



# **School-Based ACCESS Program (SBAP)**

## ***General Session***

### **FY2020-2021 Statewide Training**

# Agenda

- Program Basics
- Overview and Financial Performance
- Unrestricted Indirect Cost Rate (UICR)
- Updates to the SBAP Handbook
- SBAP & Impacts from COVID-19
- SBAP Resources

# SCHOOL-BASED ACCESS PROGRAM BASICS

# SBAP Roles

- PA Department of Human Services (DHS)
  - Office of Medical Assistance Programs (OMAP)
  - Bureau of Program Integrity (BPI)
  - Bureau of Fiscal Management (BFM)
  - Bureau of Policy, Analysis, and Planning (BPAP)
- PA Department of Education (PDE)
  - Bureau of Special Education (BSE)
- Local Education Agencies (LEA)
- Contractor for Lot 1: Public Consulting Group (PCG)
- Contractor for Lot 2: Sivic Solutions Group (SSG)

# Contractor Responsibilities

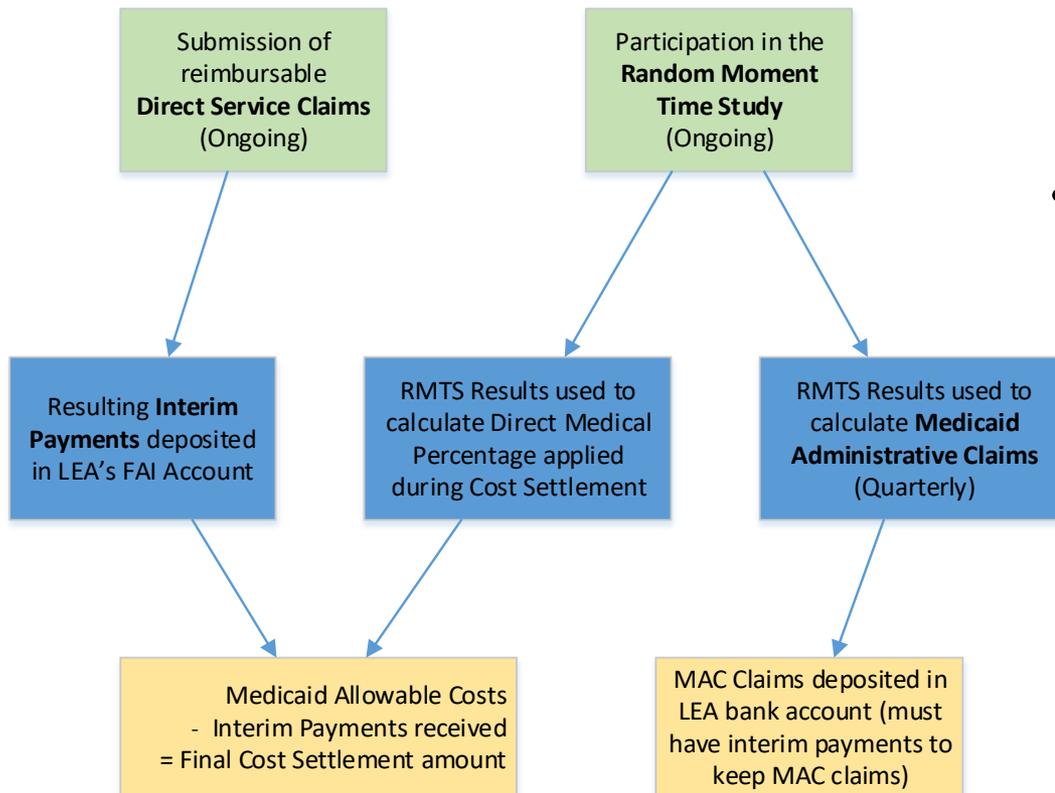
## Lot 1 Services (PCG):

- Operating and maintaining a third-party billing system to submit claims to DHS for direct services and special transportation
- Conducting the Random Moment Time Study (RMTS)
- Submitting quarterly claiming for Medicaid administrative activities to DHS
- Contractor Systems: *EasyTrac* and *Claiming System*

## Lot 2 Services (SSG):

- Performing annual cost reconciliation and settlement tasks
- Conducting annual oversight and monitoring reviews
- Calculating annual interim rate adjustments
- Conducting quarterly RMTS coding reviews
- Contractor System: *e-SivicMACS*

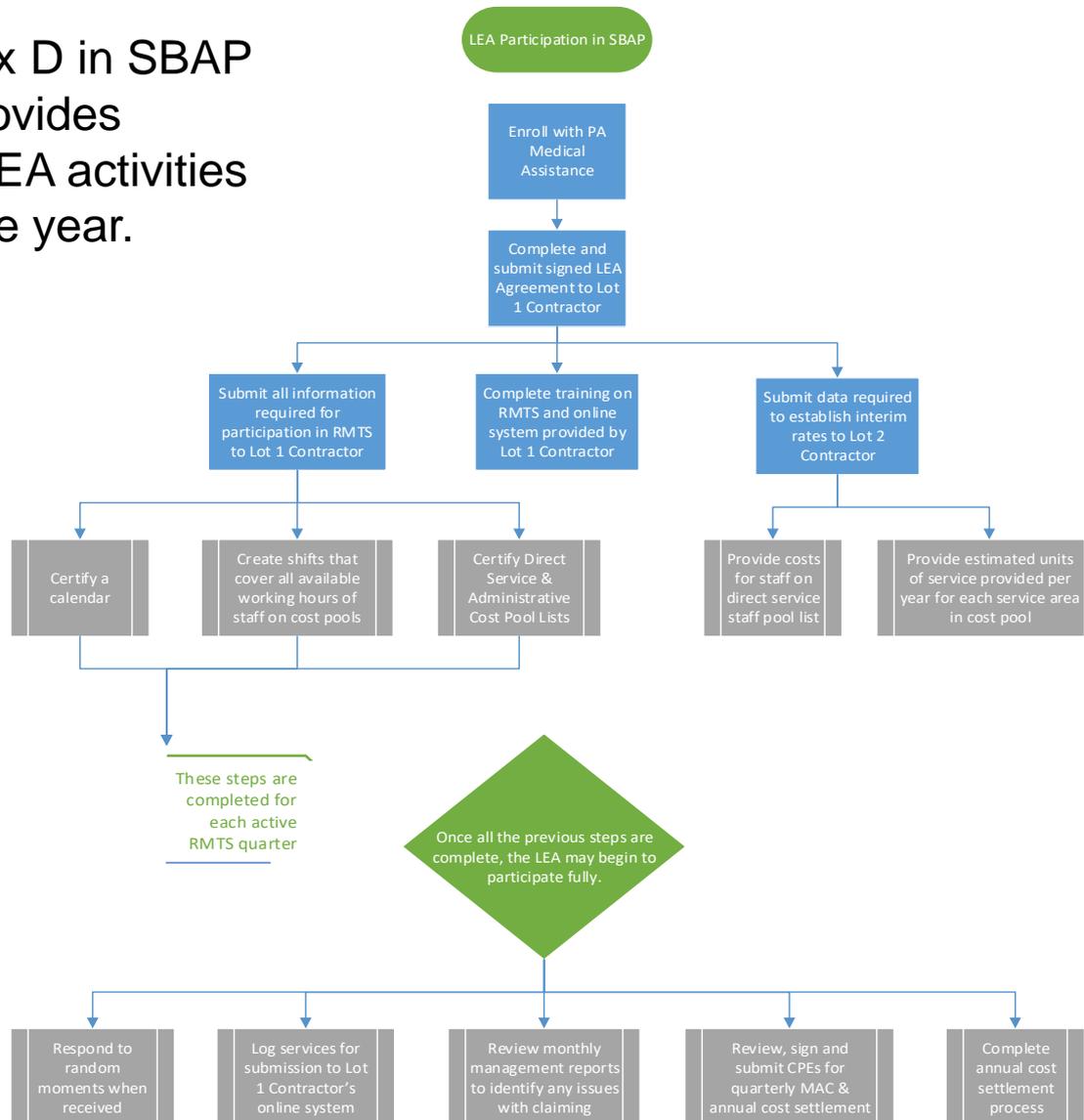
# Program Components



- Redesigned view of the key SBAP components is included in the September 2020 SBAP Handbook.
- Shows how your ongoing activities impact the financial outcomes for your LEA.

# LEA Responsibilities

New Appendix D in SBAP Handbook provides overview of LEA activities throughout the year.



# SBAP Recurring Timeline – FY 2020-2021

## July (2020)

- July - Sept Quarter Begins (Inactive Quarter – No RMTS moments)
- Certify Costs for April-June Quarter (MAC Checks)
- LEA Agreements for FY20-21

## August (2020)

- Open Oct – Dec Quarter RMTS Staff Pools and School Calendar

## September (2020)

- Deadline to Certify Oct – Dec Quarter RMTS Staff Pools and School Calendar
- All MAC CPEs due for FY19-20
- Annual Fall Program Trainings

## October (2020)

- Oct – Dec Quarter Begins
- Certify Costs for July – Sept Quarter (MAC Checks)
- Interim Rate Adjustments
- Annual Fall Program Trainings / Cost Settlement Webinars
- Open Cost Reports FY19-20
- Apply for UICR

## November (2020)

- Annual Cost Settlement Webinars FY19-20
- Open Jan – March Quarter RMTS Staff Pools and School Calendar

## December (2020)

- Annual Cost Settlement Webinars FY19-20
- Deadline to Certify Cost Reports FY19-20
- Deadline to Certify Jan – March Quarter RMTS Staff Pools and School Calendar

## January (2021)

- Jan – March Quarter Begins
- Certify Costs for Oct – Dec Quarter (MAC Checks)

## February (2021)

- Open April – June Quarter RMTS Staff Pools and School Calendar
- Annual Cost Settlement Desk Reviews

## March (2021)

- Deadline to Certify April – June Quarter RMTS Staff Pools and School Calendar
- Annual Cost Settlement Desk Reviews

## April (2021)

- April – June Quarter Begins
- Certify Costs for Jan – March Quarter (MAC Checks)

## May (2021)

- Release FY19-20 Reconciliation/ Cost Settlements to LEAs
- Deadline for LEAs to submit FY19-20 Cost Settlement CPE Forms

## June (2021)

- Review and Approval of Cost Reconciliation Report by DHS



# October to December Quarter

## October (2020)

- Oct – Dec Quarter Begins
- Certify Costs for July – Sept Quarter (MAC Checks)
- Interim Rate Adjustments
- Annual Fall Program Trainings / Cost Settlement Webinars
- Open Cost Reports FY19-20
- Apply for UICR

## November (2020)

- Annual Cost Settlement Webinars FY19-20
- Open Jan – March Quarter RMTS Staff Pools and School Calendar

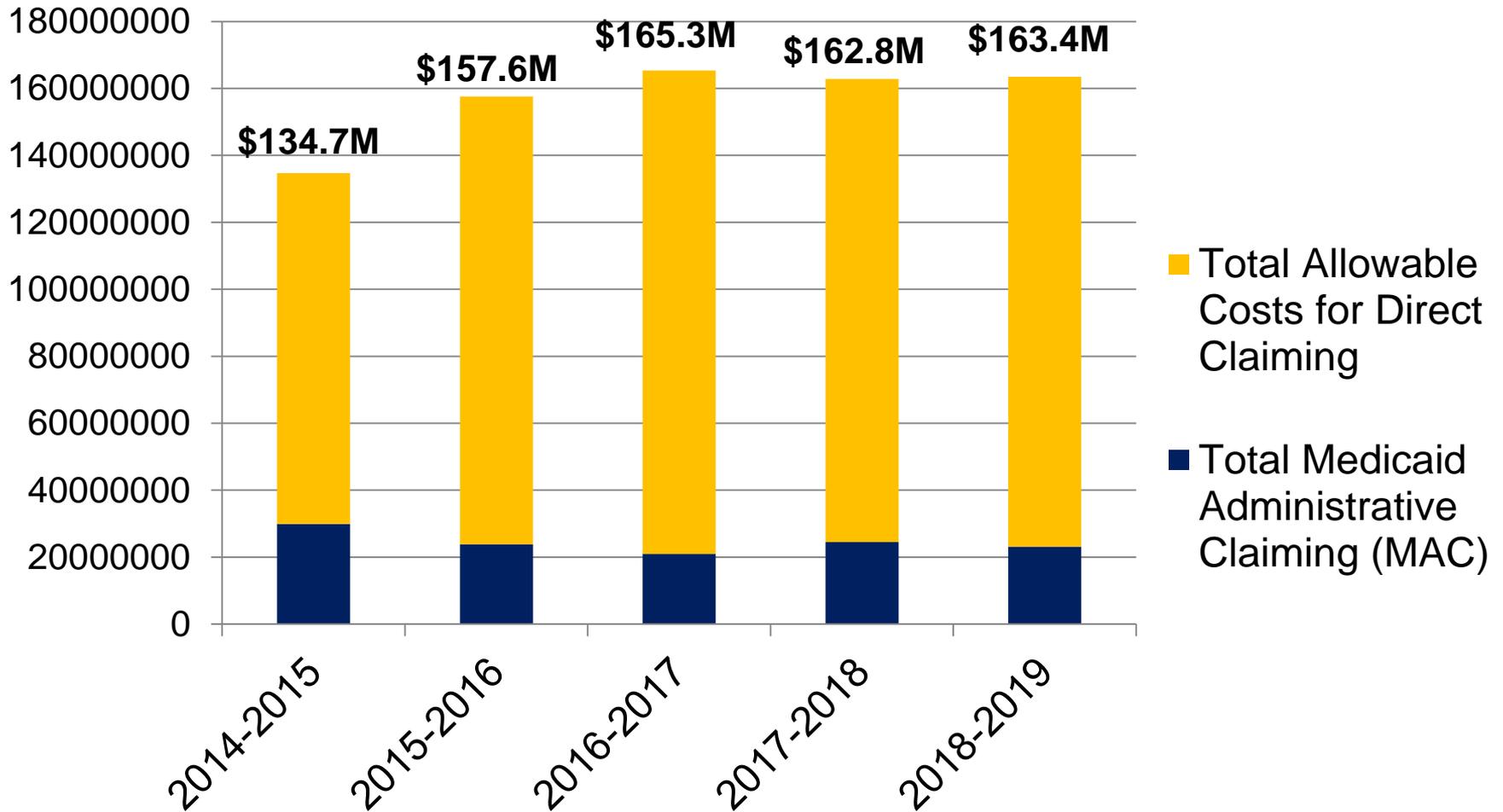
## December (2020)

- Annual Cost Settlement Webinars FY19-20
- Deadline to Certify Cost Reports FY19-20
- Deadline to Certify Jan – March Quarter RMTS Staff Pools and School Calendar

- Note the step to apply for a UICR by completing your Annual Financial Report for PDE by October 31, 2020.
- In October, start preparing your LEA's Cost Report for previous fiscal year (accrual basis). Start Early and participate in Cost Settlement webinars!
- *In October, look back at previous quarter* – submit quarterly costs for MAC for July to September quarter, due one month after close of quarter (based on actual costs)
- *In November, look ahead to next quarter* – update and certify calendars and Staff Pool Lists for January to March quarter.
- December 31 – all LEA Cost Reports are due.

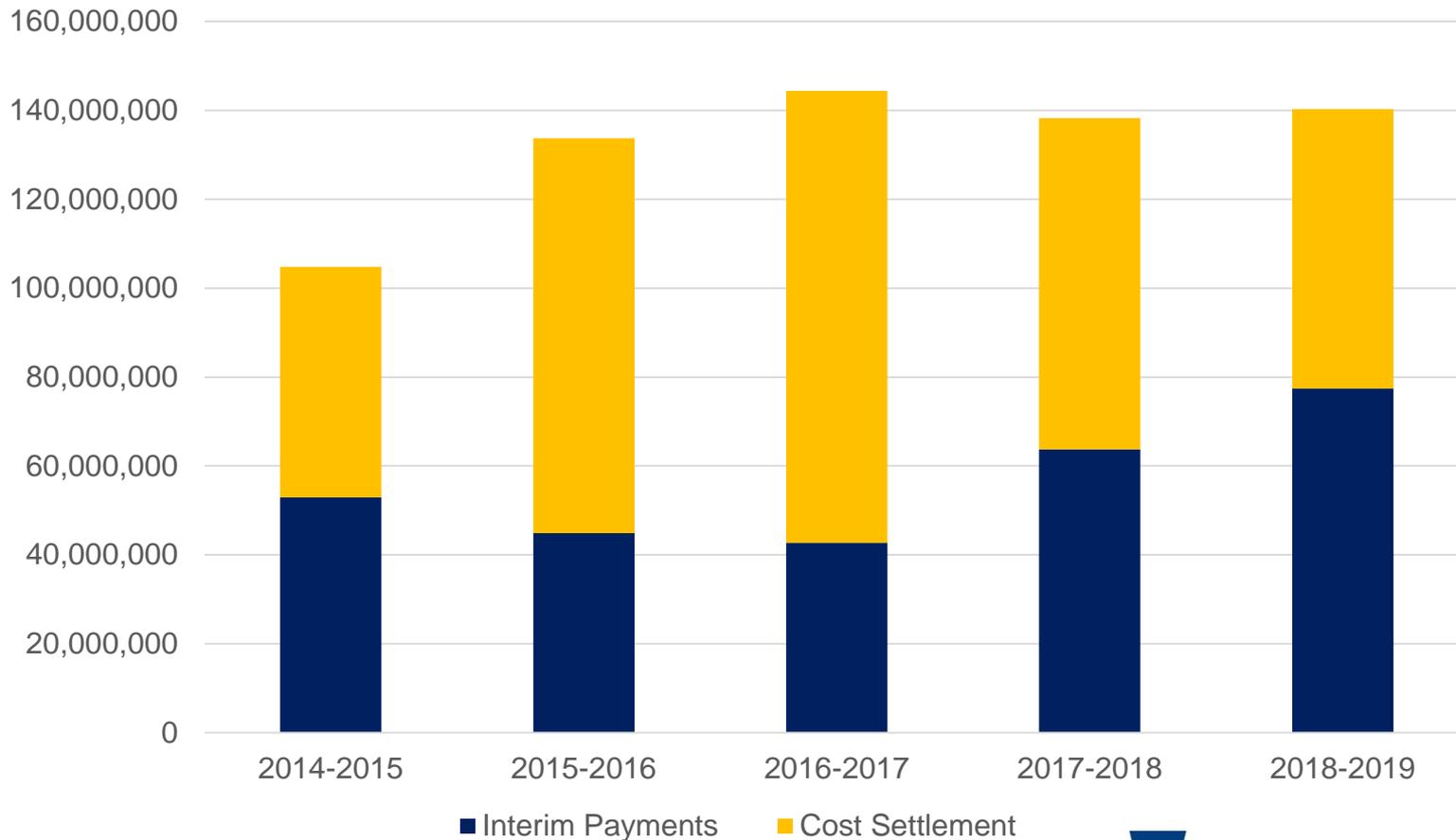
# FY2019-2020 FINANCIAL PERFORMANCE

# Statewide Financial Performance



# Direct Service Claiming vs. Cost Settlement

- More reimbursement was through Direct Service claiming (Interim Payments) than through cost settlement for FY18-19



# Direct Service Claiming vs. Cost Settlement

FY 2018-2019:

- More LEAs received the bulk of reimbursement in interim payments for properly submitted claims rather than at cost settlement.
- However, there are still LEAs that are not reaching proper claiming levels, and instead rely on a few claims to support their costs.
- Approximately 48% of LEAs claimed 50% or less of Total Medicaid Allowable Costs (compared to 56% in FY17-18).
- Of those, approximately 17% claimed 25% or less (19% in FY17-18).

<b>Interim payments received based on claiming activity</b>	<b>Cost Settlement Payments based on total allowable costs</b>
\$9.85	\$10,696.61
\$7,396.61	\$175,345.08
\$13,526.25	\$411,260.19

# UNRESTRICTED INDIRECT COST RATE

# Unrestricted Indirect Cost Rate

Indirect costs are an allowable component of the LEA reimbursement within the School-Based ACCESS Program.

To include indirect costs as part of the reimbursement calculation, an LEA-specific unrestricted indirect cost rate (UICR) must be established.

- PDE has the authority to establish and certify UICRs.

LEAs may apply for a UICR by completing the Indirect Cost Schedule portion of the Annual Financial Report (AFR) and submitting it to PDE.

- Completion of the AFR by October 31 each year is an existing requirement for LEAs.
- Requesting an indirect rate is **not required** by PDE or DHS.
- **If an LEA does not timely apply** for and receive an LEA-specific UICR, a zero rate will be applied and no indirect costs will be included.
- Rates are certified by PDE, provided to DHS and then to vendors.
- The result of a zero rate is decreased SBAP reimbursement for your LEA for both MAC and Cost Settlement.

# Unrestricted Indirect Cost Rate

Please note: the screen to request an indirect rate does NOT mention SBAP; however, selecting that you are NOT requesting an indirect cost rate will have a negative impact on your SBAP reimbursement levels.

**CFRS** Consolidated Financial Reporting System  
CFRS Home | Search | Maintenance | Reports | Help & Support | Logout

### Indirect Costs (Schedules for Reporting Indirect Costs)

Check here if you are NOT requesting an Indirect Cost Rate

<input type="checkbox"/> <b>Unrestricted Rate Requested</b> Schedules Required: <ul style="list-style-type: none"><li>• Proprietary Expense Detail</li><li>• Subcontract/Subaward</li><li>• Paid Leave</li></ul> Uploads Required: <ul style="list-style-type: none"><li>• Organization Chart</li></ul>	<input type="checkbox"/> <b>Restricted Rate Requested</b> Schedules Required: <ul style="list-style-type: none"><li>• Proprietary Expense Detail</li><li>• Subcontract/Subaward</li><li>• Paid Leave</li><li>• Restricted Rate Adjustment</li><li>• Plant Maintenance Costs</li></ul> Uploads Required: <ul style="list-style-type: none"><li>• Organization Chart</li><li>• Back up Excel Template for the Plant Maintenance Costs Schedule</li></ul>
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By checking the below box and requesting an unrestricted and/or restricted indirect cost rate, the LEA and its authorized officials certify that the LEA has complied with the applicable federal requirements contained in 2 CFR §200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards related to cost principles, administrative standards, and audit requirement publications.

The LEA also certifies that it has reviewed the most recent Chart of Accounts for Pennsylvania Local Education Agencies maintained by the Pennsylvania Office of the Budget, Office of Comptroller Operations, to ensure that the LEA's chart of accounts accurately reflects the revenue, funding source, expenditure function and object codes.

I certify compliance with applicable federal requirements as described above.

[Training materials and instructions for completing the Indirect Cost Schedules](#)

For any specific questions or issues after consulting the training materials, please contact [RA-EDPDEINDIRECTCOST@pa.gov](mailto:RA-EDPDEINDIRECTCOST@pa.gov)

# Unrestricted Indirect Cost Rate

For more information how to apply for a UICR when completing your AFR, please contact PDE at:

- [RA-EDPDEINDIRECTCOST@pa.gov](mailto:RA-EDPDEINDIRECTCOST@pa.gov)

Instruction manuals and other helpful information can be found at:

- [ftp://copaftp.state.pa.us/pub/PDE\\_PUBLIC/Indirect\\_Cost\\_Training/](ftp://copaftp.state.pa.us/pub/PDE_PUBLIC/Indirect_Cost_Training/)

For more information about how an UICR affects your SBAP reimbursement, see the SBAP Handbook, Section 9.4.

# SBAP HANDBOOK UPDATES

# SBAP Handbook Updates

- An update to the SBAP Handbook will be issued September 2020.
- Updates are highlighted for easy identification.

SBAP Handbook is available at:

<http://www.dhs.pa.gov/provider/School-BasedACCESS/>

# Updates to PCA Services

Changes to Section 3.8 reinforce that billable PCA services are medically necessary, not educational, services.

Examples of Services	For personal care services to be compensable, they must be: <ol style="list-style-type: none"> <li>1. Face-to-face with the student.</li> </ol>
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	<ol style="list-style-type: none"> <li>2. A medically necessary service.</li> <li>3. NOT educational in nature.</li> </ol> <ul style="list-style-type: none"> <li>• Assist the student to use equipment that is necessary due to student's disability.</li> <li>• Assist the student to use and maintain augmentative communication devices.</li> <li>• Assist a student to ambulate, position, and transfer.</li> <li>• Assist with or carry out range of motion and other exercises.</li> <li>• Assist with Activities of Daily Living (ADL), such as feeding, grooming, bathing, toileting, etc.</li> </ul>
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# Updates to PCA Services (cont.)

A new service example was added to indicate that assistance in getting on or off school transportation is a billable service when part of the student's IEP.

	<ul style="list-style-type: none"><li>• Accompany student on school bus or <u>other</u> vehicle per the IEP.</li><li>• Assist student to get on or off school bus or other vehicle upon arrival or departure from school, per the IEP.</li><li>• Cuing the student to pay attention, participate in activities, and complete tasks. Personal Care Services are not to be used to help students with educational activities.</li></ul>
Procedure	T1019 U3 TM – PCA Service

# Updates to Evaluations

- Replaced the chart of requirements with explanations of requirements in paragraph form.
- New and updated language is highlighted.

## 4.8 Evaluations

Medicaid can provide reimbursement for an evaluation when a health-related service is identified and documented in the IEP. However, evaluations that identify the need for special education services, but not for health-related services, are not billable to Medicaid.

### 4.8.a Authorization for an Evaluation

All initial evaluations and re-evaluations must be authorized or prescribed by a licensed MD, licensed DO, licensed CRNP, or licensed practitioner within his or her scope of practice and enrolled in the MA Program. Licensed practitioners including licensed psychologists, licensed social workers, and licensed professional counselors enrolled in the MA Program can sign medical authorizations for services and/or evaluations within their scope of practice.

The medical authorization or prescription is required to be in place prior to or on the date of

# Updates to Evaluations (cont.)

- Provides definition of initial evaluation
- Explains billing requirements
- Provides clarification about psychological evaluations

## 4.8.b Initial Evaluations

An initial evaluation occurs any time that a student is evaluated or assessed in a service type under which they have not been previously evaluated.

When parental consent and medical authorization are in the child's record at the time of the evaluation, and an ongoing health-related service in the service type being evaluated is identified and documented in the student's IEP, the initial evaluation may be billed.

An initial evaluation may be billed in both the Early Intervention and the School Age programs.

An initial psychological evaluation conducted solely to determine a student's eligibility for special education services **may not be billed**. However, if the psychological evaluation identifies an MA health-related covered service(s) to be documented in the IEP, the evaluation may be billed.

# Updates to Evaluations (cont.)

- Provides definition of re-evaluation
- Explains billing requirements
- Provides clarification around psychological re-evaluations

## 4.8.c Re-evaluations

A re-evaluation occurs any time that a student is evaluated or assessed in a service type under which they are currently receiving or have previously received services.

A re-evaluation is only compensable when parental consent, medical authorization, and a current IEP are all in the child's record at the time of the re-evaluation, and the re-evaluation results in an ongoing MA health-related covered service from the evaluation conducted.

NOTE: A psychological re-evaluation conducted solely to determine a student's ongoing eligibility for special education services **may not be billed**. However, if the psychological re-evaluation identifies the continued need for counseling/therapy services and this is documented in the IEP, the re-evaluation may be billed. As set forth in Section 3.13, counseling and social work services must be prescribed/ordered by a licensed MD, licensed DO, licensed CRNP, or licensed psychologist, but can be delivered by the practitioners identified in Section 3.13.

# Updates to Evaluations (cont.)

- Separate section for billing information
- Reminders about dates of service

## 4.8.d Billing Information

All initial evaluations and re-evaluations are billed based upon a ["Per Evaluation" unit of service](#).

Parental Consent is required to be completed prior to or on the date of service of the evaluation in order to bill for the evaluation.

**For Early Intervention initial evaluations,** the Date of Service is the IEP Meeting Date or the child's 3<sup>rd</sup> birthday, whichever is later.

**For School Age initial evaluations,** the Date of Service is the IEP Meeting Date.

The Date of Service to be used for billing an initial service type evaluation when an IEP exists **(i.e. when a new service is being added to an existing IEP)** would be the last date the evaluation activities with the student were performed.

# Clarifications on Tuition

- Section 7.5.a was updated to remind LEAs that reporting tuition costs is only one portion of full participation in SBAP.
- LEAs with only tuition costs and no interim payments will not receive reimbursement through cost settlement.

To receive reimbursement for allowable health-related tuition costs, LEAs must still participate in all program components as indicated in the LEA Agreement (Appendix A) and Section 1.3.b of

this Handbook, including submitting compensable direct service claims. An LEA that reports only tuition costs is NOT eligible to receive or retain MAC payments.

# Miscellaneous Updates

- Language was added to Section 1.3 regarding program participation and revalidation.

By signing an LEA Agreement, the LEA is acknowledging the requirement to participate in each of the program components. Failure to participate in each of the program components may result in a lower or no reimbursement.

LEAs are responsible to revalidate their enrollment with the MA Program every five years (see Section 2.2).

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## Miscellaneous Updates (cont.)

- Language was added to Section 4.5 to clarify that students with any of the codes listed in this section are NOT MA-eligible.
  - The following categories are non-MA categories:
    - ACX is managed by the Office of Long-Term Living (OLTL).
    - EIX is managed by the Office of Child Development and Early Learning (OCDEL).
    - MHX is managed by the Office of Mental Health and Substance Abuse Services (OMHSAS).
    - MRX is managed by the Office of Developmental Programs (ODP).

Individuals enrolled in these categories do not have MA benefits ([MA Eligibility Handbook, 305.1 Category, General Policy](#)).

# **SBAP & COVID-19: Impacts And Expectations**

# Effects of COVID-19 on SBAP

- Sudden closure of schools affected how services are delivered.
- New challenges in documenting services.
- Questions around renewal of licenses and credentials.
- Questions around the Medical Provider Authorization Form and billing for services.

# Telemedicine in SBAP

In response to school closures, DHS allowed some services to be delivered via Telemedicine.

- Telemedicine seeks to improve health by allowing two-way, real-time interactive communication between the patient and the provider.
- This communication means a minimum of audio and video connection.
- During the COVID-19 emergency, Medicaid policy allows the use of audio-only communication where the visual component is not possible. **This should be used only when absolutely necessary and only when the service can be fully delivered as described in the procedure code.**

## Telemedicine in SBAP (cont.)

- Asynchronous, or “store and forward” transfer of data may be used as part of a service but is NOT considered telemedicine.
- For billing purposes, that means only the time spent directly with a student providing a service may be billed to Medicaid.

### EXAMPLE:

- Occupational Therapist designs an activity, emails a video and list of materials to the student and his/her parent before the scheduled session.
- The OT and the student have a real-time session where the student demonstrates completion of the activity (using materials as requested by OT).
- The time spent with the student in the real-time session may be submitted to SBAP.

## ▶ Telemedicine in SBAP, cont.

As of 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\*

\* Note: this includes counseling services provided by other mental health providers, such as psychologists or psychiatrists.

As of July 1, 2020, these additional SBAP services may be provided via telemedicine and billed for payment:

- Audiology
- Hearing Impaired Services
- Vision Impaired Services
- Physician/CRNP\*\*

\*\* Note: This still requires a direct service between provider and student.

# Telemedicine & Documenting Services

- Documentation of ALL services provided should continue, regardless of the ability to bill for that service.
- Paper Logs for FY20-21 have been updated to reflect that a service was provided either direct face-to-face or direct telemedicine.
- PCG, in coordination with DHS, will submit to PROMISe™ those logged services that are eligible to be billed to Medicaid.

NOTE: While you should continue to document all services provided, the following services are NOT permitted via telemedicine:

- Personal Care Services
- Nursing Services/Medication Administration

# Licensing during COVID-19

- Many professional organizations offered an extension of existing credentials due to difficulties presented by the public health emergency.
- These organizations also provided additional documentation to verify these extensions, which must be maintained.
- The Department of State extended renewal deadlines for some licenses. Professionals need to check with their own licensing bodies to ensure they are doing what is necessary to maintain their license.
- Many licensing bodies also provide specialty-specific guidance around what services may be provided via telemedicine and best practices for doing so. It is the obligation of the provider to ensure he/she is following professional guidelines in delivering services.

# Medical Provider Authorization Form

- All 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.
- Medically necessary services are ordered or prescribed through a prescription or the signed MPAF before they are eligible for MA payment.
- The prescription or MPAF must be concurrent with the IEP and obtained on an annual basis, or whenever there is a change to the health-related services in the IEP.
- For more details on the MPAF please see Section 4.2 of the [SBAP Provider Handbook](#).

## Medical Provider Authorization Form (cont.)

When no changes have been made to a student's IEP or the health-related services he/she receives, a new MPAF is not needed during the PHE.

- MPAFs signed prior to the PHE will be considered current through the end of the PHE.
- The Governor recently extended the PHE through the end of November.
- LEAs have 60 days beyond the PHE to secure a new MPAF.
- All health-related services documented on the IEP and authorized in the existing MPAF may continue to be billed when delivered as authorized.
- No update is required if only the mode of delivery (i.e. telemedicine) has changed.

## Medical Provider Authorization Form (cont.)

When a new IEP is written or services in an existing IEP are updated, a new MPAF must be secured.

- All newly identified health-related services added to a student's IEP must be ordered/prescribed through a signed MPAF before services are compensable through SBAP.
- MPAFs may be completed via electronic signature. Sections 4.2 and 5.3 of the SBAP Provider Handbook address DHS requirements for use of electronic signature.

# RESOURCES

# LEA Contact Information Form

- Please use the LEA Contact Information Form to:
  - Inform us when LEA SBAP staff and/or their contact information changes.
  - Ensure that the appropriate LEA staff members receive the relevant communications from DHS and the vendors.
- The form is located on the DHS website under “FORMS” at: [www.dhs.pa.gov/provider/School-BasedACCESS/SupportingDocuments/index.htm](http://www.dhs.pa.gov/provider/School-BasedACCESS/SupportingDocuments/index.htm) and should be submitted to: [RA-PWSBAP@pa.gov](mailto:RA-PWSBAP@pa.gov).
- The Contact Information Forms are used to update the Master Contact List, which is used by DHS and the two SBAP vendors.
- The Master Contact List is updated once a month, usually on the 15<sup>th</sup>.

# COVID-19 PHE Resources

There are many websites available that address questions and concerns about delivering services during the PHE. We have shared a few, below:

- Information on MA Program coverage related to COVID-19, to include an FAQ document, can be found on the Department of Human Services website [here](#).
- Information specific to SBAP can be found [here](#).
- Questions around parental consent and electronic signature, addressed by the [US Department of Education](#).
- Information about carrying out evaluations has been provided by the [US Department of Education](#) and [PDE](#).

# Resources

- **SBAP on the DHS website**
  - [www.dhs.pa.gov/provider/School-BasedACCESS/](http://www.dhs.pa.gov/provider/School-BasedACCESS/)
- **SSG website – cost settlement FAQs**
  - <https://pasbap.ssghosting.com/rms/login.aspx>
- **PCG website – document library and SBAP 101**
  - <https://paaccess.pcgus.com/documents.html>
  - <https://paaccess.pcgus.com/SBAP101.html>
- **PCG weekly webinars**
  - <https://paaccess.pcgus.com/calendar.html>

# DHS SBAP Staff Contact Information

Program questions should be directed to the DHS resource account: [RA-PWSBAP@pa.gov](mailto:RA-PWSBAP@pa.gov)

Jennifer Wiegand  
[jenwiegand@pa.gov](mailto:jenwiegand@pa.gov)

Devon Hogan  
[devhogan@pa.gov](mailto:devhogan@pa.gov)

TJ Thomas  
[tythomas@pa.gov](mailto:tythomas@pa.gov)

# SBAP Contractors' Contact Information

## **Lot 1 Contractor - PCG:**

1-866-912-2976

[SBAPsupport@pcgus.com](mailto:SBAPsupport@pcgus.com)

## **Lot 2 Contractor - SSG:**

1-877-916-3222

[PAsupport@sivicsolutionsgroup.com](mailto:PAsupport@sivicsolutionsgroup.com)