



School-Based ACCESS Program Winter 2019 Newsletter

As the 2019-2020 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 and remind you of the following information regarding the Pennsylvania School-Based ACCESS Program (SBAP).

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1. Annual SBAP Statewide Training Follow-Up

Thank you to all those who attended the annual SBAP statewide trainings in September and October! 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 one of the SBAP Fall Training dates, the three presentations have been recorded and are now available via links on the DHS SBAP webpage: dhs.pa.gov/providers/Providers/Pages/School-Based-ACCESS-Program.aspx. For those of you who participated via Zoom when technical difficulties meant that you were unable to see the demonstration of the preclusion/exclusion websites, the recording of the General Session includes that same information.
- A Frequently Asked Questions document is posted on the [DHS SBAP webpage](#). This document includes many questions from the 2019 Fall Training sessions as well as questions from the 2018 Fall Training sessions.

2. Cost Report Deadline – December 31, 2019

SBAP Cost Reports for the FY 2018-2019 period opened in October and are **due by December 31, 2019**. 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? Register for the remaining SSG webinar to be held Friday, December 6 at 10:00 am [HERE](#). You can also find the PowerPoint from the webinar on the bottom right of SSG's e-SivicMACS system [HERE](#).

Questions regarding the FY 2018-2019 cost reports and cost reconciliation process should be directed to the SSG Help Desk at 1-877-916-3222 or PAsupport@sivicsolutionsgroup.com.

3. Random Moment Time Study (RMTS)

1. The current deadline to certify Calendars and Staff Pool Lists for the January – March 2020 quarter is December 6, 2019.

Since winter break is around the corner, 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. It is important to keep the following in mind for your LEA:

Reminders to share with LEA participants

- Respond timely to your assigned moments.
- Provide a clear picture of what activity is occurring during your assigned moments.
- Be sure your response addresses what was occurring at that one specific moment.
- Answer all RMTS follow-up questions, if received.

Reminders for LEA Admin

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

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.

For additional information, please reference the recent communication on 11/12/19: [Random Moment Time Study – Important Reminder](#)

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

- At the beginning of each school year, we send an email to all staff as to what RMTS is and what is expected of them.
- Beginning of each quarter we print out a list of staff who are chosen for a moment.
- If any staff chosen for a moment have resigned or are on medical leave, and there is not a replacement, send an email to notify SBAPsupport@pcgus.com.
- Every morning, check who has not completed their moment. If not completed after 3 days, send an email to the staff member, their supervisor and program secretary. (Supervisor or program secretary then calls the staff person to inform them to complete it.)
- With completing the above steps, we have been able to obtain 100% participation for each RMTS Quarter with around 120 staff being chosen for a moment each quarter.

4. Medicaid Administrative Claiming (MAC)

Certified Public Expenditure (CPE) Forms for the **July – September 2019 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 for.**
- 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.

MAC Reimbursement:

- The deadline to submit MAC certifications for late FY2018-19 quarters was October 29, 2019.
- **October-December 2019 quarter** cost reporting certification will be due January 31, 2020.
- **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](#)

5. SBAP Handbook – Updated Version

An update to **The School-Based ACCESS Program (SBAP) Handbook** was released in **September 2019** and is available as a resource [HERE](#). All updates to the Handbook are highlighted for easy identification.

1. Evaluations

To continue to address questions around when evaluations, both initial and re-evaluations, may be compensable in SBAP, please see the information below:

SBAP may provide reimbursement to LEAs for the expenses they incur in providing direct health-related services to special education students who are Medicaid-eligible when those services have been identified in the student's IEP. Per guidance from the Centers for Medicare and Medicaid Services (CMS), if medical evaluations or assessments are conducted to determine a child's health-related needs for purposes of the IEP/IFSP, payment for some or all of the costs may be available under Medicaid. However, if the evaluations or assessments are for educational purposes, Medicaid reimbursement is not available.

The **initial evaluation**, psychological and other service types, must result in an IEP that contains at least one health-related service to be compensable.

The psychological and other service type **re-evaluation** must result in an IEP that contains a health-related service from the evaluation conducted. That is, a physical therapy re-evaluation must result in a physical therapy service in the IEP.

Psychological services include individual or group therapy or counseling, crisis assistance, and skill training designed to improve the basic functioning of the student in activities of daily and community living and improve social interaction with others.

2. Requirements for Personal Care Attendant (PCA) Credentials

The September 2019 update to the SBAP Handbook included specific information about what documentation needs to be maintained by the LEA to verify the provider holds the required credentials for the services that he/she provides. This includes verification of the ongoing requirement that PCAs have a high school diploma or GED.

In some cases, an individual may no longer have access to a copy of his/her high school diploma or GED. Verification of a higher level of education, such as an associate's degree or bachelor's degree, is acceptable documentation, as the individual would have had to meet the requirement of high school graduation to be admitted to a higher level educational program. Written documentation from the graduating institution may be substituted for the diploma, such as an official letter or email sent by the district providing the individual's name and graduation status. Personal attestation, as may be provided on an employment application, is not sufficient documentation.

6. Commitment to Compliance

Individual vs. Group Session

Individual versus group sessions on IEPs and Medical Practitioners Authorization Form (MPAF) should follow the guidelines listed below. **LEAs should be addressing what is medically necessary for the student.**

- If the student requires only individual, then that is what should appear on the IEP and MPAF (e.g., speech therapy individual 30 min 3x per week).
- If the student requires group only, then that is what should appear on the IEP and on the MPAF (e.g., OT group 30 min 2x per week).
- If the student requires a combination, then we would expect to see both on the IEP and the MPAF (e.g., OT individual 30 min 2x per week, OT group 30 min 4x per year).
- If group therapy has been ordered for the student and everyone is absent except for that student, then the choice is to reschedule the group session later that week or provide a make-up session (be sure to document as a make-up session).

If you provide a service that is not listed on the IEP or deemed medically necessary by the MD, DO or CRNP (and therefore not part of the MPAF), then **do not bill** for the service. For example, the student's IEP and MPAF indicate group therapy only, but it is determined that the student would benefit from having an incidental individual session. This individual session is **not** an MA compensable service. It can still be provided, but it cannot be billed to MA.

If a student's IEP and MPAF indicate individual therapy and he/she is actually provided therapy in a group setting, that session is not individual and is not eligible to be billed to MA.

7. Revalidation

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.

Reminder to each provider that:

1. You will NOT get paid if you are not enrolled/revalidated.
2. Payments cannot be made retroactively.

Additional information is available on the [DHS SBAP webpage](#). This includes a PowerPoint presentation on Provider Type 35 enrollment and revalidation along with a sample application.

8. New to SBAP? Check out SBAP 101

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 all of 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](#)

9. 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](#) 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