

To: Kim Donica, Chief, Bureau of Long Term Care Services and Supports
From: Michael Collins and Bryan Williams
Ohio School Health Services Association
Date: April 7, 2017
Subject: Medicaid School Program Rules

Thank you for soliciting the input and opinion of the various Ohio MSP stakeholders represented by the Ohio School Health Services Association (OSHS). Our collective concerns listed below are based on interpretation of the proposed language.

- 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?
- 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)?
- 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?
- 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. " Are you saying this based on the language of HB 89 or past practice in Ohio MSP?

Thank you for addressing the concerns we raised based on our reading of the present language. We are available to dialogue further at your convenience. Please call Michael Collins at 614.296.5118 (cell) if you need any further clarification.