TO: Local Education Agencies (LEA) participating in the School-Based ACCESS Program

DATE: March 18, 2015

FROM: Rebekah Ludwick, Director
School-Based ACCESS Program
Department of Human Services

SUBJECT: Medical Practitioner Authorization Requirements for School-Based Services

This memorandum serves as a written follow-up to the Department of Human Services’ (Department) verbal notification to Local Education Agencies (LEA) during the 2014 Regional Fall Trainings.

Face to Face Encounters

LEAs must obtain an authorization or prescription from a physician or Certified Registered Nurse Practitioner (CRNP) in order to receive payment for medical services identified in the Individualized Education Program (IEP).

In 2012, the Financial Management Branch of the Centers for Medicare and Medicaid Services (CMS) conducted a Financial Management Review of Pennsylvania’s School-Based ACCESS Program. In their final report, CMS informed the State that authorizations or prescriptions by a physician or CRNP made without a face-to-face encounter with the student are not compensable.

Therefore, effective April 1, 2015, authorizations or prescriptions made by a physician or CRNP are compensable only when in conjunction with a face-to-face encounter with the student.
PDE Certified School Psychologists

Pennsylvania’s Medicaid State Plan authorizes payment of psychological, counseling and social work services and evaluations when authorized or prescribed by a physician or other licensed practitioner within their scope of practice.

Therefore, effective April 1, 2015, the Department will no longer provide payment for psychological services and evaluations authorized or prescribed by a non-licensed Pennsylvania Department of Education (PDE) certified school psychologist.

Psychological, counseling and social work services and evaluations are compensable only when authorized or prescribed by a physician or other licensed practitioner within their scope of practice. For example, a licensed psychologist can only authorize/prescribe psychological services; a licensed social worker can only authorize/prescribe social work services; and a licensed professional counselor or licensed family counselor can only authorize/prescribe counseling services.

Please note that the Department will continue to provide payment for psychological services and evaluations performed by a non-licensed PDE certified school psychologist once authorized or prescribed by physician or other licensed practitioner within their scope of practice.

The information above sets forth the requirements for Medicaid reimbursement in the SBAP program. For any questions regarding this notification, please contact me at rebludwick@pa.gov or (717) 787-5512.