



Interpretation Services Question and Answer Session Division Responses

If a case manager bills for interpreter services needed by the participant, does it impact the participant's budget?

Response: No. The funding used to pay for interpreter services is outside of the participant's IBA and will not affect the participant's purchasing power in any way.

Is Prior Authorization required?

Response: No. A prior authorization number is not required for interpreter services.

Are providers authorized to add the drive time of interpreters to the bill?

Response: In accordance with the [CMS 1500 Provider Manual](#) (page 336), travel time to and from appointments is specifically excluded as a covered service. The medical provider, regardless of type, can only bill Medicaid for the time spent with the Member in conjunction with the Medicaid service. Teams may want to consider using a remote service, such as Zoom, Microsoft Teams, or Google Meet to bring the interpreter into the meeting.

If a provider is in need of interpretation services, is the provider considered the business owner and required to provide the services for themselves?

Response: Yes. Providers, as the employer, are responsible for meeting all Department of Labor laws, including those regarding employee accommodations such as interpreter services. Wyoming Medicaid is responsible for the reimbursement of interpreter services when a Comprehensive, Supports, or Community Choices Waiver **participant or their legally authorized representative** needs the interpreter services in order to gain meaningful access to waiver services through the service planning and review process.

If the person who needs the interpreter is an employee, would the EOR be responsible for paying for the interpretation service?

Response: Yes. Page 2 of the ACES\$ Employer Packet states "Employer - the Employer is the person who is ultimately responsible for managing the employees and ensuring **applicable employment laws** are upheld. This includes hiring, firing, scheduling, training, ensuring competency, supervising and approving timesheets. The Department of Labor [website](#) has more information on an employer's obligation to provide reasonable accommodations to employees with disabilities.

Who is responsible for paying for interpretation services during plan of care meetings?

Response: If the participant or their legally authorized representative needs the interpreter services, Wyoming Medicaid will pay for the services; however, the interpreter cannot bill Medicaid directly. The case manager is responsible for securing the interpreter services, billing Medicaid for the services, and reimbursing the interpreter for the services.

Is ACES\$ responsible for paying for interpretation services since they issue W-2's to the employee?

Response: No. When the Employer of Record (EOR) completed the ACES\$ employer packet, they acknowledged that they were acting as the EOR, and further acknowledged that neither the State of Wyoming or ACES\$ was the employer. The EOR filed for, and was issued, an Employer Identification Number (EIN) and authorized ACES\$ to submit required tax forms on their behalf. The EOR is the employer listed on the employee's W-2, and is obligated to review requests and determine reasonable accommodations for their employees.