

**Subject: Providing Direct Services via Telemedicine in the School-Based ACCESS Program (SBAP) During the COVID-19 Emergency**

Date: 4/3/20

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

In response to Governor Wolf's [disaster declaration](#) due to the spread of COVID-19, the Department of Human Services (DHS) has issued guidance to Medicaid-enrolled providers that encourages the use of telemedicine as a way of mitigating the spread of COVID-19 through reduced person-to-person contact between health professionals and beneficiaries, particularly those who are in quarantine or isolation as a result of possible COVID-19 exposure.

Following Governor Wolf's March 13, 2020 order that all of Pennsylvania's schools close to reduce the spread of COVID-19, PDE issued guidance related to continuity of education for students affected by school closures. Additional information for students receiving special education services has also been provided.

**Guidance issued by PDE provides that:**

- LEAs are strongly encouraged to provide continuity of education during extended school closure, and to the greatest extent possible, students with disabilities are to receive special education and related services identified in the Individualized Educational Plan (IEP).
- Health-related services may be provided as part of the continuity of education when those services are reasonable and appropriate and when done in accordance with the Governor's aggressive social distancing guidelines of at least six feet between individuals.
- The parent or guardian of a student receiving services under an IEP under IDEA will be notified in writing of the LEA's plan for ensuring their child has access to FAPE as required under IDEA.

PDE's full [School Guidance/Answers to Common Questions](#) can be found [here](#).

In conjunction with PDE, DHS has reviewed the services reimbursed under SBAP when provided face-to-face to determine which of those services may be provided via telemedicine while maintaining the intent of the service as documented in the students' IEPs.

**DHS Guidance on SBAP services delivered via telemedicine:**

- 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
- All therapy services must be provided over an audio-visual connection.
- 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.
- Note “**telemedicine**” in the “**Daily Progress Note**” section of the service log in EasyTrac or in the “**Description of Service**” section of the provider service paper log for any service provided by telemedicine.

This guidance will remain in effect while a valid disaster declaration by the Governor related to the COVID-19 virus remains in effect.

Additional information is also available on the [CDC](#) website and through [CMS](#).

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](#).

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

If you have further questions related to submitting claims for direct services during this period of emergency, please email [SBAPsupport@pcgus.com](mailto:SBAPsupport@pcgus.com) or call 1-866-912-2976.

Thank you,

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