
INFORMATIONAL LETTER NO. 2634-MC-FFS

DATE: October 17, 2024

TO: Home and Community-Based Services (HCBS) Waiver Services Providers, HCBS Habilitation Services Providers, Integrated Health Homes (IHH), Targeted Case Managers, Health and Human Services (HHS) Service Workers

APPLIES TO: Managed Care (MC), Fee-for-Service (FFS)

FROM: Iowa Department of Health and Human Services (HHS),
Iowa Medicaid

RE: Clarification of Home and Community-Based Services (HCBS) Documentation Requirements

EFFECTIVE: Immediately

The purpose of this Informational Letter (IL) is to provide clarification of the service documentation requirements to support claims for payment submitted to Iowa Medicaid and the Managed Care Organizations (MCOs) specifically related to Home and Community-Based Services (HCBS). Providers have requested this clarification because they have historically been told that service documentation was non-billable time and must occur outside uncompensated service hours. We are clarifying that providers may document during service provision when it does not interfere with the service delivery.

Federal and State laws require providers to maintain the records necessary to “fully disclose the extent of services,” care and supplies furnished to beneficiaries, as well as to support claims billed. Clear and concise service documentation is critical to providing individuals with quality care and is required for providers to receive accurate and timely payment for furnished services. This applies to services delivered in-person, through remote support and telehealth.

Historically, HCBS providers understood that documentation of service delivery may only occur at the conclusion of the service encounter outside of the direct service delivery. To maintain accurate service documentation, direct service professionals are encouraged to document services during service provision or as soon as practical after the service.

Consistent with the person-centered philosophy of service provision, documentation of service delivery may occur during service provision when the person delivering the direct support has been trained to actively engage the HCBS member in the documentation of their service activities, goals, medication administration or other service-related activities. Best Practice is that staff document throughout the shift as activities occur or goals are worked on, then finish up at the end of the shift with any other additional information needed to complete the service note. Documentation of service delivery during the provision of services must not interfere with or detract from the service delivery experience of the HCBS member.

Service documentation training materials and Frequently Asked Questions (FAQs) documents are available on the [Iowa Department of Health and Human Services' website](#)¹ on the [Competency-Based Training and Technical Assistance webpage](#)² and on the [Learning Management System \(LMS\) webpage](#)³.

If you have questions, please contact Iowa Medicaid Provider Services or the appropriate MCO:

Iowa Medicaid Provider Services:

- Phone: 1-800-338-7909
- Email: imeproviderservices@dhs.state.ia.us

Managed Care Organizations (MCOs):

Iowa Total Care:

- Phone: 1-833-404-1061
- Email: providerrelations@iowatotalcare.com
- Website: <https://www.iowatotalcare.com>

Molina Healthcare of Iowa:

- Phone: 1-844-236-1464
- Email: japroviderrelations@molinahealthcare.com
- Website: <https://www.molinahealthcare.com/providers/ia/medicaid/home.aspx>
- Provider Portal: <https://www.availity.com/molinahealthcare>

¹ <https://hhs.iowa.gov/>

² <https://hhs.iowa.gov/programs/welcome-iowa-medicaid/provider-services/provider-trainings/cbt>

³ <https://hhs.iowa.gov/programs/welcome-iowa-medicaid/provider-services/provider-trainings/lms>

Wellpoint Iowa, Inc. (formerly Amerigroup Iowa, Inc.):

- Phone: 1-833-731-2143
- Email: ProviderSolutionsIA@wellpoint.com
- Website: <https://www.provider.wellpoint.com/iowa-provider/home>