

MEMO

To: DDS Directors and Billing Managers

From: Selina Hickman, Director, Developmental Disabilities Services

Date: March 30, 2021

**Re: Clarification of threshold for monthly (PMPM) billing Developmental Disabilities Services
Home and Community-based Services**

On July 9, 2020, the DAIL business office sent guidance regarding billing the PMPM for DDS HCBS with a start date of 7/1/20. The guidance included the following regarding the threshold of service delivery required to bill the PMPM. "Providers should submit claims for the authorized PMPM after the month in which the service was delivered. A claim may be submitted as long as the person received one unit of service during that month."

On December 4, 2020, DAIL posted an update to the [COVID 19 Guidance for Providers of Development Disabilities Services](#). Page 14-15 of this guidance describes a return to the temporary payment model starting 11/1/20. The temporary payment model allows agencies to continue to bill the authorized budgets without the need to suspend billing when there is a gap in services greater than 14 days. The update further notes that "the minimum threshold for billing the monthly rate is increased to 6 units of service¹." Pages 15-17 of the FAQ document provide additional information regarding when billing must be suspended or terminated.

It has come to our attention that the 12/4/2020 guidance failed to clarify what changes were also necessary for PMPM billing, because of the increase to the minimum billing threshold.

DAIL offer the following clarifications.

- The threshold to bill the PMPM is six units.
- This may be any six units of service across all service categories.
- If you had continued to bill the PMPM at the one-unit threshold, DAIL is not requiring the agency to correct that. Use the six-unit threshold for your next monthly billing.
- When you do not meet the six-unit threshold in a month, you need to suspend the person's budget on the HCBS spreadsheet that is submitted to the business office. When the threshold is met in subsequent months, you should unsuspend the person's budget.

The six-unit threshold is a minimal amount of service to provide in a month and to be permitted to continue to bill for the whole individual budget. It could be as low as an hour and a half of service for those services with a 15-minute unit.

¹ Note- units of service are defined in the DDSD Encounter Data Submission Guidance
https://ddsd.vermont.gov/sites/ddsd/files/documents/Encounter_Data_Submission_Guidance.pdf