

**School-Based ACCESS Program
Frequently Asked Questions
October 2019**

TUITION

1. I have tuition costs for schools that are not listed in the Cost Report, what should I do?

Please email the list of schools to SSG at pasupport@sivicsolutionsgroup.com. The list of schools will be reviewed in conjunction with DHS and PDE to determine their inclusion in the approved list of schools/programs for reporting tuition.

2. If a student is receiving Special Transportation and no other Health-Related Services, can we report the tuition in the Cost Summary Report?

No. The cost of tuition can only be reported for those students who receive a health-related service contained in their IEP.

3. What if my LEA sends a student to an IU – can I report tuition for the services provided by the IU?

Only one entity may report costs or bill for services for any given student. The LEA (home district) is responsible for ensuring that no other entity is billing the SBAP for direct services for that student before claiming tuition costs for that student.

4. When paying tuition, do invoices have to be broken out by discreet services?

No. LEAs only need to identify the total amount of tuition paid. LEAs do not need to break down the tuition costs into health-related services vs. education-related services, as this is the function of the health-related tuition percentage specific to each out of district school. Documentation of tuition must include the student name, time period being billed, entity billing, total cost for that time period, and verification of payment.

5. How do I submit special transportation claims for the students for whom my LEA provides transportation to/from the APS?

Special transportation alone is not a health-related service. Even if you are providing transportation for these students to get to the school they attend in order to receive necessary health-related services, your LEA will not have a corresponding direct service claim for those students. A special transportation claim can only be submitted (and paid) when there is a corresponding paid direct service claim for the same student on the same date. Please see Sections 3.14 and 7.4 in the SBAP Handbook for additional information.

IEP / IEP Ratio

6. Why is “as needed” in an IEP not acceptable?

Section 1.2 of the SBAP Handbook states, “Health-related services provided or purchased by LEAs, defined in a student’s IEP, may be compensable provided...the services defined in the IEP include frequency and duration.” Frequency must address how often (during the day, the week,

etc.) and for how long (30 minutes, 3 hours) the student is to receive the service. Duration addresses the overall length of time the student is expected to require and receive the service. The limited use of “up to” is a potential way to describe the frequency and duration for a health-related service; for example, “PCA services for up to 2 hours per school day, over the period of 8/1/2018 through 12/31/2018”. Documentation of frequency using vague terms such as “as needed” is not appropriate, and the projected beginning date and the anticipated duration of the related service must be listed. Additional information from PDE about IEPs and SBAP can be found in the materials from the 2018 Fall Training Compliance session.

7. Can students we pay tuition for be included in the IEP ratio?

The IEP ratio is intended to determine how much (what percentage) of your costs to provide health-related services to students in accordance with their IEPs are eligible to be reimbursed by Medicaid. Your IEP ratio should reflect only those students for whom you actually provide direct, health-related services. So students who attend an APS in order to receive the health services they need would **not** be included in your IEP ratio.

8. Are third party systems acceptable for providing Medicaid Eligibility for students who have an IEP?

DHS encourages LEAs to independently verify Medicaid eligibility for students with an IEP as of December 1 in PROMISE. DHS does accept third party systems for the IEP ratio as long as all compliance elements are met; however, third party systems are to be used at the discretion of the LEA. Any documentation maintained must include student name, DOB, health related service, eligibility as of December 1 (see Fall Training 2019).

RMTS

9. Can a transportation coordinator be included in my administrative staff pool?

Yes, a transportation coordinator may be included on the administrative staff pool list. This list should include staff who perform activities that support the provision of direct services in an administrative capacity. Please see the SBAP Handbook Section 8 – Random Moment Time Study (RMTS) for additional information, specifically, section 8.4 – RMTS Participants.

10. Should staff who are 100% federally funded be on the staff pool for RMTS?

No.

TRANSPORTATION

11. If we buy a van using ACCESS funds from our FAI account, can that van be depreciated?

Yes. A van to be used primarily for special education purposes may be purchased with funds from your LEA's FAI account and can be depreciated. Please see Section 7.4 of the SBAP Handbook.

12. Is the timeframe used for the IEP ratio the same as the timeframe used for the Special Transportation Ratio?

No, the IEP Ratio is based on a specific moment in time – December 1 of the fiscal year. The data used for the Special Transportation Ratio reflects the entire Fiscal Year, July 1- June 30.

13. Can my LEA submit special transportation claims for the students for whom we report tuition?

No. See question 5 above.

SERVICES

14. Is there a minimum number of minutes for a health-related service to bill for services?

The MPAF (Medical Practitioner Authorization Form) and the IEP should clearly indicate the frequency and duration for each type of service. Most SBAP services are based upon a 15-minute billing unit; with the exceptions of evaluations and medication administration.

TRAINING / REQUESTING HELP / SELF-AUDITS

15. What types of trainings can be provided to an LEA?

LEAs can receive trainings from both vendors, Public Consulting Group (PCG) and Sivic Solutions Group (SSG). Each vendor has 101 online trainings to help an LEA get started with the basic understanding of the SBAP program. PCG and SSG also provide face-to-face time with an LEA at the LEA's request to provide additional training for specific elements within the SBAP program.

16. Can vendors identify logs for self-audit help?

Yes, PCG can provide examples of paid claims for LEAs to use in self-audits. DHS recommends selecting a reasonable percentage of services, ideally of multiple service types, for LEAs to review in a self-audit. A link to the self-audit form is located on the PCG website. See Section 6.4 of the SBAP Handbook for additional information on self-audits.

17. Can vendors help identify over-billing?

The LEA is responsible to document the services according to the child's IEP requirements. EasyTrac does not have an edit check to ensure the units of service billed equal the units of service authorized, but has the ability for the provider to be able to see the duration and frequency of each related service as they are logged. DHS highly encourages LEAs to verify through the self-audit process that the duration and frequency of the services billed are equal or less than the duration and frequency recommended in the IEP and authorized on the MPAF.

MATERIALS AND SUPPLIES

18. Can Band-Aids purchased and reported to SBAP only be used for SBAP eligible students?

LEAs should only report materials and supplies used predominantly for the provision of a health-related service in a special education student's IEP. Costs for materials and supplies should not be solely for general education students.

CREDENTIALS AND LICENSING

19. What if an individual working as a PCA does not have a copy of their high school diploma or a 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.

20. What if an individual working as a Speech Language Pathologist does not have either a Department of State license or their ASHA CCCs? What credential is acceptable?

If the individual is completing their Fellowship or is a PDE-certified Speech Pathologist, he/she may only provide services under the supervision of a SLP who holds a state license or ASHA CCC. In addition to that individual’s PDE certificate, the LEA should have copies of the provider’s logs that include the required supervisory signature. Please see Section 3.15 of the SBAP Handbook for details about SLP providers that require supervision.

21. What is auditable documentation for the preclusion/exclusion websites? How long must it be maintained? In what form must it be maintained? Why is it important?

For MA purposes:

- DPW/BPI generally uses 4 years for auditing purposes but cannot speak for the OIG.
- Providers can maintain printouts of each database.
- DPW would accept an internal spreadsheet in lieu of printouts for tracking and auditing purposes.
- There are also commercially available screening resources.
- Whatever method used, Providers must maintain documentation in a permanent file.

You may use an Excel spreadsheet such as:

Provider Name	Medicheck	LEIE	SAM	Comments	Date Checked	Initials
XXXX	Nothing	Nothing	Nothing		1/15/2019	PT
YYYYY	Match ruled out	Match ruled out	Match ruled out	Diff DOB	1/16/2019	PT

OTHER

22. Why does a student appear on more than one month's Exception Report if I updated the needed information in EasyTrac?

The timing of when the information was updated into EasyTrac compared to when the information was pulled for claiming, as well as the date range covered by the data entered should be considered. If the logs withheld are for a longer time frame than the date range entered, the logs still not covered will remain on the Exception Report.

23. If a student's PA Secure ID is not in PDE's system, what should we do?

Please visit the link provided below for more information on PASecureID:

<https://www.education.pa.gov/Teachers%20-%20Administrators/Pages/PASecureID.aspx>

24. Is an initial psychological evaluation claimable if it results in an IEP? What about evaluations for other service types?

The initial psychological evaluation must result in an IEP that contains at least one health-related service to be claimable. A psychological re-evaluation must result in an IEP that contains a psychological health-related service to be claimable.

Initial evaluations for other service types must result in an IEP that contains at least one health-related service. Re-evaluations for other service types must result in an IEP that contains a health-related service in the same category as the evaluation (e.g., speech evaluation resulting in speech service, OT evaluation resulting in OT service).

Please note that this is not new content or a change to existing rules. When determining if a service is claimable, the LEA should always remember that the SBAP provides 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.