

Local Education Agency
Ad Hoc Workgroup Meeting
February 3, 2010 Meeting Minutes

Location: Natomas Unified School District (USD)

ATTENDEES:

Name	Organization/Title
1. Liz Touhey	DHCS, Safety Net Financing Division (SNFD)
2. Rob Williams	DHCS, SNFD
3. Steve Perez	DHCS, SNFD
4. Yvonne Lawrence	DHCS, SNFD
5. Laura Baynham	Mendocino County Office of Education (COE)
6. Sherry Purcell	Los Angeles USD
7. Cathy Bennett	Sacramento City USD
8. Anysia Drumheller	Butte COE
9. Marlene Burruel	San Joaquin COE
10. Greg Englar	Sonoma COE
11. Michelle Cowart	Contra Costa COE
12. Tracy Cole	Natomas USD
13. Matthew Hill	California Department of Education, Special Ed.
14. Kevin Harris	Navigant Consulting, Inc.
15. Gloria Eng	Navigant Consulting, Inc.

Handouts

Each participant received a folder with copies of the following: Agenda, LEA Workgroup December 2009 Meeting Minutes, and the updated FY 2006-07 and FY 2007-08 Paid Claims Reimbursement Enrollment Trend Analysis and Reimbursement by Service Type. In addition meeting participants received copies of the Cost and Reimbursement Comparison Schedule (CRCS) LEA Errors and Statistics Summary, LEA Workgroup Issue Track, Training subcommittee meeting notes, and Services subcommittee research matrix.

Purpose

The meeting was convened by DHCS. The purpose of the Workgroup is to improve the Local Educational Agency (LEA) Program. The emphasis of the meeting is to strategize various goals and activities aimed at enhancing the Medi-Cal services provided on school sites and access by students to these services, while increasing federal reimbursement to LEAs for the cost of providing these services.

Review of December Meeting Minutes

The Workgroup reviewed the December 2009 Meeting Minutes and clarified any questions. The Workgroup and DHCS approved the minutes and they are ready to be posted on the LEA website.

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DHCS SNFD Update

Claims Exceeding 2-Year Claiming Limit

- DHCS is working internally and with CMS to determine possible funding sources for claims beyond the 2-year claiming limit which were deferred by CMS

Cost and Reimbursement Comparison Schedule (CRCS)

- DHCS continues to log the submitted CRCS hard copies for completeness
- DHCS and NCI received electronic CRCS copies, as of December 28, 2009, and started to review and check for accuracy, validation and completeness through the CRCS import application
 - FY 2006-07: 182 LEAs submitted (64 of which are PDF/JPEG documents)
 - FY 2007-08: 215 LEAs submitted (69 of which are PDF/JPEG documents)
- DHCS will not accept PDF/JPEG documents and LEAs are required to resubmit their CRCS in Excel
 - DHCS will email LEAs who submitted in PDF/JPEG
- DHCS will be sending LEAs a list of their CRCS errors if the electronic and/or hard copy CRCS is incomplete and requires additional review and revisions
- Common CRCS errors included: mismatching and improper pairing of LEA costs and FTEs; reported Medi-Cal reimbursement and units, but no costs/FTEs; and missing LEA identification information
- DHCS plans on conducting a CRCS Webinar to discuss the CRCS submission process
 - Information to include: what the CRCS is; how to properly submit the CRCS; and common CRCS form errors
- DHCS will determine which LEAs have not submitted the required CRCS forms and contact them via a targeted SELPA superintendent email
 - CDE can specifically identify which districts require the notification
- The Workgroup discussed concerns regarding the time consuming process of the CRCS and vendor costs associated with obtaining the correct information to complete the CRCS for previous years. The Workgroup believes that some LEAs may not feel the LEA Billing Option Program is cost effective and may not be willing to seek reimbursement from Medi-Cal in the future.
- DHCS is discussing LEA ramifications for not complying with CRCS submission requirements and potential LEA withholds of claims payments
- The Workgroup also discussed the CRCS A&I audit positions required (currently proposed in the Governor's budget) to reconcile the LEAs costs to Medi-Cal reimbursement. CRCS A&I reconciliation and/or desk/site reviews are necessary in order to be compliant with CMS and SPA 03-24.
 - The public has the right to review the proposed budget through a public records act request through the Governor's office

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Erroneous Payment Corrections (EPCs)

- Fiscal Year Utilization Controls
 - EPC implemented 12/23/09: Non-IEP/IFSP services paid over 24 services per rolling calendar year with dates of service 7/1/2005-6/30/2009

LEA Deferrals

- CMS is no longer deferring current LEA Program reimbursement, but are still reviewing FY 2005-06 reimbursements. DHCS is working with CMS to respond to questions and follow-up, as necessary.

SELPA Distribution Process

- DHCS provided CDE with the LEA CRCS information to be distributed via the SELPA superintendent's e-mail blast on February 1, 2010
 - Two LEA Workgroup members noted that they had received a copy of the e-mail

LEA Accounts Receivable (A/R)

- LEAs that originally had an outstanding A/R set up after the first EPC (FMAP overpayments) were erroneously charged seven percent interest on the principal amount owed
 - EDS/HP refunded the seven percent interest to LEAs, however the 3.5 percent withhold was also taken out of the reimbursement
 - DHCS will discuss this with EDS Cash Control and determine which LEAs that were charged seven percent interest
- LEAs may have paid 100 percent of the outstanding A/R after the first EPC; some LEAs paid 96.5 percent of the outstanding A/R
 - LEAs that paid 96.5 percent have 3.5 percent of their previous principal amount owed in an outstanding A/R
 - LEAs need to be refunded the 3.5 percent
 - DHCS to discuss with EDS Cash Control

DHCS Tape Match Process

- The Workgroup expressed that there is often a delay between the eligibility determination of a student from the date of service and date of payment
- Benefits Identification Card (BIC) numbers for students can change
 - Students often get a Temporary Identification Number (TIN) and LEAs can't bill claims with a student's old BIC number if he/she has a TIN
- LEAs should request BIC numbers based on date of service
- There is an eligibility gateway and students are given an initial BIC number, but there is a three-month period to determine if the student is truly eligible for Medi-Cal services
- DHCS will add an FAQ on the website regarding the BIC/TIN information

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Increased FMAP

- Obama's plan is to continue the increased FMAP for FY 2011

H1N1 Update

- LEAs can partner with local health departments to get funding for the administration of the H1N1 vaccine, but this is not reimbursable under the LEA Billing Option Program

LEA Issue Track

Denial Code 9909

- Some LEAs have recently received claims that have been denied with RAD denial code 9909 - *optional service not payable on date of service*
 - Impacts students who are age 21 or older
 - LEAs provided copies of RADs and claim information
 - DHCS to research the adult optional services to determine if limitations to optional services begin at a specific age and impacts the LEA Program and provide RAD examples to EDS/HP for research

CP-O-888 Report

- LEAs currently receive a monthly CP-O-888 report which includes reimbursement to date based on procedure codes (without any modifiers)
- The Workgroup does not find this report useful as is and requests DHCS to eliminate the report or fix it via EDS.

SB 231 Funding

- DHCS is in the process of developing a proportionate collection of the 2.5 percent withhold from LEAs. DHCS will draft a description of the potential process which will be reviewed by the Workgroup.

Annual Legislative Report

- Due to an Executive Order, the Legislative Report for the period April 2007 through March 2008 will not be reviewed or published by the Governor
- The Legislative Report for April 2008 through March 2009 is currently being reviewed and expected to be published

Workgroup Subcommittee Reports

Communications Subcommittee

- The CRCS deadline reminder was sent via the SELPA superintendent's e-mail blast on February 1, 2010
 - CDE has gotten some calls regarding the e-mail already
- LEA Program communications will continue to be distributed via SELPA e-mails

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Training Subcommittee

- Self-audit checklist
 - The Subcommittee requested the LEA Workgroup provide examples of relevant and quality LEA service documentation
 - Service documentation is intended to supplement the self-audit checklist
 - Documentation samples will be reviewed and critiqued against A&I policies
 - The Subcommittee decided not pursue meeting with professional service organizations to assist in obtaining documentation standards for each discipline
- CRCS refresher
 - The proposed CRCS Submission Process Webinar intends to update LEAs on FY 2006-07 and 2007-08 CRCS findings, common issues and process of submission
 - The Webinar is intended to be saved and accessible for download on the LEA Program website
 - DHCS to share presentation information with the Training Subcommittee for feedback

Services Subcommittee

- The Subcommittee compiled a list of services to potentially expand the LEA Program for DHCS consideration and follow-up. DHCS needs to research and determine if a new SPA is required or if services may be covered currently under the SPA (i.e., alternative types of assessments provided by qualified practitioners)
- The Subcommittee will add other types of IEP/IFSP assessments that do not fall under the names of initial/triennial, annual and amended assessments
- The Subcommittee intends to survey LEAs (via a SELPA e-mail blast) to identify other potential services that LEAs are currently providing, but not receiving LEA reimbursement for DHCS consideration

By-laws Subcommittee

- Legal's preliminary opinion is that the LEA Workgroup does not fall under Bagley-Keene Act and the Workgroup "consults" with DHCS in the form of meetings
- The Workgroup agreed that there are no current issues with the structure of the Workgroup; if issues arise, the Workgroup will address issues accordingly

Next Meeting

Wednesday, April 7, 2010 10:30am – 3:00pm at Natomas USD