

## Comments for Chapter 538 School Based Health Centers

Effective Date: August 1, 2019

<u>Comment Number</u>	<u>Date Received</u>	<u>Comment</u>	<u>Action</u>
1.	1/7/19	PAGE 9 – Should the TCM Procedure Code of T1017 include the SE modifier required for School-Based Health Services?	CHANGE: SE was added to section 538.11.1 Anaphylactic Reaction – Assessment/Evaluation
2.	1/7/19	PAGE 38 - Targeted Case Management (Procedure Code T1017 SE) – Recommend removing the daily service limit and restriction to instructional days. Based on student specific issues, TCM can exceed five current units. TCM activities also occur on teacher workdays when students are not present. These are not considered instructional days. If any of this changes, the billing form would need adjusted. It currently has the service limit included.	NO CHANGE: CMS recommended limits on this service during the state plan negotiations in 2014.
3.	1/7/19	PAGE 42 – Rounding Units of Service. The following sentence appears in the last paragraph: “The result of the division <b>must be rounded to the nearest whole number</b> in order to arrive at the number of billable units.” This implies rounding up or down to the nearest whole number. Should this read “round down to the nearest whole number”?	CHANGE: Correction was made to policy it now states “rounded down to the nearest whole number”
4.	1/7/19	PAGE 44 – Glossary – The definition of billing agent includes Regional Education Service Agency. RESA no longer exist by state code. Districts currently either handle billing with their staff, or contract with another district or an Educational Service Cooperative for a billing agent.	CHANGE: Removed RESA from glossary and double checked it was not in the manual in other sections.
5.	1/7/19	PAGE 47 – Glossary – Remove Regional Educational Service Agency. These agencies no longer exist	CHANGE: Removed from glossary
6.	1/7/19	PAGE 48 – Should effective date of revision be August 1, 2019	CHANGE: Corrected

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7.	1/7/19	APPENDIX H – Attached is a revised TCM form proposal. This form uses the term Plan of Care at the top instead of Service Care Plan. This change reflects the changes in the draft policy.	CHANGE: Appendix H has been updated
8.	1/14/19	To combat the statewide substance abuse epidemic, in addition to the previously described lack of accessible mental health services, PMH-APRNs should be utilized and included as eligible psychological healthcare providers—who receive payment for services within the school-based health system—as described in Chapter 538: School-Based Health Services.	NO CHANGE: Medicaid SBHS State Plan Amendment does not allow for APRN's to render psychological services
9.	1/21/19	When looking up telehealth services for school- based health, under authorized distance site practitioners it lists LP's, Licensed Psychologists and LICSW's, Licensed Clinical Social Workers. My comment is Medicaid has allowed LPC's, Licensed Professional Counselors to bill for Medicaid services. Why are they not listed as authorized for telehealth services? They should have parity here also.	NO CHANGE: Medicaid SBHS State Plan Amendment only allows for school psychologist to render SBHS services through the county school systems
10.	1/21/19	Please add additional units to speech therapy group and individual	CHANGE: Additional units have been added to each service code