

School-Based ACCESS Program (SBAP)

General Session

FY2023-2024 Statewide Training

Key Topics

- Contract Updates
- SBAP Basics
- FY21-22 Financial Performance
- Unrestricted Indirect Cost Rate (UICR)
- SBAP & Telehealth
- SBAP Handbook Updates
- Provider Log Updates
- PDE Updates
- SBAP Reminders
- SBAP Resources

CONTRACT UPDATES

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)
- Commonwealth Contractor: Sivic Solutions Group (SSG)

Contract Updates

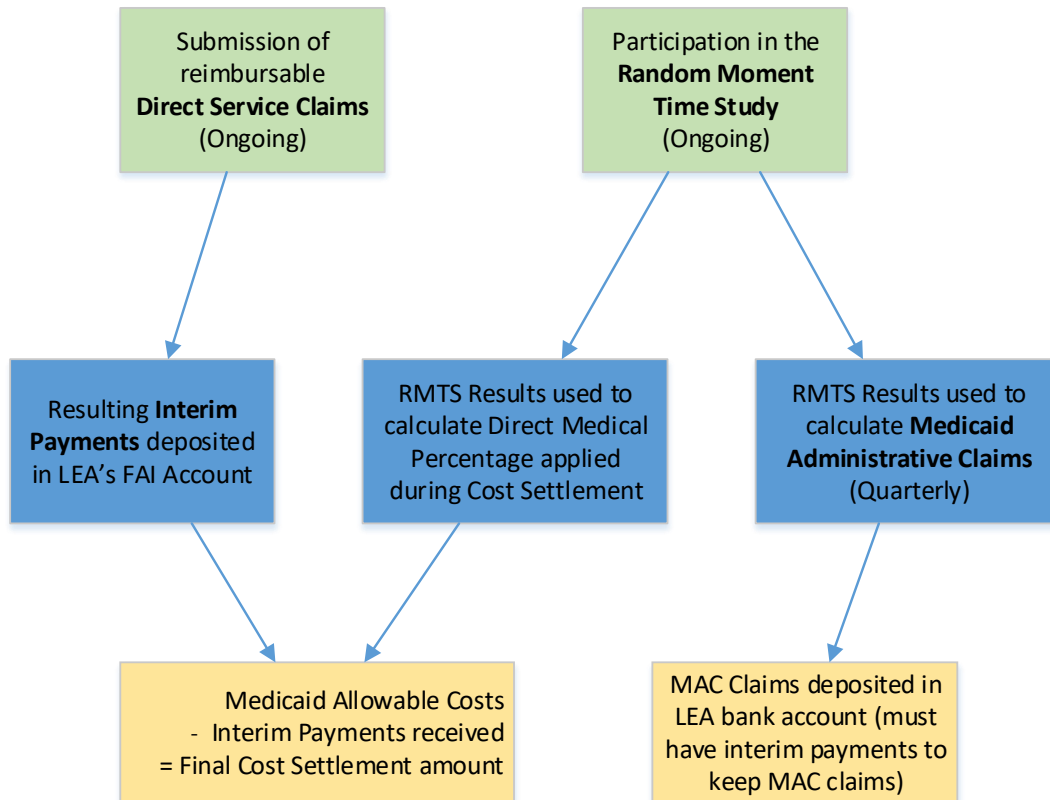
- The Commonwealth issued a request for proposals in 2022 for a single vendor to support all aspects of the SBAP.
- Following the procurement process, Sivic Solutions Group (SSG) was awarded the SBAP contract.
- As of October 1, 2023, SSG will support all aspects of the SBAP, including:
 - Random Moment Time Study
 - Medicaid Administrative Claiming
 - Direct Service & Special Transportation Claiming
 - Cost Settlement
 - Oversight & Monitoring (including Quality Assurance Reviews)

Contract Updates (cont.)

- The SSG staff you are familiar with will continue to support the SBAP in Pennsylvania, with additional staff coming on board to provide support across the program.
- SSG staff will include LEA Support Liaisons who will be assigned to specific areas in the state and will provide direct support to LEAs.
- All SBAP activities will be completed using SSG's online systems:
 - eSivicMACS (which you have been using for Cost Settlement)
 - MAXCapture
 - eSivicTPA
- A wide range of training activities have been ongoing for the past month and will continue as we move through each phase of the project.

SCHOOL-BASED ACCESS PROGRAM BASICS

Program Components

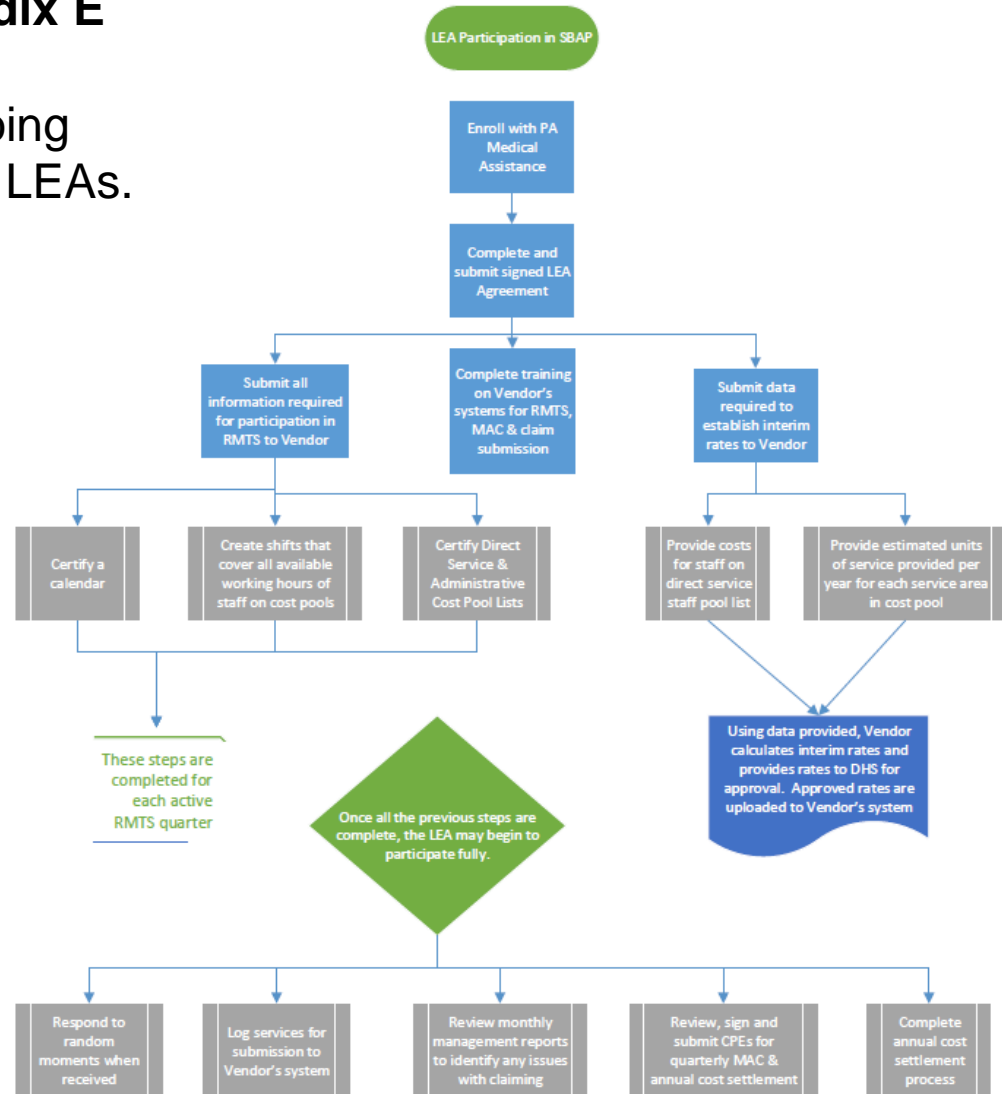


- This flowchart shows how your ongoing activities impact the financial outcomes for your LEA.

LEA Responsibilities

SBAP Handbook – Appendix E

Flowchart of initial and ongoing SBAP activities required for LEAs.



July 1 – September 30*

- ✓ July – September RMTS is run (Inactive Quarter – No RMTS moments)
- ✓ LEAs must certify MAC costs for April – June Quarter
- ✓ LEA Agreements for participation in FY23-24 SBAP are due
- ✓ LEAs must certify calendars and staff pool lists for October – December RMTS
- ✓ Annual Statewide Trainings
- ✓ All MAC CPEs are due for FY22-23

***Download important data from PCG systems by
September 30, 2023**

October 1 – December 31

- ❑ October – December RMTS is run
- ❑ Interim Rates are Adjusted for each LEA
- ❑ LEAs must complete cost reporting for FY22-23*
 - ❑ Remember to apply for a UICR when completing your AFR
- ❑ LEAs must certify calendars and staff pool lists for January – March RMTS
- ❑ Annual Cost Settlement Trainings
- ❑ Double check your FY22-23 cost reports before submission deadline of December 31!

*In October, start preparing your LEA's Cost Report for previous fiscal year (accrual basis). Start Early and participate in Cost Settlement trainings!

January 1 – March 31

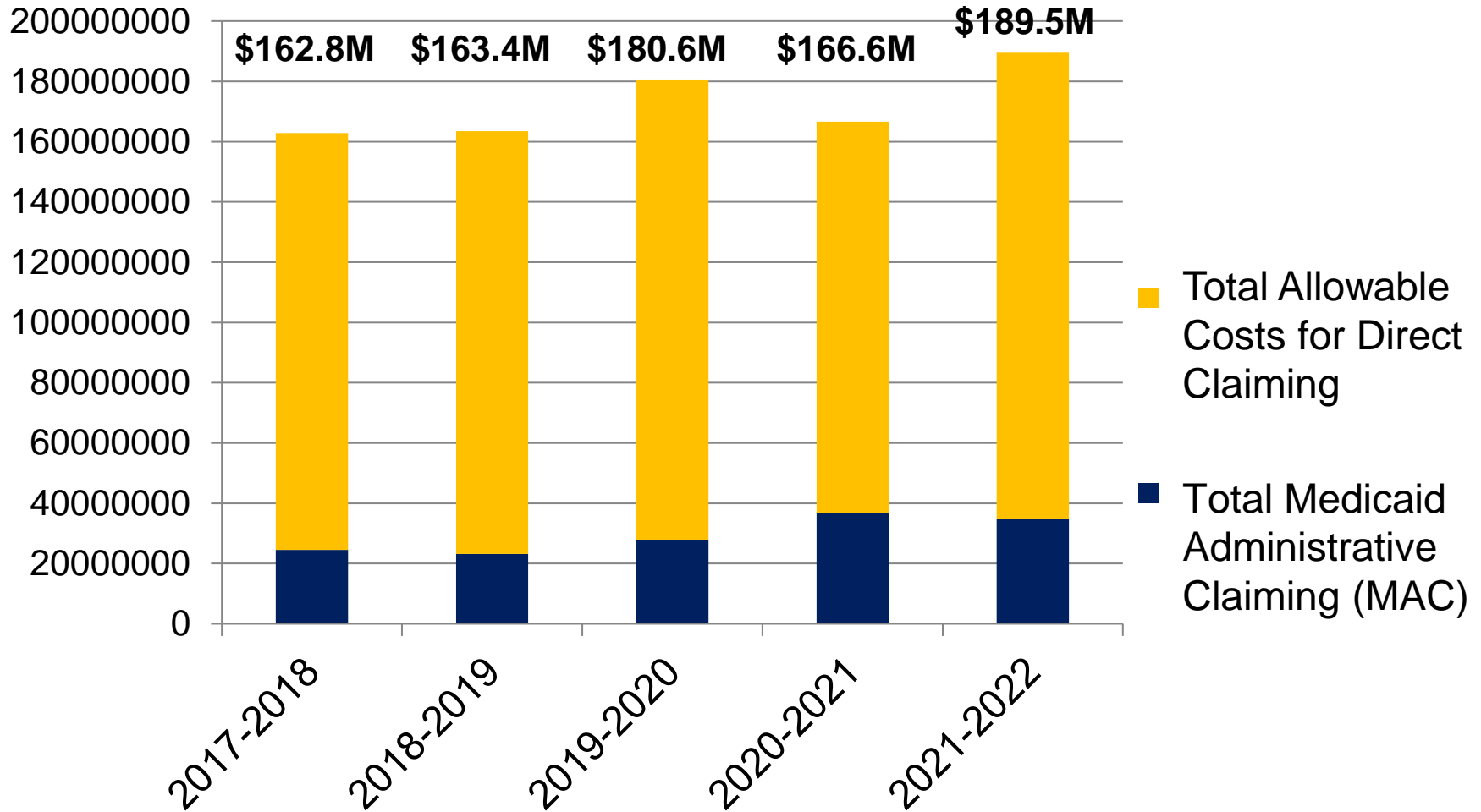
- January – March RMTS is run
- LEAs must certify MAC costs for July – September Quarter
- LEAs must certify MAC costs for October – December Quarter
- LEAs must certify calendars and staff pool lists for April – June RMTS
- Annual Cost Settlement Desk Reviews – Last chance to change your Cost Report data!

April 1 – June 30

- April – June RMTS is run
- LEAs must certify MAC costs for January - March Quarter
- LEAs must submit FY22-23 Cost Settlement CPE Forms
- LEAs must certify calendars and staff pool lists for July – September RMTS
- DHS reviews and approves final Cost Settlement

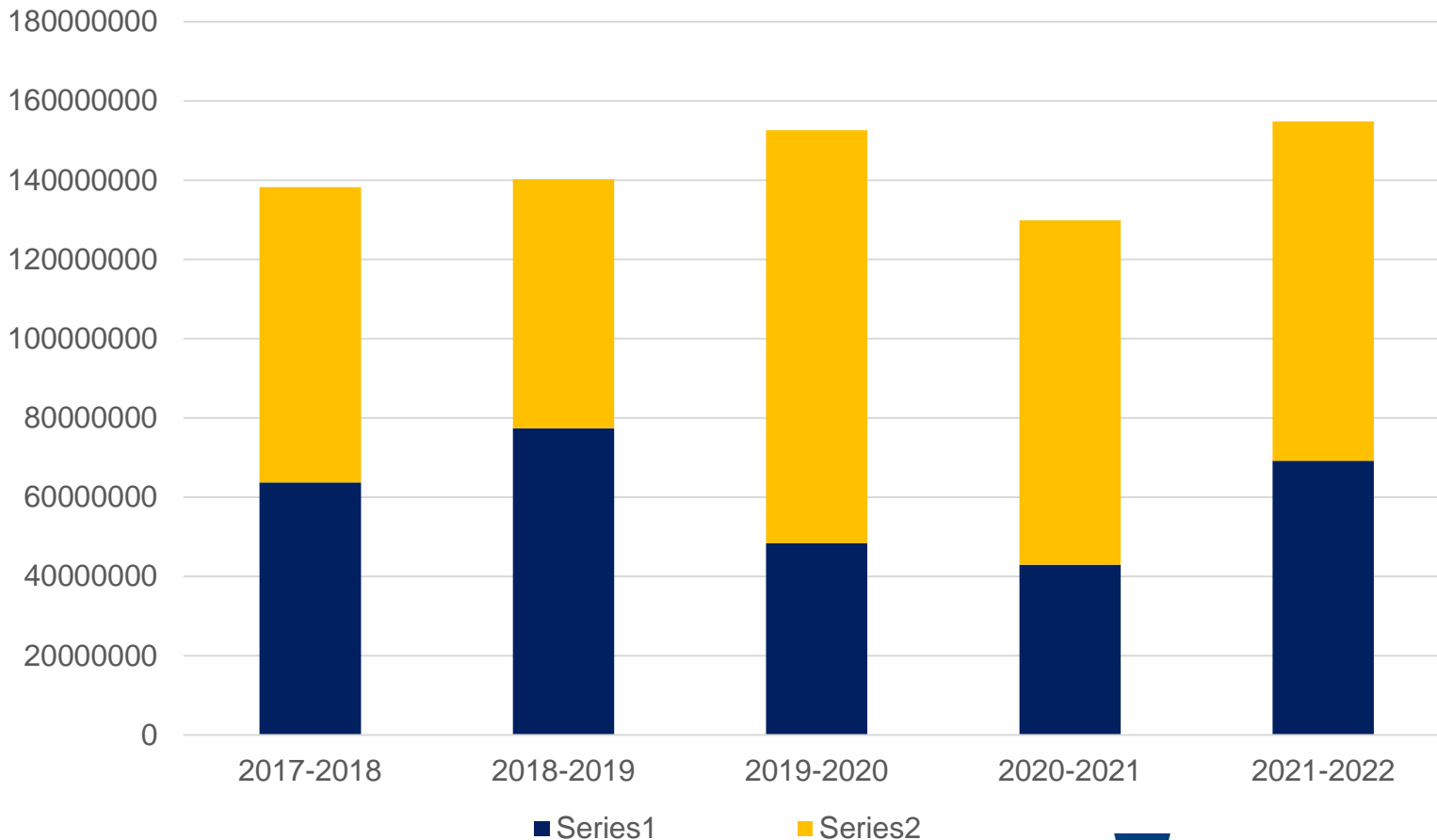
FY2021-2022 FINANCIAL PERFORMANCE

Statewide Financial Performance



Direct Service Claiming & Cost Settlement

Work at the LEA level can be seen in the trend to a more even balance between cost settlement and interim payments for FY21-22



Direct Service Claiming Improvement Strategies

- Ways to improve claiming levels:
 - Maintain required compliance elements such as parental consent, medical authorization, and provider credentialing.
 - While we are in Phase One with MAXCapture, take this time to review student and provider data to make sure you are ready to submit services.
 - Get ready for Phase Two by gathering IEP and MPAF information that will be needed to verify data that was transferred and to add new data.
 - Maintain consistent logging and billing practices rather than “end-loading” submission of services late in the school year.
 - Keep logging services in preparation for submission in Phase 3.
 - Remember that program requirements haven’t changed, so required fields will still need to be entered.

Direct Service Claiming Improvement Strategies (cont.)

- Regularly review available reports to ensure that the services your providers are logging are leading to reimbursement.
 - Make sure your LEA's contacts have been updated so that you receive all the important updates from DHS and SSG.
 - Reporting functions will be part of Phase Four of the rollout.
- Create emergency and contingency plans to address different scenarios that may affect your LEA's ability to continue SBAP operations, such as school closures or sudden loss of or change in staff.
- New Year, New System, New Habits! Take this opportunity to change things about your process that may improve your work flow.

Impacts of the “Unwinding” of the PHE

- Enhanced FMAP* = reimbursement was increased by 6.2% over Pennsylvania’s rate of 52.25% during the PHE, but will be phased down during 2023.
 - April-June => $52.25\% + 5\% = 57.25\%$
 - July-September => $52.25\% + 2.5\% = 54.75\%$
 - October-December => $52.25\% + 1.5\% = 53.75\%$
- ESSER Funds will no longer be available
- Continuous enrollment ended in April 2023
 - Students remained enrolled in MA throughout the PHE with no redetermination of eligibility, keeping enrollment numbers high.
 - The overall number of students eligible for MA in your LEA will likely be reduced with the end of continuous enrollment.
 - Many families may be confused by renewal processes and may need assistance from the LEA to renew or re-enroll.

*Federal Medical Assistance Percentage

Helping Families Access Medicaid

- Families who first became eligible for the MA program during the PHE may not be familiar with the renewal process.
- How can your LEA support families in the Medicaid determination process?
 - Remind parents/guardians to keep their address and contact information up-to-date with the County Assistance Office or through COMPASS.
 - Remind parents/guardians that even if the parents are not eligible for MA, their student may be.
 - Assist families with completing the MA program application.
- Why does this matter?
 - Your LEA's Medicaid Eligibility Rate affects reimbursement levels.
 - Medicaid eligibility rates also affect your IEP ratio.
- Staff that regularly assist with these steps should be included on the Administrative Staff Pool List for RMTS.

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 the vendor.
- The result of a zero rate is decreased SBAP reimbursement for your LEA for both MAC and Cost Settlement.

Unrestricted Indirect Cost Rate (cont.)

- UICRs are *applied in* the fiscal year in which they are certified and posted by PDE, at which time the UICRs are *applied to* the cost settlement of the prior fiscal year that is underway at that time.
- Therefore, an AFR submitted by the 10/31/2023 deadline where an unrestricted rate has been requested by the LEA and certified by PDE, results in a UICR to be applied during the 2023-2024 fiscal year.

PDE AFR / UICR			SBAP Application of UICR	
Data Year	Year AFR is Submitted Requesting Rate	Year Rate is Posted	Cost Settlement Year UICR is Applied to	Year Cost Settlement is Conducted
20-21	21-22	22-23	21-22	22-23
21-22	22-23	23-24	22-23	23-24
22-23	23-24	24-25	23-24	24-25
23-24	24-25	25-26	24-25	25-26

Unrestricted Indirect Cost Rate (cont.)

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"/> Unrestricted Rate Requested Schedules Required: <ul style="list-style-type: none">• Proprietary Expense Detail• Subcontract/Subaward• Paid Leave Uploads Required: <ul style="list-style-type: none">• Organization Chart	<input type="checkbox"/> Restricted Rate Requested Schedules Required: <ul style="list-style-type: none">• Proprietary Expense Detail• Subcontract/Subaward• Paid Leave• Restricted Rate Adjustment• Plant Maintenance Costs Uploads Required: <ul style="list-style-type: none">• Organization Chart• Back up Excel Template for the Plant Maintenance Costs Schedule
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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

Unrestricted Indirect Cost Rate (cont.)

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

- RA-EDPDEINDIRECTCOST@pa.gov

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

TELEHEALTH UPDATES & REMINDERS

Telehealth in SBAP

- Personal Care and Nursing continue to require in-person, one-to-one services in order to be billable. We do NOT anticipate this policy to change.
- Orientation & Mobility Services are no longer billable when provided via telehealth.
- Telehealth may use one of two Place of Service indicators:
 - 02: telehealth delivered in a setting other than the individual’s home
 - 10: telehealth when delivered in the individual’s home
- Providers should refer to MA Bulletin 99-23-08, “Updates to Guidelines for the Delivery of Physical Health Services via Telehealth”, for general guidance on use of telemedicine by MA providers.

Telehealth & Documenting Services

- As always, ALL services provided should be documented, regardless of the ability to bill for that service.
- Paper Logs for FY23-24 have been updated to reflect that a service was provided either direct face-to-face or direct telehealth.
- Providers should continue to note any technology issues that affected service delivery.
- The student record must include verification of consent by the parent/guardian for the student to receive services via telehealth.

THE SBAP HANDBOOK

SBAP Handbook Updates

- An updated SBAP Handbook was issued September 16, 2022, with guidance effective for the 2022-2023 school year.
- The 2023 issue of the Handbook will be issued later this fall.
- All newly added or revised text is highlighted in yellow for your convenience.

SBAP Handbook is available at:

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

SBAP Handbook Updates, cont.

Overview of Changes:

- Updates to reflect changes to vendor.
- Updates to telehealth allowances and Place-of-Service (POS) indicators.
 - Orientation, Mobility & Vision Services must be in-person.
 - POS 02 and POS 10 indicators added for relevant service types.
- Updates to ICD-10 Code chart to crosswalk with new system(s).
- Updates to unit limits for various service types.
 - Utilization trends were considered when adjusting limits.
- Updates to links and forms.

PROVIDER LOG UPDATES

Summary of Provider Log Updates

- Updated to include auditable electronic signature fields for both the Provider's Signature, and the Supervisor's Signature, if applicable.
- Instead of checkboxes to indicate Individual vs. Group services, all service types that allow for group billing have a "Group Size" column.
 - This should include the exact number of students in each group. When recording the delivery of an individual service, simply enter "1".
 - When entering the service into MAXCapture, select "Individual".
- Updated the Service Type key for any service types allowing telehealth delivery to include both POS 02 and POS 10 indications.

Summary of Provider Log Updates (cont.)

- Updated the Treatment key which summarizes the type of service to remove “Other Direct Service”.
 - If a provider feels a treatment type is missing, please contact DHS with the specific activity description, so we can review and possibly update the SBAP Handbook.
- Service Provider Evaluation Log
 - Updated Evaluation Service Type codes
 - Added Psychological Services as an evaluation type and removed the need for a separate Psychological Services Evaluation log.

PDE UPDATES

Changes to FAPE

- PDE recently extended the age of school eligibility until age 22 for a Free and Appropriate Public Education (FAPE) through the Individuals with Disabilities Education Act (IDEA).
- This has raised questions about whether SBAP services may be reimbursed when provided past the student's 21st birthday.
- The SBAP, an extension of the Early and Periodic Screening, Diagnostic and Treatment (EPSDT) benefit, covers children only through age 20 (up to the 21st birthday), even though IDEA covers children through age 21 (up to the 22nd birthday).
- Since the Pennsylvania State Plan limits SBAP services to beneficiaries under 21 years of age, **any claims for services provided after the student turned 21 would continue to be denied.**

Changes to Parental Consent

- NOT YET!
- A proposed rule to remove the annual parental consent to bill Medicaid was issued earlier this year.
- Comments closed on August 1, but a Final Rule has not yet been issued.
- LEAs should continue to obtain signed parental consent at the time of the IEP meeting.
- If a Final Rule is issued, LEAs will be notified of any relevant changes via email blast and/or the SBAP newsletter.

SBAP REMINDERS

Downloading Historic Data

- LEA access to PCG's EasyTrac system will end on **September 30, 2023.**
- DHS recommends that LEAs download the Service Log and Standard Service Log reports for each fiscal year of participation in the SBAP, but at least back to FY18-19.
- Larger reports run at night, so be sure to schedule any reports by Thursday, September 28 so that they will be available for download on Friday.

Changes Effective with FY22-23 Settlement

Health-Related Purchased Services

Updates in the September 2022 SBAP Handbook provided a further distinction between tuition and contracted costs.

- Tuition (Section 7.5.a)
 - LEAs may NOT report tuition paid to entities that are eligible to participate in SBAP. There will be a significant decrease in the number of entities available in the system to report tuition when completing cost reports for FY22-23.
 - Tuition costs are to be reported using accrual-based accounting method – so the dates of attendance (dates of service) must reflect the fiscal year being settled.
 - Documentation supporting those costs (including 4010 reports) must reflect the dates of attendance NOT the date when the costs were paid.

Changes Effective with FY22-23 Settlement, cont.

- Contracted Costs (Section 7.5.b)
 - Contracted costs are costs paid to an entity that provides health-related services when that entity is unable to support the individual provider's participation in RMTS.
 - When an individual provider does not participate in RMTS, their costs CANNOT be reported under salary/benefits.
 - LEAs should maintain contracts and invoices for these services and report the total of invoices on the cost report.

Changes Effective with FY22-23 Settlement, cont.

- Section 7.5.b – Contracted Costs, cont.
 - Invoices received for services not included in the cost of tuition may be reported separate from tuition
 - Those costs will be subject to the direct medical percentage, rather than the health-related tuition percentage.
- Documentation for these costs should include:
 - Contract showing the hourly rate for service.
 - Monthly invoice with total number of hours and total cost.
 - Backup details for invoice that provide student names, dates of service, total hours per student.
 - Verification that the invoice was paid.

Impediments to MAC Reimbursement

Missing or incorrect banking information

- If the LEA fails to provide or update its banking information, the electronic transfer of funds for the MAC payment will fail and the claim may not be completed.

Contractor Responsibility Program (CRP) Block

- If the LEA has an outstanding obligation to the Commonwealth, this will prevent payment of MAC until the obligation has been resolved.

Failure to submit compensable claims

- If the LEA has no interim payments at the close of the fiscal year, then the LEA will not be entitled to any cost settlement reimbursement or MAC reimbursements received for that fiscal year.

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 [SBAP website](#) and should be submitted to: RA-PWSBAP@pa.gov.
- The Contact Information Forms are used to update the Master Contact List, which is used by DHS, PDE, and the SBAP vendor.
- The Master Contact List is updated regularly, usually on the 15th of the month. Throughout the vendor transition, these updates are being made more regularly to ensure you receive important information.

Resources

- **SBAP on the DHS website**
 - www.dhs.pa.gov/provider/School-BasedACCESS/
- Program questions should be directed to the DHS resource account: RA-PWSBAP@pa.gov
- **SSG website –**
 - pasbap.ssghosting.com
- Questions about system support for RMTS, MAC, Cost Settlement, or Direct Service Claiming should be directed to SSG's Help Desk at: 1-877-916-3222 OR PAsupport@sivicsolutionsgroup.com