a face to face evaluation.	[Control]
	cus Area: Home/ mmunity Opportunities	Select:	Comments/Actions Needed: Concerns, Barriers, Successes
45	The individual has unpaid community connections. If not, describe steps being taken to further develop community connections.	Yes,	[Control]

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes		
46	The individual is receiving services in a setting where he/she has the opportunity to interact with people who do not have disabilities (other than paid staff).	Yes There could be times when there is not clarity to respond without a face to face evaluation.	[Control]		
47	The individual is being offered/provided documented opportunities to participate in activities of choice with non-paid community members.	Yes, There could be times when there is not clarity to respond without a face to face evaluation.	[Control]		
48	The individual has the opportunity to participate in activities he/she enjoys in their home and community. Describe steps being taken to increase opportunities to meet this objective and allow choices to be offered while in services.	Yes, There could be times when there is not clarity to respond without a face to face evaluation.	[Control]		
49	If desired, the individual is actively supported to seek and/or maintain	Yes,	[Control]		

Focus Area: Environment		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes	
	employment in competitive and integrated settings and/or offered customized opportunities. If applicable, note how he/she is supported to do so. If no, indicate how the issue is being addressed.	There could be times when there is not clarity to respond without a face to face evaluation.		
50	The individual has the necessary access to transportation for employment and community activities of his/her choice.	Yes, There could be times when there is not clarity to respond without a face to face evaluation.	[Control]	
Focus Area: Financial		Select:	Comments/Actions Needed: Concerns, Barriers, Successes	
51	There are no barriers in place that limit the individual's access to spend his/her money, as desired.	Yes, (by verbal confirmation with the waiver participant, staff, family, or guardian, if applicable, or confirmation in Therap or other webbased applications/documentation, would be affirmative documentation. Otherwise, N/A.		

Foo	us Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes		
Foo	cus Area: Satisfaction	Select:	Comments/Actions Needed: Concerns, Barriers, Successes		
52	Overall, the individual is satisfied with their life activities since the last review.	Yes, SC may need a face to face to confirm	[Control]		
53	Overall, the individual is satisfied with their service providers since the last review.	Yes, SC may need a face to face to confirm	[Control]		
54	Overall, the individual is satisfied with the type of services received since the last review.	Yes, SC may need a face to face to confirm	[Control]		
55	Overall, the individual is satisfied with their family relationships/natural supports since the last review.	Yes, SC may need a face to face to confirm.	[Control]		

Reference IQOMR chart above: Yes – Can be answered. N/A – Not available without visual Confirmation. Due to the critical nature of the work related to COVID-19, if questions within the IQOMR are not tied to health and safety directly or, are not easily responded to by the individual,





VERSION 10

COVID-19 2020: DBHDD Community Developmental Disability Services Policy Modifications

EFFECTIVE 6/25/2020



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Georgia Department of Behavioral Health & Developmental Disabilities

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COVID-19 2020: DBHDD Community Developmental Disability Services Policy Modifications - 6/25/2020

EFFECTIVE IMMEDIATELY

APPLICABILITY

DBHDD Providers of Community **Developmental Disability** Services

POLICY

In response to the continued transmission of COVID-19, where necessary new measures are in effect to minimize community spread of the virus, and to assist in the continued delivery of community developmental disability services.

Modifications as described in this policy refers to the restriction, enhancement, relaxation, and partial or full suspension of existing policies in PolicyStat, <u>Provider Manual for Community</u> <u>Developmental Disability Providers</u>, or <u>Provider Manual for Community Developmental Disability Providers of State-Funded Developmental Disability Services</u> as applicable to the service. This policy includes full details of the alternate requirement(s) or procedures.

The following temporary modifications to the policies listed below are pertinent to community developmental disability services, effective immediately. Please refer to the full policy via the hyperlink, noting the alternate requirements applicable until further notice.

This policy will be updated as necessary. This policy remains in effect until the Governor of the State of Georgia lifts the Emergency Declaration.

1. The "Appendix K: Operational Guidelines for the NOW and COMP Waiver Programs Response to COVID-19 Pandemic" permits temporary modifications for the services detailed in Appendix K, Appendix K Attachment 1, and Appendix K Attachment 2 (attached below). The purpose of this guidance document is to provide additional information to providers of traditional waiver services and families who opt to participant direct services. The guidance within this document is temporary until otherwise notified by DBHDD and DCH. This guidance supersedes only conflicting guidance in the NOW and

- <u>COMP Waivers for Community Developmental Disability Services, 02-1202, Provider Manual for Community Developmental Disability Providers, and DBHDD PolicyStat policies.</u>
- 2. **Temporary suspension** of the site inspection requirement for developmental disability provider enrollment, per Recruitment and Application to Become a Provider of Developmental Disability Services, 02-701 is permitted as follows:
 - a. Site inspections for Community Residential Alternative Host Home sites are suspended. Host Home applications will remain in pending status until site inspections resume.
- 3. A *partial suspension* of the fingerprinting requirement described in <u>Criminal History Record Check for DBHDD Network Provider Applicants</u>, 04-104 as follows **only if fingerprinting services are not available in your area**:
 - a. DBHDD's Provider Network must have each person subject to Policy 04-104 complete the "Network Provider Applicant Attestation," **Attachment A** to this policy, instead of completing the fingerprint based background check stipulated in Policy 04-104.
 - b. Within sixty (60) days of cessation of the Public Health Emergency, all persons who signed the Network Provider Applicant Attestation instead of completing the fingerprint based background check must complete a fingerprint based background check as required by Policy 04-104. The provider is responsible for sending any person who signed the Network Provider Applicant Attestation for a fingerprint based background check.
 - c. The provider is also responsible for sending to DBHDD's Criminal History Background Check (CHBC) section each signed Network Provider Applicant Attestation, while retaining a copy in the applicant's personnel file. The provider must send the signed and dated Attestation to CHBC, and acknowledge receipt of an email from CHBC confirming acceptance of the Attestation, before the applicant begins working. The Individual Assessment process set forth in section D of Policy 04-104 does not apply to persons who sign the Network Provider Applicant Attestation.
 - d. The Attestation cannot be used by Network Provider Applicants who were fingerprinted for a fingerprint based background check within sixty (60) days prior to the declaration of the Public Health Emergency.
- 4. A *partial suspension* of the fingerprinting requirement described in <u>Criminal History Record Check for Individual Provider Applicants</u>, 04-111 is permitted as follows **only if fingerprinting services are not available in your area**:
 - a. All applicants who are subject to Policy 04-111 must complete the "Individual Provider Attestation," **Attachment B** to this policy, instead of completing the fingerprint based background check documented in Policy 04-111.
 - b. Within sixty (60) days of cessation of the Public Health Emergency, all applicants who signed the Individual Provider Attestation instead of completing the fingerprint based background check must complete a fingerprint based background check as required by Policy 04-111.
 - c. DBHDD Provider Enrollment is responsible for sending to DBHDD's Criminal History Background Check (CHBC) section all signed Individual Provider Attestations and for acknowledging receipt of an email from CHBC confirming acceptance of the Attestation, before the Individual Provider Applicant can be considered eligible. The Individual

- Assessment process set forth in Part D of Policy 04-111 does not apply to applicants who sign the Individual Provider Attestation.
- d. The Attestation cannot be used by Individual Provider Applicants who were fingerprinted for a fingerprint based background check within sixty (60) days prior to the declaration of the Public Health Emergency.

DBHDD sincerely appreciates your compliance with these measures throughout this Public Health Emergency.

Attachments

A - COVID-19 2020 - Attestation of Absence of Barrier Crimes Data & Cover Letter 4/23/2020.docx Appendix K Attachment 1 - NOW and COMP Provider Spreadsheet 4/22/2020

Appendix K Attachment 2 - Simplified AS Request Sheet 4/20/2020

Appendix K Operational Guidelines for the NOW and COMP Waiver Programs Response to COVID-19 Pandemic, 6/25/2020 Version 3.1

B - COVID-19 2020 - Attestation of Absence of Barrier Crimes Data & Cover Letter 4/23/2020.docx

Approval Signatures

Approver	Date
Anné Akili, Psy.D.: Director, Policy Management	6/25/2020
Ron Wakefield: Director, Division of Developmental Disabilities	6/25/2020
Anné Akili, Psy.D.: Director, Policy Management	6/25/2020

DBHDD Division of Developmental Disabilities

Appendix K: Operational Guidelines for the NOW and COMP Waiver Programs

Response to COVID-19 Pandemic



Version 3.1

Released: 06.25.2020

Section A. Overview & Purpose

Overview: The Georgia Department of Behavioral Health and Developmental Disabilities (DBHDD) and the Georgia Department of Community Health (DCH) submitted an Appendix K to the Centers for Medicare and Medicaid Services (CMS) in order to request necessary flexibilities to service delivery during the COVID-19 public health emergency. The changes outlined in Appendix K for the NOW and COMP waivers are **temporary** policy allowances, **temporary** rate increases for target services, and **temporary** retainer payments for specific services, effective March 1, 2020. Georgia intends to withdraw the Appendix K when systems, services, and the ability to travel freely are less restricted. At the conclusion of the state of emergency, pre-emergency service plans will be reimplemented unless the individual has experienced a change in condition or circumstance that requires reassessment and development of a new service plan.

Purpose: The purpose of this guidance document is to provide additional information to providers of traditional waiver services and families who opt to participant direct services. The guidance within this document is temporary until otherwise notified by DBHDD and DCH. This guidance supersedes only conflicting guidance in the NOW and COMP manuals, DD Community Standards Manual, and DBHDD Policy Stat Policies.

Section B: Appendix K Chart At a Glance - "X" indicates provisions for the waiver service

Waiver Service	Telehealth	Provider Retainer	Family	Exceed	Provided in	Increase
	Options	Options	Caregiver	Service	Alternative	Rate
			Hire Options	Limitations	Settings	
		X	X	X	X- including out	
Community Living support					of state and	
(Basic and Extended)					acute care	
					settings	
Respite (in home and out of			X	X	X – including	
home)					out of state	
Community Access	Х	X -only applicable for	Х	Х	Х	
		DBHDD traditionally				
		enrolled Providers				
Specialized Medical Supplies				Х		
Additional Staffing					X	

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Nursing Services	X- RN only					X- LPN
						only
Support Coordination	X					Х
Intensive Support	X					
Coordination						
Fiscal Intermediary						Х
Community Residential		Χ				
Alternative						
Behavioral Supports Services	Х					
Prevocational Services	Х	Χ				
Adult Occupational Therapy	X					
Adult Physical Therapy	X					
Adult Speech and Language	X – exceptions					
Therapy	noted below					
Supported Employment	X- limited scope	Χ	·			

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C. General Provider Guidance

- C.1 Background checks for any function that requires face-to-face action or availability of third-party vendors will be temporarily suspended for the duration that Appendix K is effective for all waiver services in the event the provider is unable to complete a background check. Within sixty (60) days of the termination of Appendix K, background checks will need to be completed retroactively for all employees who were hired while Appendix K was effective and according to policy.
- C.2 Required staffing ratios for an individual as outlined in the individual's Individual Service plan, may be modified to allow the individual to receive services in safe and accessible environments if the individual's needs are still being met. Documentation must include staffing ratios, justify the decrease in ratio and verify how the individual's health and safety needs are being met.
- C.3 State certification survey staff will postpone on-site provider certification and other reviews for provider agencies and individual providers rendering NOW and COMP services unless there is cause to believe there may be an immediate jeopardy and/or health and safety concern.
- C.4 The annual DMA-7 assessment requirements will be suspended for all individuals while Appendix K is effective unless required otherwise by another governmental agency. There are no requirement modifications to the DMA -6. The Regional Field Office and/or Support

Coordination (SC) agency will document, in the individualized service plan (ISP), the contact with the individual, legal guardian if applicable, and team to discuss the extension, as well as the projected date that the DMA-7 will be completed, which can be no later than the individual's subsequent birthday.

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C.5 Telehealth Guidance: The state temporarily authorizes, during the time that the Appendix K is effective, Adult Occupational Therapy Services, Adult Physical Therapy Services, most Adult Speech and Language Therapy Services, Behavior Support Services, Support Coordination, Supported Employment (limited scope), Community Access Services, Prevocational Services, and registered nurse (RN) oversight to be provided using telehealth or other telephonic means. All licensed providers must abide by training requirements established by their governing professional licensing boards. For provision of Behavior Support services, there are currently no CEU requirements for telehealth training by The Behavior Analysis Certification Board (BACB), or other non-board-certified behavior support service providers that render this service. The Behavior Analysis Certification Board has issued guidance that has been included in the Reference Section of this document. Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth.

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C.6 Family Caregiver Option: Several services, as indicated in Section B above, list an option for Family Caregivers to temporarily render specific services. Family Caregiver hire option is applicable to both traditionally enrolled provider families as well as families who opt to participant direct their services. A family caregiver hire shall only render services in lieu of a regular staff member (as defined in section C.7 below) and not in conjunction with a regular staff member. As specified in the NOW and COMP Manual Part II Section 902, a Family Caregiver hire is defined as an individual's family member, by blood or marriage, who is aged 18 years or older, who may be reimbursed for providing services when there are extenuating circumstances (family is defined as a person who is related by blood within the third degree of consanguinity by blood, adoption, or marriage. Third degree of consanguinity include mother, father, grandmother, grandfather, great grandfather, great grandmother, sister, brother, daughter, son, granddaughter, grandson, great granddaughter, great grandson, aunt, uncle, niece, or nephew. The provider network may hire family caregivers to provide Community Living Supports, Community Access and/or Respite Services in lieu of existing provider staff if the provider is unable to render the service due to health and safety concerns for either the provider staff or the individual. In the event a provider hires a family caregiver to render the service when provider staff is unable to provide a service, providers may bill both the retainer and for actual service delivery. The family caregiver hire start day may begin after there is documented evidence that the regular provider staff are no longer rendering services and no sooner than the effective date of the Appendix K. MMIS billing system does not permit the same procedure code to be billed at the same time of the day. While the Appendix K is effective, providers are temporarily permitted to bill a retainer and the family caregiver hire on the same day, however the time that service and retainer are billed for may not overlap and may not exceed the approved service units on the individual's Prior Authorization. Training requirements specific to family caregiver hire can be found in section C.9 of this document.

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C.7 Retainer Specifications-Retainer payments are authorized in the event that the provider is not serving the individual under other comparable services with regular staff members of the provider. The retainer payment will be authorized at the level, duration and amount as outlined in the prior authorization in place as of February 29, 2020. Initial retainers cannot exceed 30 consecutive days. After the initial 30 day retainer is billed, the provider may bill for additional periods of retainer, with each additional period not exceeding seven (7) consecutive calendar days, in accordance with the following:

- 1. After the expiration of the initial 30-day retainer period, the regular staff member for whom the retainer was billed must deliver the service to the individual for a minimum of one encounter before the provider can bill any further retainer for that regular staff member.
- 2. An "encounter," for these purposes, is defined as a minimum of two (2) hours of the service, delivered and billed, with a scheduled agenda and a curriculum that addresses the individual's person-centered goals, in accordance with the individual's ISP. The encounter can take place over multiple sessions, if such service delivery is consistent with the individual's ISP and Individual 360; however, such multiple sessions must take place in a single calendar day.
- 3. Once the regular staff member has delivered at least one encounter of service to the individual, the provider may bill for additional days of retainer for that regular staff member, during a retainer period of up to 7 consecutive calendar days beginning on the calendar day after the encounter is completed. Billing for such additional days of retainer must be done in accordance with the same rules applicable to retainer payments generally. During the 7-day additional retainer period, the provider may bill for retainers only on those days when the regular staff member would normally have been delivering the service to the individual under the individual's ISP (but did not in fact deliver the service to the individual on those days).
- 4. If the regular staff member delivers a second or subsequent encounter of service to the individual, the provider may again bill for additional days of retainer for that regular staff member, during another retainer period of up to seven (7) consecutive calendar days, consistent with item (3) immediately above.

EXAMPLE 1: Under Individual's ISP, Provider would normally provide Service to Individual on Monday, Wednesday, and Friday of each week. Provider has already billed 30 days of the initial retainer payments for the regular staff member who delivers the Service to Individual. Due to COVID-19 concerns, Provider is now limiting delivery of the Service to Mondays only. That regular staff member delivers two hours of the Service to Individual on Monday, June 29 (consistent with Individual's ISP). Provider may bill a retainer payment for that regular staff member during a period of up to 7 calendar days beginning on June 30, billing only for the days on which the Service would have been normally delivered during that 7-day period. Thus, the Provider may bill a retainer payment for that regular staff member on Wednesday, July 1, and on Friday, July 3. The regular staff member delivers two more

hours of the Service to Individual the following Monday, July 6. Provider now has another period of 7 calendar days, beginning on Tuesday, July 7, during which Provider may bill retainer payments for the regular staff member—i.e. Provider may bill those retainers on Wednesday, July 8, and on Friday, July 10. The regular staff member continues to have service encounters with Individual every Monday, so Provider may continue billing retainers in this way for as long as the current version of Appendix K remains in effect.

EXAMPLE 2: Under Individual's ISP, Provider would normally provide Service to Individual on Monday, Tuesday, Wednesday, Thursday, and Friday of each week. Provider has already billed 30 days of the initial retainer payment for the regular staff member who delivers the Service to Individual. That regular staff member delivers two hours of the Service to Individual on Monday, June 29 (consistent with Individual's ISP). However, due to COVID-19 concerns, Provider is then unable to deliver the service to the individual until Monday, July 13. Provider may bill a retainer payment for that regular staff member during a period of up to 7 calendar days beginning on June 30, billing only for the days on which the Service would have been normally delivered during that 7-day period—i.e. for Tuesday (June 30), Wednesday (July 1), Thursday (July 2), Friday (July 3), and the following Monday (July 6). Because the 7-day additional retainer period expires after July 6, Provider may not bill a retainer for the following Tuesday (July 7), Wednesday (July 8), Thursday (July 9), and Friday (July 10), because there has been no new service encounter by the regular staff member to support renewal of the retainer. However, when the regular staff member delivers at least two hours of the Service to Individual on the next following Monday (July 13), Provider may again bill a retainer payment for that regular staff member during a period of up to 7 calendar days beginning on Tuesday, July 14 (if the regular staff member does not deliver services on July 14).

5. Encounters for service delivery may be made via telehealth if appropriate and if consistent with the individual's person-centered goals.

Providers should submit claims for only scheduled days and units as authorized in the individual's ISP. The retainer option should only be billed when the provider is retaining (maintaining the staff's employment for) all employees (including administrative and support staff) required to resume that particular service for the individual(s) whose retainer is being billed. Service retainers may not be billed for staff whose employment the provider/employer is not maintaining.

As used in this guidance, the term "regular staff member" means a staff member who meets <u>all</u> of the following criteria:

- (i) the staff member would normally be rendering services to an individual served by the provider agency; and
- (ii) due to the COVID-19 Emergency, the staff member either
 - (a) is temporarily not rendering services to the individual due to the COVID-19 Emergency, or

- (b) is temporarily rendering to the individual a different type of service than the service the staff member usually renders, at another service setting <u>operated by the same provider agency</u>¹, and the provider agency is not otherwise being reimbursed (e.g. through Additional Staffing rates) for the different service temporarily rendered by that staff member; and
- (iii) the staff member continues to be employed by the provider and is expected to resume rendering services to the individual after the expiration of the COVID-19 Emergency.

For each individual who is temporarily not being served by the provider's regular staff members, the provider must document in the individual's record certain information in order for the provider to be eligible for retainer payments for the regular staff who would normally serve that individual. For each regular staff member who is temporarily not serving the individual, the provider must document in the individual's record:

- 1. Name of the regular staff member;
- 2. Date on which the staff member's temporary absence from rendering services to the individual (at the site where the staff member would normally render services) began;
- 3. Reason for the staff member's temporary absence from rendering services at the service site (note: valid reasons may include, but are not limited to, that provider agency's services to the individual have temporarily ceased due to the COVID-19 Emergency, or (if applicable) that provider agency has temporarily hired family caregiver(s) to serve the individual in lieu of regular staff);
- 4. If applicable, the date on which the staff member resumed rendering services to the individual;
- 5. The specific dates on which, prior to the staff member's absence, the staff member was scheduled to render services to the individual any of the services for which retainer payments were requested and authorized; and
- 6. For each of the dates identified in (5) above, the number and type of authorized service units the staff member would have been delivering to the individual, in accordance with the ISP in effect for the individual on February 29, 2020.

¹ For example, an individual who would normally spend daytime hours at a Community Access (CA) site operated by a provider might, due to the COVID-19 Emergency, now be spending daytime hours at a Community Residential Alternative (CRA) site operated by the same provider. The provider might utilize staff from the CA site as staff at the CRA site during those hours. Retainer payments could be authorized for those staff, in accordance with this guidance. The primary intention of such authorization is to allow the individual to continue being served by the same staff members who would normally be rendering services to the individual.

C.8 Documentation Requirements- All providers must continue to adhere to documentation requirements set forth in Part II and Part III Policies and Procedures for the COMP and NOW Waiver General Manual. Providers must document for each encounter when providers have hired a family caregiver hire to render a service. Providers must document at each encounter when services are rendered via telehealth or other telephonic means using 02 P.O.S. (Place of Service). Providers must document each service delivery when billing a retainer. Representatives for Participant-direction model must adhere to all applicable documentation requirements. The specificity of such services, including amount, duration, and scope, will be added to the ISP as soon as possible, but no later than 30 business days after service initiation, ISPs should be written to reflect the date that service delivery began. The ISP must be signed by the individual or legal guardian. Supporting notes should identify each procedure code separately and how many units are being billed for each. Documentation to support clinically assessed need must be indicated in the Supporting notes. Documentation of services delivered via telehealth must indicate this service delivery method.

IDD-C Version Change Provisions- the below table represents actions that require and do not require a version change to be submitted through IDD-Connects. Providers are to request services not related to Appendix K through existing DBHDD policies 02-443 and 02-444

Actions Requiring Version Change	Actions NOT Requiring Version Change
Add of any type of service	Rate Increase for licensed practical nurse (LPN), Fiscal Intermediary,
	Support Coordination- temporary increase will be automated in
	IDD-Connects
Change in Provider Agency	Change in location of service delivery
Increase in units beyond the standardized increase in authorization	Telehealth – Providers are to continue to bill the same procedural
for all services that include family caregiver hire and retainer	code for telehealth and use the 02 P.O.S. (place of service)
allowances within Appendix K (Community Access traditional,	
Community Living Supports, Respite Services)	
	Goal(s) - Modification of Person-Centered Goal(s) do not require a
	version change and can be documented in support notes
	Retainer payments billing (when staff are not delivering service but
	are being retained to resume service delivery after Appendix K is no
	longer effective)

C.9 Training Requirements- In lieu of face-to-face training, DBHDD suspends required face-to-face training for newly hired staff during the time that the Appendix K is effective. Family members serving as reimbursed Family Caregivers hires who have experience delivering required care will be supported, as needed, by provider agency supervisory staff telephonically or electronically and have modified training requirements as specified below. Newly hired regular staff with a minimum of 1-year experience with individuals with I/DD will be supervised telephonically or electronically and those with no previous experience will be provided electronic video training by agency supervisory staff. Every effort should be made to complete training requirements when possible. Training requirements for any function that requires face-to-face action or availability of third-party vendors will be temporarily suspended for the duration that Appendix K is effective for all waiver services in the event the provider is unable to complete a training. Providers must continue to document all annual training completed with staff, contractors or consultants and document when a training cannot be completed with specific rationale. After Appendix K is no longer effective, trainings will be required to be completed within a timeframe which will be communicated to providers in subsequent communication from DBHDD.

The state modifies required trainings for new Family Caregiver hires. All trainings below are required to be provided by the provider agency to the family caregiver hire within ten (10) days via telephonically or electronically:

- 1. The purpose, scope of services, supports, care and treatment offered including related policies and procedures;
- 2. HIPAA and Confidentiality of individual information, both written and spoken;
- 3. Rights and Responsibilities of individuals;
- 4. Requirements for recognizing and mandatory reporting suspected abuse, neglect or exploitation of any individual;
- 5. Medical, physical, behavioral and social needs and characteristics of the individuals served; and
- 6. Techniques of Standard Universal Precautions to include:
 - Preventative measures to minimize risk of infectious disease transmission;
 - Use of Personal Protection Equipment (PPE); Sharps Safety (with sharp containers disposed of according to state and local regulated medical waste rules);
 - Environmental Controls for cleaning and disinfecting work surfaces;
 - Skills Guides for handwashing, cleaning up spills, gloves use, and what to do with contaminated supplies;
 - Respiratory Hygiene/Cough Etiquettes for cough, congestion, runny nose or increase production of respiratory secretions; and
 - Approaches to individual education to include incident reporting and follow-up.

C.10 Incident Reporting Requirements- DBHDD maintains data on COVID-19 cases involving individuals receiving services and staff. Effective Tuesday March 24, 2020, the Department is using Image, DBHDD's incident management system, for reporting. DBHDD Behavioral Health and Intellectual and Developmental Disabilities Providers have access to, have received training (available here) on, and have experience entering critical incidents directly into Image for incidents involving individuals receiving services. DBHDD has added three incident type codes to Image to assist in the tracking of coronavirus' (COVID-19) impact on the individuals we serve, and provider staff. These are in addition to the usual incident reporting requirements outlined in Policy 04-106.

Section D. Service Specific Guidance

Service	Service Specific Guidance			
D.1	The state temporarily authorizes, during the time that the Appendix K is effective, retainer payments for Community			
Community	Residential Alternative in the event the individual is hospitalized or in an alternate care setting due to health and safety			
Residential	concerns related to the COVID-19 Emergency. Retainer payments will only be authorized for the amount, frequency and			
Alternative (CRA)	duration listed on the individuals ISP/prior authorization (PA) on February 29, 2020.			
(CIA)	Notification Guidance- The Regional Field Office (via email to the I&E manager and RSA) and SC Agency must be immediately notified when an individual is moved. Please include "COVID-19 MOVE" in the email subject header.			
	Infinediately notified when an individual is moved. Flease include COVID-13 WOVE in the email subject fleader.			
	Documentation Guidance- Providers are to document retainer service delivery in the "COVID-19 NOW & COMP Provider			
	Spreadsheet" – see Section G for reference.			
	Billing Guidance - For the retainer procedure code, use the procedure code authorized on the prior authorization. Retainers			
	cannot exceed 30 consecutive days. Providers should submit claims for only scheduled days and units as specified in the individual's ISP. See Section C.7 for additional information regarding retainer guidance.			
D.2	The state temporarily authorizes, during the time that the Appendix K is effective, retainer payments for Community Living			
Community	Support Services that cannot be rendered due to national state of emergency. Retainer payments will only be authorized for			
Living Support	the frequency listed on the individual's ISP/PA on February 29, 2020. The state temporarily authorizes, during the time that			
Services Basic	the Appendix K is effective, providers to exceed the cap limitations for Community Living Services that can be rendered via			
	traditional provider, participant directed services, and/or a combination with live-in caregiver.			

and Extended (CLS)

Documentation Guidance- Providers are to document retainer service delivery and list of family caregiver hire by way of the "COVID-19 NOW & COMP Provider Spreadsheet" – see Section G for reference.

Billing Guidance: Providers should bill the existing service procedure codes on the prior authorization when billing for a retainer and/or services delivered by a family caregiver hire.

If a provider bills the retainer fee on the same day that a family caregiver hire renders the service, the units for each must be aggregated together and billed as one claim line. For example, the family caregiver hire delivers 1 hour (four 15 min units) of service and the provider bills for 1 hour (four 15 min units) of retainer, one claim line for 8 units of service should be billed. Supporting notes should identify that both services are being delivered and how many units are being billed for each. Retainers cannot exceed 30 consecutive days. Providers should submit claims for only scheduled days and units as specified in the individual's ISP. See Section C.7 for additional information regarding retainer guidance.

D.3 Supported Employment (SE)

The state temporarily authorizes, during the time that the Appendix K is effective, retainer payments for Supported Employment Services in the event the provider is unable to render a service due to health and safety concerns for either the individual or the provider. The retainer payment will be authorized at the level, duration and amount as outlined in the ISP/PA on February 29, 2020.

DBHDD is granting increased flexibility and accommodation in the way supported employment are delivered. Below are a few of the measures:

Remote Job Coaching while Appendix K is in effect, required in-person job coaching contacts and supports may temporarily be made remotely (i.e. phone, telehealth). These services (or face to face service if required for immediate health and safety) may be provided to individuals who continue to work during the COVID-19 emergency. This may include teleworking for any business or in person at businesses that remain open. Remote job coaching is subject to the support needs of the individual and may not be appropriate depending on the individual's protocols and health and safety concerns. Classes and training may be delivered remotely temporarily during this time. This may include offering skills training such as resume building, interview skills, self-advocacy skills, assistance to obtain required job certifications such as food handler's cards, assisting with employment goals, technology training, computer skills and other activities intended to promote gaining competitive integrated employment.

Billing Guidance- For the retainer procedure code, providers should use the procedure codes as authorized on the prior authorization. Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth. Retainers cannot exceed 30 consecutive days. Providers should submit claims for only scheduled days and units as specified in the individual's ISP. See Section C.7 for additional information regarding retainer guidance.

D.4
Prevocational
Services

Prevocational services providers will be authorized for retainer payments in the event that the provider is not serving the individual under other comparable services or using differential staff such as family caregivers hires to provide service. The retainer payment will be authorized at the level, duration and amount as outlined in the ISP/PA on February 29, 2020. Prevocational Services delivered via telehealth should be billed using the Place of Service (POS) code '02' for telehealth. Video enabled telecommunications applications (e.g. SKPE, ZOOM, Microsoft teams, DUO, etc., as long as these are used in compliance with existing HIPAA requirements) are the preferred method of service delivery when providing services via telehealth. Some examples of Prevocational Services delivered via telehealth may include but are not limited to:

- What is social distancing,
- How to properly wash hands,
- How to wear personal protective equipment (PPE) and when does PPE have to be worn;
- What will riding in vehicles with others consist of?;
- Why are you taking my temperature?
- Discussing fears with the group of returning to the day setting?
- Resume building utilizing virtual resume videos and one-pagers to share marketable strengths,
- Career exploration videos based on job interests, and
- Discussion on moving towards competitive integrated employment.

Community Access Services delivered via telehealth may include but are not limited to:

Billing Guidance- For the retainer procedure code, providers should use the procedure codes as authorized on the prior authorization. Retainers cannot exceed 30 consecutive days. Providers should submit claims for only scheduled days and units as specified in the individual's ISP. See Section C.7 for additional information regarding retainer guidance. Prevocational Services delivered via telehealth should be billed using the Place of Service (POS) code '02'.

D.5 Community Access (CA)

Services, for traditional providers only, for services that cannot be rendered due to national state of emergency. Retainer payments will only be authorized through agency delivered services using the frequency listed on the individual's ISP/PA on February 29, 2020 and cannot exceed 6 hours a day and 5 days a week. Community Access Services delivered via telehealth should be billed using the Place of Service (POS) code '02' for telehealth. Video enabled telecommunications applications (e.g. SKPE, ZOOM, Microsoft teams, DUO, etc., as long as these are used in compliance with existing HIPAA compliance requirements) are the preferred method of service delivery when providing services via telehealth. Some examples of

The state temporarily authorizes, during the time that the Appendix K is effective, retainer payments for Community Access

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- What is social distancing,
- How to properly wash hands,
- How to wear personal protective equipment (PPE) and when does PPE have to be worn
- What will riding in vehicles with others consist of,
- Why are you taking my temperature,
- Discussing fears with the group of returning to the day setting,
- Virtual exercise classes, and
- Any virtual group instruction/ teaching type opportunities

Note: Community Access includes both Community Access Group (CAG) and Community Access Individual (CAI) Services.

Documentation Guidance- Providers are to document retainer service delivery and a list of hired family caregivers in the "COVID-19 NOW&COMP Provider Spreadsheet" – see Section G for reference.

Billing Guidance: Providers should bill the existing service procedure codes on the prior authorization when billing for a retainer and/or services delivered by a Family Caregiver hire. If a provider bills the retainer fee on the same day that a family caregiver hire delivers the service, the units for each must be aggregated together and billed as one claim line. For example, the family caregiver hire delivers 1 hour (four 15 min units) of service and the provider bills for 1 hour (four 15 min units) of retainer, one claim line for 8 units of service should be billed. Supporting notes should identify that both services are being delivered and how many units are being billed for each. Retainers cannot exceed 30 consecutive days (traditional providers only). Providers should submit claims for only scheduled days and units as specified in the individual's ISP. See Section C.7 for additional information regarding retainer guidance Community Access Services delivered via telehealth should be billed using the Place of Service (POS) code '02'.

D.6 Support Coordination (SC)

The state temporarily authorizes, during the time that the Appendix K is effective, SC providers to render services telephonically or through other telehealth means. SC providers are also authorized for a –temporary rate increase from \$152.88 to \$175.00 per individual per month.

Documentation Guidance- Telephonic service delivery is acceptable during the time that Appendix K is effective. Telecommunications applications (e.g. SKYPE/Facetime/Duo/ZOOM) are not required, but encouraged where

	possible and in accordance with governing privacy regulations. Residences that have computers or similar electronic devices should use a telecommunication application at minimum for ISP meetings, but preferably all contacts when possible. Support coordinators s should send providers and families a copy of the IQOMR template (see Section G) when possible to help prepare for contacts. SC Support Notes: A comprehensive support note must be entered by the Support Coordinator for all regular required contacts with the individual, with the exception of the completion of the quarterly (IQOMR) Individual Quality Outcome Measures Review. Contacts should focus on health and safety concerns. All support notes are entered into the online case management system within three (3) business days of the contact. Billing Guidance- Rate Increase- Providers will need to adjust claims for the rate increase once the rate has been adjusted in the billing system- Providers will be notified by DBHDD once the rate has been increased in the billing system. Providers may only adjust claims beginning March 1, 2020 (the effective date of Appendix K). Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth.
D.7 Intensive Support Coordination (ISC)	The state temporarily authorizes, during the time that the Appendix K is effective, Intensive SC providers to render services telephonically and through other telehealth means. Documentation Guidance- Telephonic is an acceptable mode of service delivery. Telecommunications applications (e.g. SKYPE/Facetime/Duo/ZOOM) is not required but encouraged where possible. SC staff are not to require provider staff to use personal phones for video conferencing. Residences that have computers or related electronic devices should use a telecommunication application at minimum for ISP meetings, but preferably all contacts when possible. SCs should send providers and families a copy of the IQOMR template (see Section G) when possible to help prepare for contacts. SC Support Notes: A comprehensive support note must be entered by the Support Coordinator for all required contacts to the individual during times outside completion of the quarterly (IQOMR) Individual Quality Outcome Measures Review. Contacts should consider focus areas of health and safety. All support notes are entered into the online case management system within three (3) business days after the event. Billing Guidance- Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth.
D.8 Specialized Medical Supplies (SMS)	The State temporarily authorizes, during the time that the Appendix K is effective, providers to exceed the SMS cap limitation. The NOW and COMP waiver programs authorize funds for goods and services that are not covered by the Medicaid State Plan or those instances in which an individual's need exceeds State Plan coverage limits and exceptions to the coverage limits are not available. Note this may include Personal Protective Equipment (PPE), as applicable.

	For individuals with SMS on their current PA, the cap has been increased. Prescriptions will not be required for the duration that Appendix K is effective, however providers must document how supplies are directly related to a waiver individual's diagnosis or disability-related condition. Providers may not bill when SMS/PPE has been donated or obtained through other means. For Individuals without SMS on their existing PA, all other sources of PPE must be exhausted prior to the request for SMS to be added to an ISP.
D.9 In Home and Out of Home Respite	The state temporarily authorizes, during the time that the Appendix K is effective, providers to exceed the cap limitations for In Home and Out of Home Respite Services that can be rendered via traditional provider, participant directed services, and/or a live-in caregiver. Documentation Guidance- Providers are to document a list of family caregivers hires in the "COVID-19 NOW & COMP Provider Spreadsheet" – see Section G for reference. Billing Guidance- Use procedure code as authorized on prior authorization.
D.10 Additional Staffing	The state temporarily authorizes, during the time that the Appendix K is effective, that Additional Staffing can be delivered on a temporary basis in alternative settings which include: extended family home, hotel, shelter, or other emergency placement, while Appendix K is effective. The location where the service is being rendered is not necessarily required to be reflected in an individual service plan. There is no retainer option for Additional Staffing. Additional staffing ratios for an individual may be modified to allow the individual to receive services in safe and accessible environments if the individual's needs are still being met. Notification Guidance- CRA providers who are not also providing Community Access/Community Access retainer services to an individual, and who can document the need for additional staff in a CRA setting to cover hours normally covered by Community Access, will need to submit a request through the "Simplified AS Request Sheet for COVID-19" – see Section G for reference. Documentation Guidance- Documentation requirements that specify additional staffing ratios and any modifications to the staffing ratio rendered must be abided by while Appendix K is effective. Billing Guidance- Use procedure code as authorized on prior authorization.

D.11 Nursing Services

The state temporarily authorizes, during the time that the Appendix K is effective, RN services to be rendered using telehealth, to the extent possible. The state temporarily authorizes, during the time that the Appendix K is effective, a temporary rate increase for LPN services from \$8.75 to \$10.00 per 15-minute unit.

Documentation Guidance- RN Services must document each service delivery rendered via telehealth or other telephonic means. In addition to documentation requirements specified in Part II and III of the NOW and COMP Manuals, which includes but is not limited to date, time, signature/credentialing, documentation while the Appendix K is effective shall include the rationale for telehealth or telephonic date of service delivery.

Billing Guidance- Use procedure codes as authorized. RN Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth. Rate Increase- providers will need to adjust claims for the rate increase once the rate has been adjusted in the billing system. Providers will be notified by DBHDD once the rate has been increased in the billing system. Providers may only adjust claims beginning March 1, 2020 (the effective date of Appendix K).

D.12 Behavior Support Services Level 1 and Level 2

Note: In addition to the authorization of Appendix K, the NOW waiver was recently amended to align with COMP waiver for Behavior Support Services. Behavior Support Services Level 1 and Level 2 provisions should be considered for both NOW and COMP waiver individuals.

The state temporarily authorizes, during the time that the Appendix K is effective, all NOW and COMP Behavior Support Services to have telehealth option. Behavior Support Service providers may provide services via telehealth or other telephonic means.

Notification Guidance The behavior supports service provider will contact the designated point of contact for the agency/home caregiver to schedule telehealth communication. SC will be notified of temporary changes in behavior support service delivery options during this time that Appendix K is effective. Requests for additional units for behavior support services should be made to the regional behavior analyst.

Documentation Guidance- Behavior Support Service Providers level I and II must document each service delivery rendered via telehealth. In addition to documentation requirements specified in Part II and Part III of the NOW and COMP General Manuals, which includes but is not limited to date, time, signature/credentialing, documentation while the Appendix K is effective shall include the rationale for telehealth or telephonic date of service delivery. In lieu of face-to-face training for behavior support plans and on-site monitoring of plan implementation, oversight, feedback, and support will be provided via telehealth and/or telephonically with behavior plans, data analysis summaries, and progress notes shared electronically via secure encrypted correspondence with staff and/or families to render services.

	Billing Guidance : Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth.
D.13	The state temporarily authorizes, during the time that the Appendix K is effective, all Adult Occupational Therapy Services,
Adult	Adult Physical Therapy Services, Adult Speech and Language Therapy Services to be provided telehealth or other telephonic
Occupational	means with the following exceptions: Adult Swallowing/Feeding Therapy; Adult Swallowing/Feeding Therapy self-directed;
Therapy, Adult	Adult Swallowing/Feeding Evaluation, Adult Swallowing/Feeding Evaluation self-directed.
Physical	Documentation Guidance - Adult Therapy Providers must document each service delivery rendered via telehealth or other
Therapy, Adult	telephonic means. In addition to documentation requirements specified in Part II and Part III of the NOW and COMP
Speech and	General Manuals, which includes but is not limited to date, time, signature/credentialing, documentation while the
Language	Appendix K is effective shall include the rationale for telehealth or telephonic date of service delivery.
Therapy.	
	Billing Guidance: Services delivered telephonically should be billed using the Place of Service (POS) code '02' for telehealth.
D.14 Fiscal	During the Appendix K authorization, FIs will have a rate increase from \$75.00 per individual who self-directs per month to
Intermediary	\$95.00 per individual per month. Rate Increase- FIs will need to adjust claims for the rate increase once the rate has been
(FI)	adjusted in the billing system. FIs will be notified by DBHDD once the rate has been increased in the billing system. FIs may
	only adjust claims beginning March 1, 2020 (the effective date of Appendix K).

Section E. Additional Guidance Specific to Participant Directed (PD) Services

E.1 PD Trainings- During the period Appendix K is effective, there will be no in-person PD trainings for new enrollees into PD Service delivery model. At this time, this training is a requirement to enroll in PD Service Delivery Model. There is no tele-health option for this training. If a Participant needs to temporarily designate a different person to serve as the personal representative during the COVID-19 Emergency, DBHDD will consider such requests, and will consider waiving training requirements for the newly-designated representative on a temporary basis.

E.2 Documentation Requirements- Documentation requirements for services rendered remain intact. Documentation of services delivered via telehealth must indicate this service delivery method DBHDD will continue to monitor service delivery and use of funding. DBHDD will continue to terminate participant directed service delivery option approval and refer suspicious spending and/or activity to the Office of the Inspector General for investigation and prosecution.

E.3 Family Caregiver hire- During the period Appendix K is effective, DBHDD will temporarily allow for the hiring of family caregivers who live in the home with the individual receiving services through the NOW or COMP waiver. As specified in the NOW and COMP Manual Part II Section 902, a Family Caregiver hire is defined as an individual's family member, related by blood or marriage, who is aged 18 years or older, who may be reimbursed for providing services when there are extenuating circumstances. "Family member" is defined as a person who is related by blood within the third degree of consanguinity by blood, adoption, or marriage. Third degree of consanguinity includes mother, father, grandmother, grandfather, great grandfather, great grandmother, sister, brother, daughter, son, granddaughter, grandson, great granddaughter, great grandson, aunt, uncle, niece, or nephew. The Participant's representative or employer of record may not serve as a family caregiver hire. During the hiring process, Family Caregiver hires must disclose to the Fiscal Intermediary that they are a Family Caregiver hire, as well as their relationship to the Individual receiving the waiver services. The enrollment packet itself will not be modified, but FI will issue the 'Good to Go' letter using a modified list of essential documents. Billing for services will not be approved prior to receipt of the 'good to go' letter and must align with the date of hire on the enrollment forms. Enrollment forms cannot be backdated, and services rendered will not be reimbursed for dates prior to the approved hire date by the fiscal agent.

If the individual chooses to appoint a new PD Representative/employer of record, a new Memorandum of Understanding (MOU) must be completed by the newly appointed PD representative/employer of record. The MOU indicates the PD representative is willing and able to take on all the responsibilities of participant-direction and comply with all Medicaid policies. The PD Representative/employer of record position remains an unpaid position. The MOU can be obtained by emailing the DBHDD email box at Participant.Direction@dbhdd.ga.gov to request a copy. The completed MOU will be emailed to DBHDD and DBHDD Central Office PD staff will notify the associated fiscal agent that this step has been completed. The newly appointed PD representative/employer of record must also complete all enrollment paperwork with the fiscal agent and be approved prior to beginning duties. The exiting PD Representative/employer of record can only become an approved family caregiver hire upon completion and approval of the new PD Representative. In addition this family caregiver hire must also complete all enrollment paperwork and receive the 'good to go letter prior to begin service delivery and billing. Billing for the delivery of services must align with the family caregiver hire date and cannot be made retroactive.

E.4 Trainings for Family Caregiver hires – During the period Appendix K is effective, the training requirements for Family Caregivers hired to provide PD services are modified as set forth at section C.9, above.

E.5 Support Coordinator visits - Although Support Coordinators generally will not be making in-home visits while Appendix K is in effect, Participants/Representatives are required to allow in-home visits when requested by Support Coordinators, and to allow telephonic or electronic visits from Support Coordinators.

E.6 Retainer Payments – During the period Appendix K is in effect, retainer payments are available for employees/support workers providing Community Living Support, Community Residential Alternative, Prevocational, and Supported Employment services for Participants receiving

PD services. These retainer payments are available as described in the latest version of DBHDD Policy "COVID-19 2020: DBHDD Community Developmental Disability Services Policy Modifications" and in these Operational Guidelines. Retainer payments are available for employees/support workers who had been serving the Participant prior to the COVID-19 Emergency (and have been retained by the Participant/Representative to resume services after the COVID-19 Emergency), as described in the policy and attachment; retainer payments are not available for family caregivers hired to provide services during the COVID-19 Emergency. See Section C.7 for more detail regarding retainer guidance.

E.7 Use of State Back-Up Plan – During the period Appendix K is in effect, the State Back-Up Plan, which ordinarily may be used for no more than 1 occasion in any two-month period, may be used in up to 2 occasions in any 2-month period.

E.8 PD and Support Coordination- SC check-ins and activities are still a requirement for PD while Appendix K is effective. SC be completed via telehealth or telephonic means during this crisis. If an individual's birthday falls while Appendix K is in effect, the support coordinator will work with the individual and representative to set up telehealth means to conduct the annual ISP meeting. ISPs, whether annual or a version change, will require physical signatures on the ISP signature page. SC will work with the representative to send the signature page via encrypted email, fax, or the US Postal Service to acquire the required signatures. It is the expectation that the individual, representative, and other involved parties all physically sign the signature page and return it to the SC. The signature page is required for an ISP to be processed.

E.9 PD Memorandum of Understanding – To the extent that the provisions of this Operational Guidance and the provisions in the latest version of DBHDD Policy "COVID-19 2020: DBHDD Community Developmental Disability Services Policy Modifications" directly and expressly conflict with the terms of the "PARTICIPANT-DIRECTION OPTION TERMS and CONDITIONS of PARTICIPATION" Memorandum of Understanding, DBHDD's enforcement of those Memorandum of Understanding provisions will be temporarily suspended during the period Appendix K is in effect.

E.10 Background checks - Background checks for any function that requires face-to-face action or availability of third party vendors will be temporarily suspended for the duration that Appendix K is effective for all waiver services in the event that the provider is unable to complete a background check. Within sixty (60) days of the termination of Appendix K, background checks will need to be completed retroactively for all employees who were hired while Appendix K was effective and according to the policy.

Section F.- Transition Plan and Re-Opening Guidance - See May 11, 2020 publication of "DBHDD I/DD Community Settings Reopening Initial Recommendations" for resources regarding strategies for day programs re-opening, available on our DBHDD website.

Section G. References:

1. Covid-19 Guidance Information https://dbhdd.georgia.gov/coronavirus-covid-19-information

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- 2. Provider Issue Management System (PIMS) https://dbhddapps.dbhdd.ga.gov/PIMS/Default.aspx
- Comprehensive Support Waiver Program and New Options Waiver Program Part II Chapters 600 1200
 https://www.mmis.georgia.gov/portal/Portals/0/StaticContent/Public/ALL/HANDBOOKS/Comprehensive%20Supports%20W
 aiver%20Program%20and%20New%20Options%20%20Waiver%20Program%20%20Part%20II%20Chapters%20600-1200%2020200107210300.pdf
- 4. Health and Human Services resource link regarding appropriate telehealth platforms for delivery of services https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html
- 5. Behavior Analysis Certification Board guidance https://www.bacb.com/bacb-covid-19-updates/

Section H. Appendices

H.1 COVID-19 NOW&COMP Provider Spreadsheet- attached to COVID-19 2020: DBHDD Community Developmental Disability Services Policy
H.2 Simplified AS Request Sheet for COVID-19- attached to COVID-19 2020: DBHDD Community Developmental Disability Services Policy
H.3 IQOMR Guidance for Support Coordination during Appendix K authorization- below:

Focus Area: Environment		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
1	The home/site is accessible to the individual.	Yes	[Control]
2	The individual has access to privacy for personal care.	Yes	[Control
3	The individual has a private place in the home to visit with friends or family.	Yes	[Control]
4	The individual has access to privacy for phone	Yes	[Control]

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
	discussions with friends or family.		
5	The individual has access to receive and view their mail/email privately.	Yes	[Control]
6	The individual is able to have private communications with family and friends through other means.	Yes	[Control]
7	The home setting allows the individual the option to have a private bedroom.	Yes	[Control]
8	All assistive technologies are being utilized as planned.	Yes	[Control]
9	All assistive technologies are in good working order.	Yes	[Control]
10	The individual has adequate clothing to accommodate the individual's needs or preferences/choices.	Yes	[Control]

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
11	The individual has adequate food and supplies to accommodate the individual's needs or preferences/choices.	Determined by SC Could be Yes (by verbal confirmation with the waiver participant/staff/guardian) It could be N/A.	
12	The Residential/Day setting is clean according to the individual's needs and preferences.	Could be Yes (by verbal confirmation with the waiver participant/staff/guardian) It could be N/A. Determined by SC	[Control]
13	The Residential/Day setting is safe for the individual's needs.	Could be Yes (by verbal confirmation with the waiver participant/staff/guardian) It could be N/A. Determined by SC	[Control]
14	The Residential/Day setting is appropriate for the individual's needs and preferences.	Determined by SC	[Control]

Focus Area: Environment		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
		Could be Yes (by verbal confirmation with the waiver participant/staff/guardian) It could be N/A.	
	cus Area: pearance/Health	Select:	Comments/Actions Needed: Concerns, Barriers, Successes
15	The individual appears healthy. Describe any observations regarding health since the last review.	Since no video conferencing, N/A	[Control]
16	The individual appears safe Describe any observed changes related to safety since the last review.	Since no video conferencing, N/A	[Control]
17	There have been no reported changes in health since the last review.	Yes, based on reports of change.	[Control]
18	The HRST aligns with current health and safety needs.	Yes, based on reports and HRST scores	[Control]

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
19	The ISP is available to staff on site. If there have been ISP addendums, they are available to staff on site.	Yes, this can be answered if there knowledge it is there – Therap, etc.	[Control]
20	Staff are knowledgeable about all information contained within the individual's ISP.	Yes	[Control]
21	Indicated healthcare plans are current and have been reviewed by a nurse within the past year.	Yes, only if available by Therap or other web-based applications/documentation, would be affirmative as well	[Control]
22	Indicated healthcare plans are available to staff on site in all applicable settings.	Yes, only if available by Therap or other web-based applications/documentation, would be affirmative as well	[Control]
23	All staff are knowledgeable about all of the individual's healthcare plans.	Yes, if we know the plans are present.	

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
24	Indicated healthcare plans are being implemented.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A.	[Control]
25	Skilled nursing hours are being provided, as ordered.	Therap or other web-based Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A.	[Control]
26	All medical/therapeutic appointments have been scheduled and attended.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A.	[Control]
27	All follow-up appointments have been scheduled and attended.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A.	[Control]

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
28	being followed.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A.	[Control]
29	ordered, and documented accurately.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Family and participant can also confirm Med administration. Otherwise, N/A.	[Control]
30	have been completed.	Yes, if Therap or other web-based applications/documentation, would be affirmative documentation as well. Otherwise, N/A, or Determined by SC	[Control]
31	emergency room, or urgent care visits since the last	Yes, (by verbal confirmation with the waiver participant or guardian, if applicable, or confirmation in Therap or other web-based applications/documentation, would be confirm as well.	[Control]

Focus Area: Environment		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
		Provider staff reports of hospital admissions, emergency room, or urgent care visits is affirmative documentation.	
32	If applicable, hospital/ED/urgent care discharge plan instructions have been followed.	Yes, (by verbal confirmation with the waiver participant or guardian, if applicable, or confirmation in Therap or other web-based applications/documentation, would be confirmation as well. Provider staff reports of hospital admissions, emergency room, or urgent care visits is affirmative documentation.	[Control]
	cus Area: Supports and vices		Comments/Actions Needed: Concerns, Barriers, Successes
33	The individual's paid staff appear to treat them with respect and dignity.	N/A, unable to assess due to the need for visual confirmation	[Control]
34	The individual's natural supports appear to treat them with respect and dignity.	N/A, unable to assess due to the need for visual confirmation	[Control]
35	Supports and services are being delivered to the	Yes, for some – some services or supports will be unable to assess due	[Control]

Focus Area: Environment		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
	the current ISP.	to the need for visual confirmation, Use of Therap or other web-based applications/documentation, would be affirmative confirmation as well.	
	supported to make progress in achieving their goals (both ISP goals and	Yes, for most – some goals will be unable to assess due to the need for visual confirmation, Use of Therap or other web-based applications/documentation, could be affirmative documentation as well	[Control]
	additional services/supports at this time.	Yes, in general if there is access to the waiver participant, family, guardian, staff, and access to Therap or other web-based applications/documentation, could be affirmative confirmation as well.	[Control]
		There well could be times when there is not clarity to respond without a face to face evaluation.	

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes	
1	cus Area: Behavioral & otional	Select:	Comments/Actions Needed: Concerns, Barriers, Successes	
	Since the last visit, there are no emerging or continuing behavioral/emotional responses for the individual.	Yes, in general if there is access to the family, guardian, staff, and to Therap or other web-based applications/documentation, could be affirmative confirmation as well. There could be times when there is not clarity to respond without a face to face evaluation.	[Control]	
39		Yes, in general if there is access to the family, guardian, staff, or access to Therap or other web-based applications/documentation, could be affirmative confirmation as well. There could be times when there is not clarity to respond without a face to face evaluation.	[Control]	
40	The individual has no active Behavioral Support Plan, Crisis Plan, and/or Safety Plan relating to behavioral interventions.	Yes	[Control]	

Foo	cus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes	
41	If applicable, the plan(s) is/are available on site for staff review.	Yes, in general if there is access to the family, guardian, or access to Therap or other web-based applications/documentation, could be affirmative	[Control]	
42	There is evidence of implementation of the Behavioral Support Plan, Crisis Plan, and/or Safety Plan. Staff are knowledgeable about the plan(s) and able to describe how they are implementing the plan.		[Control]	
43	Since the last visit, there have been no needs to access GCAL or the Mobile Crisis Response Team in response to a behavioral emergency If GCAL/MCT has been accessed, describe reason, frequency, duration of any admissions, and if discharge recommendations have	Yes, (by verbal confirmation with the waiver participant, staff, family, or guardian, if applicable, or confirmation in Therap or other webbased applications/documentation, would be affirmative documentation. Frequency could be addresses by staff, family, or guardian.		

Focus Area: Environment	Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
been followed. If applicable, the BSP/ Safet Plan/ Crisis Plan has been adapted to reflect any new recommendations or interventions needed.	And Yes, it applicable, the BSP/	
Since the last visit, the individual has had no contact with law enforcement. If they have describe reason and lengt of involvement. If applicable, the BSP/ Safet Plan/ Crisis Plan has been adapted to reflect any new recommendations or interventions needed.	based applications/documentation, would be affirmative documentation.	

Focus Area: Environment		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
		There could be times when there is not clarity to respond without a face to face evaluation.	
Focus Area: Home/ Community Opportunities		Select:	Comments/Actions Needed: Concerns, Barriers, Successes
45	The individual has unpaid community connections. If not, describe steps being taken to further develop community connections.	Yes,	[Control]
46	The individual is receiving services in a setting where he/she has the opportunity to interact with people who do not have disabilities (other than paid staff).	There could be times when there is not clarity to respond without a face to face evaluation.	[Control]
47	The individual is being offered/provided documented opportunities to participate in activities of choice with non-paid community members.	Yes, There could be times when there is not clarity to respond without a face to face evaluation.	[Control]

Focus Area: Environment		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
48	The individual has the opportunity to participate in activities he/she enjoys in their home and community. Describe steps being taken to increase opportunities to meet this objective and allow choices to be offered while in services.	Yes, There could be times when there is not clarity to respond without a face to face evaluation.	[Control]
49	If desired, the individual is actively supported to seek and/or maintain employment in competitive and integrated settings and/or offered customized opportunities. If applicable, note how he/she is supported to do so. If no, indicate how the issue is being addressed.	There could be times when there is not clarity to respond without a face to face evaluation.	[Control]
50	The individual has the necessary access to transportation for employment and	Yes,	[Control]

Focus Area: Environment		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
	community activities of his/her choice.	There could be times when there is not clarity to respond without a face to face evaluation.	
Focus Area: Financial		Select:	Comments/Actions Needed: Concerns, Barriers, Successes
51	There are no barriers in place that limit the individual's access to spend his/her money, as desired.	Yes, (by verbal confirmation with the waiver participant, staff, family, or guardian, if applicable, or confirmation in Therap or other webbased applications/documentation, would be affirmative documentation. Otherwise, N/A.	[Control]
Focus Area: Satisfaction		Select:	Comments/Actions Needed: Concerns, Barriers, Successes
52	Overall, the individual is satisfied with their life activities since the last review.	Yes, SC may need a face to face to confirm	[Control]
53	Overall, the individual is satisfied with their service providers since the last review.	Yes, SC may need a face to face to confirm	[Control]

Focus Area: Environment		Instructions	Comments/Actions Needed: Concerns, Barriers, Successes
54	Overall, the individual is satisfied with the type of services received since the last review.	Yes, SC may need a face to face to confirm	[Control]
55	Overall, the individual is satisfied with their family relationships/natural supports since the last review.	Yes, SC may need a face to face to confirm.	[Control]

Reference IQOMR chart above: Yes — Can be answered. N/A — Not available without visual Confirmation. Due to the critical nature of the work related to COVID-19, if questions within the IQOMR are not tied to health and safety directly or, are not easily responded to by the individual, can be noted as 'Non applicable due to COIVD-19'