

To: Michael Collins and Bryan Williams, Ohio School Health Services Association

Thank you for taking the opportunity to review and respond to ODM's proposed rules associated with the Medicaid School Program.

The proposed rules are related to provisions of section 5162.366 of the Revised Code, adopted under Sub. H.B. 89. The proposed language is specific to MSP services that are provided by a therapist within a school setting, and authorizes certain Medicaid providers to make referrals for physical therapy, occupational therapy, speech therapy, and audiology services.

We have followed each of your below questions with the following responses:

- 1) Does the rule suggest that in some way outside practitioners need to be involved in school licensed therapists of the healing arts are enrolled and refers for the MSP services?

If an appropriate referring practitioner is available in the school, there is no need for an outside referral.

- 2) Can the evaluation/re-evaluation code case note that is used for interim claiming suffice as a record of the referral in the billing system (or as one of the potential manners to verify the practitioner who has made the referral)?

Yes, the evaluation/re-evaluation code case note that is used for interim claiming will be sufficient as long as the referral is documented in the medical record with the referring practitioner.

- 3) Can you reaffirm there is no requirement for a paper prescription if a school-based, enrolled practitioner makes a referral within the scope of their practice?

We acknowledge that there is no need for a paper prescription if a school-based, enrolled practitioner makes a referral within the scope of their practice. Please also note that all referrals for services must be documented in the medical record.

- 4) In your cover letter you state, "This rule will not alter the scope of these practitioners, and they will still be required to submit an order from a physician or other licensed practitioner of the healing arts, nor does this rule alter services rendered by such practitioners when provided outside of MSP"

No we are not implying that this is based on the language of HB 89, nor are we suggesting that this is a past practice in Ohio's Medicaid School Program. This language was intended for informational purposes.

As needed, ODM will address any points of confusion and will provide ongoing clarification in future correspondences, webinars and trainings opportunities.

Again, we thank you for your time and look forward to our continued collaboration.