

FY25-26 SBAP Session: Intersection of PDE Documents & MA Requirements

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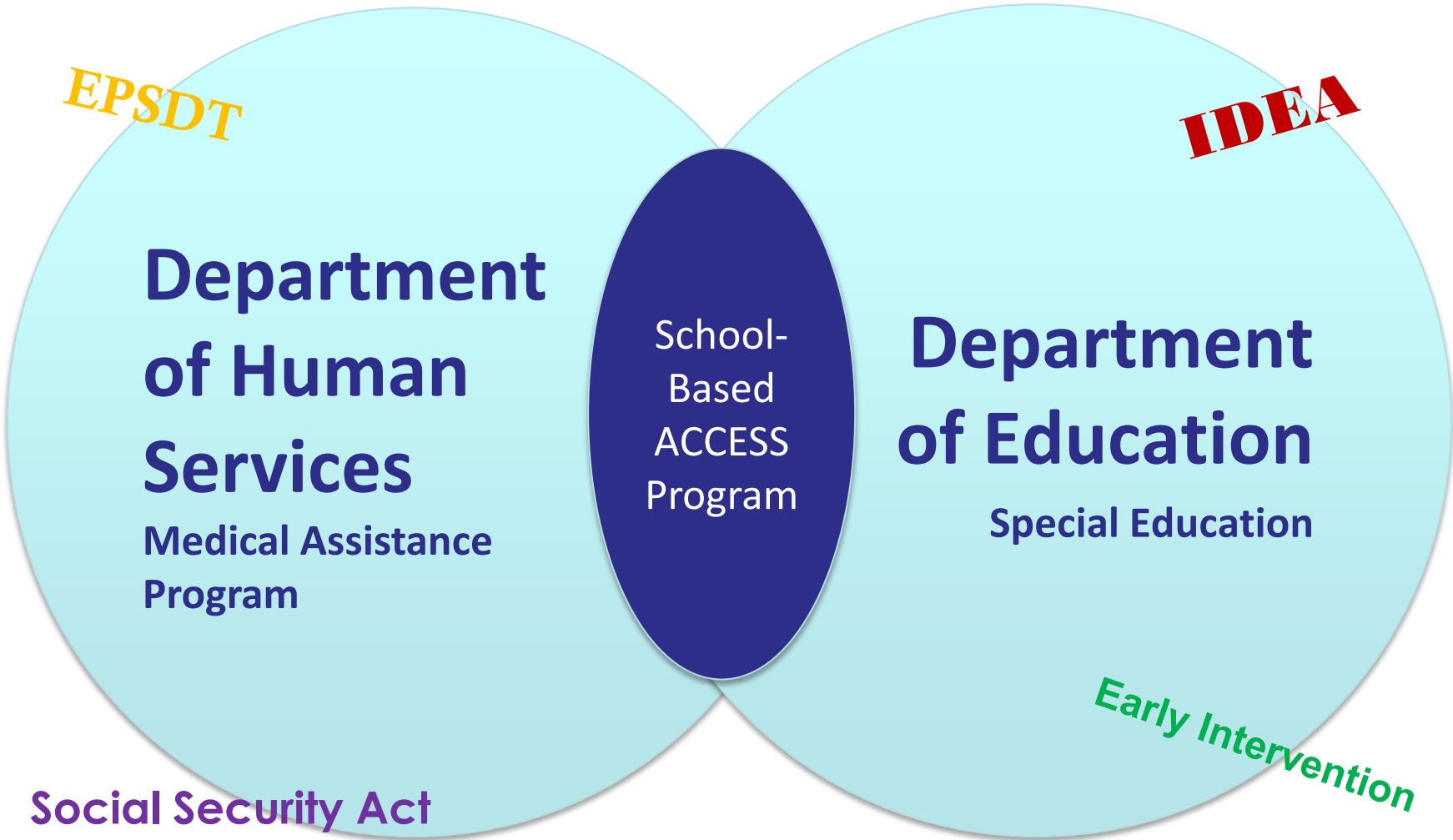


Key Topics

- **How do Education and the Medical Assistance (MA) Program connect?**
- **What are the requirements for each?**
- **How do those requirements work together?**
- **Who can answer my questions?**
- **How can I use the reimbursement that I receive?**



What's the Connection?



What Guides the MA Program?

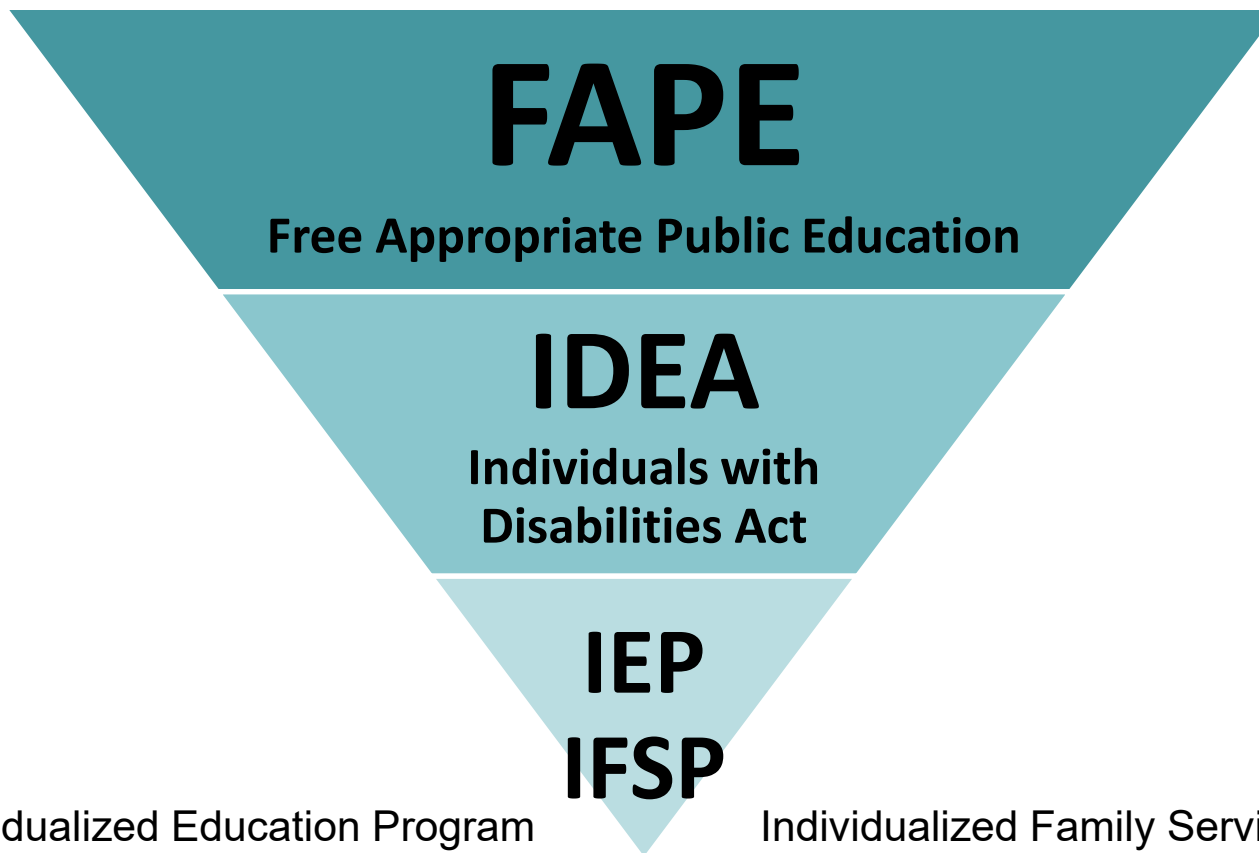
Social Security
Act

CMS
Guidance

Medicaid
State Plan



What Guides Education?



What it's really all about...



Requirements for MA Billing

- **IEP or IFSP with health-related services documented in a way that demonstrates medical necessity**
 - Amount, Frequency, Duration
 - Individual or group setting
- **Signed Medical Practitioner Authorization Form (MPAF)**
- **Signed Parental Consent Form**
- **Qualified providers that meet the guidelines in the SBAP Handbook**
- **Verification of MA-eligibility**
- **Documentation that supports the delivery of services**

Requirements for Education

- **IEP or IFSP that details what the student needs to receive an education in the least restrictive environment**
- **Qualified providers to deliver services**
- **Documentation that supports the delivery of services**

Potential Conflicts

- **IEP/IFSP requirements**

- Primary goal from a special education perspective is to assure student receives FAPE
- MA Program goal is to see documentation of health-related services that demonstrates medical necessity

- **Possible solutions**

- Work toward including specific details in the IEP to ensure that all health-related needs are addressed.
 - If the student needs both group and individual services, be sure to indicate how many of each type is needed
 - Think about smaller chunks of time when describing frequency
 - the total number of minutes across an entire year doesn't demonstrate medical necessity for MA billing

Potential Conflicts (cont.)

- **Considerations when writing an IEP that contains health-related services:**
 - Will a non-educator be able to locate the services on the IEP?
 - Is the medical necessity of the service clear from the information provided in the IEP?
 - Do the services clearly connect to the student's disability?
- **Aligning the IEP/IFSP and the MPAF**
 - Consider that a healthcare provider may not equate “specially designed instruction” with a medical service.
 - If you plan to seek reimbursement for services in the IEP, be clear about how those services support the child's medical needs in addition to their educational needs.
 - Be specific about how often the student needs the service:
amount/frequency/duration = 30 minutes/2x wk/ month

****Still have questions? Talk to your special education director!***

Potential Conflicts (cont.)

- **Qualified providers**

- An individual who provides services in school must meet PDE qualifications
- An individual who submits services for reimbursement through the SBAP must meet the qualifications established by the MA Program

- **Possible solutions**

- Remember, FAPE comes first. If the student needs a service and there is a PDE-credentialed provider to deliver it, the student should still receive the service.
- Check provider credentials to know who you can bill for, who requires a supervisory signature, etc.

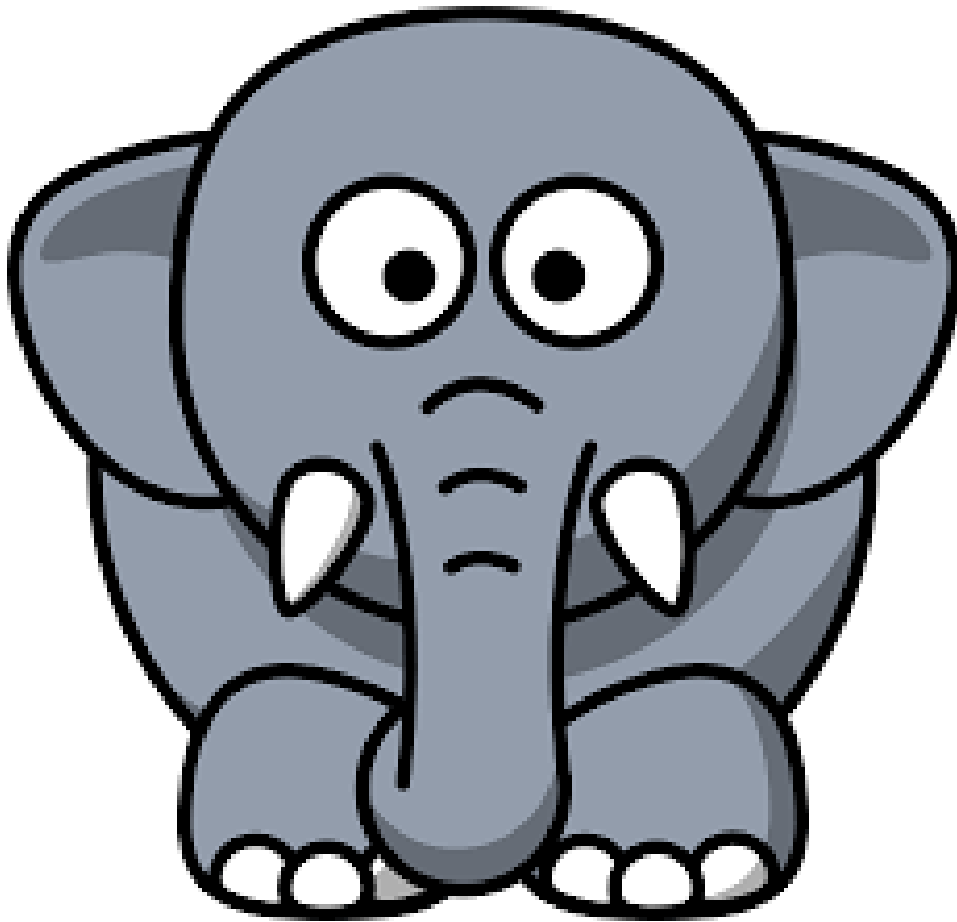
Potential Conflicts (cont.)

- **Documentation of services**
 - Providers/LEA staff may be required to document IEP/IFSP services in a specific manner or program to meet special education requirements
 - Providers/LEA staff must enter documentation of services in the SBAP vendor's system for the services to be submitted for potential reimbursement
- **Other considerations**
 - As an MA-enrolled provider, the LEA is required to maintain documentation of services provided, regardless of how those services are entered or uploaded to the vendor's system.
 - More information on documentation was provided in Session 3 and can be found in Sections 4 & 5 of the SBAP Handbook.

Who can help?

- If you have questions about how to write services into a student's IEP, reach out to your Bureau of Special Education contacts.
- If you have MA billing policy related questions, reach out to the SBAP staff through the resource account: RA-PWSBAP@pa.gov





Please don't ask
about specialized
transportation...

Specialized Transportation

Education

- Student need for special transportation is noted in IEP
- Transportation must be provided for each day that the student attends school

MA Program

- Student's IEP and MPAF must clearly document how the vehicle is specialized and the reason the student needs this specialized transport
- Specialized transportation is solely for the purpose of getting to/from a medical service and can only be billed on a day the student received a qualifying (paid) service.

Specialized Transportation (cont.)

- **Making the connection for specialized transportation:**
 - Ensure the IEP includes the need for specialized transportation and the reason.
 - Joey has severe asthma and must be transported in a vehicle equipped with air conditioning.
 - Susie, who has autism spectrum disorder, is an elopement risk. She must be transported in a vehicle equipped with seat restraints and with no more than 5 total students.
 - Ensure that the specifics of the vehicular accommodation and the reason the student needs that accommodation are described in the IEP and that they carry over to the MPAF.

SBAP Reimbursement



SBAP Funding Information page for School-Age

- Pennsylvania Department of Education, Bureau of Special Education website link for School-Based Medical Access Program funding and fiscal guidelines
- <https://www.pa.gov/agencies/education/programs-and-services/instruction/elementary-and-secondary-education/special-education/funding-and-fiscal-guidelines/special-education-medical-access>

Withdrawing Direct Service Reimbursement Funds for School- Age

Funds reimbursed from the federal Medicaid School-Based ACCESS Program (SBAP) for direct health-related services are maintained in restricted, Local Education Agency (LEA)-specific accounts at the Pennsylvania Department of Education (PDE).

To receive these funds, each LEA must complete the electronic form PDE-352 and submit it to the Bureau of Special Education (BSE) along with a short narrative explaining what the funds will be used for and how they will support special education programs.

The Chief Administrative Officer must sign this form.

SBAP Funding Information page for Early Intervention

- Pennsylvania Department of Education, Early Intervention website link for School-Based Medical Access Program funding information
- <https://www.pa.gov/agencies/education/programs-and-services/instruction/early-learning/early-intervention>

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To receive these funds, each LEA must complete the electronic form PDE-352M and submit it to OCDEL, Brian Bell, bribell@pa.gov

The Chief Administrative Officer must sign this form.

Withdrawing Direct Service Reimbursement Funds

Digital copies of the form PDE-352 or PDE-352M should be submitted by email to RA-EDSBAPFUNDING@pa.gov.

Funds may be used to support the education of any special education student, not only those who are Medicaid eligible. Once the funds have been approved for disbursement, PDE-352 or PDE-352M is sent to the Comptroller's office for processing.

Funds are transferred to the LEA's local bank account after PDE receives the request. Narratives are filed along with copies of the PDE-352 or PDE-352M.

Administrative Claiming Reimbursement Funds

- Reimbursements for Administrative Claiming are paid quarterly, directly to each LEA.

Accounting Bulletin #2008-01

- Accounting for Medical Assistance (MA) Payments - Updated 9/7/2023
- Accounting Bulletin #2008-01 – provides a summary of MA payment types and how the LEA should record (document) them
- <https://www.pa.gov/agencies/education/programs-and-services/schools/grants-and-funding/school-finance/reporting/office-of-comptroller-operations/accounting-information/accounting-bulletins>

Resources

Thank you for participating!

**For policy questions, reach out to the DHS SBAP
Policy Resource Account**

RA-PWSBAP@pa.gov

PDE Contacts

- **FAI Account Questions:**
RA-EDSBAPFunding@pa.gov
- **IEP Writing Questions: Your LEA's Bureau of
Special Education (BSE) contact**

