Division of TennCare

To: TennCare MCOs, SBS Providers, and SBS Billing Vendors
From: Johnny Lai, Director of Managed Care Operations
Date: October 1, 2026
Subject: Grace Period for New Requirement of Re-signing Parental Consent to Access Information Form when a New Type of Service is Added

TennCare's School-based Services (SBS) Manual (last revised May 2026) includes a new requirement that TennCare's Parental Consent to Access Information be signed by the student's parent/guardian when a new service is added. The requirement applies to Individualized Education Plan (IEP) or other individualized plan (e.g. IHP, ISP, IFSP) revisions created on or after **August 1, 2027**. This new implementation date reflects a grace period for schools, families, and school-based providers, while also allowing time for TennCare to incorporate stakeholder feedback into the Parental Consent to Access Information Form.

TennCare's Parental Consent to Access Information form exists to allow a child's school, along with the Division of TennCare, a child's health care providers, and a child's TennCare managed care organization (MCO) to release documents to each other containing educational records about a child to facilitate TennCare reimbursement for school-based services.

TennCare's Parental Consent to Access Information form must be re-signed when one or more of the services below are newly added to the child's individualized plan:

- Physical Therapy*
- Speech Therapy*
- Occupational Therapy*
- Audiology
- Nursing Services via orders from a Medical Doctor, Doctor of Osteopathic Medicine, Physician's Assistant, or Nurse Practitioner
- Behavioral Health Services
- Applied Behavioral Analysis Therapy

*CoverKids- Annual benefit limits are applied to include services when provided in a school setting. Services are limited to 52 visits per calendar year

The examples below illustrate when a service is considered newly added for purposes of re-signing the Parental Consent to Access Information form:

Scenario	Revision to the Individualized Plan	Should the Consent Form be re-signed
The school's or school district's IEP team newly initiates an IEP for speech therapy services.	Physical Therapy Services are added to the IEP.	YES
The school's or school district's IEP team newly initiates an IEP for speech therapy services. Time passes and all speech therapy goals outlined in the IEP are achieved, resulting in the student being discharged from speech therapy services.	The student's speech regresses and speech therapy is again referred/ordered for the student.	NO Resuming the same service after discharge does not constitute a new service.
A parent/guardian consents to the student receiving Nursing Services and the student begins receiving G-Tube feeding.	The student later begins receiving wound care services.	NO Consenting to nursing services includes any and all services listed in the Table of Billable Nursing Services in the School-based Services Billing Manual.
A parent/guardian consents to the student receiving Behavioral Health Services and individual counseling services are initiated.	The student begins receiving Crisis Intervention Services.	NO Consenting to behavioral health services includes any and all services under the Behavioral Health provider's scope of practice.
A parent/guardian consents to the student receiving Behavioral Health Services and group counseling services are initiated.	The student begins receiving Applied Behavioral Analysis (ABA) therapy services.	YES TennCare and the Department of Mental Health and Substance Abuse Services consider behavioral health services to be distinct from ABA therapy, thus ABA therapy is considered a new service.

TennCare does allow the parent/guardian to revoke consent at any time by sending a letter to the Director of Special Education of the TennCare enrolled student's school or school district. In the event that a parent/guardian previously revoked consent for services and later signed a new individualized plan for services, then the Parental Consent to Access Information form would need to be signed.