

John R. Kasich, Governor  
Paolo DeMaria, Superintendent of Public Instruction

To: Medicaid Schools Program (MSP) Stakeholders

From: Ohio Department of Education, Office for Exceptional Children

Date: September 15, 2016

Re: Ordering, Referring, and Prescribing (ORP) for MSP therapy services

The purpose of this memo is to offer continuing information related to Ohio's compliance efforts in meeting Ordering, Referring, and Prescribing (ORP) provider requirements for MSP therapy service reimbursements.

The therapy services affected by this issue are Physical Therapy, Occupational Therapy, Speech-Language Pathology and Audiology provided in educational settings.

In October 2015, the Centers for Medicare and Medicaid services (CMS) sent a letter to the Ohio Department of Medicaid informing Ohio about issues related to the Ohio Medicaid in Schools Program's compliance with [42 CFR 455.410](#), the federal regulation related to provider requirements for Medicaid reimbursement of therapy services. Ohio began researching this issue and shared feedback with MSP stakeholders in a January 2016 webcast. A copy of that materials used in the January, 2016 webcast are located at [this link](#).

CMS requested Ohio submit a plan to address the ORP concerns by 8/1/2016. Prior to the 8/1/2016 deadline, Ohio submitted a plan as requested. At the present time, Ohio has not received a formal reply to the plan from CMS.

**As we wait for further communications from CMS related to the compliance plan, we ask all Ohio MSP providers to continue to document all services rendered and evaluations provided as they currently do. Once we have clarity from CMS on their decisions, we will communicate out next steps and any necessary program or documentation changes.**

As stated previously, the Medicaid ORP issue related to reimbursements, and in no way should affect the delivery of special education services detailed by the Individuals with Disabilities Education Act (IDEA).

Please know that as soon as any additional information received from CMS related this manner, both ODE and ODM will make every effort to inform MSP stakeholders of any needed action as soon as possible.

Thank you for your continued partnership and cooperation in serving students with disabilities.

Cc: MSP stakeholders  
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