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Agency of Human Services

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MEMORANDUM

TO: Designated Agency Staff
FROM: Sarah Squirrel, Commissioner, Department of Mental Health
DATE: March 19, 2020
SUBJECT: COVID-19 Guidance for Success Beyond Six

This information may be superseded by subsequent guidance. Always check Vermont Department of Health for updated information.

Guidance and Updates

While the situation continues to rapidly evolve, we want to provide as much information as possible to you at this point regarding impacts of COVID-19. Please review the information below carefully and distribute it to your staff and partners as you deem appropriate. We recognize additional detail will be necessary in some areas and guidance may change in the coming days and weeks. We will share further information as clarification becomes available. If the Vermont Department of Health subsequently releases any direction that differs from the guidance below, the VDH direction takes precedence.

Service Delivery

Medicaid already allows some services to be provided by phone, including Community Supports and Service Planning & Coordination which are the most commonly used services under SB6. DVHA is working on alleviating other restrictions to allow telehealth (video/audio) and telephonic (audio only) service delivery under broader authority due to COVID-19. That specific guidance can be found [here](#).

DMH, in coordination with DVHA, has the authority to change restrictions on service delivery, including thresholds for case rates. Therefore, the following changes are in place during the COVID-19 school closure period.

Behavioral Intervention Program services

- May be provided through telehealth or phone with the student and/or family in their home or chosen setting and are not required to be in-person in a school setting. This includes the following services: Service Planning and Coordination, Community Supports.

School-based clinician services

- May be provided through telehealth or phone with the student and/or family in their home or chosen setting and are not required to be in-person in a school setting. This includes the

following services: Service Planning and Coordination, Community Supports, Individual and Family Psychotherapy.

- The minimum service threshold is lowered from 2 hours (8 units) of a qualifying service per month to 15 minutes of a qualifying service per week (equivalent of 1 hour per month) in order to bill the monthly case rate.
- Agencies are looking at other ways of deploying SB6 staff to support other service delivery. DMH supports this practice to ensure that necessary services are available during this period when staffing is limited due to COVID-19 impacts. Please note that we are looking into whether there are limitations related to the same staff person billing more than one case rate in a day (eg. Children’s mental health case rate and SB6 clinician case rate).

CERT

- May be provided through telehealth or phone with the student and/or family in their home or chosen setting and are not required to be in-person in a school setting. This includes the following services: Service Planning and Coordination, Community Supports, Individual and Family Psychotherapy.
- The minimum service threshold is lowered from 2 hours (8 units) of a qualifying service to 15 minutes of a qualifying service per day in order to bill the per diem rate.

Finance: Match Payments

We understand the request to postpone match payments for SB6 until after the COVID-19 crisis is resolved. We discussed this with AHS Central Office finance. Any postponement of match could not extend beyond the fiscal year (June 30, 2020). Please communicate with DMH Business Office your agency’s plan for match payments.

For additional program guidance, please contact Laurel.Omland@vermont.gov.

Additional Covid-19 Resources

This information may be superseded by subsequent guidance. Always check [Vermont Department of Health](#) for updated information.

Vermont Department of Health

- [2019 Novel Coronavirus Webpage for information, guidance and updates on the status of the Coronavirus.](#)

Telehealth

- [HIPAA](#) was modified by OCR and HHS March 16th to support broader use of telehealth during the COVID-19 event.
- [Vermont Medicaid Payments for Telephonic Services Furnished During the Emergency Response to COVID-19. \(3/18/2020\)](#)
- [OCR bulletin advising covered entities](#) of further flexibilities available AND obligations that remain in effect under HIPAA as they respond to crises or emergencies.

Governor's Office

- [Governor Orders Orderly Closure of Vermont PreK-12 Schools](#)
- [Executive Order Declaring State of Emergency in Response to COVID-19 & National Guard Call-Out](#)
[Addendum 1 to Executive Order 01-20](#)
- [Addendum 2 to Executive Order 01-20](#)
- [Directive 2 - Childcare for Essential Service Providers \(Pursuant to EO 01-20\)](#)

Vermont Emergency Management

- [Essential Service Provider List](#)

Vermont Agency of Education

- [COVID-19 Guidance for Vermont Schools](#)

Vermont Agency of Human Services

- [Agency and Departments Covid-19 websites](#)