



May 20, 2020

**SANTA CLARA AND
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Dear Service Provider,

On March 4, 2020, the Governor declared a State of Emergency as a result of the COVID-19 outbreak. This memo notifies you of a newly released Directive from the Department of Developmental Services, dated May 7, 2020, that contains additional specific requirements for those seeking to bill for nonresidential services during the State of Emergency.

The May 7, 2020 [DDS Directive on Additional Guidance on Payments](#) states service providers must maintain documentation to support claims during the State of Emergency. Providers are reminded that the required documentation to support these claims is subject to review and audit.

Throughout the State of Emergency, providers must maintain proper documentation of calculation of average number of absences

Beginning with billing for the month of April 2020 and ongoing, providers must maintain documentation of:

- 1) Efforts made to provide services, including services in alternate location or remote services
- 2) Reason for absences related to COVID-19
- 3) Continuation of employee payroll during the period absences were claimed

Beginning with billing for the month of May 2020 and ongoing:

- 1) 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
- 2) Providers are expected to first seek and apply for all available COVID-19 relief funding, such as "payroll" loan forgiveness or reimbursement program, before receiving absence funds through regional centers
- 3) Claims submitted to the regional center for absence funds must be reduced by the amount the provider receives from other available sources
- 4) Providers may not receive funding from absence payments and other relief sources in excess of what the provider otherwise would have received by providing services to consumers absent the State of Emergency
- 5) Providers can continue to bill for services if approved for a PPP loan; however, if/when the loan is forgiven, the vendor would be expected to reconcile at that time.

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San Andreas Regional Center has a responsibility to verify that service providers are billing in accordance with applicable laws, regulations and DDS Directives. Service providers must continue to follow the guidance provided in the [Service Provider Billing Letter, Updated April 7, 2020](#).

Providers who intend to bill for non-residential COVID-19-related absences and cancellations must follow these steps:

Average Billing Calculation: (All calculations must be done for each individual served)

1. **Calculate the actual attendance for the month** for each individual enrolled in the program. (If the program is closed this will be zero.)
2. **Calculate the absences for each individual for the month.** If the program is closed this will be the total number of individuals enrolled in the program.
3. **Calculate the total absences for each individual during the 12-month period** (3/1/19 to 2/29/20). If the individual was not in the program for the whole year use the number of months they were enrolled.
4. **Calculate the average number of absences in last 12 months.** Divide the 12-month total absences (from step 3) by 12 (or the number of months the individual was enrolled that year). This provides the average monthly absences for this 12-month period.
5. **Calculate the number of billable absences.** Take the absences due to the SOE (from step 2) and subtract the average monthly absences during the 12-month period (from step 4). The difference is the absence amount that you can bill for. (Make sure to round to the nearest whole number and if the number is negative, use zero).
6. **Calculate total billable days.** Bill for the actual attendance during the month (from step 1) plus the difference between the absences due to the SOE and the average monthly absences during the 12-month period (from step 5).
7. **Maintain all proper support and documentation to support your calculations and billings.**

Example (billing days for month 22)

1. Actual Attendance for Mary	0	11
2. Absences during billing month	22	11
3. Absences March 19 – Feb 20	36	36
4. Average monthly absences	$36/12$	3
5. Calculate billable absences	$22 - 3 = 19$	$11 - 3 = 8$
6. Calculate total billable days	$0 + 19 = 19$	$11 + 8 = 19$

Thank you for continuing to take precautionary measures and assist our individuals served to remain safe and healthy during this critical time. If you have any questions, please direct them to eattendance@sarc.org.

Regards,

Greg Hoffman
Chief Financial Officer