Third Party Reimbursement for Nursing Services on an IEP (Individualized Education Program)

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This presentation is made possible through COVID-19 Public Health Workforce supplemental funding from the CDC, administered by the MDH in collaboration with Brightworksmn.org. 2023

Objectives

Participants will be able to:

- Describe the big picture role of the nurse in accessing funding sources for nursing services listed on the IEP.
- Understand how Time and Effort impacts Third-Party Reimbursement (TPR).
- Apply information to access funding sources for IEP related services according to statute and following Minnesota Department of Education (MDE) and Department of Human Services (DHS) guidance.
- Understand best practices and realize the variability among district billing processes.

Medicaid in Education: Interchangeable Terms

- Third-Party Reimbursement (TPR)
- Third Party Billing (TPB)
- Medical Assistance, Medicaid, (MA) Billing
- MN Health Care Programs (MHCP)

Why Seek TPR for IEP Nursing Services?

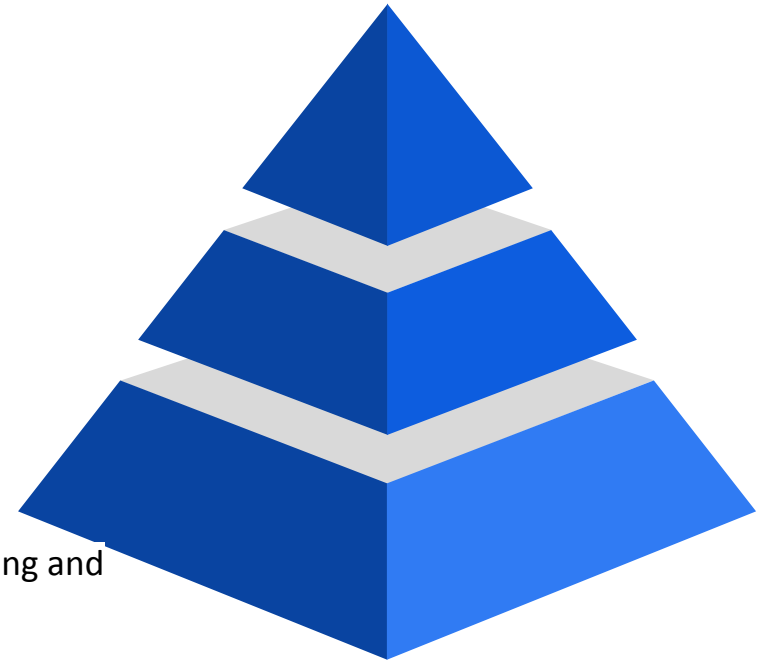
- **State law mandates** schools to seek reimbursement for IEP related services. Legal requirement (MN 125A.21, Subd. 2 Third-Party Reimbursement).

- Third-Party Reimbursement helps to access **funds to support** Minnesota schools in building capacity to provide better health and behavioral health services to students. (MDE)

- Use of Third-Party Revenue (MN section 125A.21, subdivision 3)
  (1) ***administrative costs*** of obtaining reimbursements.
  (2) ***training*** and ***professional development*** to improve the district's ability to access third-party payments.
  (3) reimbursements for the ***benefit of students*** with an IEP or IFSP* in the district.

*Individualized Family Service Plan

Tracking Nursing Services Funding

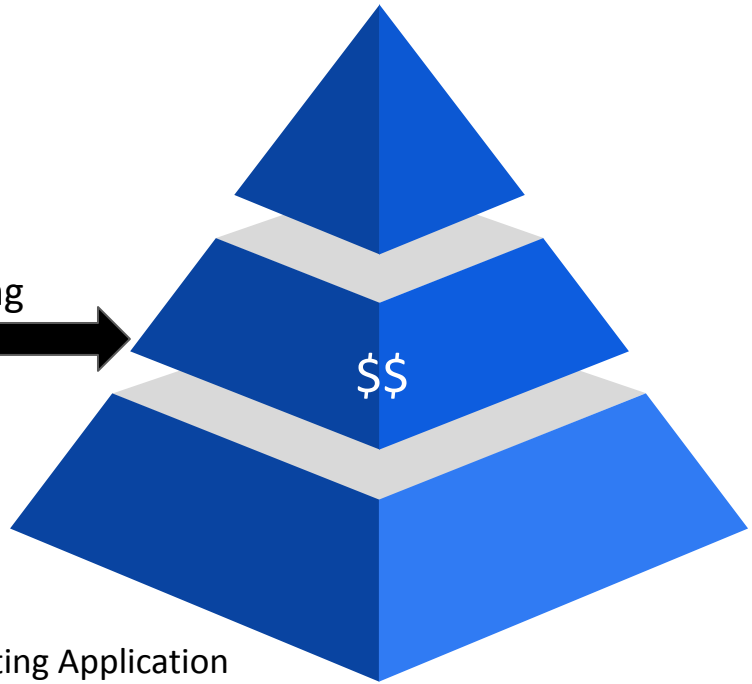


UFARS* is coding system for General (GenEd) and Special Education (SpEd) expenditures.

*Uniform Financial Accounting and Reporting Standards

Tracking Nursing Services Funding

SEDRA* is the SpEd coding requirement. (MDE)



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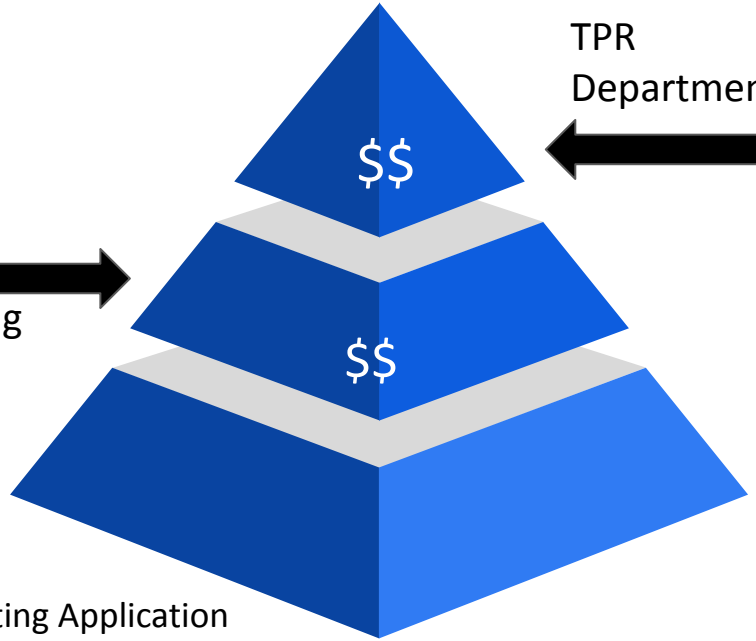
*Special Education Data Reporting Application
**Uniform Financial Accounting and Reporting Standards

Tracking Nursing Services Funding



TPR
Department of Human Services (DHS)

SEDRA* is the SpEd coding requirement. (MDE)

UFARS** is the coding system for GenEd and SpEd expenditures.

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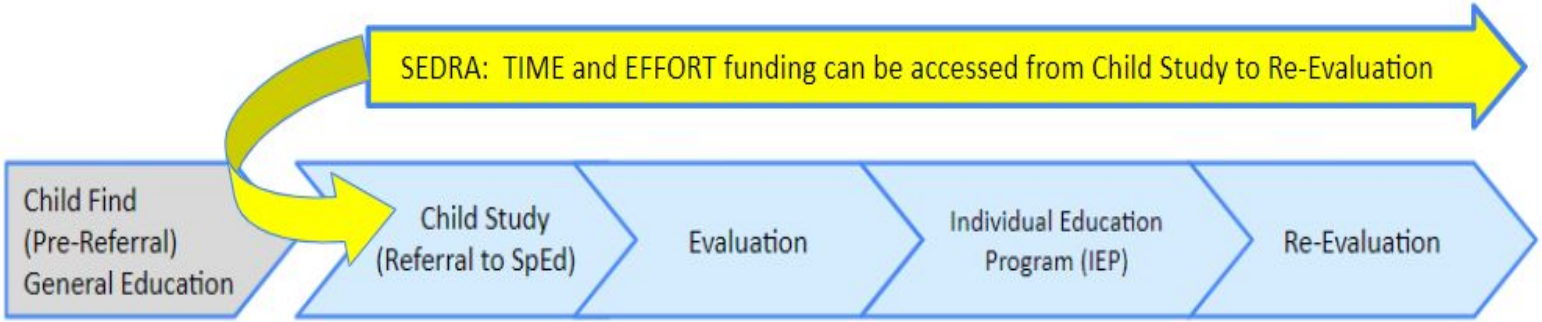
**Uniform Financial Accounting and Reporting Standards

Time and Effort



SEDRA (Special Education Data Reporting Application) is the **MDE system** to report special education expenditures.

- Based on SEDRA data, districts are reimbursed for a portion of staff salaries and benefits.
- MDE requires that staff who are paid from two different funding sources must complete a **daily time and effort** breakdown.
  - Example, when a nurse's salary is funded out of GenEd and SpEd, time and effort is required.

- Find out the source(s) of your salary and ask if time and effort must be completed.
- Questions regarding Time and Effort should be directed to MDE Finance.

Daily Time and Effort Documentation

School	Name of School																							
Employee Name	First and Last Name																							
Employee Title:	School Nurse, RN																							
Time Period (Month/Year):	23-Sep																							
		Mon	Tue	Wed	Thur	Fri	Sat	Sun	Mo	Tue	Wed	Thur	Fri	Sat	Sun	Mon	Tue	Wed	Thur	Fri	Sat	Sun		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	Total Hour	%
SPED	IEP Nursing Services	2	2	2	2	2			2	2	2	2	2			2	2	2	2	2			30	
	SPED Meetings			2	1												1						4	
	SPED Assessments	1								1	1	1							1				5	
	SPED Paperwork					1							1							1			3	
Gen ED	GenEd Nursing Services	5	6	4	5	5			6	5	5	5	5			6	5	6	5	5			78	65.0%
	Total SPED hours	3	2	4	3	3			2	3	3	3	3			2	3	2	3	3			42	35.0%
	Total hours	8	8	8	8	8			8	8	8	8	8			8	8	8	8	8			120	

SAMPLE	**Description of Activities**
Date	Time, Activity, Student Intials
9/1/2023	8-10am IEP Svcs HT, LP, NB, SW, DR, BT
Mon, 1st	10:00 - 11:00 SPED Health/ Physical Assessment

- Percentage estimates of SpEd time or short term time studies **Do Not Qualify** as Time and Effort.
- Time and Effort and Personnel Activity Record (PAR) might be used interchangeably.
- Time and Effort is not required if working in 100% GenEd or 100% SpEd.

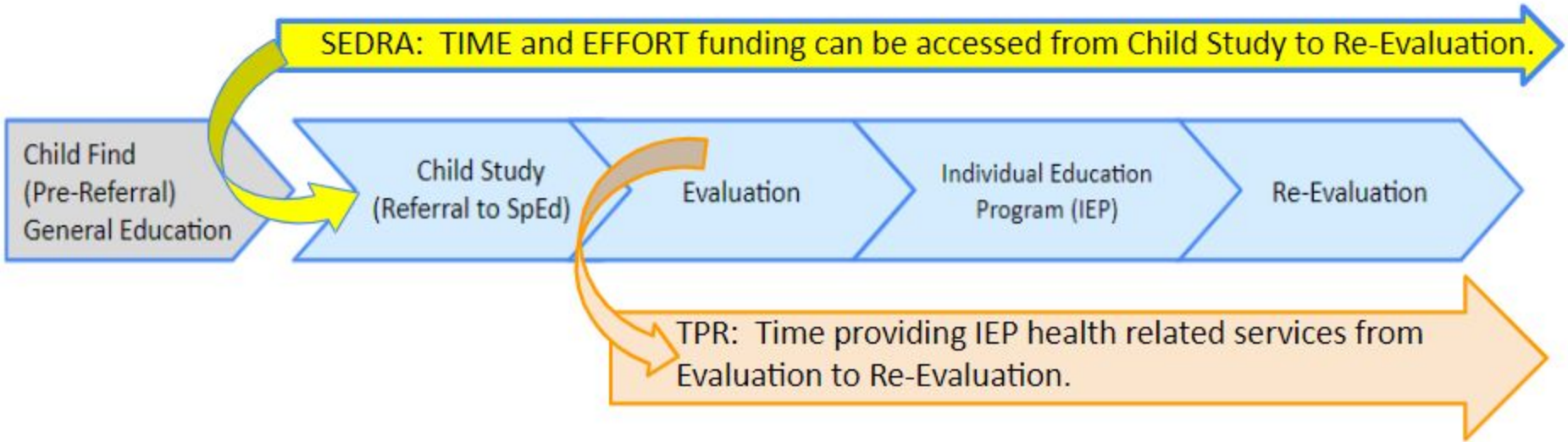
Time and Effort - sample

The Bottom Line

If a nurse has no allocated costs reported in SEDRA then there is no “cost”.

No cost = No rates = No 3rd Party Reimbursement.

Maximizing Funding for Nursing Services



TPR for Nursing Services: Who is Qualified to Submit?

Professional Nurses:

- Registered Nurse (RN) – Has a current Minnesota (MN) Board of Nursing (BON) professional nursing license.
- Public Health Nurse (RN/PHN) – Has a current MN BON license and is certified in public health nursing by MN BON.
- Licensed School Nurse (RN/LSN) – Has a current MN BON professional nursing license and also has a MN Board of Teaching license as a school nurse. Public health nursing certification is a prerequisite for licensure as a school nurse.

Practical Nurses:

- Licensed Practical Nurse (LPN) – Has a current MN BON practical nursing license.

- Professional and Practical Nurses have different scopes of practice.

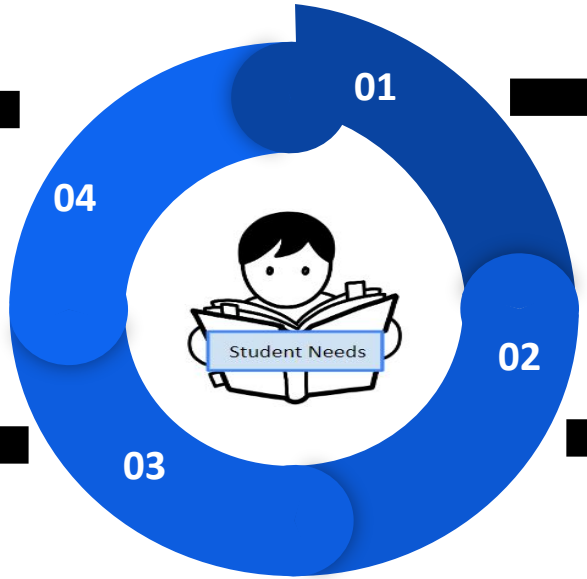
Steps in the IEP Process

<u>Determine Need</u>
Student needs are based on the comprehensive IEP evaluation.

<u>Document the Need</u> on the Evaluation Report and PLAAFP.*

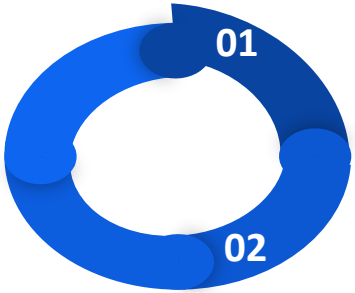
<u>Document Services</u> on the service grid and/or accommodation section on the IEP.

<u>Annual Assessment and Reevaluation</u> to determine continued services or new need.



*Present Levels of Academic Achievement & Functional Performance

Billing Nursing Services: Steps 1-2



Determine Need
Student needs are based on the comprehensive IEP evaluation.

Document the Need on the Evaluation Report and PLAAFP.

What can be billed:

STEP 1 - Conducting the evaluation - time spent gathering and interpreting data for mental or physical health conditions that might impact learning.

- Health and physical record review, parent/guardian and/or student interview, observation, hearing and vision screening.

STEP 2 - Time spent writing the evaluation report and PLAAFP.

- Determine who submits billing for your district.
- Evaluation time can be submitted even if a student is not eligible for nursing services or an IEP.

Billing for an Evaluation

Billing example:

- MM/DD/YYYY - (10:00 - 10:20 am) - Hearing and vision screening.
- MM/DD/YYYY - (9:15 - 10:00 am) - Interpret health and physical records to determine educational impact.
- MM/DD/YYYY - (8:00am - 8:15 am) - Parent/guardian interview.
- **MM/DD/YYYY** - (1:45pm - 3:15 pm) - Evaluation report write up.
    - Use the **final date of evaluation** to reflect the total evaluation minutes under one entry or *unit.
      *If a child receives a service on the same day as the final date of evaluation, add the service time to the evaluation time for that specific date and bill as 1 unit of evaluation.

- Evaluation activities must be documented in the billing software. (Additional documentation is needed unless you use the billing software as your documentation.)
- Ask how you will document the evaluation activities in your district.

ICD-10-CM (International Classification of Disease)

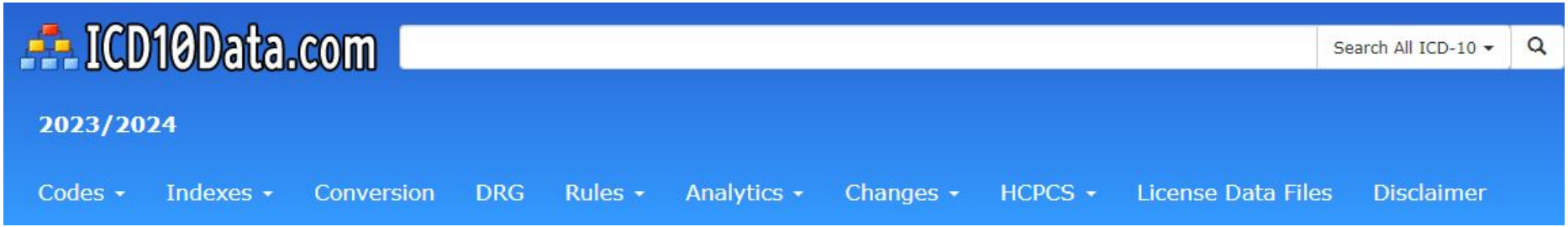
Federal law requires schools to report an individual ICD-10-CM code for health-related services that are billed.

In order to bill:

- ICD-10-CM code
- Document activity
- Start and stop times

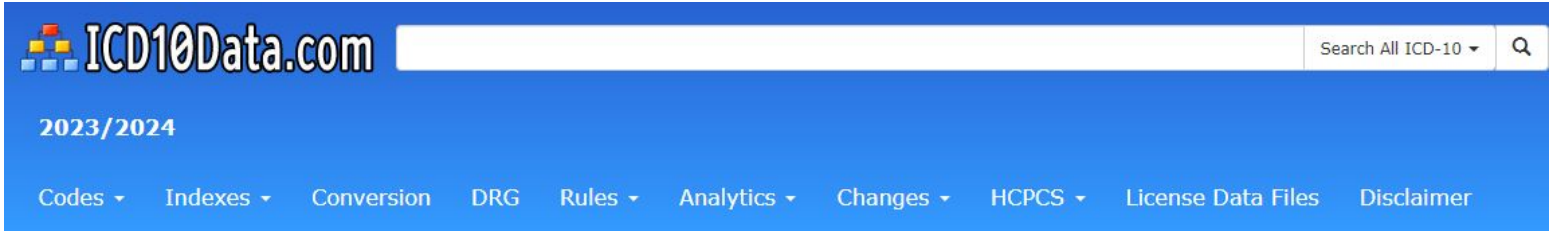
ICD codes are the 'cornerstone' of disease classification in HIPAA (Health Insurance Portability and Accountability Act) covered entities at the federal, state, and local level. Codes are used for disease surveillance, tracking patient care, and claims reimbursement.

- Best practice is to have the related service provider determine the appropriate ICD-10 code.
- Codes are subject to change at any time, refer to ICD10Data.com.



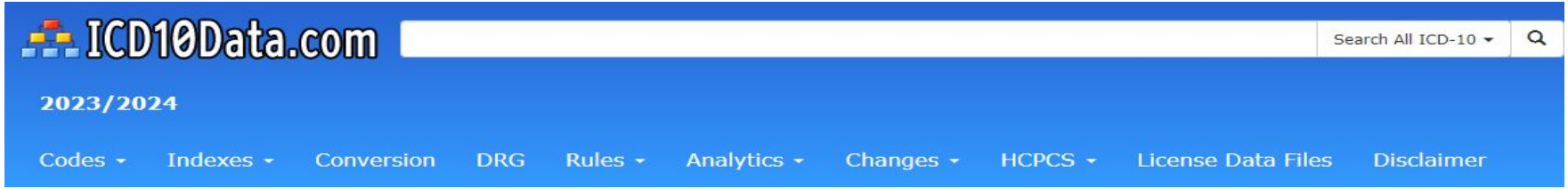
2023/2024 ICD-10-CM Diagnosis Codes

- ICD-10-CM Codes
  - New Codes
  - Revised Codes
  - Deleted Codes
  - Billable/Specific Codes
  - Non-Billable/Non-Specific Codes



2024 ICD-10-CM Codes

- G00-G99 Diseases of the nervous system
- H00-H59 Diseases of the eye and adnexa
- H60-H95 Diseases of the ear and mastoid process
- I00-I99 Diseases of the circulatory system
- J00-J99 Diseases of the respiratory system



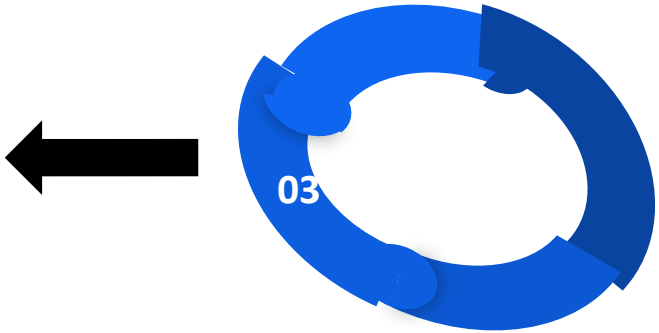
ICD-10-CM Codes › Symptoms, signs and abnormal clinical and laboratory findings, not elsewhere classified R00-R99

- R00-R09 Symptoms and signs involving the circulatory and respiratory systems
- R10-R19 Symptoms and signs involving the digestive system and abdomen
- R20-R23 Symptoms and signs involving the skin and subcutaneous tissue
- R25-R29 Symptoms and signs involving the nervous and musculoskeletal systems
- R30-R39 Symptoms and signs involving the genitourinary system

ICD-10-CM Codes › Factors influencing health status and contact with health services Z00-Z99

Billing Nursing Services: Step 3

<u>Document Services</u> on the service grid and/or accommodation section on the IEP.



What can be billed:

- Time spent documenting the nursing services (report writing) that will be provided to the student.

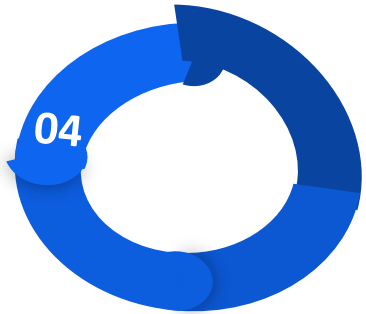
- If a nursing service isn't on the IEP, the service cannot billed.
- No Documentation = No Payment or Reimbursement.
- The service grid is not an indicator of what can be billed.
- Just because a student requires a service during the day, it does not mean that is billable.

Billing Nursing Services: Step 4

What can be billed:

<u>Annual Assessment</u>:

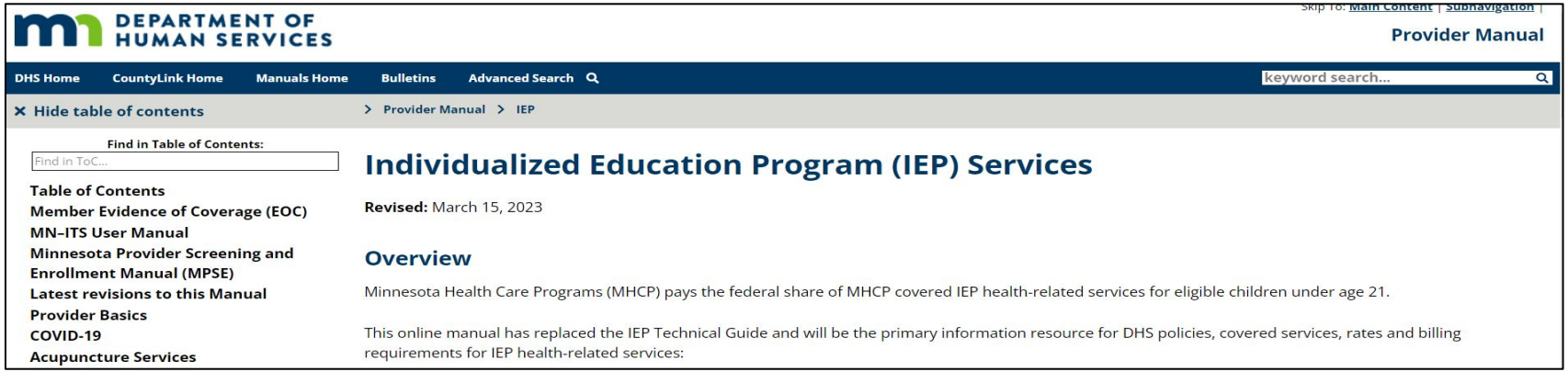
- Review of current health and physical status.
- Determine if needs are reflected accurately on the IEP.



<u>3 year Re-Evaluation</u>:

- Start process over from step 1.
- Comprehensive nursing evaluation.

Covered and Non Covered Services - DHS IEP Manual



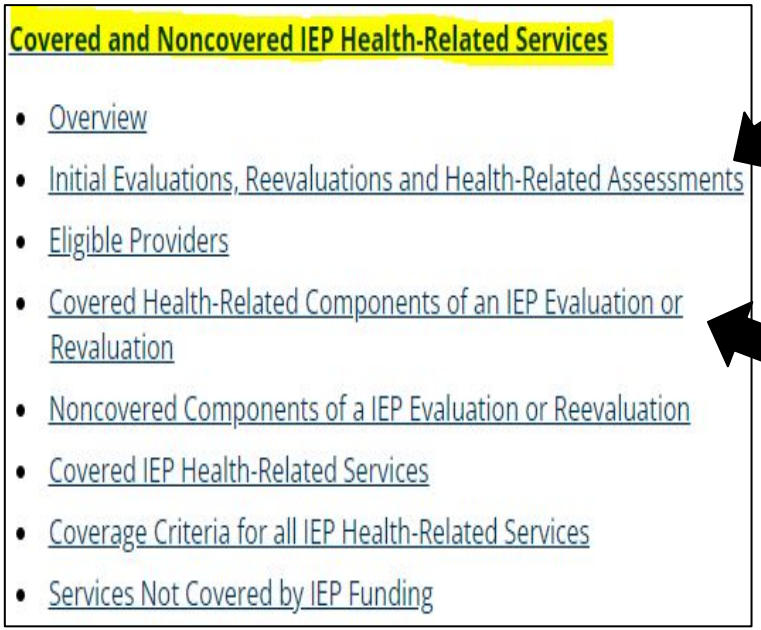
Covered and Noncovered IEP Health-Related Services

- Overview
- Initial Evaluations, Reevaluations and Health-Related Assessments
- Eligible Providers
- Covered Health-Related Components of an IEP Evaluation or Revaluation
- Noncovered Components of a IEP Evaluation or Reevaluation
- Covered IEP Health-Related Services
- Coverage Criteria for all IEP Health-Related Services
- Services Not Covered by IEP Funding

Nursing Services

- Overview
- Authorization and Orders
- Qualified Services Providers
- Covered Services
- Noncovered Services
- Health Records and Documentation
- Billing

Covered Services in the IEP Process



Initial Evaluations, Reevaluations and **Health-Related Assessments**:

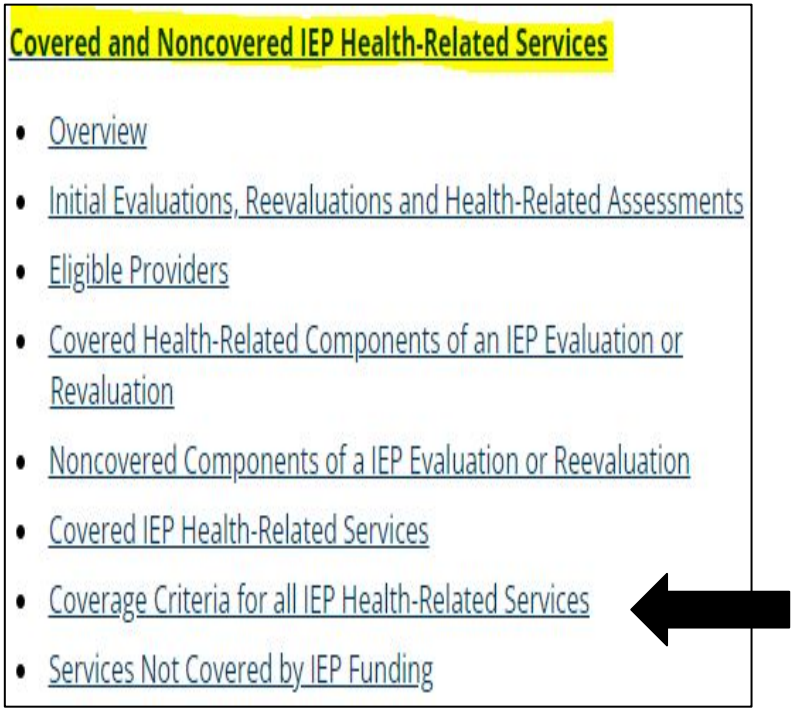
- Health-related evaluations and assessments when conducted for the purpose of **identifying health-related needs** for the IEP/IFSP **OR** to **determine continued coverage**, even if the service does not get added to, or result in an IEP.

Covered Health-Related components of the IEP Evaluation or Reevaluation:

- Face-to-face **health related assessments.**
- **Interpreting** health-related assessment results.
- **Writing a report of the health-related assessment results.**

- Writing a report includes documenting the assessment results on the evaluation report, present levels, service grid and accommodation section of the IEP.

Coverage Criteria for All IEP Health-Related Services



- **Medically necessary**.
- A health-related service that is necessary for the child to **benefit from their education.**
- **Covered by MA.**
- Authorized by the child's IEP or IFSP team.
- **Documented in the child's IEP or IFSP** (including extended year).
- **Documented in the child's health record.**
- Provided by a qualified service provider within their **scope of practice and licensure.**
- Provided during the **school day** (including during the **extended school year (ESY).**

- **Eligible Children** - under 22 years old or have not graduated from the 12th grade.

Authorization and Orders

The IEP team authorizes health-related services included in the IEP/IFSP.

Medical order are necessary for some nursing services

- medication administration.
- some medically necessary treatments and procedures.

Orders must:

- ICD 10 and description to verify medical necessity.
- Describe the actual service.
- Signed and dated by a physician, advanced practice registered nurse, nurse practitioner or physician assistant.
- Required each school year with date span no more than one year.
- Be in place before services are billed.

Covered *Nursing Services*

Covered nursing services include **face-to-face** and **non-face-to-face** nursing services when identified and included in the child's IEP/IFSP in order for a child to attend school and receive (FAPE) during the school day.

- Provide eligible nursing services that are ordered by a licensed healthcare provider.
- **Medication management**
  - Review and adherence to, effectiveness, adverse reactions and collaboration with health care professionals and parent/guardian.
- Education and counseling about medication or chronic health condition.
- **Independent nursing interventions** based on the observation and monitoring of the child's health status and nursing services provided.
- **Chronic disease management** related to the medical condition identified on the IEP.
  - Observation and monitoring, collaborating, coordinating with the health care providers and parent/guardian regarding questions, changes or concerns on the child's condition.

Activities of daily living services **provided by a nurse are only covered** when the IEP indicates a one-on-one nurse is required all day at school.

Covered Nursing Services: Chronic Disease Management

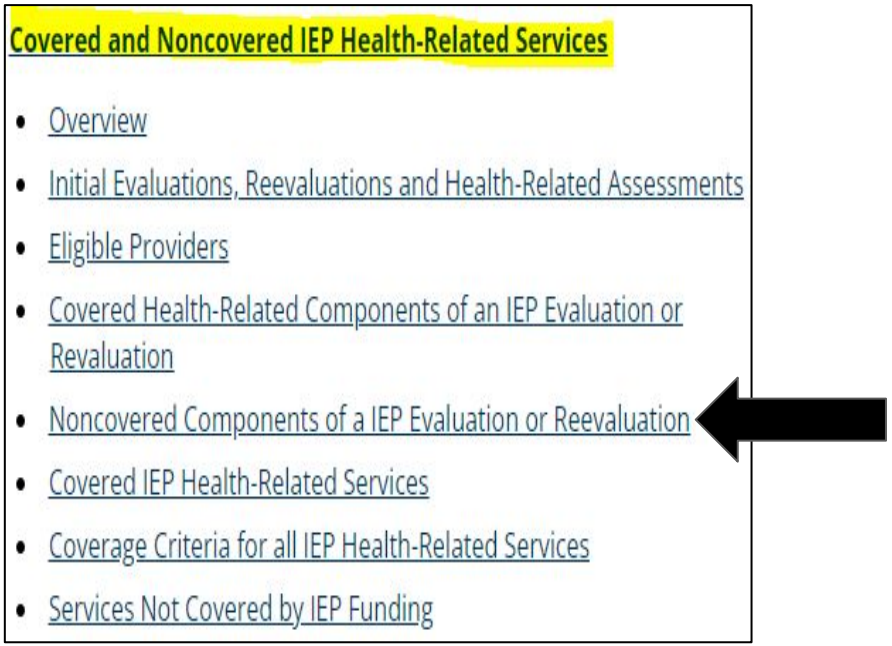
Plan, implement, and evaluate the school health services required to address the needs of the student with a chronic health condition. (National Association of School Nurses)

Examples of diagnoses that may require chronic disease management:

- Asthma, Cystic Fibrosis and other lung diseases
- Heart disease
- Diabetes and other metabolic disorders
- Food allergy management such as celiac disease and anaphylaxis
- Mental Health condition
- Neurologic diseases such as cerebral palsy
- Neurodevelopmental disorders such as Attention Deficit Hyperactivity Disorder and Autism
- Seizure disorders

- If billing for chronic disease management, it must be written on the IEP.
- Document in IEP accommodation section **and** in the student health record when the service is provided.

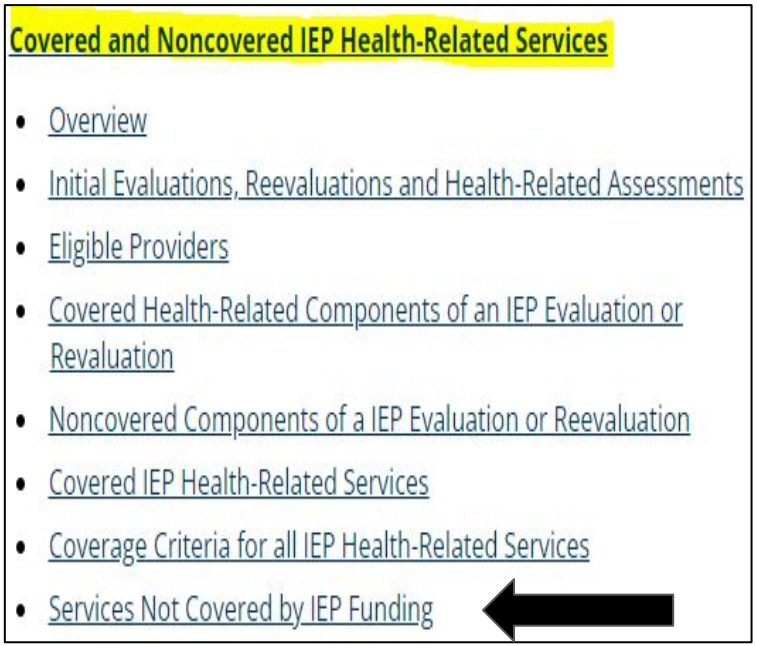
Non Covered Services



Noncovered Components of an IEP Evaluation or Reevaluation:

- Determining the child's present academic levels or instructional needs.
- Screenings or discussions to determine academic instruction strategies/curriculum.
- Evaluations or assessments conducted to determine 504 plan.

Services Not Covered by IEP Funding (*not all inclusive*)



- Services provided by a **teacher, teacher's aide, bus drivers and monitors.**
- **Observation and consultation except** as specifically included under covered mental health services, **nursing services** and PCA services.
- Services provided in before or after school programs or activities.
- **Attending staff meetings**, **supervising staff**, **developing treatment plans**, **consulting and meeting with parents, teachers and other staff, documenting services and billing activities.**
- IEP activities including planning, developing or writing the IEP, meetings, consultation and communications.
- Services that are not face-to-face except as covered under IEP evaluations.

Non Covered *Nursing Services*

- Services not authorized or documented in the child's IEP/IFSP or health record (including during extended school year).
- Services that are not face-to-face services (example, consultation) **except** as covered under IEP evaluations, or when providing medication management or chronic disease management.
- Medical care and administering medications and treatment for acute and episodic illnesses and injury.
- Classroom health education such as first aid or substance prevention classes.
- Services delegated to or provided by someone who is not a nurse or personal care assistant (PCA).
- Training or supervision of nursing cares.
- Supplies for the health office.
- Time spent writing the PCA plan of care and individualized health plan (IHP) or emergency care plan (ECP).

- Time spent supervising, training, developing health plans and attending meetings should be reported in Time and Effort.
- RN or LSN may delegate medication that is self-administered and other treatments or procedures. These delegated functions may be billable under PCA services.

Record Keeping and Documentation

Record Keeping and Documentation

- Overview
- Health Service Records
- Assistive Technology Devices
- Special Transportation
- Personal Care Assistant (PCA) Services
- Occupational Therapy, Physical Therapy, Speech and Language Pathology, Audiology, Mental Health, Nursing, and Interpreter Services
- Co-Therapy and Co-Treatment
- Service Time and Encounters
- Record Retention

Each entry in the health service record must contain (not all inclusive):

- The recipient's name and date of service provided.
- Documentation of the actual services provided (IEP/IFSP is not sufficient documentation of services).
- Length of time spent with the recipient (start and end time).
- Signature and title of the person who provided the service.
- Documentation of required supervision and direction.

- If it's not documented, it's not done. Services must be documented on the IEP or IFSP **and** in the student's record in order to be billable.

Nurse on Special Transportation

Special Transportation Services

- Overview
- Authorization
- Eligible Children
- Eligible Service Providers
- Covered Special Transportation Trip
- Noncovered Special Transportation Services
- Documentation Specific to Special Transportation
- Health Records and Documentation
- Billing

Special transportation is considered a **related service** to access and attend school and receive (FAPE) as other children without a disability.

Some students may require a nurse in order to access or remain on the special transportation vehicle.

- If a nurse or PCA is required on the bus, they are considered the adaptation, similar to a wheelchair, special car seat or harness.
- A nurse is assigned to a specific child during transport and the **need is identified** in the **IEP**.
- When a child requires a nurse during the trip, bill the special **transportation** service **and** the **health-related service** on **separate** claims.

- Special Transportation Log - sample Additional sample forms can be found on MDE's Sharepoint. For access, email mde.special-ed@state.mn.us.

Contracted Nursing Services

- When a school district is paying for the IEP nursing service, they may submit for reimbursement.
- The district nurse and the IEP team assures that nursing is on the IEP regardless of who is the contractor.
- Examples of contracted nurses may include:
  - Agency Nurse
  - Consultant Nurse
  - Public Health Nurse

- The contractor must provide the medical orders and documentation of their services to the district.
- Ask who is responsible for contract work in your district.

Consent Form for Health-Related Services

Part B school districts may obtain informed parent consent in two ways:

1. With school consent forms (e.g. the MDE recommendation form)

OR

1. The Minnesota Health Care Programs (MHCP) application.

*The two options for obtaining consent impose different timelines for billing. With school district consent making immediate billing possible and the MHCP application options requiring a waiting period up to one year during which parents at some point have re-enrolled in MA and have provided their consent at that time.

Part C school districts must obtain informed parent consent:

1. With a signed consent form

and

1. Received a **Written annual Notice Related to Third Party Billing for IFSP Health-Related Services**.

*MCHP application can not be used as a signed informed consent under Part C.

- Find out who is responsible for getting consents.
- Questions regarding consents can be directed to MDE.

Requirements for Accessing TPR for IEP Nursing Services

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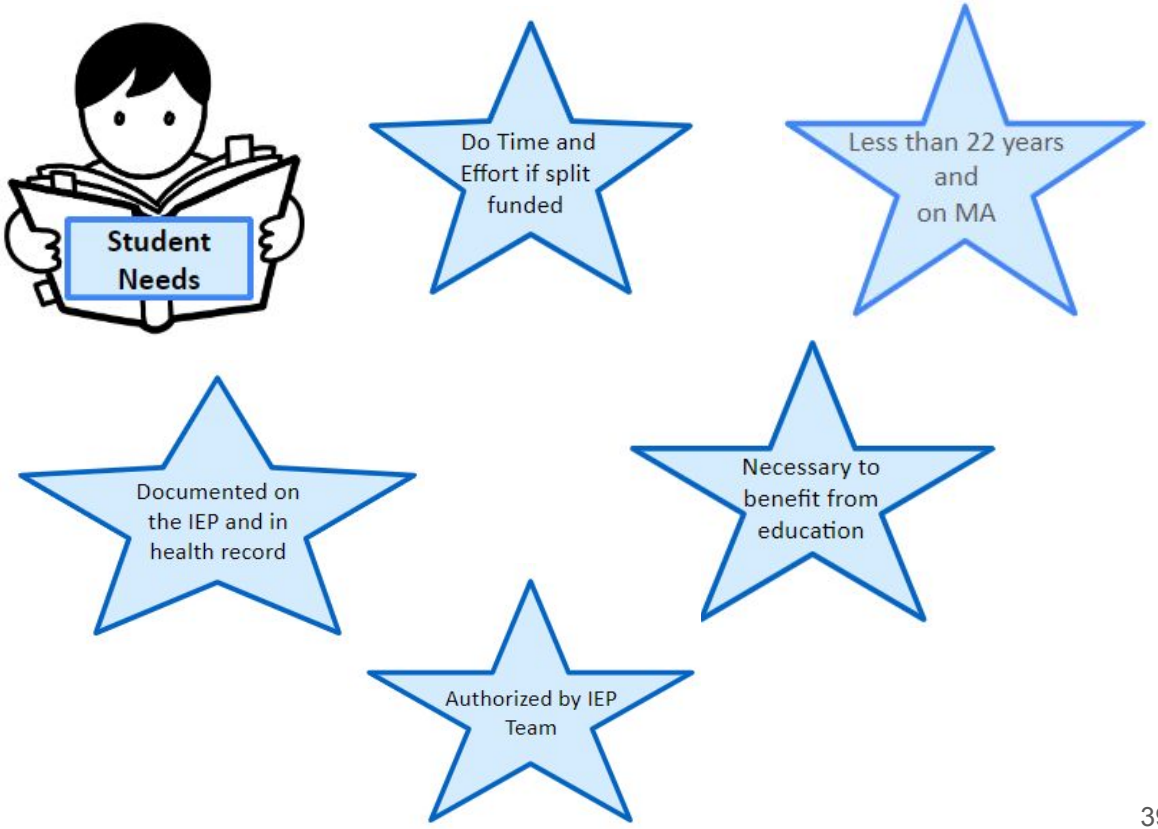
Do Time and Effort if split funded

Less than 22 years and on MA

Necessary to benefit from education

Authorized by IEP Team

Requirements for Accessing TPR for IEP Nursing Services



Requirements for Accessing TPR for IEP Nursing Services

Do Time and Effort if split funded

Less than 22 years and on MA

Documented on the IEP and in health record

Necessary to benefit from education

Qualified Service Provider

Authorized by IEP Team

Requirements for Accessing TPR for IEP Nursing Services

Do Time and Effort if split funded

Less than 22 years and on MA

School Day

Documented on the IEP and in health record

Necessary to benefit from education

Qualified Service Provider

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Requirements for Accessing TPR for IEP Nursing Services

Do Time and Effort if split funded

Less than 22 years and on MA

Signed Consent (Parent / Guardian)

School Day

Documented on the IEP and in health record

Necessary to benefit from education

Qualified Service Provider

Authorized by IEP Team

Requirements for Accessing TPR for IEP Nursing Services

Follow the DHS IEP Related Services Manual

Do Time and Effort if split funded

Less than 22 years and on MA

Signed Consent (Parent / Guardian)

School Day

Documented on the IEP and in health record

Necessary to benefit from education

Qualified Service Provider

Authorized by IEP Team

Resources

Department of Human Services:

- Individualized Education Program (IEP) Services (https://www.dhs.state.mn.us/main/idcplg?IdcService=GET_DYNAMIC_CONVERSION&RevisionSelectionMethod=LatestReleased&dDocName=dhs16_151385)

ICD10data.com (https://www.icd10data.com**)**

MN Department of Education:

- Special Education, (https://education.mn.gov/MDE/dse/sped/)
- Medicaid in Education (https://education.mn.gov/MDE/dse/sped/med/)
- Special Education Funding Guide (https://education.mn.gov/MDE/dse/schfin/sped/guide/)
- Sharepoint (mde.special-ed@state.mn.us)

MN Department of Health MDH - School Health, (https://www.health.state.mn.us/people/childrenyouth/schoolhealth/index.html)

MN Board Of Nursing MN Board of Nursing Legal Scopes of Practice

National Assoc. School Nurses Improving Care for Students with Chronic Health Conditions (https://learn.nasn.org/courses/25340)

Pacer Center (https://www.pacer.org/parent/)

Thank you!