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## **MEMORANDUM**

**TO:** School District Superintendents

**FROM:** Jacob Oliva

**DATE:** May 5, 2020

**SUBJECT: Mental and Behavioral Health and Telehealth Services for Florida Students**

In recent years, we have made significant strides in improving students' access to school-based health services, particularly mental health services, and many students rely heavily on these supports. While the serious and highly contagious nature of COVID-19 necessitated the closure of school campuses throughout the State of Florida, students' needs remain and their stress levels are likely amplified due to the sudden changes in their routines, concerns for their loved ones, and fear of the virus itself.

We have received outstanding reports from school districts regarding the successful implementation of distance learning, and it is imperative that health, including mental health, be a mainstay in each district's continuity of instruction plan. Increased state and local funding has enabled schools to bolster teams and resources dedicated to students' mental wellbeing, which include school counselors, school social workers, and school psychologists. We must build on this momentum to ensure there is infrastructure that enables school-based health providers to remotely serve all of their students' needs.

It is important now more than ever, that student services professionals and other licensed mental health providers continue to collaborate with parents, educators, and administrators to meet students' needs when face-to-face interaction is not feasible. Previous [guidance](#) from the Florida Department of Education (FDOE) allows districts to redirect unspent 2019-2020 funds from the Safe Schools and Mental Health allocations to virtual and telephonic mental health counseling services for students who need support due to COVID-19.

Here are some ways your student services professionals (school counselors, school social workers, school psychologists and school nurses) are trained to support students and families:

- Identify students who are in need of mental health supports.
- Provide and/or coordinate the delivery of virtual mental health services.
- Create and deliver virtual social emotional supports and character education lessons for students and families.
- Complete pending, social history evaluations and re-evaluations. This includes writing reports and conducting interviews with parents using the telehealth model (phone or computer contact).
- Collaborate with community agency stakeholders to assist in providing services and support to families in need.
- Conduct components of initial evaluations and reevaluations that can be completed.

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CHANCELLOR OF PUBLIC SCHOOLS

- Provide virtual services as it relates to the individual education plans, 504 plans and health care plans.

For additional information and resources please see the following links:

- [Helping Children Cope with Changes Resulting from COVID-19](#)
- [Virtual Service Delivery in Response to COVID-19 Disruptions](#)
- [Talking With Children About Coronavirus Disease 2019](#)
- [Parent/Caregiver Guide to Helping Families Cope With the Coronavirus Disease 2019 \(COVID-19\)](#)
- [Planning for Virtual/Distance School Counseling During an Emergency Shutdown](#)
- [American Occupational Therapy Association \(AOTA\): Telehealth Resources](#)
- [American Speech-Language-Hearing Association \(ASHA\): Telepractice](#)

FDOE urges districts to consider using web-based, online platforms to provide counseling and other telehealth services, facilitate meetings on digital platforms or phone conferencing, connect with students and families by phone, and leverage social messaging platforms to provide information. Please refer to guidance issued by the U.S. Department of Health & Human Services (HHS), which applies to students and is available online at [Notification of Enforcement Discretion for Telehealth Remote Communications During the COVID-19 Nationwide Public Health Emergency](#). This guidance should be used in conjunction with joint guidance issued by the U.S. Department of Education and HHS that addresses the application of the Family Educational Rights and Privacy Act (FERPA) and the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy Rule to records maintained on students. This guidance is available online at [Joint Guidance on the Application of FERPA and HIPAA to Student Health Records](#).

Additionally, because some of the services provided by schools and school districts are Medicaid-reimbursable the Agency for Health Care Administration (AHCA) has issued [guidance](#) to school districts including private and public charter schools on Florida Medicaid coverage of school-based services (therapies, behavioral health) via telemedicine during the 2019 novel coronavirus (COVID-19) state of emergency.

#### Telemedicine Definition

Telemedicine is the practice of health care delivery by a practitioner who is off-site, using interactive telecommunications equipment that minimally includes real time, two-way interactive communication between a recipient and a practitioner using audio and video equipment. The AHCA's [current telemedicine policy in the fee-for-service delivery system is available on the AHCA website](#).

#### Telemedicine Flexibilities During the State of Emergency

It is imperative that services specified on a child's Individual Educational Plan (IEP) or Individual Family Support Plan (IFSP) continue. To ensure that Florida Medicaid school-based providers (school districts and private/charter schools) can maintain continuity of care during the state of emergency, AHCA is granting the temporary use of telemedicine for key medical services.

These flexibilities apply to services when they cannot be delivered face-to-face or in-person due to school closures.

### Therapy Services

Florida Medicaid will reimburse for the delivery of occupational, physical, and speech therapy services included on the Medicaid Certified School Match [fee schedule](#) when provided via telemedicine. Services must be delivered in a manner that is consistent with the child's existing plan of care/IEP or IFSP and standards of care. All service components designated in the American Medical Association's Current Procedural Terminology and the Florida Medicaid [coverage policy](#) must be provided.

### Behavioral Health Services

Florida Medicaid will reimburse for the delivery of certain school-based behavioral health evaluation and counseling services via telemedicine when performed by an eligible school-based provider in a manner consistent with the Florida Medicaid coverage policy. Florida Medicaid does not cover group services via telemedicine for school-based providers.

### Provider Telemedicine Requirements

School-based providers using telemedicine to deliver services must comply with the following:

- Ensure services are medically necessary and performed in accordance with the [service specific policy](#) and [fee schedule](#).
- The recipient (and their legal guardian) must be present for the duration of the service provided using telemedicine.
- Telemedicine should not be used by a provider if it may result in any reduction to the quality of care or if the service delivered through this modality could adversely impact the recipient.
- Documentation regarding the use of telemedicine must be included in the progress notes for each encounter with a recipient. All other documentation requirements for the service must be met as described in the coverage policy.
- Providers must comply with the HIPAA when providing services; all equipment and means of communication transmission must be HIPAA compliant.
- Providers must assure that the recipient has compatible equipment and the necessary connectivity in order to send and receive uninterrupted video. Telephone or electronic-based contact with a Florida Medicaid recipient without a video component is not permitted to be billed.

### Reimbursement

In the fee-for-service delivery system, Florida Medicaid reimburses at the same rate detailed on the school-based [fee schedule](#). Florida Medicaid does not reimburse for the acquisition, installation, and maintenance of telecommunication devices or systems. Providers must append the GT modifier to the procedure codes when filing claims.

To view all of AHCA's COVID-19 alerts, [visit the AHCA website](#).

For assistance, please contact Monica Verra-Tirado at [Monica.Verra-Tirado@fldoe.org](mailto:Monica.Verra-Tirado@fldoe.org) or Andrew Weatherill at [Andrew.Weatherill@fldoe.org](mailto:Andrew.Weatherill@fldoe.org), in the FDOE Bureau of Exceptional Education and Student Services.