



COVID-19 Frequently Asked Questions

Q When will I be paid?

A RCOC will adhere to normal payment cycles and invoice cut-offs. Residential and day program providers, invoices are due by the 5th of the month to be paid on the 15th of the month. All other service provider invoices are due by the 15th of the month to be paid on the 30th of the month.

Q How do I bill for absences?

A Below is a link for billing instructions.

<http://www.rcocdd.com/wp-content/uploads/serviceproviders/resources/COVID19EmergencyBillingMarch182020.pdf>

Q When can I start billing for absences?

A You may start billing absences as of March 4, 2020, the date Governor Newsome declared a State of Emergency. Below is the link to the DDS letter.

https://www.dds.ca.gov/wp-content/uploads/2020/03/COVID-19_2020StatewideStateofEmergency_20200312.pdf

Q Can I bill for cancellations due COVID-19 exposure and diagnosis?

A Yes.

Q Can I bill for cancellations as a precautionary measure?

A Yes.

Q Can I bill if I voluntarily closed by program as a precautionary measure?

A Yes.

Q Do the make-up policies still apply?

A Yes.

Q Can I provide telehealth services?

A Yes. Below is the link to the DDS letter.

https://www.dds.ca.gov/wp-content/uploads/2020/03/DDSDirective_RequirementWaivedDueCOVID_031220.pdf

Q What services are included in telehealth?

A The following services codes are included 612, 620, 707, 772, 773, 810, 805

Q Does telehealth have to be HIPAA compliant?

A Below is the link the U.S. Department of Health & Human Services notice delineating HIPAA compliance enforcement during the COVID-19 national emergency.

<https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html?fbclid=IwAR1KIV35M-UJcM1WxO6nLHN2c6-BdGXskr2U9aFvxEyph1iV9EcS-as2Fmw>

The following FAQs were added March 23, 2020:

Q If I provided services, can I bill those services in addition to the monthly average?

A No. Services provided should be included in the average billing and not included in absences. Services cannot be billed twice.

Q Do I have to pay my staff with the emergency billing?

A Yes. The intent of emergency billing is for vendors to continue to pay staff so that they are ready to return to work when regular business resumes.

Q What documentation do I have to maintain to support emergency billing?

A Document the following for emergency billing:

1. The date the program closed.
2. The reason for the closure.
3. A description of how absences were calculated.
4. Documentation that staff were paid.
5. A description of what, if anything, was done to help persons served during the time that the program was closed.
6. For telehealth:
 - a. Document the platform used to provide services.
 - b. Documentation that family agreed to telehealth services.

Q How do I bill for absences?

A Bill as you normally would, per day. On a separate sheet, identify actual attendance/absences. **Attach the Actual Attendance to the eBilling invoice.**

Sample Hourly Billing for a program that closed on March 18, 2020:

eBilling

Day	11	12	13	14	15	16	17	18	19	20
Unit		6	6	6			6	6	6	6

Actual Attendance P=Present A=Absent

Day	11	12	13	14	15	16	17	18	19	20
Unit		P	P	P			P	A	A	A

Q I was recently vendored by RCOC. How do I calculate the average if I do not have 12 months of history available?

A If you provided service to non-RCOC persons served, you may use that absence pattern to calculate the 12 months.

Q How do I calculate the average if the person served attended less than 12 months?

A Calculate and use the overall average for all persons served.

The following FAQs were added March 25, 2020:

Q How long will State of Emergency funding last?

A Requests for additional funding and payment for absences is time limited and will only be processed while the State of Emergency is in effect. While we do not know when DDS will end the State of Emergency funding, please do not plan on this additional funding for the long term.

Q Can emergency billing be used to pay staff that do not serve RCOC persons served?
A The intent of emergency billing is for vendors to continue to pay staff that serve RCOC persons served so that they are ready to return to work when regular business resumes.

Q Do I have to submit payroll documentation with my invoice?
A Not with your invoice, but please remember that payroll records are part of the documentation that vendors must maintain to support their billing.

The following FAQs were added April 7, 2020:

Q If my organization applied and was approved for the **Paycheck Protection Program** for services provided to RCOC, is there a conflict if we also bill RCOC?

A You should not expect to be paid twice for the same service; you should not double dip.

Q Do 612 Behavior Analyst and 620 Behavior Management Consultant vendors have to obtain signatures on Form DS 5862 Parental Verification Form for Receipt of Behavioral Services for telehealth services?

A If vendors are unable to obtain signatures due to COVID-19, they should write Unable to Obtain Signature Due to COVID-19 on the Signature of Parent or Legal Guardian line.

Q Can I include regular absence on the COVID-19 Monthly Attendance Sheet?

A No. Only include absences and closures due to COVID-19.

Q Can 896 Supported Living Service vendors bill absences due to COVID-19?

A Yes. Attach the COVID-19 Monthly Attendance Sheet to the eBilling invoice.

Q How can 896 Supported Living Service vendors bill for additional services provided due to COVID-19?

A Vendors can submit a modified budget with the additional hours to the consumer's assigned service coordinator for approval.

~~Q How long will RCOC fund absences and closures?~~

~~A RCOC will fund absences and closures as long as the State of Emergency is in effect unless instructed otherwise by DDS.~~

Q Do I have to fill out the COVID-19 Monthly Attendance Sheet?

A Yes, if you are billing absences due to COVID-19.

The following FAQs were corrected April 30, 2020:

~~Q How long will RCOC fund absences and closures due to COVID-19?~~

~~A Absent additional direction from DDS, RCOC will fund absences through May 11, 2020, per the DDS directive dated April 2, 2020, that can be found at <https://www.dds.ca.gov/wp-content/uploads/2020/04/DDSDirective-Extensions-04022020.pdf>. RCOC encourages vendors to plan accordingly.~~

- Q How long will RCOC fund the Health & Safety rates approved by RCOC's Executive Director
A Absent additional direction from DDS, RCOC will fund health and safety rates through May 17, 2020, per the DDS directive dated April 2, 2020, that can be found at https://www.dds.ca.gov/wp-content/uploads/2020/04/DDSDirective_Extensions_04022020.pdf. RCOC encourages vendors to plan accordingly.

The following FAQ was added on May 8, 2020:

- Q How long will RCOC fund absences and closures due to COVID-19?
A RCOC will fund absences during the State of Emergency. Effective May 1, 2020, "Absence funds are provided based on the expectation that other sources of funding are not currently available to providers due to the impact of COVID-19. Accordingly, absence funding will be provided as a funding source of last resort." The DDS Directive can be found at https://www.dds.ca.gov/wp-content/uploads/2020/05/DDSDirective_PaymentsForNonresidentialServices_05072020.pdf.

The following FAQs were added on June 11, 2020:

- Q Where can I find COVID-19 updates and directives?
A All DDS directives are available at the DDS website at <https://www.dds.ca.gov/corona-virus-information-and-resources/>. You may also find information on RCOC's website at <http://www.rcocdd.com/covid19/>.
- Q Which months should I use to calculate the 12-month average in order to bill absences beginning April through the end of the State of Emergency.
A Use the same calculations you used for March 2020 (March 2019 to February 2020), but remember to take into consideration the number of billable days per month.
- Q For service providers that have received PPP loan funds, but do not yet know how much will be forgiven; should the service provider continue to bill absences and notify RCOC once the forgiveness amount is known? Or should the provider defer absence billing until the forgiveness amount is known?
A The answer depends on when the PPP application was submitted and which months of COVID-19 absences were billed.

If the vendor submitted the PPP application prior to the DDS directive on May 7, 2020, and the PPP loan was forgiven, it would be double dipping for the months of March and April. RCOC paid vendors for absences. The PPP loan, if forgiven, would be income for the same service that RCOC paid for.

The PPP loan application includes the following certifications:

Current economic uncertainty makes this loan request necessary to support the ongoing operations of the Applicant.

The funds will be used to retain workers and maintain payroll or make mortgage interest payments, lease payments, and utility payments, as specified under the Paycheck Protection Program Rule; I understand that if the funds are knowingly used for unauthorized purposes, the federal government may hold me legally liable, such as for charges of fraud.

If the PPP application was submitted after the DDS directive on May 7, 2020, the PPP loan was forgiven, and the vendor had not billed for COVID-19 absences, the forgiven PPP loan would be the vendor's revenue for RCOC's services. If the vendor did bill for absences, the vendor would then send RCOC a check for the amount equal to amount of forgiven PPP loan.

The DDS directive issued on May 7, 2020, included the following:

• Beginning with claims submitted for May 2020: Absence funds are provided based on the expectation that other sources of funding are not currently available to providers due to the impact of COVID-19. Accordingly, absence funds are provided as a funding source of last resort. Providers are expected to first seek and apply for all available COVID-19 relief funding before receiving absence funds through regional centers.

If the vendor has more than one source of revenue, the PPP loan, if forgiven, would be credited as the vendor's situation and accounting rules dictate. Vendors must maintain documentation in the event of an audit. RCOC recommends that vendors work with their accounting department to ensure that they are applying all revenue correctly.

Note: RCOC cannot give legal advice regarding employment practices.
Emergency funding is time-limited.

If you have additional questions, please email them to accounting@rcocdd.com and they will be added to the FAQs.