



School-Based ACCESS Program (SBAP)

Compliance Session

FY 2020-2021 Statewide Training

> Compliance Training Objectives

- Learning Objective: Upon completion of this session, participants will be able to identify key aspects of compliance and recognize commonly identified issues/errors in an audit of School-Based ACCESS Program (SBAP) services billed by the Local Education Agencies (LEAs).
- Key Topics:
 - New SBAP Coordinator
 - Common Audit Findings
 - Tele-Medicine
 - License Verification
 - Documentation Reminders

Bureau of Program Integrity

- The Bureau of Program Integrity (BPI) is part of the Pennsylvania Department of Human Services (DHS).
- BPI has medical professionals responsible for:
 - preventing, detecting, deterring, and correcting fraud, abuse, and wasteful practices by providers of Medical Assistance (MA) services – including LEAs,
 - applying administrative sanctions, and
 - referring cases of potential fraud to the appropriate enforcement agency.

> New SBAP Coordinator

Debra J. Buffington, RN
Department of Human Services
Bureau of Program Integrity
Division of Provider Review

Common Audit Findings

Issues Frequently Discovered During Audits

- Services billed were not documented on Medical Practitioner Authorization form (MPAF)
- Group or individual not specified in the Individualized Education Program (IEP) and/or MPAF
- Order is for individual, but billed as group
- MPAF & IEP do not match/service lacked duration
- Service does not fully disclose the nature & extent of services/lack of sufficient documentation
- Personal Care Attendant (PCA) service not 1:1
- Billed for services that were not face to face

Common Audit Findings

Services not Listed on MPAF

As a condition of MA payment, health-related services identified in a student's IEP must be authorized or prescribed by a licensed practitioner, acting within their scope of practice and enrolled in the MA Program.

This is addressed in the SBAP Handbook Section 4.2 Medical Necessity/Medical Authorization

> Common Audit Findings (Cont.)

Order is for Individual, but Billed as Group

Individual and/or group must be clearly identified on both the MPAF and the IEP with the frequency and duration specified for each type of session.

If providing as an incidental group service that is not recommended in the IEP and authorized/prescribed by the MPAF, do NOT bill for this service.

This is addressed in the SBAP Handbook Section 4.3 Documenting Individual and Group Therapy

> Common Audit Findings (Cont.)

Authorized vs. Documented Services

- Units of service billed must be equal to or less than the units of service authorized on the MPAF.
- You are highly encouraged to verify through the self-audit process that the duration and frequency of the services billed are equal to or less than the duration and frequency recommended in the IEP and authorized on the MPAF.
- Link to self audit form:

https://paaccess.pcgus.com/documents/PA%20SBAP_Self_Audit%20Review.pdf

Common Audit Findings (Cont.)

Group or Individual Not Specified in the IEP and/or MPAF

Group vs Individual sessions on IEPs and MPAF/order/prescription should be listed as below.

- LEAs should be writing for what is medically necessary for the student. If the student requires only individual, then that is what should appear on the IEP and MPAF/order/prescription (Example- Speech therapy individual 30 min 3x per week).
- If the student requires group only, then that is what should be placed in the IEP and on the MPAF/order/prescription (Example- OT group 30 min 2x/week).
- If the student requires a combination, then we would expect to see both on the IEP and the MPAF/order/prescription (Examples- OT individual 30 min 2x per week, OT group 30 min 4x per year).
- Group therapy has been ordered for the students and everyone is absent except for that student, then the choice is to reschedule group later that week or provide a make-up session (be sure it is documented as a make-up session).

> Common Audit Findings (Cont.)

MPAF and IEP Do Not Match/Service Lacked Duration

Prescriptions or MPAFs must be concurrent with the IEP and obtained at least annually, or whenever there is a change to the health-related services in the IEP (i.e. service added or changes in frequency of service).

- Ensure the service type, frequency, duration and mode are listed on both the IEP and MPA.

Common Audit Findings (Cont.)

Medical Practitioner Authorization for SBAP Services

Student's Name: Pamela Tressler
 Participating School Name: IU Name & School District

Date of the current IEP Meeting: 06/30/17
 MM/DD/YY

Related Services	Duration	Frequency	Projected Start Date	Projected End Date	Group	Individual
Audiology					N/A	
Nursing					N/A	
Occupational Therapy	30 Min	3Xwk	7/1/17	2/1/18		X
Occupational Therapy						
Orientation, Mobility & Vision					N/A	
Personal Care Services	SD	Daily	7/1/17	6/30/18	N/A	X
Physical Therapy	30 Min	2Xwk	7/1/17	6/30/18	X	
Physical Therapy	15 Min	Wkly	7/1/17	6/30/18		X
Psychiatric						
Psychiatric						
Psychological						
Psychological						
Social Work						
Social Work						
Speech & Language						
Speech & Language						
Hearing Impaired						
Hearing Impaired						
Special Transportation					N/A	

Re-Evaluations to be provided throughout the duration of this IEP:

- | | | |
|--|--|---|
| <input type="checkbox"/> Audiology | <input checked="" type="checkbox"/> Occupational Therapy | <input type="checkbox"/> Orientation, Mobility & Vision |
| <input checked="" type="checkbox"/> Physical Therapy | <input type="checkbox"/> Psychiatric | <input type="checkbox"/> Psychological |
| <input type="checkbox"/> Social Work | <input type="checkbox"/> Speech & Language | <input type="checkbox"/> Hearing Impaired |

I reviewed the Individualized Education Program (IEP) for this student and agree that the health-related services and re-evaluations recommended above by the IEP team are both appropriate and medically necessary.

Authorized Signature _____

*Date of Signature 7/2/17

Printed Name/Practitioner Title Im Outofideas/MD

License # MD-----

NPI# 1234567890

MA Provider # 1000000000128

If review of medical necessity was conducted face-to-face with the student, separate documentation must be maintained.

*The date of signature is required prior to or on the date of service.

MPAF = Medical
Necessity!

> Common Audit Findings (Cont.)

Lack of Sufficient Documentation

When documenting the service, providers should ensure that these 5 questions are addressed in the documentation:

- Why did the student present for service/treatment?
- What kind of treatment did student receive?
- What was observed during the service/treatment?
- What was the outcome of the service/treatment?
- Is follow-up needed?

Relate documentation to goals and objectives in the IEP.

> Common Audit Findings (Cont.)

Insufficient Documentation Examples

- OT – FM/HW initials traced & copied
- PT – balance and reaching for toy
- SW/PSY – anger management
- Nursing – post seizure care
- PCA - monitored and assisted

Common Audit Findings (Cont.)

Sufficient Documentation Examples

- OT - Fine motor/handwriting exercise. Traced initials 12X with 90% accuracy. Copied initials 18X, T legible, C is not. Will continue to work with student.
- PT - Worked on standing balance by taking steps to the R & L to reach for a toy with min assistance. Able to ambulate 200' by holding hands.
- SW/PSY - Anger management group. Focused on de-escalation techniques. Very agitated and unable to focus and participate.
- Nursing - Emergency skilled nursing services required for post grand mal seizure observation. Teacher reported at 1230 (note what teacher stated), Moved to nurse's office for observation. (Document what you did or observed while waiting for mom). Home with mom at 1310.
- PCA - Opened milk carton and inserted straw, all other items opened, cut food into bite size pieces, monitored while eating, hand-over-hand assistance given 3 times.

> Common Audit Findings (Cont.)

Billing for Multiple PCAs Time

Personal care is a one-to-one service provided to beneficiaries with physical or mental impairments or conditions in accordance with a plan of treatment and prescribed by a physician.

- Should a student require the assistance of more than one PCA, you may only bill for **one** PCA.

> Common Audit Findings (Cont.)

Billing for Non-Face-to-Face Services

All services must be face-to-face with the student in order to be compensable.

MA does not pay for consultation with another provider or parent.

> Telemedicine

For purposes of Medicaid, telemedicine seeks to improve a patient's health by permitting two-way, real time interactive communication between the patient, and the physician or practitioner at the distant site. This electronic communication means the use of interactive telecommunications equipment that includes, at a minimum, audio and video equipment.

For dates of service on or after March 16, 2020, the following SBAP services may be provided via telemedicine and billed for payment:

- Occupational Therapy
- Physical Therapy
- Speech Therapy
- Social Work and Counseling

> Telemedicine (Cont)

Asynchronous or "Store and Forward": Transfer of data from one site to another through the use of a camera or similar device that records (stores) an image that is sent (forwarded) via telecommunication to another site for consultation. Asynchronous or "store and forward" applications would **not** be considered telemedicine.

Telemedicine Documentation Example

- Mother and student actively participating via Zoom no connectivity issues. 'Her mother said she can understand her better now.' Rose produced /l/ in the final position of words with 70% accuracy. Rose's pronunciation has improved 10% since the last session with visual cues of tongue placement. Rose continues to improve with /l/ in the final position and is reaching goal status of /l/ in the initial position. The next session will focus on /l/ in the medial position.

> Extended Certifications

Department of State sought, and the Governor granted, extensions to various (not all) professions whose licenses were scheduled to expire. We recommend if any of your providers fall under this extension that you save a copy of the memo granting this extension.

The following is a link to the Pennsylvania Department of State - COVID-19 Suspensions:

<https://www.dos.pa.gov/Pages/COVID-19-Waivers.aspx>

Extended Certifications (Cont)



American
Red Cross

has successfully completed requirements for

Adult and Pediatric First Aid/CPR/AED; valid 2 Years

Date Completed: 05/23/2018

conducted by: American Red Cross

Instructor:

ID

Scan code or visit:
redcross.org/confirm

Extended Certifications (Cont)

LEAs will need to reach out to the entity that issued the certificate to determine if that entity has provided an extension



American Red Cross
Training Services

Certificate of Completion

has successfully completed requirements for

120 day certification extension from original expiration date. This certificate must be presented with a Red Cross certificate expired as between March 1st – June 30th, 2020

Date Completed: 6/3/2020
Validity Period: 120 - Days

Conducted by: American Red Cross



To verify certificate, scan code or visit redcross.org/digitalcertificate and enter ID.

Learn and be Inspired at LifesavingAwards.org

009HUAD

► Documenting Provider Credentials

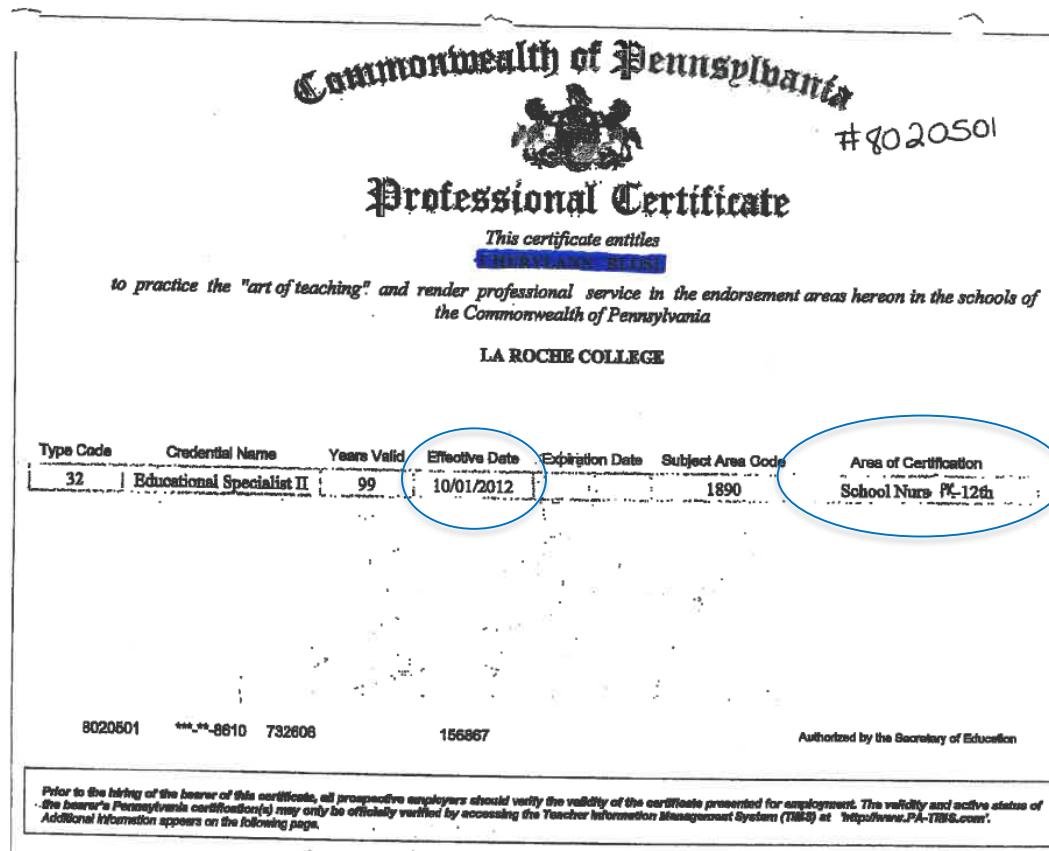
Many individuals who provide SBAP services have a Pennsylvania Department of Education (PDE) certificate associated with their position (e.g., school nurse, social worker); however, most PDE certificates are NOT sufficient verification of the individual's eligibility to provide services under the SBAP.

How do I ensure my LEA has the appropriate documentation?

- Ideally, the individual should provide the LEA with a copy of his/her current license or certification.
- Pennsylvania Licensing System Verification service found on the Department of State website at <https://www.pals.pa.gov/#/page/search>.
- Certification Verification search function found on the American Speech-Language-Hearing Association website at <https://www.asha.org/eweb/ashadynamicpage.aspx?webcode=ccchome>.

► Documentation for School Nurse

The individual who holds this PDE certificate **may** be a qualified school nurse, but this document **does not** provide sufficient verification.



► Documentation for School Nurse (cont.)

The document below provides verification of the individual provider's Department of State license as a Registered Nurse, including effective dates. <https://www.pals.pa.gov/#/page/search>

BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS P. O. Box 2849 Harrisburg, PA 17105-2849 09/18/2019	
License Information	
[REDACTED] ENOLA, Pennsylvania 17025	
Board/Commission:	State Board of Nursing
License Type:	Registered Nurse
Specialty Type:	
License Number:	[REDACTED]
Status:	Active
Disciplinary Action Details	
No disciplinary actions were found for this license.	
This site is considered a primary source for verification of license credentials provided by the Pennsylvania Department of State.	

Documentation of SLP Credentials

The individual who holds this PDE certificate **may** be a qualified Speech Language Pathologist (SLP), but this document **does not** provide sufficient verification.

Commonwealth of Pennsylvania

Professional Certificate
This certificate entitles
EDWARD J. KELLY
to practice the "art of teaching" and render professional service in the endorsement areas hereon in the schools of
the Commonwealth of Pennsylvania
CALIFORNIA UNIVERSITY OF PA

Type Code	Credential Name	Years Valid	Effective Date	Expiration Date	Subject Area Code	Area of Certification
62	Instructional II	99	07/01/2016		9265	Speech & Language Impaired PK-12

9382147 932453 459714 Authorized by the Secretary of Education

This is not an official record. Prior to the hiring of the bearer of this certificate, all prospective employers should verify the validity of the certificate presented for employment. The validity and active status of the bearer's Pennsylvania certification(s) may only be officially verified by accessing the Teacher Information Management System (TIMS) at <http://www.teachercertification.pa.gov>. Additional information appears on the following page.

Documentation of SLP Credentials (cont.)

The screenshot below provides verification of the individual provider's certification as a SLP, including effective dates.

The screenshot shows a web browser displaying the ASHA Certification and Ethics Verification page. The URL is https://www.asha.org/eWeb/ashadynamicpage.aspx?sitepath=acmsite+webcode+ccderitiv2&v3_cstkey=am2015b-Trca-4bs1_0ba1-4ce75d44313f. The page title is "ASHA Certification and Ethics Verification". The main content area displays the "Certification Status" for a provider. The provider's name is listed as [REDACTED], ASHA Account Number is X00 [REDACTED], and Certification Status is CCC-SLP. Other Name(s) is listed as [REDACTED]. The Area of Certification is SLP, Certification Awarded date is 02/28/2014, and Valid Through date is 03/31/2020. To the right of the main content, there is a sidebar titled "ASHA CERTIFICATION" with links for "APPLY FOR SLP CERTIFICATION", "APPLY FOR AUDILOGY CERTIFICATION", "CERTIFICATION MAINTENANCE", "PRAXIS EXAM", and "CLINICAL FELLOWSHIP". Below the sidebar is a small "Secured by Comodo" logo. At the bottom left, there is a section titled "About ASHA Certification" with a brief description of the renewal process.

ASHA Certification and Ethics Verification

Certification Status

Individuals certified in speech-language pathology have successfully completed the requirements in effect at the time of their application for certification. This includes completion of the requisite academic course work and clinical practicum, completion of a Clinical Fellowship experience supervised by an individual who held valid ASHA certification in Speech-Language Pathology during the CF experience, and successful completion of the Praxis examination in Speech-Language Pathology administered by the Educational Testing Service (ETS).

Name: [REDACTED]	ASHA Account Number: X00 [REDACTED]	Certification Status: CCC-SLP
Other Name(s) [REDACTED]		
Area of Certification: SLP	Certification Awarded: 02/28/2014	Valid Through: 03/31/2020

About ASHA Certification

ASHA certification must be renewed on a yearly basis through payment of annual dues and/or fees. There also is an additional maintenance requirement for completion of 30 hours of professional development activities every three years.

► Documentation of SLP Credentials (cont.)

The individual who holds this PDE certificate **may** be a qualified SLP, but this document **does not** provide sufficient verification.

#3068414

Commonwealth of Pennsylvania

Professional Certificate

This certificate entitles
[Redacted]
to practice the "art of teaching" and render professional service in the
endorsement areas hereon in the schools of the Commonwealth of Pennsylvania

Type Code	Years Valid	Effective Date	Area of Certification	Type Code	Years Valid	Effective Date	Area of Certification
62	99	07/2003	SPEECH & LANGUAGE IMPAIRED	**	***	*****	[Redacted]
**	***	*****	[Redacted]				[Redacted]

TYPE CODE: 01 Occupational Comp Area (Not)
07 Voluntary Deletion
08 Allot Provisional
09 Allot Permanent
** No Longer Issued

01 Vocational I
02 Vocational II
03 Vocational III (Administrator)
04 Coordinator II (Administrator)
05 Alternative Intern

01 Biological Specialist I
02 Educational Specialist I
03 Educational Specialist II
04 Instructional I
05 Instructional II
06 Supervisor

00 Professional College
01 Institutional I
02 Institutional II
03 Supervisory I

08 Administrativ I
09 Permanent College
01 Supervisory II
02 Supervisory III

00 COMPETENCY AREA OF PERMITTING IN CONJUNCTION WITH VOCATIONAL INSTRUCTION

236 31 1377 14 03022890
INSTRUCTIONAL CERT ISSUED IN ACCORDANCE WITH 6/1/1987 REGS

IMPORTANT INFORMATION ON REVERSE

Authorized by the Secretary of Education

► Documentation of SLP Credentials (cont.)

The document below provides verification of the individual provider's Department of State license as a SLP, including effective dates.

The screenshot shows a web page from the Bureau of Professional and Occupational Affairs. At the top is the Commonwealth of Pennsylvania seal. Below it, the text reads: "BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS", "P. O. Box 2849", "Harrisburg, PA 17105-2849", and the date "09/17/2019". A large redacted area follows. The next section, "License Information", contains the following data:

Board/Commission:	State Board of Examiners in Speech-Language Pathology and Audiology	Status Effective Date:	03/29/2011
License Type:	Speech Language Pathologist	Issue Date:	01/23/2006
Specialty Type:		Expiration Date:	07/31/2020
License Number:	SL008415	Last Renewal:	07/18/2018
Status:	Active		

The next section, "Disciplinary Action Details", states: "No disciplinary actions were found for this license."

At the bottom, a note reads: "This site is considered a primary source for verification of license credentials provided by the Pennsylvania Department of State."

> Self-Audits

- Best Practice: Perform periodic self-audits on your LEA's direct service and transportation compliance data and documentation to ensure services were rendered and billed correctly and documentation appropriately maintained.
- The Self-Audit Tool provides a checklist of documents/records required for SBAP billing.

NOTE: Just because you find an error on a log does not mean it was a paid claim! Be sure to check with BPI or PCG on whether the log resulted in a paid claim to determine next action.

> Self-Disclosures

- Providers have a legal and ethical commitment to return inappropriate Medicaid payments.
- LEAs are encouraged to self disclose billing errors and violations identified.
- Disclosures should be made directly to the BPI SBAP Coordinator at (717)772-4631.

> Documentation and Storage

- Scanning – Must maintain originals
- Electronic Records/Storage
 - EasyTrac Export – Backup
- Physical Records/Storage
- For MA related purposes, retain records for at least four (4) years from date of service

NOTE: Discontinued participation in SBAP doesn't avoid the LEA's obligation as an MA Provider to follow the records retention requirement.

> Presenter Contact Information

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