Policy Hot Topic #2

4/15/2020

PRIOR AUTHORIZATION (PA)

IFSP Services via Teletherapy

During the public health emergency, all face to face, in person early intervention services have been suspended and will be provided remotely, via tele-intervention (teletherapy) until Part C Providers receive written notice from the lead agency that the period has ended.

Regardless of pay source, all IFSP services provided remotely must have a new PA in order to use the required modifiers that indicate the service was provided via teletherapy. These PA requests are entered for 30 days during the public health emergency. If additional time is needed, the service provider emails Amanda Smith to request another 30-day period and copies the family's service coordinator on the email.

When Part C funds are requested to pay for a service on a current IFSP (when there is no other pay source), the service coordinator enters the PA request in CDS (for 30 days). To document that the service will be provided via teletherapy, the SC types "teletherapy" on the comment line or notes box and uploads/attaches the parent-signed FC Remote Services Consent Form to the PA request.

When Medicaid is the pay source for any service on an IFSP, the service provider enters the PA request in the Provider Portal (InterChange) for 30 days of service. The service provider uploads / attaches a copy of the parent-signed FC Remote Services Consent Form in the case notes section of the child's electronic record and types a case note to indicate that the PA request was entered in the Provider Portal. Provider program consent forms are not approved for use to provide IFSP services via tele-intervention.

NOTE: If providers need additional Part C funding to provide services on a current IFSP, they may request funding on a per-child basis in 30-day increments using a form they'll complete and email to the PA Unit.



What about existing PAs for IFSP services?

De-obligating funds that were prior approved

When a PA was already issued for a service that was provided through inperson visits and that service will now be provided remotely, the service provider:

- Enters a new PA request using the appropriate modifiers for a service provided via teletherapy for a 30-day period.
- De-obligates part of the existing PA for the dates the service will be provided via teletherapy



COORDINATING PAYMENT AND DELIVERY OF SERVICES ON THE IFSP

IFSP SERVICES PROVIDED VIA TELE-INTERVENTION

Developmental Therapy	Part C funding only
Occupational Therapy	Medicaid. Part C for non-Medicaid children with a current IFSP
Physical Therapy	Medicaid. Part C for non-Medicaid children with a current IFSP
Speech Therapy	Medicaid. Part C for non-Medicaid children with a current IFSP

Regardless of pay source, services on a current IFSP may be provided at a maximum level of 60 minutes per week (per IFSP service) with parent consent on the FC Remote Services Consent Form uploaded in the child record in CDS.



NOTE: During the period of the public health emergency when in-person services are suspended, evaluations may not be provided via teletherapy. Medicaid is allowing an extension of time for annual re-evaluations, and the Part C program is following the allowance of an extension of time for re-evaluations.

How do I document remote services?

FC Tele-Intervention Session Outcome (form)

Therapists document remote service sessions using the FC Tele-Intervention Session Outcome (form).

The therapist completes the top section of the form and emails the form to the individual who participated in the remote session with the child to complete the check boxes and e-sign.

The therapist uploads the form to the case notes section of the child record in CDS and completes the Delivered Services note for the session date/time.

Regardless of pay source, for any service on a current IFSP provided remotely, documentation is required.