Today’s Webcast

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SchoolMedicaid@education.ohio.gov
Today’s Presenters

Ohio Department of Medicaid
John McCarthy, Director
   Bibi Manev, Network Management
   Peggy Smith, Medicaid Health System Administrator
   Yolanda Talley, Medicaid Health System Administrator

Ohio Department of Education
Sue Zake, Director, Office for Exceptional Children
   Mark Smith, Financial Program Manager
   Office for Exceptional Children
Background

Medicaid began phase-in of ordering, referring and prescribing provisions

Oct 2014
Requested that Medicaid School Program providers refrain from instructing individual practitioners - who render services through MSP - to enroll as ORP providers

Dec 2014
MSP providers waived from the ORP provisions for the 2014-15 school year
What is changing for the Medicaid Schools Program?
Federal Requirement

Issued by the Center for Medicare and Medicaid Services

Mandated for all Medicaid providers in Ohio

Required for other states’ school-based Medicaid programs
CMS Guidance: MSP

ODM received a letter from CMS stating:

• “…to be covered by Medicaid, physical therapy, occupational therapy, or speech pathology and audiology services must be prescribed, or referred by a physician or other licensed practitioner of the healing arts.”

• “…claims lacking an appropriate prescription or referral are not consistent with federal regulations and to the extent ODM is paying such claims, ODM is out of compliance with its State Plan and federal regulations.”
How will this impact the Medicaid School Program providers?
Federal Requirement

All school-based services reimbursed by Medicaid must be ordered, referred or prescribed by a physician or licensed practitioner of the healing arts.

Effective: Aug. 1, 2016
CMS Guidance: MSP

Services furnished pursuant to an IEP document formulated by a team, without an express order, referral, or prescription from an appropriate practitioner under 42 CFR 440.110, are not reimbursable by Medicaid.
CMS Guidance: MSP

If the State is not in full compliance with 42 CFR 440.110, 42 CFR 455.410 (b), and 42 CFR 455.440 with respect to IEP services, by August 1, 2016, we will have to **begin deferring the IEP services claims** and ultimately disallowing Federal Financial Participation (FFP).
Will claims include new information?
Who Can Order, Refer or Prescribe?

The following provider types are authorized to order, refer, or prescribe in the State of Ohio and under the state’s Medicaid program:

- Physician (DO or MD)
- Advance Practice Nurse (APN)
- Physician’s Assistant (PA)

The above must have a valid National Provider Identifier (NPI) number and be actively enrolled in Medicaid as either a provider of physician services, or as an ORP-only provider (does not bill Medicaid).
Federal Requirement for Claims

Districts must include both the ORP practitioner's Medicaid provider name and National Provider Identifier.

Claims that lack this information will not be reimbursed.
Services that Require a Medical Practitioner Order

- Speech and Language Therapy
- Occupational Therapy
- Physical Therapy
- Audiology
What does this mean for the Medicaid Schools Program?
What does this mean for the Medicaid School Program?

• **Beginning Aug. 1, 2016** (the 2016-17 school year):
  – To receive Medicaid reimbursement for services provided to a Medicaid eligible-student with a disability:
  – Medicaid claims from MSP providers to ODM must include the name and NPI number of the individual who ordered/referred/prescribed the service for the student.
What does this mean for the Medicaid School Program?

This **impacts claims for reimbursement** for:

- ✓ audiology services;
- ✓ occupational therapy services,
- ✓ physical therapy services,
- ✓ speech-language pathology services, AND
- ✓* nursing services

* NOTE: Nursing services have required ORP approval for coverage since the start of Ohio’s Medicaid School Program and will continue to do so. There is also a requirement to provide the name and NPI of the registered provider
Role of School Therapists

Therapists will continue to:

**Evaluate**, serve as members of the IEP team and provide IEP services to students

**Document** services for Medicaid School Program reimbursement
Role of School Therapists

Currently, there are no requirements for individual therapists to independently enroll in Medicaid nor include a NPI on claims
No Change to IEP Process

IEP team still makes decisions on what is best for a student’s special education needs.

To Receive Medicaid Reimbursement:
Medical Referral or order needed prior to the service being provided to Medicaid eligible students with disabilities.
Resource Documents

Reference materials in the webcast documents tab

October 23, 2015

John B. McCarthy
Director, Ohio Department of Medicaid
50 West Town Street
Suite 400
Columbus, Ohio 43215

Dear Mr. McCarthy,

Thank you for your inquiry regarding the Ohio Department of Medicaid’s (ODM) efforts to comply with the federal regulation at 42 CFR 455.410(b) specifying that State Medicaid agencies must require all ordering or referring providers to be enrolled as participating providers. This and the remainder of the regulations found at 42 CFR 455 Subpart E became effective March 25, 2011.

We understand from your letter dated July 24, 2015 and from our July 31, 2015 telephone conversation with ODM and the Ohio Department of Education (ODE) personnel that the Medicaid Schools Program (MSP) within ODE submits claims to ODM that are not compliant with both 42 CFR 455.410(b) and 42 CFR 449.119.

During our call, we discussed that an individualized education plan (IEP) is formulated by a team. In subsequent review of material published online by the ODE we looked at ODE guidance document “Chapter 7.2: Identification of IEP Team members and Their Roles” at [http://education.ohio.gov/Tours/Special-Education/Federal-and-State-Requirements/Procedures-and-Guidance/Individualized-Education-Program-IEP/Identification-of-IEP-Team-members-and-Their-Roles](http://education.ohio.gov/Tours/Special-Education/Federal-and-State-Requirements/Procedures-and-Guidance/Individualized-Education-Program-IEP/Identification-of-IEP-Team-members-and-Their-Roles). This document indicates that an IEP team includes individuals who may suggest or recommend services but this guidance does not indicate the required presence of an individual authorized and accountable to order, refer, or prescribe IEP services that are reimbursable by Medicaid. We understood from our discussion that ODE takes the position that the IEP document itself stands as an ordering, referring, or prescribing document. We rejected the notion that this was appropriate during our phone call.
Questions

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Next Steps

Guidance to support documentation and implementation of the new requirement

Ongoing process for ODM and ODE to respond to questions
For More Information

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Provider Enrollment Questions:
Contact Provider Network Management at 1-800-686-1516 or access the link in the webcast documents tab