

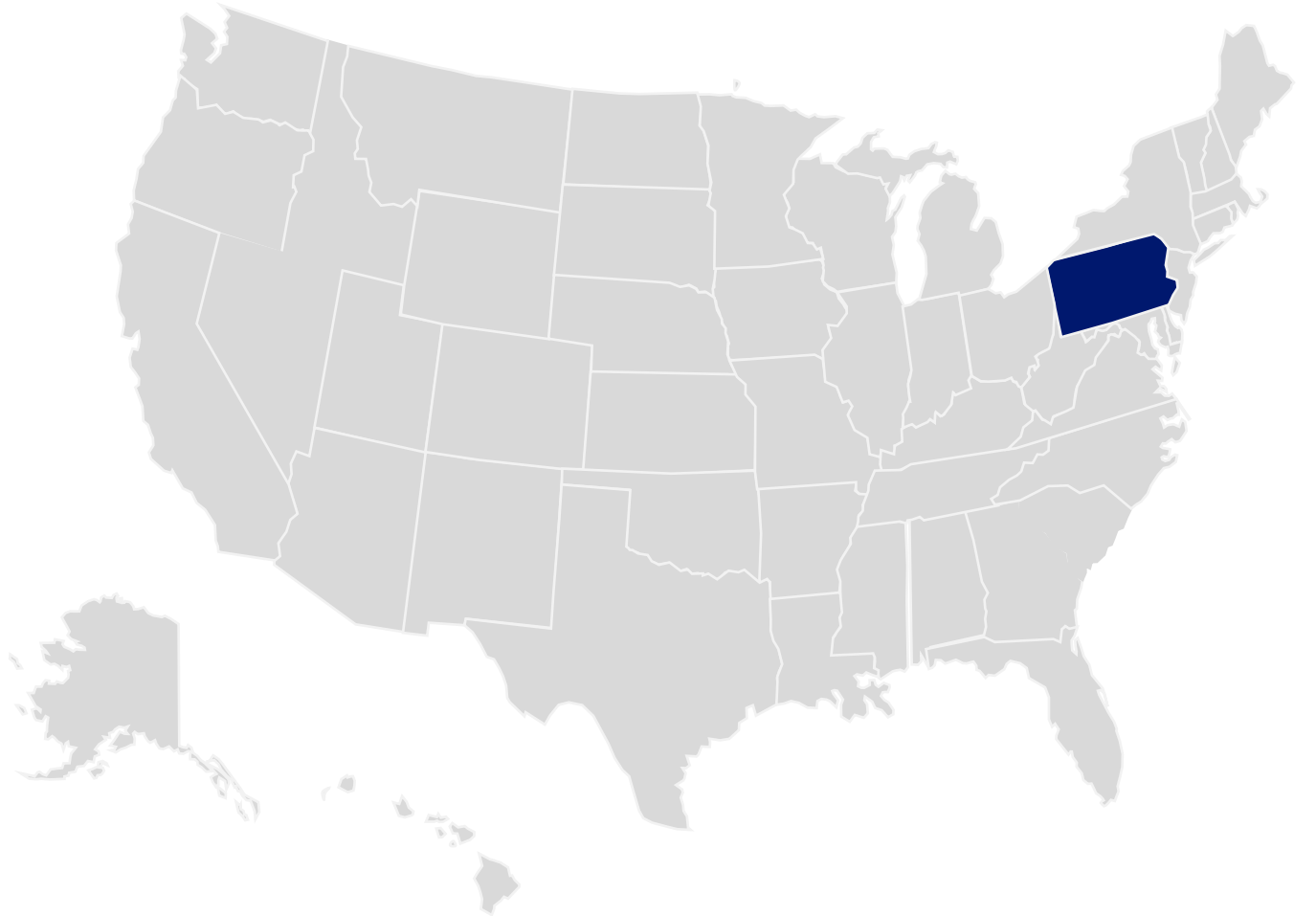
Optimizing Your SBAP Potential in a Virtual Setting

FY2021-2022 Statewide Training

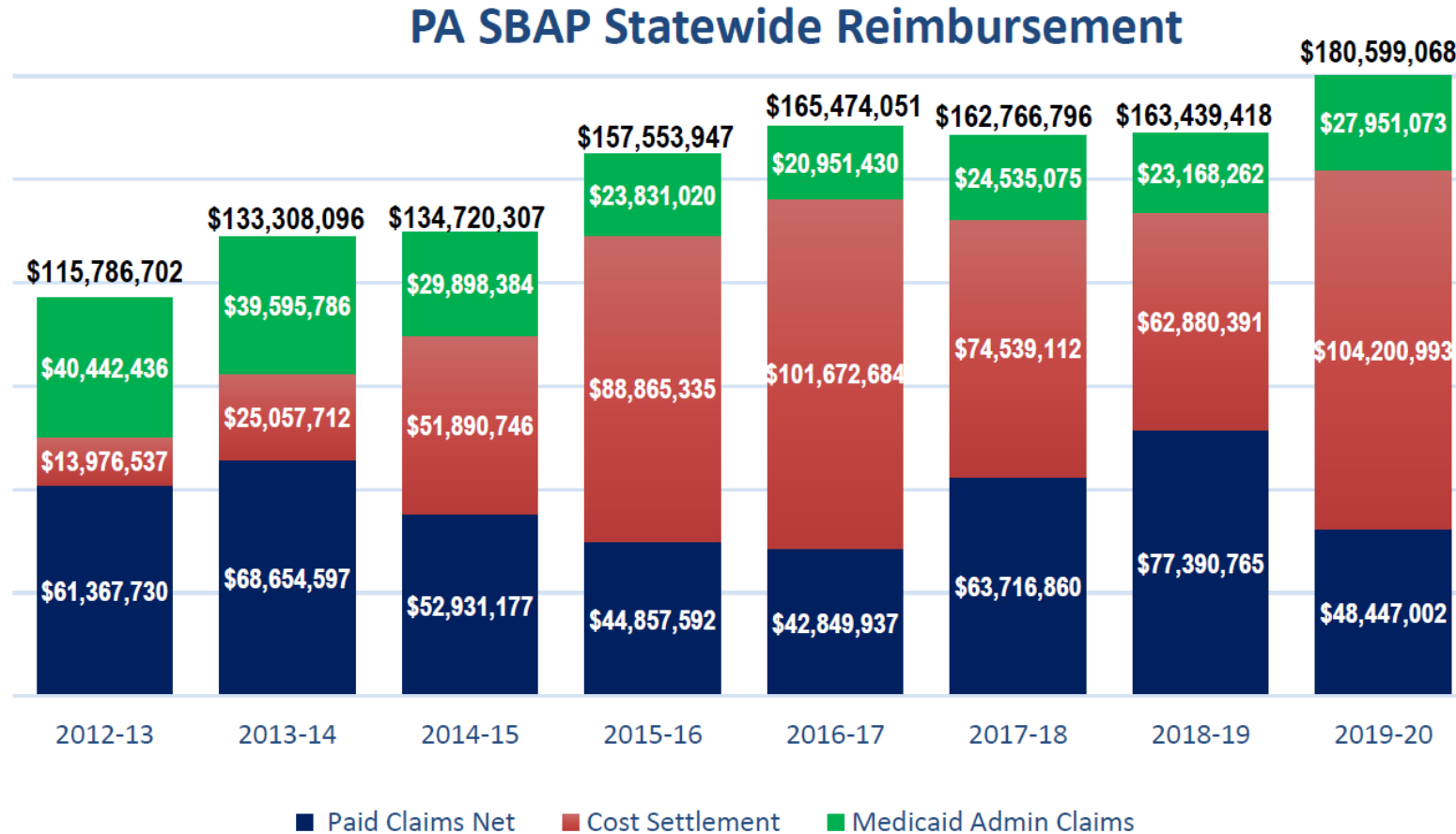
Public Consulting Group

Agenda

- **Related Service Documentation**
- **Random Moment Time Study (RMTS)**
- **Medicaid Administrative Claiming (MAC)**



PA SBAP Statewide Reimbursement



Related Service Documentation

Current Status

- Addition of Telemedicine Service Type options as a reimbursable service.
 - Psychological and Service Provider Evaluations
 - In accordance with guidance issued by the PA Department of Education, some evaluations or re-evaluations may be conducted via telemedicine
 - Please refer to the updated guidance from the PA Department of Education if there are questions: [Guidance on Evaluations and Reevaluations \(pa.gov\)](#) and [Special Education and Preschool Early Intervention Evaluations & Virtual Assessment Guidance](#)
- Updates to Treatment Key (Areas Covered/Assessed in EasyTrac) for the following Services:
 - Physician and Psychological and Service Provider Evaluations
- Updates to the Notes section in paper logs for the following services:
 - Audiology, Personal Care, Physician, Speech/Language/Hearing and Psychological and Service Provider Evaluations
- Extensions that have ended
 - Medical Authorizations: [Practitioner Prescription and Medical Provider Authorization Form \(MPAF\) Updates in the School-Based ACCESS Program \(SBAP\)](#)
 - Provider Licensures: [Waived and Suspended Licensing Regulations](#)



Addition of billable Telemedicine service types

Approved for Telemedicine

Audiology Services
Hearing-Impaired Services
Nurse Practitioner Services
Occupational Therapy Services
Orientation, Mobility and Vision Services
Physician Services
Physical Therapy Services

Psychiatric Services
Psychological Services
Social Work and Counseling Services
Speech and Language Services

Psychological and Service Provider Evaluations

Not Approved for Telemedicine

Nursing Services
Personal Care Services
Special Transportation Services

DHS Communication sent
12/23/2020

DHS Communication sent
7/2/2021



MPAFs Guidance

- LEAs must secure a prescription or signed MPAF concurrent with the student's valid IEP as explained in Section 4.2 of the SBAP Provider Handbook.
- All health-related services documented in a student's IEP must be ordered or prescribed through a prescription or signed MPAF before the services are compensable through SBAP.
- The prescription or signed MPAF must continue to indicate frequency and duration, as well as group or individual, for each health-related service compensable through SBAP.
- Prescriptions and MPAFs may be completed using electronic signature. See Sections 4.2 and 5.3 of the SBAP Provider Handbook for requirements for use of electronic signature.



What remains the same?

From a programmatic perspective - pretty much everything else!

Remember:

- Service Documentation should be maintained for all Related Services, regardless of whether the service method is currently considered reimbursable.
- Only reimbursable related services/service types will be submitted to Medicaid.
- Service Documentation for related services also serves to support your overall Direct Service reimbursement in the SBAP for each Cost Settled year.

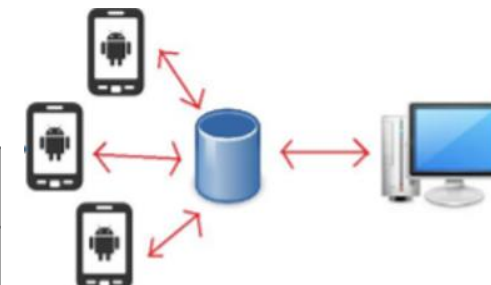


LEA Requirement: Service Documentation



**Provider delivers
service to eligible child**

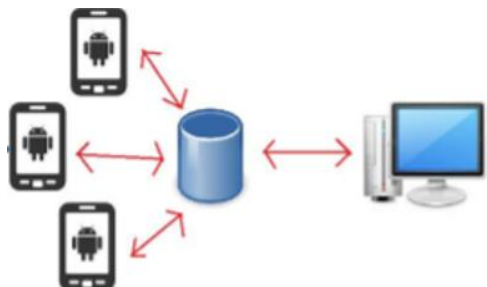
Service Documentation Checklist	Yes	No
Service Provided to Student	x	
Service Documented in EasyTrac	x	
Service Approved in EasyTrac	x	
Service entered into EasyTrac within timely filing window	x	
Student basic demographics entered in EasyTrac	x	
First Name, Last Name, D.O.B., Gender for Medicaid Match	x	



**Services move to
compliance check stage**



LEA Requirement: Compliance Information



**Services move to
compliance check stage**

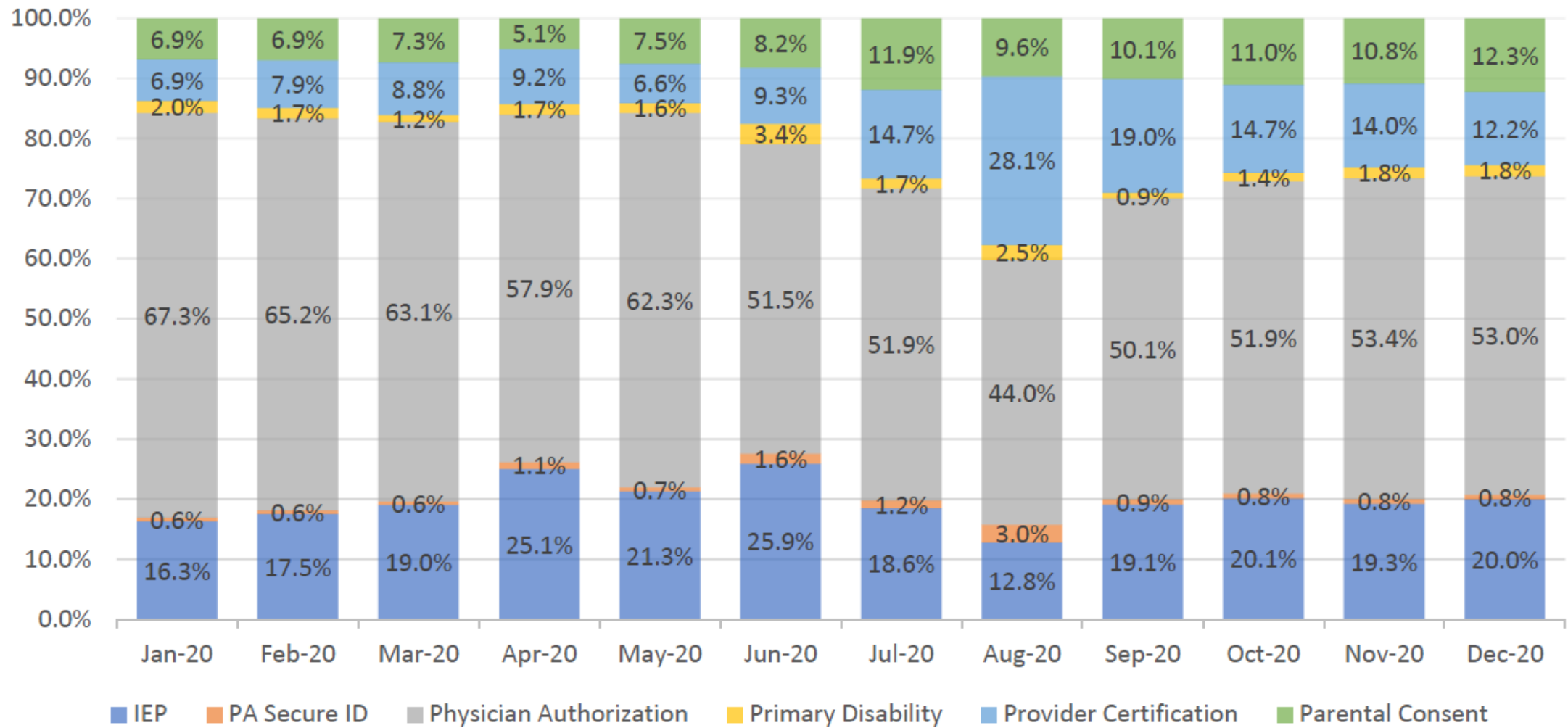
Compliance Information Checklist	Yes	No
PA Secure ID	x	
Parental Consent	x	
Medical Auth	x	
Name of Prescriber	x	
10-digit NPI of Prescriber - not office	x	
13-digit Medicaid ID of Prescriber - not office	x	
IEP	x	
Primary Disability	x	
Provider information entered	x	
Provider certifications	x	
Nursing Certifications - RN or LPN	x	



**State Medicaid agency
receives claims**



EXCEPTIONS BY SERVICE DATE (01/01/2020-12/31/2020) REPORTED TO DHS IN FY 2020-2021



LEA Requirement: Payment Status



**State Agency reviews
and process claims**

Payment Status Checklist: Service Date or Date Paid	Yes	No
Claims are submitted to Medicaid and reimbursed to LEA	x	
Claims are reimbursed for all service types LEA is billing for	x	
Claims are reimbursed for all service types on RMTS direct service cost pool	x	
Denied claims require action on part of LEA	x	



**Approved status for
reimbursement**



EasyTrac Enhancements

Telemedicine

EasyTrac was updated so that Service Documentation could occur for all Related Services. Regardless of whether the service method was delivered via Telemedicine or Face to Face, only reimbursable services are submitted to Medicaid.

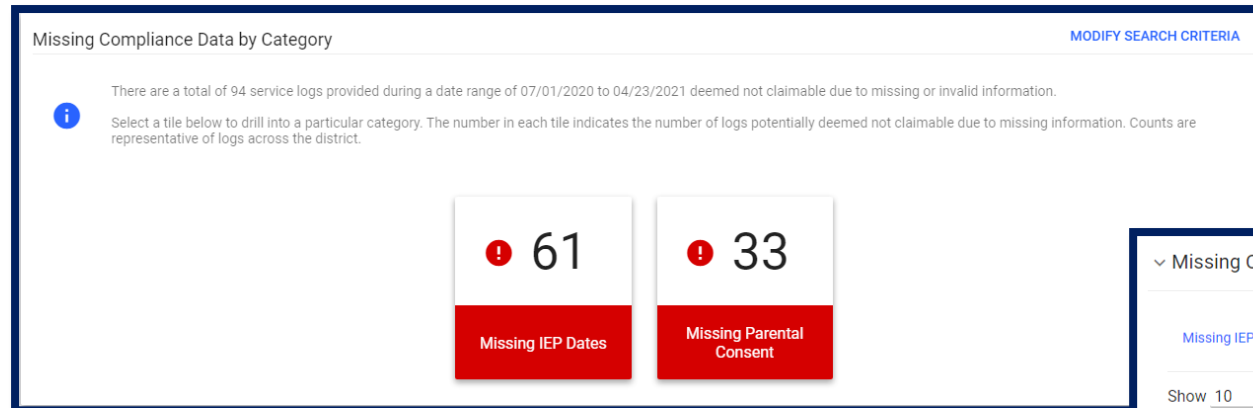
The following new Service Types delivery options were added and available to the EasyTrac Logging Wizard, Paper Logs and via import:

- Direct Session: Telemedicine
- Direct Session: Make-Up Telemedicine
- Initial Evaluation/Assessment: Face to Face and Telemedicine
- Re-evaluation/Re-assessment: Face to Face and Telemedicine



EasyTrac Enhancements

Exception Dashboard: Service Log Exceptions



- Two interactive compliance data tiles: **'Missing IEP Dates'** and **'Missing Parental Consent'**
- The tiles are colored based on thresholds of service logs missing data and priority: Red, Yellow and Green

Drill down by category to see the number of service logs with missing or incorrect information.

- Data can be added or corrected directly through the tiles.
 - ✓ Selecting the **'Student Name'**, to change directly in student profile and review other information through the Compliance Data Tab.
 - ✓ Select the **'Edit Pencil'** on the right side to add/edit the record.
- Printed as a PDF or exported in excel.

Missing Compliance Data Results [PRINT DATA](#) [EXPORT DATA](#) [MODIFY SEARCH CRITERIA](#) [BACK TO DASHBOARD](#)

[Missing IEP Dates](#) [Missing Parental Consent](#)

Show 10 entries Search:

Student Name	Student ID	PA Secure ID #	School	Service	Most Recent Signature Date	Most Recent Begin Date	Most Recent Response	Number of Logs Withheld	Edit
Aga Test	12345678		FS	SW				2	
Corey Jones	0369874103	0369874103	TS	SL				4	
Corey Richards	9517536548	9517536548	SHS	SL				1	
Jacob Masters	8934901		FS	Nurse	09/01/2011	09/01/2011		2	
Jennifer Test	1122334456	1122334456	FS	SW	02/04/2019	02/04/2019	No	1	
Jennifer Test	1122334456	1122334456	FS	PT	02/04/2019	02/04/2019	No	1	
Jonathan Barns	TEST9022	5568749250	WHHS	SL	09/01/2008	09/01/2008		2	
Jordan Smith	TEST9035		WHHS	SLE	09/01/2011	09/01/2011		2	
Larry Clark	TEST9038		FS	Nurse	09/01/2010	09/01/2010		1	
Mason Hummel	9338405567	9338405567	TS	SL				7	



EasyTrac Enhancements

Resources Tab was added to EasyTrac to provide LEA Administrators with easy access to frequently used websites.



Resources such as the **PA Licensing** and **ASHA Certification** websites can be used to ensure providers on the Staff Pool List are properly certified.

✓ [PCG SBAP](https://paaccess.pcgus.com)

<https://paaccess.pcgus.com>

✓ [DHS SBAP](https://www.dhs.pa.gov/providers/Providers/Pages/School-Based-ACCESS-Program.aspx)

<https://www.dhs.pa.gov/providers/Providers/Pages/School-Based-ACCESS-Program.aspx>

✓ [ASHA Certification](https://apps.asha.org/eweb/ashadynamicpage.aspx?site=ashacms&Webcode=ccchome)

<https://apps.asha.org/eweb/ashadynamicpage.aspx?site=ashacms&Webcode=ccchome>

✓ [PA Licensing Look Up](https://www.pals.pa.gov/#/page/search)

<https://www.pals.pa.gov/#/page/search>

✓ [NPI Registry](https://npiregistry.cms.hhs.gov)

<https://npiregistry.cms.hhs.gov>



Reminders on Record Retention and Revalidation

Records Retention Requirement

Records Retention Requirement from Section 5 of DHS Handbook:

Pennsylvania MA Regulations (55 Pa. Code § 1101.51 (e)) require medical and fiscal records that fully disclose the nature and extent of the services rendered to MA beneficiaries be retained for at least four years, or longer if required by the Health Insurance Portability and Accountability Act of 1996, Pub. L. No. 104-191 and implementing regulations at 45 CFR Parts 160, 162, and 164

What are the records PCG has access to?

- None – PCG uses the compliance dates entered by LEAs. Hard copy record reviews are conducted during audits.

What are the records PCG references in trainings?

- Specifically, compliance information and service documentation.
- Generally, SBAP Handbook section 5 - Documentation

What processes and records are specific to the LEA?

- Understanding internal LEA procedures versus MA provider documentation requirements.



Re-enrollment information included in section 2.2 of DHS handbook

- ✓ 31 LEAs have provider enrollment expiring between June 2021 – September 2021
- ✓ During QARs many LEAs weren't aware of their MA revalidation status or who is managing revalidation
- ✓ The LEA must revalidate for PCG to submit claims to Medicaid on its behalf.
- ✓ PCG is unable to assist with revalidation questions. Please reference section 2.2 of DHS handbook or contact the Resource Account for the Enrollment office
- RA-ProvApp@pa.gov

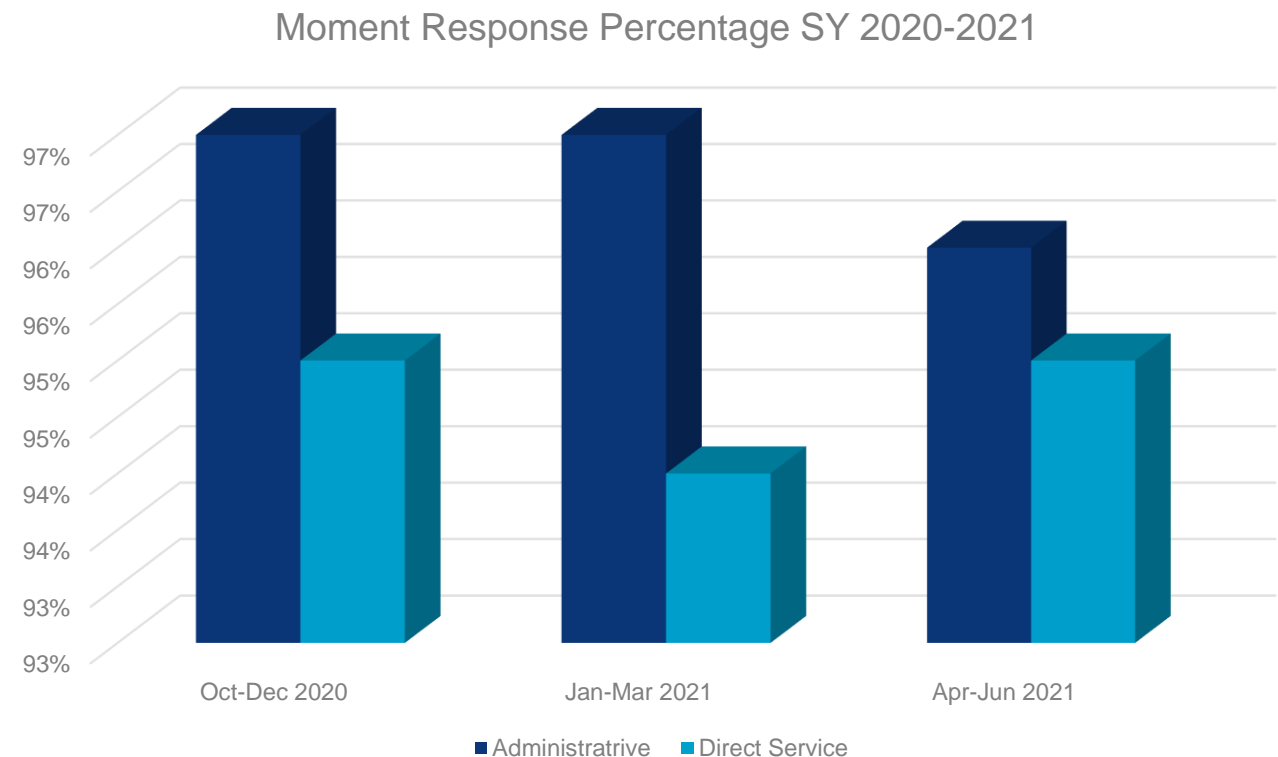


Random Moment Time Study

Random Moment Time Study

Overall Moment Response

- Response Percentages maintaining in the 94% - 97% range despite school calendar and schedule changes.
- LEAs should feel positive about moment completion during challenging school year.
- Emphasis remains on the content of the answer rather than the completion of the moment. Moments must be complete and valid in content.
- Complete responses mean sufficient information is provided in the response.
- Valid responses mean the moment was responded with true and accurate information about the participants 1 minute moment in time.



Random Moment Time Study Response Details

	Oct-Dec 2020		Jan-Mar 2021		Apr-June 2021	
Response Type	Direct Service	Admin	Direct Service	Admin	Direct Service	Admin
	3000	3000	3400	3000	3400	3000
Educational	40%	74%	37%	73%	37%	72%
Not Working/Not Paid	15%	5%	15%	4%	13%	4%
No Response/Vacancy Moment	13%	7%	13%	5%	12%	7%
All Other	32%	14%	35%	18%	37%	17%

Review how moment activity reflects makeup of Staff Pool Statewide

- What types of Administrator positions would respond with an Educational response?
- Why are the not working responses so much higher for the direct service cost pool?
- Why are vacancy moments so much higher for the direct service cost pool?



Random Moment Time Study Response – The Good

1. Who was with you?

One student

2. What were you doing? Please be as specific as possible.

I was working directly with a student (virtually). This is a regularly scheduled meeting for this student. We were working on an assignment for her Biology class on Edgenuity (online k-12 curriculum).

3. Why were you performing this activity?

The student is behind in some of her classes. She works with me to get caught up and also to get pre-teaching, re-teaching and support. I also am this student's Teacher of Record for English, so we often use activities/assignments in her content area classes as English lessons. In other words, she can stay caught up in her classes (school responsibility) and also learn new skills and make progress on IEP goals.

4. Is this activity regarding a Special Education student?

YES

5. Is the service you provided part of the child's IEP?

YES



Random Moment Time Study Response – The Bad

1. Who was with you?

At another job

2. What were you doing? Please be as specific as possible.

Does not involve students

3. Why were you performing this activity?

Work

4. Is this activity regarding a Special Education student?

NO

5. Is the service you provided part of the child's IEP?

NO



Random Moment Time Study Response – The Ugly

1. Who was with you?

n/a

2. What were you doing? Please be as specific as possible.

n/a

3. Why were you performing this activity?

n/a

4. Is this activity regarding a Special Education student?

N/A

5. Is the service you provided part of the child's IEP?

N/A

(1) What specific activity were you actively engaged in at the time of the moment?

No Response

(2) Could you please tell us if you were working on 11/24/2020 at 1:42pm and, if so, what specific activity were you actively engaged in at the time of the moment? As part of this program, we need to know the specific activity you were doing in order for us to code your moment correctly.

No Response

(3) Could you please tell us if you were working on 11/24/2020 at 1:42pm and, if so, what specific activity were you actively engaged in at the time of the moment? As part of this program, we need to know the specific activity you were doing in order for us to code your moment correctly.

No Response



RMTS Staff Pool List outreach and confirmation

SPL Check	What do we look for?	Expected Result
Change greater than +/- 25% of staff in a position	LEAs with a 25% or greater increase or decrease in the number of staff members in a particular job category excluding any changes of 5 or fewer staff members	Either confirm the greater than 25% change to the job position or make any necessary corrections
Change greater than +/- 25 staff in a position	LEAs with an increase or decrease of 25 -29 staff members in a particular job category	Either confirm the change to the number of staff in the job position or make any necessary corrections
Change greater than +/- 30 staff in a position	LEAs with an increase or decrease of 30 or more staff members in a particular job category	Either confirm the change to the number of staff in the job position or make any necessary corrections
More than 20% vacancies	LEAs where the number of vacancies exceeds 20% of the entire staff pool list	Either confirm the 20% vacancies or delete any positions that are no longer being actively hired for/will likely not be filled
Significant increase in vacancies	LEAs where the number of vacancies significantly increased compared to the previous quarter	Either confirm the increase in vacancies or delete any positions that are no longer being actively hired for/will likely not be filled



RMTS calendar/shift outreach and confirmation

Shift Check	What do we look for?	Expected Result
Weekend Shifts	Any shifts scheduled for a Sat or Sun	No shifts are on Sat or Sun
Inactive Shifts	Any staff members assigned to work shifts that have been inactivated	No staff members are assigned to work inactive shifts
Before 7:00 am	Any shift that begins before 7 am	Either confirm the shift is accurate or correct the start time to be accurate
After 5:00 pm	Any shift that ends or begins after 5:00 pm	Either confirm the shift is accurate or correct the end time to be accurate
Less than 4 hrs.	Any shift assigned for less than a total of 4 hrs. per week	Either confirm the shift is accurate or correct the shift to include all paid working hours



RMTS calendar/shift outreach and confirmation

Shift Check	What do we look for?	Expected Result
Greater than 42.5 hrs.	Any shift assigned for more than a total of 42.5 hrs. a week	Either confirm the shift is accurate or correct the shift to cover only working hours
Break in the Day	Any shift that starts and ends more than once during a day leaving a gap or break between working hours	Either confirm the shift is accurate or correct the shift to cover all paid hours without gaps
Single Full Time Shift/1 Full Time Shift + 1 Part Time Shift	Any LEA that has every staff member assigned to the same full-time shift or every staff member assigned to the same full-time shift and one part time shift	Either confirm the shift(s) cover the earliest start time and latest end time for every assigned staff member or separate out different shifts for staff members who start and end at different times
Majority Not Full Time	Any LEA where more than half of the staff pool list is assigned to a shift that is less than 32.5 hours per week/6.5 hours per day	Either confirm each shift covers the earliest start time and latest time for each assigned staff member or correct the shift times to encompass all paid hours
Timed Shift Names	Any shift with a name including days or times that do not match what days or times are assigned to the shift	Either correct the shift name to reflect the times or change the shift times to reflect the name depending on what is accurate



RMTS Staff Pool List Certification Feature

Job Category and Vacancy Review:

- Provides LEAs a high-level review at the changes they made to their Staff Pool list before certifying.
- Summary of job category and vacancies

If you need to make additional updates to your staff pool list, click Edit

Staff Pool List Certification

Job Category Review

Cost Pool	Service Type	Job Category	Previous Count	Current Count	Difference	% Difference	Status / Warnings
		Administrator / Administrator for Exceptional Student Education	47	52	5	10.64%	Low Change
		Counselor	19	19	0	0.00%	No Change
		Interpreter	1	0	-1	-100.00%	Job Category is now 0
		Program Specialist	5	24	19	380.00%	Significant Increase
		Speech-Language Pathologist and Assistants	18	19	1	5.56%	Low Change
		Student Services Personnel	46	45	-1	-2.17%	Small Change

Please indicate if you have reviewed the job category changes above. If the SPL is accurate as certified, please click the Confirm button. If changes are needed, please click the "Edit" button.

Confirm Edit

Vacancy Review

Previous Vacancy Count	Previous SPL Total	Previous Vacancy %	Current Vacancy Count	Current SPL Total	Current Vacancy %	Change in Vacancies
2	136	1.47%	2	159	1.26%	0

As a reminder, vacancies should only be used if you intend to fill the positions. Please indicate if you have reviewed the vacancy counts and percentages above. If the SPL is accurate as certified, please click the Confirm button. If changes are needed, please click the "Edit" button.

Confirm Edit



Medicaid Administrative Claiming

Medicaid Administrative Claiming Variables

Total costs entered for positions on your staff pool

- Admin Cost Pool = **\$2,150,644**
- Direct Service Cost Pool = **\$1,319,145**

Random Moment Time Study Activity Percentages Specific to Cost Pool

- Admin Cost Pool Administrative RMTS activity percentages = **Approximately 19%**
- Direct Service Cost Pool Administrative RMTS activity percentages = **Approximately 18%**

LEA Total Student Population Medicaid Eligibility Rate (MER) = **49.71%**

Unrestricted Indirect Cost Rate = **27.21%**

Gross Claim amount = **\$107,762**

Net Claim amount = **\$53,881**

District Share amount = **\$26,940**



Connecting the MAC Variables

MAC Variables	LEA Action Impacting MAC Variables
Total allowable costs entered for positions on your staff pool	Certified positions are working and paid in the quarter.
	Positions are replaced in real time when turnover occurs.
	Federal funds, like ESSER, are diverted to other needs rather than funding staff pool positions. Otherwise, any federal funds must be removed from the costs you report.
	Reference section 11 of SBAP Handbook to determine Unallowable Costs. These include:
	<ul style="list-style-type: none"> - Direct Costs related to staff that are not identified as eligible time study participants - Any costs that have already been fully paid by other revenue sources - Costs that are paid with 100 percent federal funds
LEA Total Student Population Medicaid Eligibility Rate (MER)	LEAs largely can't control student population MERs. Some impact can be made with LEA-community outreach on Medicaid resources.



Connecting the MAC Variables

MAC Variables	LEA Action Impacting MAC Variables
Unrestricted Indirect Cost Rate	LEAs must follow PDE's instructions to complete the Indirect Cost section of the Annual Financial Report (AFR) and provide the required information each year in order to receive an approved UICR. See section 9.4 of SBAP Handbook. Timelines to submit the AFR and obtain an UICR percentage very important to correspond with MAC claim calculations
	Roughly 25% of LEAs have 0% UICR when applied to MAC calculations.
Random Moment Time Study Activity Percentages Specific to Cost Pool	SPL positions are working in the quarter, so moment response reflect "working moments".
	SPL positions reflect properly credentialed direct service providers and administrators that work with the SBAP.
	RMTS Coordinator actively tracking moment completion, so no potential reimbursable moments are lost.
	Positions are replaced in real time when turnover occurs, so moment responses reflect "working moments"
	Shifts reflect working hours, so moment responses reflect "working moments".
	Calendar certified to ensure that days when school is scheduled to be closed are excluded from the total of active moment days



Direct Service Staff Pool Administrative Time Study Calculations

Direct Service Providers	Percent of Time Spent on Reimbursable Activity X	Total Costs Entered X	Medicaid Eligibility Rate X	General Admin Overhead Factor X	= Total Gross Claim Amount
X	0.00000%	\$1,319,145	N/A	N/A	\$0
X	0.00000%	\$1,319,145	N/A	N/A	\$0
X	0.00000%	\$1,319,145	49.71%	N/A	\$0
X	0.00000%	\$1,319,145	49.71%	N/A	\$0
X	0.04237%	\$1,319,145	49.71%	N/A	\$277
X	0.63559%	\$1,319,145	49.71%	N/A	\$4,168
X	5.46610%	\$1,319,145	49.71%	N/A	\$35,850
X	12.75423%	\$1,319,145	N/A	3.50%	\$5,890

Direct Service Providers Total Gross Claim: \$46,187



Administrative Staff Pool List Administrative Time Study Calculations

Administrative Providers	Percent of Time Spent on Reimbursable Activity X	Total Costs Entered X	Medicaid Eligibility Rate X	General Admin Overhead Factor X	= Total Gross Claim Amount
X	0.03635%	\$2,150,644	N/A	N/A	\$781
X	0.10905%	\$2,150,644	N/A	N/A	\$2,345
X	0.00000%	\$2,150,644	49.71%	N/A	\$0
X	0.00000%	\$2,150,644	49.71%	N/A	\$0
X	0.03635%	\$2,150,644	49.71%	N/A	\$388
X	0.50890%	\$2,150,644	49.71%	N/A	\$5,441
X	2.18102%	\$2,150,644	49.71%	N/A	\$23,321
X	16.21228%	\$2,150,644	N/A	1.79%	\$6,245

Administrative Providers Total Gross Claim: \$38,524



Application of the Unrestricted Indirect Cost Rate (UICR)

Direct Service Providers	\$	46,187
Administrative Only Providers	\$	38,524
<hr/>		
Gross Claim Subtotal 1	\$	84,712
Indirect Cost Rate (x 27.21%)	\$	23,050
Total Gross Claim Amount	\$	107,762
Federal Financial Participation (FFP) Rate		<hr/> x 50%
<u>Total Net Claim Subtotal</u>		<u>\$53,881</u>
<div></div>		
50% PA State Share (unreimbursed)		50% District Share
\$26,940		\$26,940
		<u>-\$500 Processing Fee</u>
		Claim: \$26,440.60



Application of the Unrestricted Indirect Cost Rate (UICR)

Direct Service Providers	\$	46,187
Administrative Only Providers	\$	38,524
<hr/>		
Gross Claim Subtotal 1	\$	84,712
Indirect Cost Rate (x 0%)	\$	0
Total Gross Claim Amount	\$	84,712
Federal Financial Participation (FFP) Rate	<hr/> x 50%	
<u>Total Net Claim Subtotal</u>		<u>\$42,356</u>
<div></div>		
50% PA State Share (unreimbursed)		50% District Share
\$21,178		\$21,178
		<u>-\$500 Processing Fee</u>
		Claim: \$20,678.60



Recap

- A difficult year with challenges but also some bright spots to emphasize
- Temporary changes going away so focus on historical SBAP processes
- Looking forward to implementing lessons learned from last school year regarding telemedicine delivery
- Focus on what you can control and try to mitigate what you can not

Resources:

- ✓ PCG SBAP
<https://paaccess.pcgus.com>
- ✓ DHS SBAP
<https://www.dhs.pa.gov/providers/Providers/Pages/School-Based-ACCESS-Program.aspx>
- ✓ ASHA Certification
<https://apps.asha.org/eweb/ashadynamicpage.aspx?site=ashacms&Webcode=ccchome>
- ✓ PA Licensing Look Up
<https://www.pals.pa.gov/#/page/search>
- ✓ NPI Registry
<https://npiregistry.cms.hhs.gov>
- ✓ PCG Claiming System
<https://claimingsystem.pcgus.com/pa>

Questions

Lot 1 Contractor – Public Consulting Group (PCG):

1-866-912-2976

SBAPsupport@pcgus.com





Solutions that Matter