

## **Subject: Providing Direct Services via Telemedicine in the School-Based ACCESS Program (SBAP) During the 2020-2021 School Year**

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TO: Local Education Agencies (LEA) participating in the SBAP  
FROM: Department of Human Services, Office of Medical Assistance Programs, School-Based ACCESS Program

COVID-19 continues to impact the day-to-day operation of businesses and schools as well as the daily lives of our communities throughout Pennsylvania. In response, the Pennsylvania Department of Human Services (DHS) is updating its guidance to LEAs participating in the SBAP for the 2020-2021 school year.

The Department issued guidance to LEAs regarding [telemedicine](#) in the SBAP on April 3, 2020. At this time, the Department is adding Audiology, Hearing-Impaired, Nurse Practitioner, Orientation, Mobility, and Vision, and Physician services to the list of SBAP services that may be provided via telemedicine as a result of the ongoing impact of COVID-19.

The following SBAP services may be provided via telemedicine and billed for payment. The services are listed with their corresponding section in the SBAP handbook:

- Audiology Services (3.2)
- Hearing-Impaired Services (3.3)
- Nurse Practitioner Services (3.5)
- Occupational Therapy Services (3.6)
- Orientation, Mobility and Vision Services (3.7)
- Physician Services (3.10)
- Physical Therapy Services (3.9)
- Psychiatric Services (3.11)
- Psychological Services (3.12)
- Social Work and Counseling Services (3.13)
- Speech and Language Services (3.15)

LEAs may bill for the above services provided via telemedicine for dates of service on and after July 1, 2020.

As a reminder, the Centers for Medicare & Medicaid Services (CMS) defines telemedicine as the use of real-time, interactive telecommunications technology that includes, at a minimum, audio and video equipment. This definition, along with other key terms related to the use of telemedicine for delivery of healthcare services, can be found on the [CMS website](#).

The US Department of Health and Human Services' Office of Civil Rights (OCR) has exercised its discretion in enforcing the Health Insurance Portability and Accountability Act (HIPAA) for the duration of the Federal public health emergency (PHE). The Department, based on [guidance](#) issued by OCR, is allowing for telephone-only services during the PHE for situations where the

beneficiary does not have access to video technology. This option and the flexibilities afforded by the OCR guidance are not permanent but will remain available while the PHE is in effect.

Evaluation services are to be provided following guidance provided by the [US Department of Education](#) and the [Pennsylvania Department of Education](#).

Nursing Services (Section 3.4 of the Handbook), Personal Care Services (Section 3.8 of the Handbook), and Special Transportation Services (Section 3.14 of the Handbook) continue to be billable only when provided in person.

The following guidance applies for all services provided via telemedicine under the SBAP:

- All services must be provided over an audio-video connection, unless the beneficiary does not have access to video technology.
- All other SBAP program requirements must be met (i.e., MA eligibility, service documented in IEP, completed Medical Provider Authorization Form).
- The service is to be rendered in conformance with the full description of the procedure code, in a clinically appropriate manner, and to the extent that it would have been rendered if the visit had occurred in person.
- The provider services log must indicate whether the service type is Direct: Telemedicine or Direct: Face-to-face when documenting the service and how it was provided. The “Daily Progress Note” section of the service log in EasyTrac or the “Description of Service” section of the provider service paper log should be used to record details about the service provided, including whether any service disruptions or connectivity issues occurred during the service delivery and whether the service was delivered using telephone-only.
- As with services provided face-to-face (in person), co-treatment services cannot occur for the therapists’ convenience but must be what is medically necessary for the student.
- There will be no technology fee paid for telemedicine services.

This guidance supersedes the previous guidance titled, “Providing Direct Services via Telemedicine in the School-Based ACCESS Program (SBAP) During the COVID-19 Emergency,” issued on April 3, 2020.

Information on COVID-19 is available on the [CDC](#) website and through [CMS](#).

Information on MA Program coverage related to COVID-19, including FAQs, can be found on the Department of Human Services website [here](#).

The Pennsylvania Department of Health (DOH) has a dedicated page for COVID-19 that provides regular updates. Click [here](#) for the most up to date information from the PA DOH regarding COVID-19.

If you have further questions related to submitting claims for direct services, please email [SBAPsupport@pcgus.com](mailto:SBAPsupport@pcgus.com) or call 1-866-912-2976. Other questions may be directed to [RA-PWSBAP@pa.gov](mailto:RA-PWSBAP@pa.gov).