

# Q&A Fall Regional Trainings

*The following Q&A is based on questions submitted at the 2009-2010 SBAP regional SBAP sessions. The list does not include every question that was submitted; rather, it addresses those questions that we believe will benefit the majority of our clients. Questions pertaining to special education regulations are not included in this list; they should be addressed to your LEA's special education director/supervisor.*

## **Special Transportation**

**Q: Can a school district claim for special transportation for a student who travels only one way on a date of service?**

A: A school district cannot claim for a student who travels only one way on a date of service; the student must ride *both ways*.

**Q: Should a school district send its special transportation logs to Leader?**

A: No, follow this process:

1. Collect, review, and file the transportation logs with other SBAP materials throughout the school year.
2. Periodically or upon request throughout the school year, Leader will send the school district a *Special Transportation Claims Report*. The report lists all students and dates for which special transportation was claimed.
3. Reconcile the claim dates indicated on the report with your transportation attendance logs. Circle any dates on the report for which a claim was submitted but where transportation was not indicated on the attendance log.
4. Upon completion, mail the report to Leader.
5. Leader will make the necessary claim adjustments.

**Q: Who authorizes special transportation?**

A: The IEP team in conjunction with the parent/guardian determines whether a student requires special transportation. A physician or CRNP must authorize the transportation service as medically necessary.

**Q: If a student receives special transportation and has another related service for which the school district doesn't bill (for example, counseling), can the district still claim for special transportation?**

A: No, the school district may only claim special transportation when a student receives at least one ongoing related service that is being claimed for MA reimbursement.

**Q: Can a school district claim for special transportation if the district contracts with an IU to provide it?**

A: If a school district contracts with an IU to provide special transportation services, the IU may choose to claim for SBAP reimbursement. However, the IU can waive its right, in which case the district can then directly claim transportation reimbursement.

**Q: If a special transportation vehicle is a regular-size school bus, is this claimable? Note: Only special education students are on the bus.**

A: If the regular-size school bus has been augmented to accommodate the special transportation needs of special education students (for example, to include bus aides or wheelchair ramp), the school district can claim for special transportation.

**Q: Should each student have his/her own special transportation log?**

A: No, multiple students may be listed on one special transportation log.

**Q: If special transportation attendance is entered on WebPSL, can it be reconciled electronically?**

A: Currently, WebPSL does not accommodate for electronic reconciliation; this feature may be implemented in the near future.

**Q: Why does Leader process special transportation claims with the related service claims? School districts cannot verify transportation until checking the transportation logs.**

A: Leader processes special transportation claims based on the billing methodology agreed to by DPW and PDE. To ensure school districts properly claim for special transportation, school districts should **only** register special education students who receive *daily, round-trip special transportation* once it has been verified that a transportation log is being maintained for the student.

**Q: Can a school district claim for special transportation when using a separate bus to provide special transportation for emotionally disturbed students to out-of-district schools?**

A: Yes, the school district can claim for special transportation as long as the transportation is provided daily (five days a week) and is round-trip.

**Q: Can special transportation logs serve as school attendance logs?**

A: No. Special transportation logs are used to track student attendance on the vehicles.

**Q: Is shuttle service reimbursable for a student when the service is provided at another school in the district?**

A: Shuttle service itself is never reimbursable. However, the school district can claim for special transportation if a student requires special busing to and from school and the shuttle service is part of the special busing arrangement. Special transportation is not reimbursable when a special education student is able to ride the regular bus to and from school and is bused to another school by shuttle to receive a health-related service.

**Q: If a student's service is provided by an approved private school, but the special transportation is provided by the school district, can the district claim for the transportation?**

A: The school district can claim special transportation reimbursement as long as the approved private school (APS) is claiming for the health-related service. An APS cannot claim special transportation reimbursement.

## **Personal Care Assistance**

### **Q: Who is responsible for the PCA monthly summary?**

A: A monthly summary is not required.

If using the *PCA Weekly Log*, the PCA must include a daily summary note that relates to the student's response in relation to the 1:1 PCA activities indicated on the *Typical Daily Schedule*. If a PCA uses the *PCA Daily Encounter Log*, the PCA must describe the time-specific activity provided and, if applicable, a response to the intervention/activity.

### **Q: Are sample PCA logs/schedules available for training purposes?**

A: Because each student has different needs, it is not good practice to provide sample narratives when training. An SBAP account manager is available to review the PCA documentation requirements with the SBAP coordinator and staff member who will co-sign the PCA logs.

### **Q: Who can sign a log as a PCA supervisor?**

A: The individual who signs the PCA log does not necessarily have to be the PCA's supervisor or be in a supervisory position. The individual should be familiar with the student and be able to attest that the 1:1 services were provided and properly documented.

### **Q: Can a school district claim for a PCA if he/she is paid with IDEA funds?**

A: No, the school district cannot claim for services if the PCA's salary is entirely funded with IDEA or other federal funds.

### **Q: If a PCA is paid through an IU, does the school district need to keep a copy of the student's PCA Typical Daily Schedule in the student's file?**

A: The school district that claims reimbursement for the PCA services is responsible for maintaining all documentation relevant to the support of those services.

### **Q: Can PCAs provide 1:1 services for more than one student throughout the day?**

A: Yes. School districts can claim for PCA services when the PCA provides the 1:1 service to more than one student throughout the day. School districts cannot claim for PCA services when the service is provided to multiple students *at the same time*.

### **Q: If a PCA is certified for CPR and first aid before the start of a school year, can the school district claim for services without the certification in hand? (it will be mailed).**

A: No, claims should not be submitted until CPR and first aid certification can be verified and a copy is placed in the SBAP file.

### **Q: Isn't it a PCA's job to provide a progress statement on the PCA logs?**

A: A progress note is not always applicable, depending on the situation. However, the PCA should note the student's outcome in relation to the 1:1 intervention when possible.

### **Q: If a student has multiple PCAs, should the PCAs use the same log and have each one sign it?**

A: It is recommended that the PCAs use the same log and have each one sign accordingly; the *PCA Daily Encounter Log* was designed for just this situation. However, as long as the services are fully documented, the information can be maintained on multiple logs. All logs must be signed by the PCA who provided the service.

**Q: Can a school district claim for a PCA's time when the student is with another service provider who also claims?**

A: Yes, the school district can claim for a PCA's time if the student's IEP specifically states that the PCA must remain with the student while the service is being provided.

**Q: Can a school district claim for a PCA's time spent preparing a student's daily schedule before the student arrives and completing paperwork for the student after he/she leaves?**

A: No, the school district cannot claim for this time, as it is considered part of the student's daily schedule.

**Q: Must the PCA document activities on the *PCA Weekly Log* and attach a *Typical Daily Schedule*?**

A: Yes, the PCA must document activities on the *PCA Weekly Log*. No, the PCA does not need to attach the *Typical Daily Schedule* to each log, as the schedule is part of the student's SBAP record.

**Q: Can a school district claim for a PCA's time spent with a student who has a behavioral need if the IEP team deems it necessary?**

A: Yes, if the IEP defines the areas in which the 1:1 support is needed.

**Q: When does a PCA need a *Typical Daily Schedule*?**

A: A *Typical Daily Schedule* is used as a guide in conjunction with the *PCA Weekly Log*.

**Q: If a PCA's time does not vary from the *Typical Daily Schedule*, can the PCA simply write "followed *Typical Daily Schedule*" on the *PCA Weekly Log*?**

A: No, the PCA must include a narrative that provides an overview of the day as it relates to the student's individual needs.

**Q: What is considered a student's "outcome?"**

A: The outcome explains how the student responded to the 1:1 PCA intervention. If there is an outcome, it must be included on the *PCA Weekly Log* or *PCA Daily Encounter Log*.

**Q: Can a school district claim for a PCA if the service is provided by a shared PCA who works with one student at a time?**

A: Yes, a school district can claim for a PCA's time that is shared as long as the aide works 1:1 with each student.

**Q: Can a school district claim for instructional aides who are not 1:1 aides?**

A: No.

**Q: Can a school district claim for sending a PCA with a student on job training?**

A: No, a school district cannot claim for PCA services that relate to a student's job training activities.

**Q: Is a PCA's time billable if he/she rides a bus with a student who requires PCA assistance?**

A: Yes, if the IEP defines the need for the student to receive bus assistance.

## ***IEP Meetings and Billing***

**Q: In order to claim for the development of an IEP, must the health-related services be listed in the student's IEP?**

A: Yes, as long as the student's IEP includes at least one ongoing SBAP-eligible service.

**Q: Can a school district claim for an IEP meeting even if it's held without the intent to change the IEP's related services?**

A: School districts can claim for the annual review IEP meeting even if there is no change to the IEP's related services

**Q: Can a school district claim for IEP development when the school district services IU students?**

A: Yes, school districts have the first right to claim reimbursement for IEP development.

**Q: Must the IEP or ER regarding the student's diagnosis match the disability codes on the SBAP logs?**

A: Not necessarily. For example, a student may have a diagnosis of autism; however, the speech therapist is working with the student because of a speech delay, and therefore, the codes would not match.

**Q: Are school districts noticing that advocates who attend IEP meetings are suggesting that parents NOT sign the *Parental Consent Form*?**

A: Yes, this issue has been brought to our attention a number of times. We continue to meet with PDE and DPW to discuss a resolution to this matter.

**Q: Can a school district claim for the IEP meeting, if the parent is not present?**

A: Yes, however, the school district may be asked to provide documentation that the parent was properly notified of the meeting.

**Q: Can a school district claim for an IEP meeting if there are no health-related services in the student's IEP?**

A: No, the student must be receiving at least one health-related service.

**Q: Can a school district claim for IEP development if the service providers were legally excused through the IEP invitation process?**

A: Yes, the school district can claim for IEP development even if the service providers do not attend.

**Q: Can a school district claim for an IEP meeting when it's conducted over the phone?**

A: No, IEP meetings conducted over the telephone are not claimable.

**Q: Can a cyber charter school claim for IEP development for meetings that occur via teleconference?**

A: Yes, if the IEP and the IEP meeting meet all special education regulations and other SBAP criteria.

## ***Individual vs. Group Billing***

**Q: What number of students constitutes a group?**

A: The minimum number is two and the maximum number is four.

**Q: When billing for a group service, should the time ever be split among the students?**

A: No. If a therapy session is 30 minutes and is provided to three students, two of whom are MA-eligible, 30 minutes would be applied to each MA-eligible student.

**Q: How should a school district claim if a provider conducts a group service with only one student because the other students are absent?**

A: The school district should claim for group services for the student present if his/her IEP and medical authorization indicates he/she is to receive group services.

## **Medical Authorization**

**Q: Before signing for a student's need for a service, must the physician examine the student?**

A: No. A physician or CRNP must review the student's IEP in order to authorize the health-related services that will be claimed to MA.

**Q: When a school district claims for a student's psychological evaluation, must the district first obtain medical practitioner authorization?**

A: No, evaluations do not require a medical authorization.

**Q: Is medical authorization required to claim for IEP development when the student's related services do not change in an IEP meeting?**

A: A medical authorization is required to bill the health related services listed in an IEP, which in turns allows the billing of the IEP. A copy of the medical authorization is not required to support the IEP billing.

**Q: Must school districts obtain a new medical practitioner authorization for each IEP?**

A: The medical authorization must cover the duration of the IEP. Therefore, it is good practice to obtain medical authorization for each new IEP to ensure there is no lapse in medical authorization coverage.

**Q: Which services require medical authorization?**

A: Medical authorization is required for all services except evaluations and IEP development. Psychological services can be determined medically necessary and authorized by a school psychologist and social work services can be authorized by a licensed social work or professional counselor.

**Q: Can prescriptions be written "as indicated" for services rather than specifying exact frequency?**

A: No, the prescription must indicate the frequency and duration of the health-related service(s).

**Q: Do school districts need to obtain parental consent before obtaining medical authorization?**

A: Yes, school districts must obtain parental consent before releasing the student's IEP to the medical doctor or CRNP for medical authorization.

## **Documentation and Record Keeping Requirements**

**Q: Which documents must be maintained for four years from the date of service? Can a school district shred records that are more than four years old?**

A: All documents that support claims for which the school district received MA reimbursement must be retained for four years from the date of service. After that time, a school can shred documents.

**Q: When a nurse is engaging in a regular daily activity (for example, giving a student his/her daily ADHD medicine), is it sufficient to write “the student takes medicine well” on the Nursing log?**

A: If there was no incident and the student had no reaction to the medication, the statement would be sufficient.

**Q: Would Leader consider issuing guidelines for therapists on “acceptable” monthly service notes?**

A: No, Leader is not permitted to provide examples on “acceptable” monthly service notes. Whether writing a daily session note or monthly note, the note must fully describe the student’s progress as it relates to the treatment provided.

**Q: Can Leader make its forms available in Microsoft Excel? They are currently available only in Microsoft Word and Adobe PDF formats.**

A: Leader will review the feasibility of offering SBAP logs in MS Excel format.

**Q: Does a school district need to keep an entire copy of a student’s IEP on file?**

A: Yes, the school district have access to the entire IEP (not necessarily a copy), for audit purposes.

**Q: Must the school district keep OT/PT reports with the student’s IEP?**

A: The school district must maintain OT/PT reports in the event they are requested for an audit. However, the school district may choose where to keep the reports.

## **Miscellaneous**

**Q: Can Leader provide MA packets for families with students who aren't MA-eligible but who have related services in their IEPs?**

A: Leader does not provide MA information. You may contact the MA Outreach Coordinator at your local county assistance office.

**Q: Does Leader have a compliance checklist?**

A: Yes, you can download a self-audit checklist from Leader's web site:

Microsoft Word document:

[http://www.leaderservices.com/services/pa/forms/self\\_audit\\_document.doc](http://www.leaderservices.com/services/pa/forms/self_audit_document.doc)

Adobe Acrobat document:

[http://www.leaderservices.com/services/pa/forms/self\\_audit\\_document.pdf](http://www.leaderservices.com/services/pa/forms/self_audit_document.pdf)

or you can download a self-audit checklist from DPW's website :

<http://www.dpw.state.pa.us/PartnersProviders/MedicalAssistance/DoingBusiness/FraudAbuse/003670226.htm>

Please note that in the event of an audit, additional documentation that supports the SBAP services provided may be requested.

**Q: Who is a "practitioner?"**

A. A "practitioner" refers to the individual who provides the direct service treatment.

**Q: Can school districts claim for end-of-school-year services?**

A: Yes, school districts can claim for extended school year (ESY) services if the student's IEP indicates the ESY services and those services are paid with state and/or local funds.

**Q: Is there an exception to the rule on speech-only IEPs? Speech-only IEPs don't have speech in related services. Do I look for these services in other areas of the IEP?**

A: A speech-only IEP must describe the service and service frequency. However, speech is not defined under the related services section.

**Q: How long after a service is provided may a school district claim for reimbursement?**

A: The claiming window is 180 days from the date of service, but a 30-day processing window should be factored into the time frame.

**Q: At last year's NAME Conference, the feds indicated they had no problem with school districts claiming for consultation time. When will we be able to do this in Pennsylvania?**

A. DPW and PDE are scheduled to review all eligible services, including claiming for consultations.

**Q: If a provider or student is unavailable to provide/receive treatment, can the service be provided the month before or after the scheduled treatment?**

A: Yes; just indicate on the provider's log that the session was a make-up session due to the absence of the student or provider.

**Q: What is a collateral service?**

A: A collateral service is service or activity that is an integral component of the direct treatment.

**Q: DPW says the SBAP manual is a tool to ensure compliance. When will Leader have the updated manual completed?**

A: The manual is a collaborative effort among PDE, DPW, and Leader Services. At this time, we do not have a specific release date for the new manual.

**Q: Can a school district claim for time spent preparing for a student's dismissal from a service?**

A: No. Evaluations and IEP meetings related to a student's dismissal from service cannot be claimed.

**Q: Can a school district claim for services if it places a student in a licensed private school?**

A: It is possible. Because each placement is different, you should contact your SBAP account manager with specific information.

**Q: Can a school district claim for monitoring if the student already receives another direct service?**

A: A school district can claim for monitoring only *when it is a component* directly related to the treatment provided.

**Q: Can a school district claim for services when a nurse is with a student for the entire school day; can the school district claim for special transportation?**

A: Yes, the nursing and transportation services can be claimed if the IEP supports the need for the services and it is deemed medically necessary by a physician or nurse practitioner.

**Q: If a service provider must drive to provide a service and is reimbursed by the school district for travel, can the provider also claim through SBAP for the travel time?**

A: Yes, the school district (not the provider) can claim for the travel time as long as the travel is provided from building to building, and not from home to a school site.

**Q: Is there a way to anticipate whether a student will lose his/her MA-eligibility?**

A: No, there is no way to anticipate when a student will lose eligibility. Leader suggests school districts check eligibility at least quarterly.

**Q: Can school districts get a list of renewal dates for eligible MA participants so we can help families renew prior to their eligibility lapse?**

A: Leader does not have access to this information.

**Q: What is the best and fastest way to determine a student's eligibility when their name comes up on PROMISE as "Duplicate Subscriber ID"?**

A: Contact Leader to determine the MA-eligibility status of these students.

**Q: How can a school district track monthly changes in MA eligibility when downloaded lists are not always correct?**

A: Leader receives access to a MA-eligibility file created by DPW monthly. The file contains the names of children between the ages of three-21 who are eligible on the *day* the file is generated. It is important that school districts first verify the student lists that they upload to Leader for correct spelling of names and dates of birth.