# School-Based ACCESS Program (SBAP)

# **General Session**FY2019-2020 Statewide Training

pennsylvania
DEPARTMENT OF HUMAN SERVICES

1

# Agenda

- Program Basics
- · Overview and Financial Performance
- · Unrestricted Indirect Cost Rates
- · Updates to the SBAP Handbook
- Key Compliance Reminders
- SBAP Resources

If you have questions during any of today's presentations, please send them to: <a href="mailto:Questions@pattan.net">Questions@pattan.net</a>

pennsylvania
DEPARTMENT OF HUMAN SERVICES

# SCHOOL-BASED ACCESS PROGRAM BASICS

3



# 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)
- Contractor for Lot 1: Public Consulting Group (PCG)
- Contractor for Lot 2: Sivic Solutions Group (SSG)



#### Contractor Responsibilities

#### Lot 1 Services (PCG):

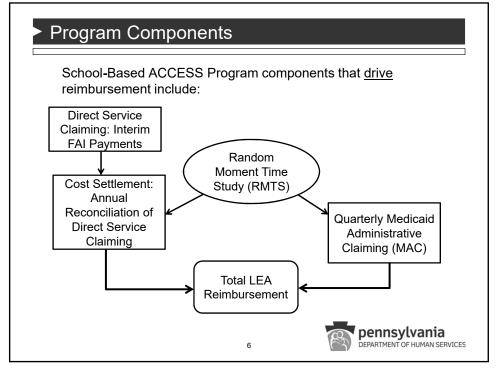
- Operating and maintaining a third-party billing system to submit claims to DHS for direct services and special transportation
- Conducting the Random Moment Time Study (RMTS)
- Submitting quarterly claiming for Medicaid administrative activities to DHS
- Contractor Systems: EasyTrac and Claiming System

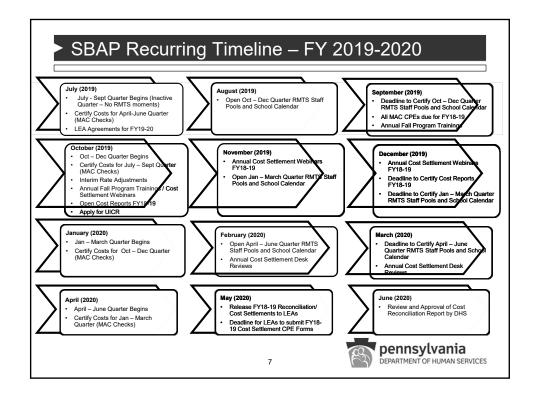
#### Lot 2 Services (SSG):

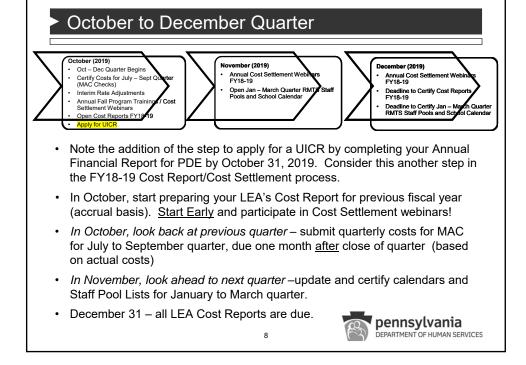
- · Performing annual cost reconciliation and settlement tasks
- Conducting annual oversight and monitoring reviews
- · Calculating annual interim rate adjustments
- · Conducting quarterly RMTS coding reviews
- · Contractor System: e-SivicMACS

pennsylvania DEPARTMENT OF HUMAN SER

5 DEPARTMENT OF HUMAN SERVICES

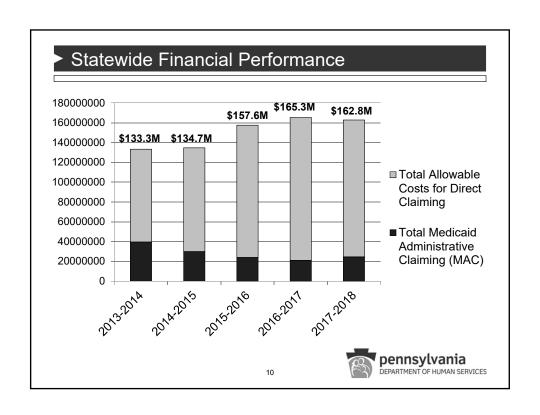


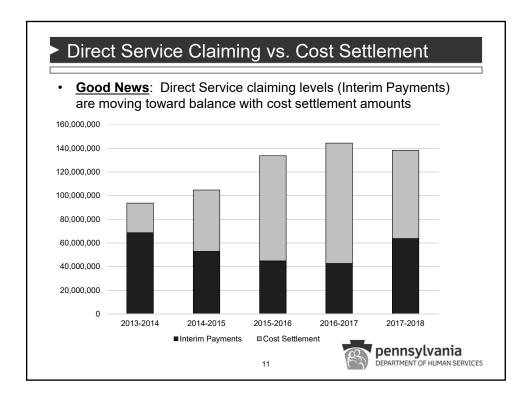




# FY2017-2018 FINANCIAL PERFORMANCE







# Direct Service Claiming vs. Cost Settlement

#### FY 2017-2018:

- Overall, the gap between interim payments received for properly submitted claims and costs received at the time of cost settlement is getting smaller.
- However, there is still room to improve. Approximately 56% of LEAs claimed 50% or less of Total Medicaid Allowable Costs (compared to 80% in FY16-17).
- Of those, approximately 19% claimed 25% or less.

Interim payments received based on claiming activity	Cost Settlement Payments based on total allowable costs	
\$68.70	\$11,995.45	
\$10,666.87	\$221,891.54	
\$9,236.07	\$112,679.71	



# UNRESTRICTED INDIRECT COST RATE

13



#### **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.
- LEAs must request that the rate be developed AND supply all additional information required by PDE.



#### **Unrestricted Indirect Cost Rate**

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.





15

#### **Unrestricted Indirect Cost Rate**

- Once the LEA completes the AFR, PDE calculates and certifies the indirect rate
- PDE transfers a list of certified UICRs to DHS in mid-February.
- These certified rates are provided to the Lot 1 vendor to be applied to MAC claims and the Lot 2 vendor to be applied to Cost Settlement.
  - > Rates must be received timely in order to be applied.
  - ➤ If you complete your AFR late, you may not receive a rate in time to be applied for that year.
- If an LEA does not apply for and receive an LEA-specific UICR, a zero rate will be applied and no indirect costs will be included.
  - The result of a zero rate is decreased SBAP reimbursement for your LEA for both MAC and Cost Settlement.



### **Unrestricted Indirect Cost Rate**

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

• RA-EDPDEINDIRECTCOST@pa.gov

Instruction manuals and other helpful information can be found at:

 ftp://copaftp.state.pa.us/pub/PDE\_PUBLIC/Indirect\_Cost\_Tr aining/

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

17



# **SBAP HANDBOOK UPDATES**

pennsylvania
DEPARTMENT OF HUMAN SERVICES

# SBAP Handbook Updates

- · The latest update to the SBAP Handbook was issued September 19, 2019.
- · Updates are highlighted for easy identification.

SBAP Handbook is available at: http://www.dhs.pa.gov/provider/School-BasedACCESS/



# SBAP Handbook Updates (cont.)

Consolidated information regarding requirements for beginning or discontinuing participation in SBAP (Section 1.3).

#### 1.3 Participation Requirements

1.3.a. New SBAP Providers

New SBAP Providers are to complete each of the steps below:

Enroll with PA Medical Assistance (see Section 2);

PA DHS School-Based ACCESS Program Handbook - September 2019

- Complete an LEA Agreement (see Appendix A);
- Certify a calendar for participation in the RMTS (see Section 8.3.d);
- Certify both direct and administrative cost pool lists for participation in the RMTS (see
- Provide information to the Lot 2 vendor required for rate setting (see Section 7.3); and
- Complete training on the Lot 1 vendor's system (for services logs, claiming, and RMTS. See Section 8.2).

The steps above, in particular certifying a calendar and staff pool lists, require that LEAs begin their participation in SBAP at the start of a quarter. LEAs are encouraged to begin participation at the start of the school year (the July to September quarter) in order to take advantage of all of the benefits of the SBAP.



#### 1.3.b. Ongoing Responsibilities

LEAs that participate in the SBAP must do all of the following in each year of participation:

- Comply with all applicable state and federal statutes, regulations, and policies which
  pertain to participation in the Pennsylvania MA Program;
- Assign a representative of the LEA to participate in SBAP mandatory training;
- Participate fully in all aspects of the RMTS (see Section 8);
- Complete annual financial report (AFR) for PDE, ensure an indirect cost rate is requested and the necessary information provided for its calculation (see Section 9.4);
- Submit compensable direct service claims (see Section 7.2); and
- Complete annual cost reconciliation/cost settlement of direct service claiming (see Section 7.6)

pennsylvania
DEPARTMENT OF HUMAN SERVICES

21

### SBAP Handbook Updates (cont.)

#### 1.3.c. Discontinuing Participation in SBAP

LEAs may stop claiming at any time but should notify DHS in writing of their intent to stop participating in the SBAP. LEAs should also check the Lot 1 vendor website for outstanding or upcoming RMTS moments.

The SBAP conducts cost settlement annually on June 30 of the fiscal year. LEAs are responsible for Cost Settlement for the last fiscal year in which they participate in SBAP. While an LEA may stop participating at any time during the fiscal year, Cost Settlement is still required for the last fiscal year. If an LEA discontinues participation in SBAP and does NOT complete cost settlement for the fiscal year, all MAC and interim payments for that fiscal year will be recouped.

PA DHS School-Based ACCESS Program Handbook - September 2019

**7 |** Page

LEAs must maintain relevant documentation even if they discontinue participating in the SBAP in accordance with Section 5.



 Added documents that must be maintained to verify certification or licensure for each provider type (Section 3).

#### SECTION 3 - COVERED DIRECT SERVICES

All individuals providing services to MA-enrolled students in the SBAP must maintain current state licensure or certification demonstrating their eligibility to provide such services. Failure of the individual to hold the appropriate licensure, or certification, or of the LEA to maintain documentation of licensure or certification, may result in the recoupment of any MA payments made for services by that provider.

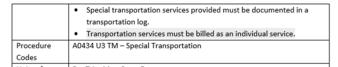
Documentation required for each provider type is included below.



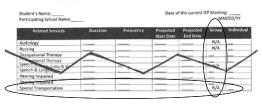
23

### SBAP Handbook Updates (cont.)

 Added the limitation that special transportation must be billed as an individual service (Section 3.14) to reflect what is already indicated by the Authorization for SBAP Services.



#### Medical Practitioner Authorization for SBAP Services





 Added information related to the impact of TPL coverage of services in schools on SBAP claiming (Section 4.1).

Some insurance companies do not provide blanket denials, but rather indicate that they cover some services provided in the schools. In cases where an LEA has submitted claims that are later determined as not included in the insurer's denial, the affected claims will be voided. LEAs will see such voids in their monthly management reports. The LEA does not have to submit documentation during this activity; this is an automatic process.

• Updated Parental Consent information to reference guidelines for use of electronic signatures (Section 4.7).

It is best practice to obtain the one-time parental consent at the initial IEP meeting; however, each LEA should establish a protocol for obtaining the consent. If the LEA chooses to allow electronic signatures on parental consent forms, the guidelines in Section 5.3 must be followed.



25

### SBAP Handbook Updates (cont.)

- Section 4.8 Evaluations was edited to delete the bullet that read, "The student left and is re-entering special education".
  - For each child, there is only ONE initial evaluation.
  - For a re-evaluation to be compensable, a current IEP must be in place.
- The evaluations chart was edited to include more detailed explanations of the requirements for ongoing health-related services in the IEP.



Evaluations	El Initial Evaluations	SA Initial	EI and SA Re-
		Evaluations	Evaluations
			authorization period.
IEP	Required – Evaluation	Required -	Required - Evaluation
	is not compensable if	Evaluation is not	is not compensable if
	it does not result in an	compensable if it	it is not conducted
	IEP.	does not result in an	pursuant to a current
		IEP.	IEP.
Ongoing	Psychological	Psychological	Evaluation is only
Health	evaluation required	evaluation required	compensable when it
Related	for special education	for special education	results in an ongoing
Service in the	determination;	determination;	MA health-related
IEP	resulting	resulting	covered service from
	psychological service	psychological service	the evaluation
	is not required.	is not required.	conducted. This
			includes psychologica
	An MA health-related	An MA health-	and all other service
	covered service in at	related covered	areas.
	least one area (e.g.,	service in at least	
	OT, PT, Speech) is	one area (e.g., OT,	
	required for	PT, Speech) is	
	evaluation to be	required for	
	compensable.	evaluation to be	
		compensable.	
Parental	Required - Prior to or	Required - Prior to	Required - Prior to or

27



### SBAP Handbook Updates (cont.)

 Added language to remind LEAs of the connection between direct service claiming and MAC payments (Section 7.7).

The LEA **must** receive direct service claiming reimbursement in order to receive MAC reimbursement. If no interim payments are received for the fiscal year, then all MAC payments for that fiscal year will be recouped.

 Updated the language related to use of shifts in RMTS (Section 8.3.d).

LEAs should use shifts to ensure that individuals on the staff pool lists can be selected to receive a moment at any time during their working hours. Additionally, LEAs can utilize shifts on their calendars for service providers, such as an itinerant OT, who work specific days/times (e.g., Monday and Wednesday from 9:00am to 11:30am). An unlimited number of shifts can be entered and used on the LEA's calendar to address these varied work schedules.



# KEY COMPLIANCE REMINDERS

29



# Documenting the IEP Ratio

Updated language in the newly issued Handbook reminds LEAs of importance of supporting documentation for the IEP Ratio (Section 9.2).

Failure to maintain documentation supporting the reported IEP ratio, when determined during an audit or oversight and monitoring, will result in the recoupment of all SBAP payments received for that fiscal year, to include interim payments, payments resulting from cost settlement, and MAC payments.

pennsylvania
DEPARTMENT OF HUMAN SERVICES

# Documenting the IEP Ratio (cont.)

What exactly is the IEP Ratio and how do I document it?

Total number of students who have a health-related service in their IEP **and** who are MA-eligible.

Total number of students who have a health-related service in their IEP. = IEP Ratio

31



# Documenting the IEP Ratio (cont.)

Where do I get these two numbers?

Total number of students who have a health-related service in their IEP **and** who are MA-eligible. This is the number of students you identify when doing your December 1 eligibility count.

Total number of students who have a health-related service in their IEP.

This is the number of all students with a health-related service in their IEP, regardless of MA eligibility.



## Documenting the IEP Ratio (cont.)

What is acceptable documentation for these numbers?

- Start with a list of students with IEPs that includes each student's full name and date of birth.
- Clearly indicate the presence of a health-related service in the IEP.
- Clearly indicate the eligibility status of each student on December 1 of that fiscal year.
  - To support the IEP Ratio for the 2018-2019 school year, you would need to document eligibility on 12/1/2018.
- Date and initial the list as you verify eligibility (you don't need to complete the verification process in a single session).





33

#### **Documenting Provider Credentials**

2019 updates to the SBAP Handbook include descriptions of the documentation required to verify that individuals providing services in the LEA hold the required license or certification.

Many individuals who provide SBAP services have a PDE certificate associated with their position (e.g., school nurse, social worker); however, most PDE certificates are NOT sufficient verification of the individual's eligibility to provide services under the SBAP.

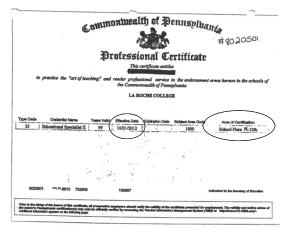
How do I ensure my LEA has the appropriate documentation?

- Ideally, the individual should provide the LEA with a copy of his/her current license or certification.
- Pennsylvania Licensing System Verification service found on the Department of State website at <a href="https://www.pals.pa.gov/#/page/search">https://www.pals.pa.gov/#/page/search</a>.
- Certification Verification search function found on the American Speech-Language-Hearing Association website at https://www.asha.org/eweb/ashadynamicpage.aspx?webcode=ccchome.



# **Documentation for School Nurse**

The individual who holds this PDE certificate *may* be a qualified school nurse, but this document **does not** provide sufficient verification.



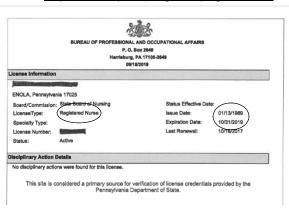
35

pennsylvania

DEPARTMENT OF HUMAN SERVICES

# Documentation for School Nurse (cont.)

The document below provides verification of the individual provider's Department of State license as a Registered Nurse, including effective dates. https://www.pals.pa.gov/#/page/search





# Documentation of SLP Credentials

The individual who holds this PDE certificate *may* be a qualified SLP, but this document **does not** provide sufficient verification.

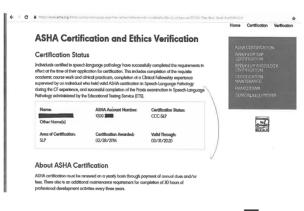


pennsylvania
DEPARTMENT OF HUMAN SERVICES

37

# Documentation of SLP Credentials (cont.)

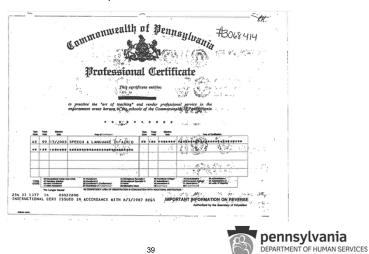
The screen shot below provides verification of the individual provider's certification as a Speech Language Pathologist, including effective dates.



pennsylvania
DEPARTMENT OF HUMAN SERVICES

# Documentation of SLP Credentials (cont.)

The individual who holds this PDE certificate *may* be a qualified SLP, but this document **does not** provide sufficient verification.



# Documentation of SLP Credentials (cont.)

The document below provides verification of the individual provider's Department of State license as a Speech Language Pathologist, including effective dates.



pennsylvania

DEPARTMENT OF HUMAN SERVICES

### Self-Audits

- Best Practice: Perform periodic self-audits on your LEA's direct service and transportation compliance data and documentation to ensure services were rendered and billed correctly and documentation appropriately maintained.
- The Self-Audit Tool provides a checklist of documents/records required for SBAP billing.

NOTE: Just because you find an error on a log doesn't mean it was a paid claim! Be sure to check with BPI or PCG on whether the log resulted in a paid claim to determine next action.

41



# Self-Disclosures

- Providers have a legal and ethical commitment to return inappropriate Medicaid payments.
- LEAs are encouraged to self disclose billing errors and violations identified.
- Disclosures should be made directly to the BPI SBAP Coordinator at (717) 705-6873.



#### Precluded/Excluded Providers

- LEAs as MA Providers are required to screen employees and contractors for exclusion from participation in federal health care programs, prior to hire, then on an ongoing monthly basis.
  - An excluded/precluded individual or entity cannot be part of a task that is reimbursed by Federal healthcare program dollars.
- · LEAs must use all 3 preclusion websites:
  - Office of Inspector General (LEIE)
  - System for Award Management (SAM)
  - Medicheck (DHS)

pennsylvania
DEPARTMENT OF HUMAN SERVICES

43

### Precluded/Excluded Providers (cont.)

- This requirement includes all employees, vendors, contractors and service
  providers whose functions are a necessary component of providing items
  and services to MA beneficiaries and who are involved in generating a claim
  to bill for services.
- In SBAP this includes all individuals listed on the LEA's staff pool lists, supervisors or teachers permitted to sign logs, physicians and/or CRNPs signing medical authorizations, and superintendents if he/she signs IEPs or has any association with SBAP. Refer to Section 5.4 Preclusion/Exclusion Checks in the SBAP Handbook for more details about the requirement.
- Helpful tip: LEAs can consider modifying their contracts to reflect the exclusion prohibition and require the contractor or vendor to check their own employees.



# Precluded/Excluded Providers (cont.)

- Office of the Inspector General (LEIE)
   https://oig.hhs.gov/exclusions/exclusions\_list.asp
- System for Award Management (SAM) https://sam.gov/SAM/pages/public/index.jsf
- Medicheck (DHS)
   http://www.dhs.pa.gov/learnaboutdhs/fraudandabus
   e/medichecklist/

45



# **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 DHS website under "FORMS" at: <u>www.dhs.pa.gov/provider/School-</u> <u>BasedACCESS/SupportingDocuments/index.htm</u> and should be submitted to: <u>RA-PWSBAP@pa.gov</u>.
- The Contact Information Forms are used to update the Master Contact List, which is used by DHS and the two SBAP vendors.
- The Master Contact List is updated once a month, usually on the 15th.



47

#### Resources

- · SBAP on the DHS website
  - www.dhs.pa.gov/provider/School-BasedACCESS/
- SSG website cost settlement FAQs
  - https://pasbap.ssghosting.com/rms/login.aspx
- PCG website document library and SBAP 101
  - https://paaccess.pcgus.com/documents.html
  - https://paaccess.pcgus.com/SBAP101.html
- · PCG weekly webinars
  - https://paaccess.pcgus.com/calendar.html



### DHS Presenters' Contact Information

Jennifer Wiegand SBAP Program Manager (717) 772-6148 jenwiegand@pa.gov

Pamela Tressler
Bureau of Program Integrity
(717) 705-6873
<a href="mailto:ptressler@pa.gov">ptressler@pa.gov</a>

49



# SBAP Contractors' Contact Information

**Lot 1 Contractor - PCG:** 

1-866-912-2976 SBAPsupport@pcgus.com

Lot 2 Contractor - SSG:

1-877-916-3222

PAsupport@sivicsolutionsgroup.com

