



STATE OF OKLAHOMA
OKLAHOMA HEALTH CARE AUTHORITY

OHCA 2015-04

March 9, 2015

RE: School Based Services Policy Changes

Dear provider,

This letter is a follow up to OHCA letter 2014-31 regarding recent school based services policy changes promulgated through the 2014 Permanent rule-making process per the Administrative Procedures Act. As of September 12, 2014, the Oklahoma Health Care Authority (OHCA) updated its School Provider policy.

OAC 317:30-5-1020 clarifies that for reimbursement purposes, school-based services provided in the school setting during school hours are SoonerCare compensable when provided pursuant to an individual education plan (IEP), or 504 Plan. Services that are medically necessary and provided pursuant to an IEP or 504 Plan are compensable by SoonerCare.

School based services provided pursuant to an IEP or 504 Plan must be performed in the school setting by providers who are contracted with OHCA. Providers may be employed by the school and included in the school's group of providers, or simply be contracted with the OHCA and billing on their own behalf. Services that are not provided pursuant to an IEP and/or 504 Plan during the school day are not compensable as school based services but may be compensable as Early and Periodic Screening, Diagnostic and Treatment (EPSDT) services if deemed medically necessary for the child. EPSDT services include outpatient, community based services that are otherwise covered by SoonerCare outside of the school setting. Effective July 1, 2015, contractual and billing obligations are as follows:

1. School Employees Providing IEP / 504 Plan Services:

- Services rendered by school employed providers (e.g. professionals, paraprofessionals) pursuant to an IEP or 504 Plan should be billed directly by the school as SoonerCare school based services.
- Schools that directly employ professional and paraprofessional providers must complete a new group contract with the OHCA to bill for school based services and should add all employed health care providers to the school's new group contract (appendix A).
- Prior to rendering services, any professional provider will be required to obtain prior authorization when necessary for IEP/504 related services.
- The school must be identified as the "pay to" provider on all school based claims related to IEP/504 services.
- All individual providers rendering school based services must contract with OHCA and be included on the claim as the rendering provider for the reimbursement of services.

2. Professional Providers Not Employed by the School Providing IEP/504 Plan Services:

- All professional providers will be required to obtain prior authorization for services to be compensable.
- All providers must use place of service 03 on their claim for services rendered at school during school hours. Individual Physical/Occupational/Speech therapy providers should include the school NPI as the referring provider on the claim.
- Those professionals that are not employed by the school must bill and will receive reimbursement directly from OHCA.
- Any medically necessary service provided at school but outside of the school day should be billed using the appropriate place of service for those services.

This letter is in regards to school based services only and provided to you for informational purposes only and in no way substitutes for the final rule. Other medically necessary services are not addressed in this letter. We have also included a Frequently Asked Questions (FAQ) document attached to this letter. OHCA encourages you to review the rule in its entirety. To review the entire rule, please visit the OHCA website at www.okhca.org. If you have any questions regarding the information provided in this letter, please contact (800) 522-0114. Thank you for the services that you provide to our SoonerCare and Insure Oklahoma members.

Sincerely,



Joel Nico Gomez
Chief Executive Officer
Oklahoma Health Care Authority



Terri White, M.S.W.
Commissioner
Oklahoma Department of Mental Health and Substance Abuse Services

1. Is an outpatient provider allowed to render services at the school during the school day if they are only contracted with OHCA and not contracted with the school for the purposes of billing? The school day does not include before or after school services that are not provided during an instructional day (e.g. start of first bell, dismissal/last bell).

Yes, if the service is covered by SoonerCare, determined to be medically necessary, and the school setting is an appropriate place of service.

- Schools, however, are charged as the overseer of the student during the school day. It is incumbent upon schools to ensure that the student's educational day is not unnecessarily interrupted and that there is appropriate parental consent for the service.
- Schools have the right, should they choose, to limit outpatient visits unrelated to IEP or 504 Plans to before and after school so that interruptions to the educational day are limited.

2. Does a therapy evaluation and/or services require a prior authorization if provided pursuant to an IEP?

It depends on the therapy.

- The initial **physical therapy** evaluation **does not** require prior authorization. All therapy services following the initial evaluation must be prior authorized for continuation of service. Prior to the initial evaluation, the therapist must have on file a signed and dated prescription or referral for the therapy services from the member's physician or other licensed practitioner of the healing arts. The prescribing or referring provider must be able to provide, if requested, clinical documentation from the member's medical record that supports the medical necessity for the evaluation and referral. Physical therapy services must adhere to guidelines found at OAC 317:30-5-291.
- The initial **occupational therapy** evaluation **does not** require prior authorization. Occupational therapy services must adhere to guidelines found at OAC 317:30-5-296.
- The initial **speech therapy** evaluation **does** require prior authorization; all services following the initial evaluation will require prior authorization. Speech therapy services must adhere to guidelines found at OAC 317:30-5-676.
- All **psychotherapy** services require prior authorization. Psychotherapy services must adhere to guidelines found at OAC 317:30-5-241.1 through 317:30-5-241.2.

3. Will training and education material be provided for prior authorization procedures?

Yes, training webinars, classes, and materials that outline the prior authorization process and requirements will be provided in May of 2015, enrollment options will be sent out April of 2015.

4. If a school already has a written consent on file for the IEP, does the school have to obtain a written consent again for evaluations and services?

Yes, the school district is required to obtain written consent before disclosing personally identifiable information, for billing purposes, from a child's education records to a party other than the school. Consent for the evaluation and/or service rendered is required with the submission of the prior authorization per OHCA prior authorization guidelines.

5. Are all providers and individuals required to attend IEP meetings?

Yes, the purpose of the initial IEP meeting is to review and assess eligibility, address areas of need, develop goals, and identify needed supports and services. The IEP must be completed and signed during the meeting by all required providers and individuals. Electronic signature and/or teleconference are acceptable. Services are not compensable until all signatures have been obtained.

6. Are two non-SoonerCare members and five SoonerCare members allowed in a group therapy session?

No, no more than five SoonerCare and non-SoonerCare members are allowed during a group session. A daily log must be kept to identify each SoonerCare member present during a session.

7. Are outpatient behavioral health providers required to include the school NPI as the referring provider on the claim in order for the claim to pay?

No, only the place of service 03 is required for the behavioral health claims to pay; however, it would be preferred for the school NPI as the referring provider also to be included on the claim.

8. Can a school nurse render a child health screening?

Yes, if the school nurse is licensed as a nurse practitioner with prescriptive authority. Screenings must be provided by a state licensed physician, state licensed nurse practitioners with prescriptive authority, or state licensed physician assistant. Children must first be referred to their primary care physician (PCP) for child health screenings. If the PCP authorizes the school to perform the screen or fails to schedule an appointment within three weeks, the school may render the screening. Written documentation is required to the PCP and a copy must be retained in the child's file.

9. If a school currently has a contract on file will the contract need to be updated?

Yes, the school is the "pay to provider" for reimbursement. The school will need to set up a group contract (appendix A) to add all providers rendering services during the school hours. All providers rendering services pursuant to an IEP/504 Plan must have a valid contract with the school and OHCA and be identified on each claim as the rendering for reimbursement consideration.