



School-Based ACCESS Program Spring 2022 Newsletter

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Spring is right around the corner – and the final quarter of the 2021-2022 School Year. 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 and remind you of the following information regarding the Pennsylvania School-Based ACCESS Program (SBAP).

1. Annual Cost Reconciliation – CPE Form Deadline May 13, 2022

The Desk Review processed was finished February 28, 2022. Thank you for ensuring that your data was accurate.

In the weeks that follow, the final cost settlement will be calculated. In late April, LEAs will receive notice that their final cost settlement is ready for review and approval. Upon notification that your LEA's Cost Settlement is ready for review, LEAs will have until **May 13, 2022** to complete their CPE form and upload it into the cost settlement system. Please remember that when completing your CPE form, you need to fill out both the account code and signature sections prior to uploading.

Compliance

Oversight and monitoring reviews for the FY19-20 cost report are still underway. If your LEA was selected, make sure all supporting documentation is uploaded by March 15, 2022. SSG will reach out if additional information and/or clarification is needed. Please respond to those requests in a timely manner.

2. Random Moment Time Study (RMTS)

Calendars and Staff Pool Lists for the April – June 2022 quarter are due March 8, 2022.

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.

It is important to ensure your LEA's participants are:

- responding timely to their assigned moments;

- providing a clear picture of what activity is occurring during their assigned moments -- the quality of the moment response is just as important as responding to the moment; and
- answering all RMTS follow-up questions, if received. This means additional information is needed to clarify their original response.

For LEA Admin:

1. General Reminders

- Maintain supporting documentation of the activity identified during moment response.
- Ensure direct service providers hold the appropriate and valid certification or licensure for the service they provide.
- If a provider is unlikely to provide or is not providing direct services to a SBAP student, do NOT include them on the direct service staff pool list.

2. Shifts

Shifts should be created and assigned to participants that cover the time they are working and being paid.

- Shifts must cover the earliest start time and latest end time of the participant.
- LEAs with only 1 full-time shift are strongly encouraged to carefully review their shift to ensure it covers the full workday for **all their staff**. For example: 8:30am – 3:15pm.
- Shifts should be utilized for service providers (e.g. Contractors) who work at specific days/times; for example, Monday and Wednesday from 9:00am to 11:30am.

3. Vacancy Positions

All positions reported on the staff pool are eligible to be assigned a moment. Vacancies should only be used if you expect to fill the position with a participant that quarter. A moment received by a vacant position results in a non-response. Non-responses are missed opportunities for a working moment, which will negatively impact reimbursement.

- If you are contacting PCG to close a moment for a participant who is no longer working, be sure to delete or replace the position when certifying the next quarter's staff pool list.
- Delete or replace positions if the participant is no longer working before certifying the next quarter's staff pools.
- Replace any direct service provider who vacates their position during the quarter.
- LEAs where the number of vacancies exceeds 20% of the entire staff pool list when certifying will be asked for confirmation.
- LEAs where the number of vacancies significantly increased compared to the previous quarter will be asked for confirmation.

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 may issue 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.

New to SBAP or need a refresher? Training Webinars are offered every Tuesday at 11am. You can sign up [HERE](#)

3. Medicaid Administrative Claiming (MAC)

Certified Public Expenditure (CPE) Forms for the **October – December 2021 quarter** will be available late Spring. 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: The Department may issue warning notifications throughout the year when it determines an LEA has received no direct service claiming reimbursement as of the date of the notice and is in danger of losing its SBAP reimbursement. This notification affords the LEA an opportunity to identify and address any direct service claiming issues prior to the end of the year.

MAC Reimbursement

- **January - March 2022** quarter cost reporting certification will be due **April 29, 2022.**

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.

DHS and PCG will notify the LEA of any outstanding CRP block. Once notified of a CRP block, the proper LEA contact should reach out to the contact(s) indicated in that notification.

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.

4. Direct Service Reimbursement and Telemedicine

Reminder to use the **EasyTrac Exception Dashboard** that was made available last Spring 2021. This provides real time exceptions! It provides:

- Color-tiled dashboard that gives you real-time information and identifies key areas impacting services from being submitted for reimbursement. Specifically:
 - Missing IEPs
 - Missing Parental Consents
- Direct access to your data in an easy-to-read format.
- Ability to fix errors with the click of a button.
- Ability to view missing compliance data by school, service, or provider.

The following resources are available to support these new enhancements: [EasyTrac Exception Dashboard Instructions](#).

Assistive Devices

Under the School-Based ACCESS Program (SBAP), participating LEAs are eligible to claim Medical Assistance (MA) reimbursement for procurement and repairs of student-specific assistive technology devices, provided the following criteria are met and/or forms are completed.

If the LEA is submitting an eligible assistive device for SBAP reimbursement, the ownership of the device must be transferred to the student. The LEA must send a *Transfer of Ownership* letter to notify the parent of a possible transfer.

If an LEA makes the decision that they want to use SBAP reimbursement for an Assistive Device, but not transfer ownership to the student, they can draw down reimbursement from their FAI account by submitting a [PDE-352 form](#).

Additional information regarding claiming for Assistive Devices can be found here: [Pennsylvania School-Based Access Program Document Library \(pcgus.com\)](#) and Section 3.1 of the [School-Based ACCESS Program \(SBAP\) Handbook](#).

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 no more than 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.

5. 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. A sample application is available [here](#).

Reminder to each provider that:

1. LEAs MUST use the pre-printed application found at the link on the DHS SBAP website to ensure that appropriate and accurate information is provided. Do NOT make any changes to the pay-to address information on that pre-printed application.
2. LEAs MUST submit their paper application to either the mailing address or the email address. However, email submission may reduce processing time.
3. If the LEA is late in submitting an application for revalidation, their location will auto-close, which could result in missed claiming opportunities until the LEA is able to reestablish an active location.

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

6. Commitment to Compliance

Per Section 4.4 of the SBAP Handbook, Provider logs are daily progress notes and should only be completed by qualified providers. The daily logs provide evidence of a delivered service, progress toward the goals and objectives, analysis of treatment strategy and needed adjustments, and the continued need for services supporting medical necessity.

Provider logs are a tool used to gauge the student's progress. Cutting and pasting of entries (cloned charting) to the provider logs is not an acceptable practice for billing services in SBAP. Each entry should reflect the student's status during the particular time period the provider is documenting. Charting in large increments of time is not recommended.

Reminder:

Provider logs are required to contain exact “Start Time” and “End Time”. Rounding up service minutes is prohibited. Most SBAP services are based upon a 15-minute billing unit; exceptions to the 15-minute billing unit include evaluations and medication administration. Non-consecutive service minutes may accumulate on a date of service for the same service type provided to the same student.

If LEAs choose to develop their own provider log template, the logs *must* reflect the required information contained in the DHS templates.

7. 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](#).

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. This will provide you with the necessary documents to get up and running.

New to SBAP or need a refresher? Various Training Webinars are available throughout the week. You can sign up [HERE](#)

8. 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 [School-Based ACCESS Program Contact Information Form](#) and return it to 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

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

SSG Help Desk: 1-877-916-3222 or PAsupport@sivicsolutionsgroup.com

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