



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

**EDUCATION**

**Frequently Asked Questions - Nonpublic School Payments  
May 20, 2020**

**Frequently Asked Questions**

The Office of the State Superintendent of Education (OSSE) remains committed to being flexible and accommodating for nonpublic schools where possible. As such, OSSE offers the following additional guidance to provide clarity on questions and concerns OSSE has received from nonpublic schools subsequent to the issuance of the OSSE guidance documents.

**Q1: Will OSSE continue to remit payment to nonpublic schools through the end of the nonpublic schools' established dates for the regular 2019-20 school year if the local education agency's (LEA's) regular school year dates end before the nonpublic school dates?**

**A:** Yes. However, each nonpublic school must submit a calendar, on school letterhead, for the remainder of the regular 2019-20 school year to include:

- The end date for the regular school year;
- Advise if there are any make-up days;
- School closures and half-day dates.

Nonpublic schools should submit school calendars to Yvonne Smith manager of the Nonpublic Payment Unit at, [yvonneS.smith@dc.gov](mailto:yvonneS.smith@dc.gov).

**Q2: Will OSSE continue to remit payment to nonpublic schools through the end of the extended school year (ESY) dates if the LEA's ESY dates end before the nonpublic school dates?**

**A:** Yes. However, each nonpublic school must submit a calendar, on school letterhead, for the 2019-20 ESY session to include, as applicable:

- The start and end dates for ESY/summer program;
- ESY/summer program days per week and daily hours;
- School closures and half-day dates.

Nonpublic schools should submit school calendars to Yvonne Smith manager of the Nonpublic Payment Unit at, [yvonneS.smith@dc.gov](mailto:yvonneS.smith@dc.gov).

**NEW Q3: Will OSSE remit payment for make-up days?**

**A:** If a nonpublic school was paid for days the school was fully closed and no distance learning took place, then OSSE will not remit payment for any make-up of those days.

**Q4: Are nonpublic school invoices required to be submitted through the US Postal Service or courier services?**

**A: [NEW OSSE Box File Transfer Protocol \(FTP\) for Online Invoice Submission Link](#)**

OSSE now has a secure method that nonpublic schools can utilize to submit invoices through an electronic portal. This can begin immediately.

- This online Box protocol will remain in use going forward for all invoice submissions.
- Nonpublic schools should submit invoices through the online portal throughout the distance learning period.
- After the distance learning period nonpublic schools can submit invoices via Box, the US Postal Service, or courier service.

**Q5: Where can nonpublic schools obtain information regarding telehealth services, standards, and licensing?**

**A: Telehealth Information:** Nonpublic schools and related service providers should reference the following documents for detailed information about the requirements for telehealth related service delivery:

- [Mayor's Order 2020-063](#)
- [March 13, 2020 - Administrative Order Waiving Licensure Requirements for Certain Practitioners;](#)
- [March 12, 2020 - Guidance on the Use of Telehealth;](#) and
- [The DC Department of Healthcare Finance \(DHCF\) distance-related services and licensing standards.](#)

**Q6: Must nonpublic schools obtain consent for telehealth services for each student?**

**A: [New OSSE Consent for Telehealth Services here](#)**

For OSSE Medicaid purposes, all nonpublic schools/practitioners must obtain written consent from parents/students to receive services remotely. Consent must be obtained, documented, and uploaded to the student's file in the OSSE Special Education Data System (SEDS) database. Written consent can be obtained in any of the following manners:

- **Email.** The practitioner must upload the email to the students file in SEDS.
- **Text message.** The practitioner must upload the text to the students file in SEDS.
- **OSSE Medicaid Consent Form (attached).** The practitioner must upload the signed consent form into the students file in SEDS.
- **Verbal conversation.** Written, memorialization of the conversation with names, date, and time should be captured. The practitioner must complete the form on behalf of the parent/student, note why written consent could not be obtained, then upload the form to the student's file in SEDS.

Consent should be obtained by the service provider(s). Consent can be obtained and documented on one form for all services. Alternatively, separate forms can be completed for each service and practitioner. Regardless, consent must be documented under one of the four options listed above. **A parent/student can change consent at any time. Any changes that occur must be documented.**

**Upload Consent into OSSE SEDS:**

- Create a Miscellaneous Cover sheet; and
- Select - Upload External Document

**Q7: What are the options if a nonpublic school cannot obtain consent for telehealth services?**

**A:** Multiple attempts should be made to obtain consent. If consent cannot be obtained, the service provider must include the following notes in SEDS:

- The number of attempts to obtain consent; and
- Reason(s) why consent could not be obtained.

**Q8: If a nonpublic school has already obtained consent for telehealth services will consent have to be obtained again?**

**A:** No. Upload into the student's file in SEDS the consent form/documentation that you possess. Previous consent through the school's own internal form will suffice.

**Q9: How should a nonpublic school document the SEDS service log entries during the distance learning period?**

**A:** To reimburse for provided related services, nonpublic schools continue to be expected to create service delivery evidence by inputting service log entries and to create the service tracker documents in the OSSE SEDS. Service logs should include, at minimum:

- Activity notes; and
- Comments that the service(s) was provided through distance learning via audio and/or visual technology.

**Q10: Is there any guidance on how nonpublic schools should handle missed related service sessions?**

**A:** Yes. Please see the [OSSE Related Services Policy](#) for additional information on procedures regarding missed related services. The nonpublic school should also provide written notice to the LEA regarding student missed service sessions in accordance with existing policy.

**Q11: How should a nonpublic school handle failed attempts to reengage a student or to reschedule missed service sessions?**

**A:** Please see the scenarios below.

1. If the provider is able to speak with a parent/student and the parent/student refuses to receive related services for one scheduled session during the distance learning period:
  - "Student Unavailable" or "Student Absent" should be selected, as applicable, as the service type on the SEDS service log entry.
2. If the parent/student refuses to receive related services for all related services during the distance learning period:
  - "Student Unavailable" or "Student Absent" should be selected, as applicable, as the service type on the SEDS service log entry for that specific session.
  - The provider should obtain another "Consent" for telehealth services to document the denial per the guidelines listed above regarding consent (Q3).

**Q12: How should related service trackers be submitted in SEDS if I don't have access to a fax machine?**

**A:** There is no need to print, sign, or fax the form back into SEDS. Each related service provider's secure log-in ID serves as an electronic signature upon completion of service log entry.

**Q13: Must all nonpublic schools use the OSSE SEATS system to record student attendance?**

**A:** Yes. All nonpublic schools should utilize the OSSE SEATS attendance system to record student attendance. If your school is not currently using SEATS, please contact Jackie Corsey at [Jacqueline.corsey@dc.gov](mailto:Jacqueline.corsey@dc.gov) to obtain access.

**Q14: If a nonpublic school entered student attendance for March into the OSSE SEATS system before April 8, 2020, will the attendance codes need to be revised?**

- A:** Yes. COVID-19 attendance codes must be utilized throughout this period.
- OSSE created special COVID-19 attendance codes that were made available starting April 8, 2020.
  - SEATS has been “unlocked” for all users to allow revisions to the March records only.
  - The COVID-19 codes are listed in Appendix I.

**Q15: What codes should be utilized to record attendance in SEATS?**

<b>Attendance Scenario</b>	<b>Proper SEATS Code</b>
March 1 through March 13, 2020 (Before COVID-19)	The non-COVID-19 SEATS codes (existing codes)
March 16 throughout the COVID-19 period	The new COVID-19 codes
Student full-day absences during the COVID-19 period	“EA” The new COVID-19 absence code
Spring break or teacher-only days	“U” The non-COVID-19 SEATS code for school closures (existing code)

**Q16: How can a nonpublic school change the attendance codes for specific students when, upon first entry, a COVID-19 attendance code auto-populates that code for all students on the same date?**

**A:** The “EA” code does not auto-populate. The “PE and HE” codes will auto-populate all student entries for that date. The “PE” code, when used, will be applicable for all students and auto-populates correctly.

The “HE” code may not be applicable to all students. To change “HE” to “EA” for specific students:

- Go back and override the “HE” code to change it to “EA” for those students-- only as applicable.

**Q17: Will OSSE remit payment for days a nonpublic school was closed for spring break or teacher-only designated days that took place during the COVID-19 period?**

**A:** No. Under existing OSSE payment rules, days designated as vacation or days designated as teacher-only attendance is not eligible for payment.

**Q18: How should a nonpublic school admit a newly placed student during this COVID-19 period?**

**A:** For students who receive a location assignment to a nonpublic school during the COVID-19 closure period, the LEA and nonpublic school should coordinate on an agreeable start date, in consultation with the parent(s) and:

- Notify OSSE of the start date via email.
- The student attendance recording in the OSSE SEATS system and nonpublic school invoice billing will begin on the agreed-upon date as determined by the nonpublic school, LEA, and parents.
- The new OSSE consent for telehealth services form should be shared and consent should be obtained as part of the admission process and upon the establishment of the student's official start date, learning schedule, and technology set-up.

**Q19: If a nonpublic school has already submitted a distance learning plan for the first 30-day period March 16 through April 14, 2020, must the nonpublic school submit another plan?**

**A:** Yes. Further, LEAs must submit a second request for nonpublic payment form and nonpublic schools must submit a completed questionnaire to comport with the reporting requirements as advised in the OSSE Nonpublic Guidance Part II dated April 15, 2020 [here](#).

**Q20: Can a nonpublic school invoice charges to OSSE for dedicated aide services during the distance learning period?**

**A:** Yes. In its guidance to nonpublic schools, OSSE has advised it will remit payment for tuition and related services. Payment for dedicated aide services is included in the tuition category and will also be remitted.

**Q21: Will OSSE remit payment for dedicated aides that are otherwise utilized by nonpublic schools?**

**A:** OSSE will remit payment for dedicated aides who are utilized in any manner that serves the assigned student. OSSE will review specific scenarios on a case by case basis. An example of the use of a dedicated aide that would not be reimbursed is where the aide performs general administrative functions unrelated to serving the assigned child. Nonpublic schools can contact Yvonne Smith, manager of the Nonpublic Payment Unit, to inquire prior to invoicing at, [YvonneS.Smith@dc.gov](mailto:YvonneS.Smith@dc.gov).

**Q22: If an LEA has already submitted a nonpublic payment form for the first 30-day period March 16 through April 14, 2020, will the LEA have to submit a new nonpublic payment form?**

**A:** Yes. Further, nonpublic schools must also submit a learning plan and questionnaire to comport with all the reporting requirements as advised in the OSSE Nonpublic Guidance Part II dated April 15, 2020 [here](#).

### **Questions?**

If you have questions relating to this FAQ contact Yvonne Smith, manager of the OSSE Nonpublic Payment Unit at, [YvonneS.Smith@dc.gov](mailto:YvonneS.Smith@dc.gov).

For resources and additional information on the District of Columbia Government's coronavirus (COVID-19) recovery and response, please visit <https://coronavirus.dc.gov/>.

## Appendix I. Guidance for Nonpublic School Closures and Individual Absences related to COVID-19

Use the following value to record in SEATS the dates the nonpublic school is fully closed and distance learning was not available due to the related public health emergency.

Code	Description	State Code Equivalent
PE	Public Emergency School Fully Closed	PE

Use the following value to record student attendance in SEATS on dates when: the nonpublic school is closed due to the public health emergency, distance learning is available, and the student received services.

Code	Description	State Code Equivalent
HE	Health Emergency Distance Learning	HE

Use the following value to record student absences in SEATS on any dates when: the nonpublic school is closed, distance learning is available, but the student did not attend due to any reason during the related public health emergency.

Code	Description	State Code Equivalent
EA	Emergency Absence during the public health emergency	EA

Use the following existing value to record student absences in SEATS on any dates when: the nonpublic school is closed for Spring Break or teacher-only development days.

Code	Description	State Code Equivalent
U	School closed to students-Non COVID-19	NPU