School-Based ACCESS Program (SBAP)

Compliance Session FY 2023-2024 Statewide Training



SBAP Coordinator

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



Compliance Training Objectives

• Learning Objective: Upon completion of this session, participants will be able to recognize the documents that should be kept on hand and readily available in the event of an audit and recognize commonly identified issues/errors found during an audit of School-Based ACCESS Program (SBAP) services billed by the Local Education Agencies (LEAs).



Compliance Training Agenda

Key Topics:

- Maintaining Documents Relevant to the SBAP Program
- Downloading PCG Data by September 30, 2023
- Common Audit Findings



Maintaining Documents

Documents to Maintain



Maintaining Documents

LEAs must maintain any and all documents relevant to the services provided.

- Parental Consent
- Individual Educational Program (IEP)
- Medical Practitioner Authorization Form (MPAF)/Order/Prescription
- Daily Service Provider Logs
- Special Transportation Logs
- Credentials
 - -Licenses
 - -Certifications
- Attendance records
 - -Student
 - -Provider
- Evaluations



Parental Consent

Local Educational Agency

PA Medical Assistance Billing Parental Consent

I understand that:

- Local Educational Agencies (LEAs) are eligible to receive federal reimbursement through the School-Based Access
 Program for certain medically necessary services provided to students with disabilities ages 3-21 in accordance
 with the students' IEP.
- LEAs use of this reimbursement program does NOT in any way affect or impact other medically necessary, covered services that are provided to your child out of school. Medical Assistance will continue to pay for these services. Any reimbursement that the SDs or IUs receives from the School-Based Access program is used to help cover the cost of special education services.
- Before the LEA can apply for reimbursement for services, a one-time written parental consent is required by The Individuals with Disabilities Education Improvement Act of 2004 (IDEA) under Part 300 (Assistance to the States for the Education of Children with Disabilities) and the Family Educational Rights and Privacy Act (FERPA).
- 4. By giving consent, I am authorizing the LEA to share my child's information such as records or information about the services that may be provided to my child with the PA Department of Education, the PA Department of Public Welfare, and a physician or nurse practitioner in order to bill Medical Assistance for services my child receives as part of his/her IEP. The only purpose of this disclosure is to bill for services provided.
- 5. If have the right to withdraw my consent at any time. Withdrawing my consent or not giving consent, will not affect the services that my child is receiving in school. It is still the responsibility of the LEA to provide my child's required services as written in his/her Individual education Plan at no cost to me.
- Upon request, I may receive copies of my child's records that are disclosed as a result of this authorization.

X I have read the Notice and I give consent for the LEA to share by child's education and health-related information and bill Medical Assistance.

Parent/Guardian Signati	Ture
Student's Full NameJ	loe Cool
Date of Birth_12/25/20	015 Date 08/22/2020
Name of School Wa	alt Disney School District



►Individualized Education Program, (IEP)

INDIVI	DUALIZED EDUCATION PROC	SKAM (IEI)		
. Application of the state of t		A (17) A (17		School Age
Student's Name:		Joe Cool		
IEP Team Meeting Date (mm/dd/y	(YYY):	05/21/2023		
IEP Implementation Date (Project	ted Date when Services and Programs Will Begin):	05/22/2023		
Anticipated Duration of Services		05/20/2024		
Date of Birth:	12/25/2015			
Age:	7			
Grade:	2nd			
Anticipated Year of Graduation:	2033			
Local Education Agency (LEA):	Walt Disney School District			
County of Residence:				
Name and Address of Parent/Gu	ardian/Surrogate:		n	
John and Ma	ary Cool	Phone (Home): (777)777-777	Email (Home):	
123 Main Stre		Phone (Work):	Email (Work):	
Orlando, PA	12345	Phone (Cell):	-	



Medical Practitioner Authorization Form, (MPAF)

Medical Practitioner Authorization Form for SBAP Services

Student's Name: Joe Cool	Date of the current IEP Meeting: 05/21/2023
Participating LEA Name: Walt Disney School District	(MM/DD/YY

Related Service	Duration	Frequency	Projected Start Date	Projected End Date	Group	Individual
Audiology					N/A	
Nursing	Sea et annel Ch. S. school	See attached Date orders	05/22/2023	05/20/2024	N/A	×
Occupational Therapy						
Occupational Therapy						
Orientation, Mobility & Vision					N/A	
Personal Care Services	240 minutes	Per day	05/22/2023	05/20/2024	N/A	
Physical Therapy	30 minutes	3 times per week	05/22/2023	05/20/2024		X
Physical Therapy	30 minutes	2 times per week	05/22/2023	05/20/2024	×	
Psychiatric						
Psychiatric		1				
Psychological						
Psychological						
Social Work						
Social Work						
Speech & Language	45 minutes	3 times per week	05/22/2023	05/20/2024		×
Speech & Language						_
Hearing Impaired						
Hearing Impaired						
Special Transportation					N/A	

Audiology Physical Therapy Social Work	Occupational Ther Psychiatric Speech & Languag	Psychological
and re-evaluations recomme	ducation Program (IEP) to	for this student and agree that the health-related service team are both appropriate and medically necessary.
Authorized Signature / Mich Printed Name/Practitioner Title Mich	kev Mouse, MD	*Date of Signature 05/23/2023 License # MD004560
Printed Name/Practitioner Title		MA Provider ID # 7896541237531/0001
If review of medical necessity w	maintai	ace with the student, separate documentation must be ained.

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Sample Medication Administration/Licensed Prescriber Example

Sample Medication Administration Consent & Licensed Prescriber Order

(School District Name)

School:	Teacher/Grade:
However, when this is not possible, prior to rec provide the school nurse with a Medication Adv	s) should be given at home before and/or after school. serving the medication at school, each student must ministration Consent form signed by the student's a licensed prescriber. All medications must be in an armacy.
Parent/Guardian Consent:	
	ting the school day. I understand that the medications ding to my child's licensed prescriber's directions.
Parent/Guardian signature:	Date:
Parent/Guardian name printed:	Phone:
Licensed Prescriber Medication Order:	
Patient's name:	Date:
	Date:
Name of medication:	
Name of medication:	
Name of medication: Route and dosage: Time of administration:	
Name of medication: Route and dosage: Time of administration: Directions:	
Name of medication: Route and dosage: Time of administration: Directions: Discontinuation date:	
Name of medication: Route and dosage: Time of administration: Directions: Discontinuation date: Allergies:	





Prescription Example







Service Provider Logs

- Each service should have a log that is used to document the service that was provided
- ➤ There are log templates approved by DHS for each service area on their website. LEAs can create their own logs. The LEA logs must include **all** of the components listed in the self-designed logs:
 - Name
 - o DOB
 - School
 - Diagnosis/Symptoms
 - Service Start Time
 - Service Stop Time
 - PA Secure ID
 - o Date
 - Signature and Title of the provider
 - Signature of the Supervisor (if applicable)
 - Treatment and Progress Indicator keys
 - Service Type "(including delivery method-whether telemedicine or in-person) and Description of Service"



Service Provider Logs (Cont.)

Physical Therapy Service Provider Log

Student's name:	Joe Cool		Provider's Name:	Daisy Duck	
Student's date of birth:	12/25/2015	PA Secure ID:	987456321	Provider's Title:	Physical Therapist
School:	Walt Disney School District	Date:	05/22/2023-05/26/2023	Provider's Signature:	
Disability/symptom(s):	Autism			☐ Early Intervention	School Age

Service		Treatm	ent	Refer to the keys below for an explanation of the treatment codes and progress indic						
Date	Start	End	Treatment	Group	Service	Description of Service				
	Time	Time	Key (see	Size	Type	Indicator Key	·			
			Pg 2)							
05/022/2023	10:05	10:35	16, 29	Indiv	D	PR	Stair training-up and down steps with HR. Joe does well on the steps with monitoring by PCA			
05/23/2023	09:35	10:05	31, 32	Group	D	PR	Gross motor activity for coordination and strengthening-UE, LE and core with animal walks, side steps and heel walks. Continues to improve.			
05/24/2023	10:01	10:31	11, 29	Indiv	D	MN	Ball skills-he is able to catch a basketball 7/10 times. When throwing baskets into the hoop, he makes 3/15 tries.			
05/25/2023	09:30	10:00	31, 32	Group	D	PR	Gross motor activity for coordination and strengthening UE, LE, and core. He is doing much better with the heel walks.			
05/26/2023	10:05	10:35	16, 29	Indiv	D	PR	Stair Training-up and down steps with HR. He continues to do well, monitored by PCA.			

Service Type:

In-Person:					
D = Direct - in-person Session	DM = Direct – in-person Make-up Session				
Session Did Not Occur:					
PA = Provider Absent	PNA = Provider Not Available				
SA = Student Absent	SNA = Student Not Available				
Т	elemedicine:				
10 = Direct - telemedicine	02 = Direct - telemedicine Session				
Session (student at home)	(student somewhere other than home)				
10M = Direct - telemedicine	02M = Direct - telemedicine Make-up				
Make-up Session (student at	Session (student somewhere other than				
home)	home)				

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Progress Indicator Type:

Mn = Maintaining	Pr = Progressing	in = inconsistent
Rg = Regressing	Ms = Mastering	
*A Licensed PTA service	needs a supervisory signature b	y a Licensed PT.
49 Pa. Code § 40.173. St	upervision of physical therapist o	ssistant by licensed physical
therapist		
Supervisor's Name:		
Supervisor's Signature*	':	
Date:		





Service Provider Logs (Cont.)

a		PA A	CCES	S Tem	plate							
Date of Birth: 02/24/20 School Address: 555 T	68 Baden 007 Test Di	Academy Charter School rive A 11234							PA Secur	rade: 3	3rd G	rad
Service Provider				Schoo	Build	ing						
James Brady				The Te	st Sch	ool (0	7923)					
Student Disability Developmental Delay (3	3-5 in i	EI Program)					e Spe h Path	cialty ologist				
Profession	onal S	Service Log		ress cator					Service Time/Typ	e		
		Aleas Covered	Prog	Main	Mast	Inc	Reg	Timel	- TimeOut	H:M	Ind	Gr
	Sve X	- Augmentative Communication: Symbol Identification - Augmentative Communication: Expressive Symbols - Aural Rehabilitation: Compensation Techniques		100			x	12:00 I	PM - 01:00	1:00	X	
purpose and is protected any disclosure, copying,	by la or dis	cluding any attachments) co w. If you are not the intend- tribution of this message, or	ed recip	cient, yo	u shou	ıld del	lete thi	is messa n it, is s	ge and are h	ereby n	otified	
09/16/2021 01/18/2022 Apprvd	X	Receptive Language: Understanding Basic Concepts Voice: Duration Feeding / Swallowing: Advancement of Diet		x				PM	AM - 12:00	1300		
Comments: Daily Prog	ress N	ote for areas/covered assess	d.									
		Si	GNA	TURI	ES							
Provider Signature:Jar	nes Br	ady		Title:					Print D	ate: <u>01/</u>	18/20	22
Supervisors Signature:*			_	Title:					Date:			_
*Supervisory signature types	requir	ed for applicable certificatio	n									



Special Transportation Logs

Special Transportation Services Log

LEA Name:	Walt Disney School District
District ID:	123789654
Month of Service:	April 2023

Provider Name:	Charlie Brown
Verification of Services LEA Approval (print name):	Baisy Duck
LEA Signature:	

	Early Intervention	School Age
--	--------------------	------------

PA Secure ID#	Student Name												(Ind	icate			f the		nth r O≃	One	Way	y)										
WATER CONTROL TO STATE OF THE PARTY OF THE P		1	2	3	4	5	6	7	8	9	10	11		13		15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
987456321	JOE COOT			R	R	R	R	R		=	R	R	R	R	R	_		R	R	R	R	0	=	_	R	R	R	R	R	-	=	F
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Credentials

Service Providers requiring PA State Licensure Only

- Audiology Services
- Nursing/Nurse Practitioner Services
- *Occupational Therapy Services
- *Physical Therapy Services
- Physician Services
- Psychiatric Services
- Social Work and Counseling Services



Credentials (Cont.)

Service Providers that require PA State Licensure OR Other Credential

- Psychological Services PDE-Certifications are acceptable credentials as well as Department of State licensure.
- Speech/Language Services ASHA CCC's Certifications are acceptable credentials as well as Department of State licensure.



Credentials (Cont.)

Service Providers that require Other Credentials

- *Personal Care Services First Aid AND CPR Certifications
 High School Diploma or GED
- Hearing Impaired Services Certificate issued by the Council on Education
 of the Deaf (CED) OR a Master's degree, from an accredited college or
 university, with a major in teaching of the hearing-impaired or in a related
 field with comparable course work and training.
- Orientation, Mobility and Vision Services Orientation and Mobility Specialist certified by the Academy for the Certification of Vision Rehabilitation and Education Professionals (ACVREP) or the National Blindness Professional Certification Board (NBPCB).



Other records to maintain

Attendance records

- Student
- Provider

Evaluations



►Downloading PCG Data by September 30, 2023

Downloading PCG Data



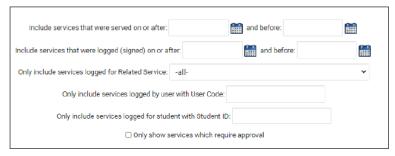
Downloading PCG Data by September 30, 2023



Solutions that Matter

Service Log Report SBAP Tips

- 1. When selecting the "Service Log (xls)" Report. You will have two sections you will select or enter criteria for:
 - General Related Service information such as: Date of Service or Entry, Related Service, Individual Provider or Student (if you choose)



• Field Definitions:

Report Creation Page Field Name	Notes
Served On	Return Services Logged with a Date of Service on that date and After the date entered
Served Before	Return Services Logged with a Date of Service Prior to the Date entered
Logged (Signed) On	Return Services Logged on and after the date entered
Logged (Signed) Before	Return Services Logged prior to the Date Entered





Solutions that Matter

Specific Fields/data to be included in the report: Such as, student and provider name, date of service
and date the served was logged/entered. When running the Service Log (xls) the fields selected below
should provide the details needed to support the SBAP.

Include these fields:	
✓ Date Signed	✓ Service
Date/Time Signed	Related Service ID
Student Full Name	☑ Date of Service
✓ Student First Name	Student Middle Name
Student Last Name	Student Suffix
☑ Student Code	☑ Type of Service
Medicaid ID	Student Social Security Number
Type of Service ID	✓ Student Gender
✓ Minutes	✓ Student Date of Birth
☑ Group Size	School Code
☐ Status	✓ Provider
Number of Areas Covered/Assessed	✓ Provider Title
☑ District Code	☑ District Name
✓ Provider Code	Areas Covered/Assessed (please don't select this unless you really need it)
✓ Start Time	☑ End Time
✓ Comments	☐ Diagnosis Code
✓ Approver	✓ Date Approved or Rejected
Objectives and Responses	Goals and Responses
Service Requires Approval	Approved or Rejected
Approval Comments	Rejection Reason
Service Log ID	







Solutions that Matter

Field Definitions between Report generation page and report output:

Report Creation Page Field Name	Report Field Label	Notes
Date of Service	ServiceDate	Date service was provided to student
	DateSigned	
Date Signed Student First Name	StudentFirstName	Date the service was entered into EasyTrac Student's First Name
Student Last Name	StudentLastName	Student's Last Name
Student Gender	Gender	Student Gender: Male or Female
District Name	District Name	Name of School District
District Code	District Code	Unique identifier for School District
Service	Service	Name of Related Service
Group Size	GroupSize	Size of the group of students the service was delivered to
Minutes	Minutes	Duration of service provided in minutes
Start Time	StartTime	Time service started
End Time	EndTime	Time service ended
Approver	Approver	User who approved the service log
Date Approved or		Date the service log was approved or
Rejected	DateApprovedOrRejected	rejected in EasyTrac
Provider Code	ProviderCode	Unique identifier of provider
Provider	Provider	First and Last name of service provider
Provider Title	Provider Title	Title of service provider
Student Code	StudentCode	Student Unique Identifier
Student Date of Birth	DateOfBirth	Date Student was born
School Code	SchoolCode	School Unique Identifier
Type of Service	Type	Type of related service, for example, direct or indirect
Comments	Comments	Service logs notes documented by provider
Areas Covered/Assessed (please don't select this unless you really need it)	Areas Covered/Assessed	Treatment key/s focus during service provided
Approved or Rejected	ApprovedOrRejected	Whether service log was approved or rejected in EasyTrac
Date Approved or Rejected	DateApprovedOrRejected	Date service was approved or rejected in EasyTrac
Service Log ID	ServiceLogID	EasyTrac's Unique ID for service log.





Solutions that Matter

When selecting the "Standard Service Log" Report. You will have one section you will select or enter criteria for:

Reports - Standard Service Log 💩 New Mail!	
Include services that were served on or after:	
Include services that were signed on or after:	
Disability:	
☐ Include diagnosis codes in the report	

Field Definitions:

Report Creation Page Field Name	Notes
Served On	Return Services Logged with a Date of Service on that date and After the date entered
Served Before	Return Services Logged with a Date of Service Prior to the Date entered
Logged (Signed) On	Return Services Logged on and after the date entered
Logged (Signed) Before	Return Services Logged prior to the Date Entered
Disability	Remain blank to include all Disabilities
Include Diagnosis codes in the report	Check Box to include diagnosis codes/primary disabilities





Solutions that Matter

• Field Definitions for report output:

Report Field Label	Notes
EasySvcLogID	EasyTrac's Unique ID for service log.
SvcDate	Date service was provided to student
SvcDateTimeSigned	Date and time the service was entered into EasyTrac
SchSysCod	Name of School District
ClientCode	Unique Billing Code for LEA
ResponsibleDistrict	Responsible District if assigned to Student
RelatedSvcCode	Name of Related Service
GroupSize	Size of the group of students the service was delivered to
SvcMinutes	Duration of service provided in minutes
StartTime	Time service started
EndTime	Time service ended
SupvSignedOff	If service log was approved in EasyTrac
ApprovalDate	Date the service log was approved in EasyTrac
ProviderCode	Unique identifier of provider
ProviderFullName	First and Last name of service provider
SupvCertType	If the Supervisor has certification information in EasyTrac for the service.
StudentID	Student Unique Identifier (if different from PA Secure ID. If not will be PA Secure ID)
StateCode	Student's PA Secure ID
DiagCode	Diagnosis Code/Primary Disability
MedicaidNumber	Populates with Y if has a Medicaid ID
SchoolCode	School Unique Identifier
SvcTypeCode	Type of related service, for example, Direct, LPN, IEVAL
ServiceDiagCode	Not Applicable to SBAP. Field will be Blank
RequestDeletion	If the service log was requested for deletion. If not requested will populate "0"



Any questions you have about system support for PCG systems and downloads should be directed to the PCG Help Desk at SBAPsupport@pcgus.com or (866) 912-2976.



Common BPI Audit Findings

Common BPI Audit Findings



Common BPI Audit Findings

- ☐ Group vs Individual
- More units billed than authorized
- MPAF Errors
- ☐ IEP and MPAF do not match
- □IEP and/or MPAF do not list duration



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 follows:
 - 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 MPA/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).



Order is for individual, but billed as group or Order is for group, but billed as Individual

- 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 and should be billed as such
- Do NOT bill for a service if you are providing the service as an incidental group or individual service that is not recommended in the IEP and authorized/prescribed by the MPAF
- If Group therapy has been ordered for the student and everyone is absent except for that student, then unless the student has an order for individual therapy, the choice would be to reschedule the group session for later that week or provide a make-up session (be sure it is documented as a make-up session).

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



Billing for more units than authorized

- 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



MPAF Errors

MPAF was not signed by the MD before services were billed

- The MPAF is essentially the doctor's order, and the date that the MD signs the MPAF is the date that services may be billed.
- Services that are provided to students prior to the date the MPAF is signed and dated are NOT compensable.

MPAF MD/CRNP signature/licensing info/date is not legible

 These are important areas. If the name and licensing information are not legible, it is difficult to verify credentials. If the date the MD/CRNP is signing the MPAF is not legible, then services could be denied



The IEP and the MPAF do not match

The IEP and MPAF should mirror each other.

Example #1:

- The **IEP** reads: Physical therapy-Individual-2-30-minute sessions per week
- The MPAF reads: Physical therapy-30 minutes 2x/per week-Individual

Even though the wording is not exactly the same, the recommendation and the order are the same. This is acceptable from an audit standpoint.

Example #2:

- The IEP reads: Speech/Language Therapy-group-120 minutes/month
- The MPAF reads: Speech/Language Therapy- Up to 120 minutes per month-group

These 2 statements are not alike, so the claims would be denied.





The IEP and/or the MPAF do not list duration

Medical Practitioner Authorization Form for SBAP Services

Student's Name: Joe Cool
Participating LEA Name: Walt Disney School District

Date of the current IEP Meeting: 05/21/2023

(MM/DD/YY)

Related Service	Duration	Frequency	Projected Start Date	Projected End Date	Group	Individual
Audiology					N/A	
Nursing	See attached Dr.'s orders	See attached Dr.'s orders	05/22/2023	05/20/2024	N/A	X
Occupational Therapy						
Occupational Therapy						
Orientation, Mobility & Vision					N/A	
Personal Care Services	240 minutes	Per day	05/22/2023	05/20/2024	N/A	
Physical Therapy	30 minutes	3 times per week	05/22/2023	05/20/2024		X
Physical Therapy	30 minutes	2 times per week	05/22/2023	05/20/2024	X	
Psychiatric						
Psychiatric						
Psychological						
Psychological						
Social Work						
Social Work						
Speech & Language	45 minutes	3 times per week	05/22/2023	05/20/2024		X
Speech & Language						
Hearing Impaired						
Hearing Impaired						
Special Transportation					N/A	

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



Resources

SBAP Handbook

https://dhs.pa.gov/providers/Documents/School-Based%20Access%20Program/SBAP-2022_Handbook.pdf

SBAP Resource Account

RA-PWSBAP@pa.gov

Verification of State Licenses
BPOA-Pennsylvania Licensing System (PALS)

https://www.pals.pa.gov

Pennsylvania Department of Education website for PDE certificate verification

https://www.education.pa.gov/ Educators/Certification/Pages/TIMS.aspx

American Speech-Language-Hearing Association website

https://www.asha.org



Resources (Cont.)

Orientation, Mobility and Vision Services – Credential verification Academy for Certification of Vision Rehabilitation & Education Professionals-ACVREP

https://www.acvrep.org/

National Blindness Professional Certification Board

https://www.nbpcb.org



A Few Things To Remember

- Reduce Risks with Preparation
 - Stay up to date with changes to rules and regulations
 - ☐ Train all staff for compliance
 - □ Take advantage of training opportunities (vendors, annual training, SBAP, etc.)
 - ☐ Regularly conduct self-audits
 - □ Reach out to BPI with any questions



Presenter Contact Information

Debra J. Buffington, RN
Bureau of Program Integrity
(717) 772-4631
debuffingt@pa.gov

