



## School-Based ACCESS Program Winter 2021 Newsletter

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As the 2021-2022 School Year progresses, the Pennsylvania Department of Human Services (DHS), Pennsylvania Department of Education (PDE), Public Consulting Group (PCG) and Sivic Solutions Group (SSG) would like to share with you and remind you of the following information regarding the Pennsylvania School-Based ACCESS Program (SBAP). We applaud all LEAs for the continued dedication and support we've seen you provide your students and each other during this time.

### **1. Annual SBAP Statewide Training Follow-Up**

Thank you to all those who attended the annual SBAP statewide training in September! As always, we appreciate your feedback on the training surveys. It will help us in planning for future trainings and know how any changes made to the format are received.

- For any of you who were unable to attend the SBAP Fall Training, the four presentation recordings and handouts are available on the [DHS SBAP webpage](#).
- A Frequently Asked Questions document will be posted on the DHS SBAP website: SBAP Training.

### **2. Cost Report Deadline – December 31, 2021**

- SBAP Cost Reports for the FY 2020-2021 reporting period opened in October and are **due by December 31, 2021**. LEAs are encouraged to plan to complete the cost by December 17<sup>th</sup>, prior to the Christmas holiday break. LEAs must complete and submit their cost reports in the [SSG e-SivicMACS system](#) by the deadline.
- Are you new or need a refresher on the cost reconciliation process and were unable to participate in recent cost settlement training webinars? The 101, beginner's training and the e-SivicMACS system training, and associated training materials are available by clicking on the links below and

registering for the recording of your choice.

➤ **Cost Settlement 101:**

<https://attendee.gototraining.com/r/6450058883734903554>

➤ **Cost Settlement/Cost Reconciliation using e-SivicMACS System:**

<https://attendee.gototraining.com/r/2707622568552855810>

- Questions regarding the FY 2020-2021 cost reports and cost reconciliation process should be directed to the SSG Help Desk at 1-877-916-3222 or [pasupport@sivicsolutionsgroup.com](mailto:pasupport@sivicsolutionsgroup.com).

### **3. Random Moment Time Study (RMTS)**

#### **1. The current deadline to certify Calendars and Staff Pool Lists for the January – March 2022 quarter is December 3, 2021.**

Since winter break will soon be upon us, please make sure your staff are answering moments before they depart for the holiday season. RMTS is designed to determine the amount of time participants are involved in a Medicaid billable activity, which has a significant impact on SBAP reimbursement.

As we prepare for the **January – March 2022** quarter please consider the following:

#### **Reminders to share with LEA participants**

- respond timely to their assigned moments
- provide a clear picture of what activity is occurring during their assigned moments
- answer all RMTS follow-up questions, if received

#### **Reminders for LEA Admin**

- hold a valid certification or licensure for direct service providers
- create and assign participants to an appropriate shift that covers the time they are working
- delete or replace positions if the participant is no longer working before certifying the next quarter's staff pools
- If a provider is not providing SBAP services for the quarter to receive reimbursement, do not include them in the direct service staff pool

#### **Staff Pool List Certification Enhancement to aid LEAs in Job Category and Vacancy review: [Staff Pool Certification Process](#)**

Each participating LEA is required to participate in the RMTS with a goal of a 100% response rate for each of the two cost pools, Direct Service and Administrative Support. DHS has issued warning letters to LEAs who are not meeting individual compliance of 85%. LEAs in default over multiple quarters may not be able to continue participation in the SBAP.

#### **2. LEA Recommendations to Achieving 100% (or close to it!) Response Rate**

- Maintain a current list of participants, including contracted staff, and note changes as received so you are prepared for the next quarter's update.
- Facilitate communication regarding the program with participants as part of professional development presentations regarding SBAP.

- Monitor moments daily and send Urgent/Time Sensitive reminder notices to participants within 24 hours of the missed moment.
- Copy the principal or supervisor on the follow-up notice when the moment remains outstanding after 2 days.
- Do not use a vacancy position holder unless you are certain the position will be filled during the quarter.
- Assign a single point of contact in the district or IU to oversee the program, answer questions and assure compliance.
- Work with the SBAP support team to identify staff out on medical leave or no longer employed.
- Strive for 100% -- Do not settle for less.

#### **4. Medicaid Administrative Claiming (MAC)**

Certified Public Expenditure (CPE) Forms for the **July – September 2021 quarter** will be available in the next few weeks. Please look for their delivery.

A few reminders:

- Failure to submit a signed copy of the Certification of Public Expenditure before the **10-business day deadline** will result in the claim **not** being included in that quarter's payment submission. If a signed copy is received by PCG after the deadline, payment will be delayed until the next quarter's payment submission within the fiscal year deadline.
- *Quarterly MAC payments are now directly deposited into the bank account identified by your LEA. If no bank account is identified, a paper check will be received.*
- **ALWAYS REPORT 100% of what was paid to employees listed in the claiming system for the quarter you are reporting.**
- **Quarterly costs for MAC are reported on a cash basis.**
- **Report any Federal dollars used to offset the cost of the employee in the Federal Offset section. Whatever amount that is included in the Federal Offset section will be deducted from your total costs as these Federal dollars are not an allowable cost to the LEA.**

**Please note:** In order to reduce the amount of MAC payments to be recouped, DHS may withhold MAC payments throughout the year when an LEA has received no direct service claiming reimbursement to date. This affords the LEA an opportunity to identify and address any direct service claiming issues prior to the end of the year.

#### **MAC Reimbursement**

- *The deadline to submit MAC certifications for late FY2020-21 quarters was November 2, 2021.*
- **October-December 2021 quarter** cost reporting certification will be due January 31, 2021.

#### **Electronic Payment**

**If you have not added/updated your bank information or have any questions, please contact:** Payable Services Call Center at 877-435-7363 (option 1).

- ✓ [Add a New Bank Account](#)
- ✓ [Change Existing Bank Account Details](#)

## **Contractor Responsibility Program Blocks**

The Contractor Responsibility Program (CRP) is intended to ensure that those agencies that do business with the Commonwealth (including LEAs) uphold their responsibilities regarding Commonwealth obligations. CRP blocks are usually initiated by the Department of Revenue or the Department of Labor and Industry due to outstanding tax obligations or failure to file a required tax report. This obligation must be resolved by the LEA; neither DHS nor its vendors can assist with resolving the block.

If you do not have regular contact with these agencies through your role, you may need to work with other school district staff to resolve the block. It is important to know who the business or financial manager is for your school district so that you can reach out in the event you are notified of one of these blocks.

Once notified of a CRP block, the proper LEA contact should reach out to:

- ✓ [RA-GSCRPSHELP@pa.gov](mailto:RA-GSCRPSHELP@pa.gov) for information related to the CRP System, or
- ✓ or [RA-RVCAT-CONTR-CLEAR@pa.gov](mailto:RA-RVCAT-CONTR-CLEAR@pa.gov) or 717-425-2495 ext. 91153 for blocks related to a Department of Revenue obligation.

Once the LEA receives notification that the block has been cleared, that notice should be forwarded to PCG and to DHS.

***Please note:** if an LEA has a CRP block with the Commonwealth, MAC reimbursement will not be received until the block is resolved.*

## **5. Unrestricted Indirect Cost Rate (UICR)**

Annual Financial Reports were due 10/31/21. Timely completion of the AFR, to include correctly requesting an indirect rate, helps to ensure the application of the UICR to your MAC claims and cost settlement.

### **Remember:**

- **The AFR you submit by 10/31/2021 is the first step** in receiving the rate that will apply to the FY20-21 SBAP Cost Settlement and FY21-22 MAC claims.
- **LEAs that do not have a UICR will have a zero-rate applied** during MAC and Cost Settlement and no indirect costs will be included, resulting in decreased SBAP reimbursement for your LEA.

**For more information on how to complete the schedules and general information regarding indirect cost rates, please contact PDE:** [RA-EDPDEINDIRECTCOST@pa.gov](mailto:RA-EDPDEINDIRECTCOST@pa.gov). **Instruction manuals and other helpful information can be found here:**

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

## **6. Direct Service Reimbursement**

### **FY2021-2022 Service Provider Paper Logs**

Please reference the 7/2/21 email: [FY 2021-2022 Updates to SBAP Service Logging](#)

### **Logging Date of Service for Timely Filing**

Due to MA timely filing limits of 180 calendar days from the date of service, LEAs could miss reimbursement opportunities if services are not entered timely. Best practice for LEAs is to enter all direct and specialized transportation services into EasyTrac within 60 days from the date of service to allow time for processing. It is recommended to enter service logs into EasyTrac by the 15th of each month.

Remember, it is best practice to maintain consistent logging and billing practices throughout the year rather than “end-loading” submission of services late in the school year. This allows you time to regularly review your exception reports from PCG to ensure that the services your providers are logging are leading to interim payment reimbursement.

### **7. Revalidation Reminder**

Section 6401 of the Affordable Care Act (ACA) established the requirement for Medicare and Medicaid to revalidate enrollment information at least every five (5) years for all enrolled providers, regardless of provider type, under new enrollment screening criteria.

Section 2 of the [SBAP Handbook](#) outlines the enrollment process, including revalidation. Please remember that only paper applications may be used for Provider Type 35.

Reminder to each provider that:

1. LEAs with multiple locations must revalidate all locations or close any that are no longer active.
2. You will NOT receive reimbursement if you are not enrolled/revalidated.
3. Reimbursement cannot be received retroactively.

Please note that due to high application volume, there is a backlog in processing revalidation applications. LEAs should allow at least 90 days for processing but may encounter longer processing times. LEAs are encouraged to monitor their revalidation process.

A copy of the Pennsylvania MA Bulletin can be found here:

[http://parecovery.pa.gov/cs/groups/webcontent/documents/bulletin\\_admin/c\\_224393.pdf](http://parecovery.pa.gov/cs/groups/webcontent/documents/bulletin_admin/c_224393.pdf)

### **8. Comment to Compliance**

#### **Required documentation for nursing services provided per physician order**

The Bureau of Program Integrity (BPI) requests records to verify documentation; a physician order is part of the documentation that is required. The physician order should be retained with the Medical Practitioner Authorization Form (MPAF) when a health-related service (medication, tube feeding, suctioning, catheterization, etc.) is ordered by a physician. It is acceptable to document “per physician orders” on the Individualized Education Program (IEP)/MPAF, but the actual physician order must also be included since it provides the details of the service provided. A nurse must have a physician order to perform the service that is ordered. The LEA’s medical practitioner will need the physician’s order when reviewing the IEP and completing the MPAF.

## **9. COVID Impacts on SBAP**

- 1. Compensatory Services.** Some students may have been identified as in need of compensatory services due to impacts of COVID-19 on the delivery of health-related services. PDE continues to be the best resource for LEAs in determining how to identify these services on the student's IEP. However, these services **must be** documented in the IEP and ordered/prescribed through the Medical Provider Authorization Form in order to be compensable through SBAP. Any services not identified on the IEP and the Medical Provider Authorization Form are **not** compensable through SBAP. Provided that claims do not exceed the number of units properly documented on the IEP and authorized on the MPAF, compensable claims will continue to be reimbursed.
- 2. Act 66.** Passed in June 2021, Act 66 allows extended special education enrollment to ensure that students do not miss educational opportunities as a result of COVID. DHS has received a number of questions related to the extension of special education services for students aged 21 years and older. The School-Based ACCESS Program allows for MA reimbursement for health-related services delivered to students ages 3 through 20 under Part B of IDEA. This legislation had no impact on the age ranges established for the SBAP.

## **10. New to SBAP? Check out SBAP 101**

In addition to the information below, LEAs are encouraged to review the LEA Participation Flowchart (Appendix D) in the [SBAP Handbook](#).

These resources will provide you with the necessary documents to get up and running:

- If you are new to the School-Based ACCESS Program or know someone who is, please refer them to the "[SBAP 101](#)" section of PCG's SBAP website.
- [New or Returning to the SBAP Guide](#)
- *New to SBAP or need a refresher? Various Training Webinars are available throughout the week. You can sign up [HERE](#)*

## **11. LEA Contact Information – Update Your forms!**

To ensure receipt of SBAP updates and communications, please remember to update your LEA's contact information using the [SBAP Contact Information Form](#) return it to [RA-PWSBAP@pa.gov](mailto:RA-PWSBAP@pa.gov) as information changes or new people join your team!

Questions? Contact the SBAP Vendors!

**PCG Help Desk:** 1-866-912-2976 or [SBAPSupport@pcgus.com](mailto:SBAPSupport@pcgus.com)

\*Support for RMTS, MAC and Direct Services/Special Transportation Claiming

**SSG Help Desk:** 1-877-916-3222 or [PAsupport@sivicsolutionsgroup.com](mailto:PAsupport@sivicsolutionsgroup.com)

\*Support for Cost Settlement/Cost Reconciliation and Interim Rate Adjustments