

Local Educational Agency
Ad Hoc Workgroup Meeting
October 6, 2010 Meeting Minutes

Location: Natomas Unified School District (USD)

ATTENDEES:

Name	Organization/Title
1. Geri Baucom	DHCS, Safety Net Financing Division (SNFD)
2. Rob Williams	DHCS, SNFD
3. Evie Correa	DHCS, Audits and Investigations Financial Audits Branch (A&I FAB)
4. Alan Eng	DHCS, A&I FAB
5. Steve Perez	California Department of Education, Special Ed.
6. Bill Barnaby	California Speech-Language-Hearing Association (CSHA)
7. Robert Powell	CSHA
8. Anysia Drumheller	Butte County Office of Education (COE)
9. Michelle Cowart	Contra Costa COE
10. Christine Mott	Fresno USD
11. Diane Torna	Fresno USD
12. Roni Tunick	Los Angeles COE
13. Sherry Purcell	Los Angeles USD
14. Margie Bobe	Los Angeles USD
15. Laura Baynham	Mendocino COE
16. Tracy Cole	Natomas USD
17. Jeremy Ford	Oakland USD
18. Cathy Bennett	Sacramento City USD
19. Marlene Burrue	San Joaquin COE
20. Greg Englar	Sonoma COE
21. Janice Holden	Stanislaus COE
22. Kevin Harris	Navigant Consulting, Inc.
23. Gloria Eng	Navigant Consulting, Inc.

Handouts

Each participant received a copy of the Workgroup Meeting Agenda and New Services Subcommittee Formal Request Status Update from DHCS.

Purpose

The meeting was convened by DHCS. The purpose of the Workgroup is to improve the Local Educational Agency (LEA) Medi-cal Billing Option 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.

Local Educational Agency
Ad Hoc Workgroup Meeting
October 6, 2010 Meeting Minutes

Review of Meeting Minutes

The Workgroup did not review the September Meeting Minutes during the meeting; however can e-mail feedback to DHCS. DHCS will post the minutes on the LEA website. For future Workgroup meetings, DHCS will send the previous Meeting Minutes at least one week in advance for Workgroup review.

Speech-Language Pathologist Requirements

Robert Powell and Bill Barnaby from CSHA attended the meeting to discuss the current challenges with Speech-Language Pathologist (SLP) shortages in California.

Speech-Language Credentialing

- At one point, California was considering reducing the credentialing requirements for SLPs that provide school-based services; however California is no longer going to implement reduced credentialing requirements for SLPs
- In 2006, the California Commission on Teacher Credentialing (CCTC) established three types of credentialed speech language practitioners:
 - Practitioners with a preliminary services credential in speech-language pathology
 - Practitioners with a professional clear services credential in speech-language pathology
 - Practitioners with a valid credential issued by CCTC on or before January 1, 2007
- The California Attorney General issued an opinion in 2006 stating that the California credentialing requirements for SLPs with a preliminary or professional clear services credential in speech-language pathology are equivalent to the federal credentialing requirements
- The speech-language equivalency State Plan Amendment (SPA) has not yet been approved by CMS; DHCS noted that SPA 03-024 compliance is required by CMS prior to their consideration of any further SPAs
- Stakeholders are anxious to see the SPA implemented
- In addition, the Workgroup discussed SLP assistants and telepractice as an area to potentially expand the LEA Program
- DHCS will prepare a synopsis of the speech-language equivalency SPA for the December Workgroup meeting

DHCS SNFD Update

Cost and Reimbursement Comparison Schedule (CRCS) Training Updates Webinar

- The webinar is tomorrow, October 7th and will focus on the FY 2008-09 CRCS form updates
- A&I will present at the webinar and discuss findings during the pilot audit

Local Educational Agency
Ad Hoc Workgroup Meeting
October 6, 2010 Meeting Minutes

- The webinar will be recorded and available on the LEA website

FY 2008-09 CRCS Update

- FY 2008-09 CRCS Interim Reimbursement and Units of Service (IRUS) Reports have been e-mailed to the LEA contacts on file with DHCS
- DHCS will monitor the LEA.IRUS.Request@dhcs.ca.gov e-mail address and send out IRUS Reports to those who request another electronic copy

SB 231 Fees

- LEAs will not be charged the 2.5 percent SB 231 withhold for FY 2010-11
- DHCS prepared a draft memo to institute a policy to collect the SB 231 funding based on prior fiscal year LEA reimbursement
 - For example, DHCS would utilize FY 2010-11 LEA claims reimbursement to determine the LEA withhold amount for FY 2011-12
 - Sherry and Laura are currently reviewing the memo

Remittance Advice Detail (RAD) Code 9909

- LEA claims are denying for beneficiaries age 21 and older and receiving RAD code 9909
 - LEA services should be excluded from age limitations when the service is part of an IEP (contains modifier "TM")
- HP expects to implement the System Design Notice (SDN) and corresponding claims processing system changes by November or December
- An Erroneous Payment Correction (EPC) to retroactively pay claims erroneously denied with RAD code 9909 will be implemented after the system fix

FY 2009-10 Annual Report Form Changes

- DHCS converted the LEA Annual Report into Excel format to facilitate electronic submission and intake
- The Annual Report is available on the LEA Program website
- The Annual Report deadline is typically October 30th of every year; however due to changes in submission requirements and new electronic format, DHCS has allowed a "grace period" to submit the FY 2009-10 Annual Report
 - LEAs must submit their Annual Report by December 31, 2010 to be exempt from the late submissions penalty process
- The Workgroup discussed the penalty of LEAs that do not submit their Annual Report by December 31, 2010
 - DHCS plans to terminate LEAs from the LEA Program that are not compliant, as stated in the LEA Provider Participation Agreement
 - The Workgroup expressed concerns regarding notifying LEAs of the Annual Report deadline and penalty process
 - DHCS will create an LEA provider bulletin regarding the Annual Report

Local Educational Agency
Ad Hoc Workgroup Meeting
October 6, 2010 Meeting Minutes

American Recovery and Reinvestment Act (ARRA) Adjustments

- Increased Federal Medical Assistance Percentage (FMAP) was recently extended beyond December 2010
- The FMAP will decrease incrementally per quarter through June 2011 from 61.59 percent back to 50 percent
- DHCS will adjust LEA Program reimbursement rates accordingly

DHCS Audits and Investigations (A&I) Financial Audits Branch (FAB)

Evie Correa and Alan Eng of A&I FAB attended the meeting to discuss A&I's CRCS pilot audits.

FY 2006-07 and 2007-08 CRCS Pilot Audit

- A&I is currently undergoing their first pilot audit at Sacramento City USD and have been at the school site for a week reviewing their CRCS and documentation that supports the practitioner costs and hours information reported
- During the pilot audit, DHCS identified a global CRCS issue impacting the IRUS Reports generated for FY 2006-07, 2007-08 and 2008-09
 - The IRUS Reports contain overstated "Units of Service" for initial treatment services: psychology counseling (group and individual), speech therapy (group and individual), audiology, physical therapy and occupational therapy
 - Initial treatment services are billed based on 15-45 continuous minutes. One unit is billed for each 15-minute increment; a maximum of three units may be billed for the initial service (indicating 45-minutes of initial treatment service)
 - The "Units of Service" information on the IRUS Report incorrectly sums the total units billed (1, 2, or 3) instead of singularly reporting the total number of initial treatment service claims reimbursed
 - The overstated units impact the percent of time and the estimated cost of providing LEA services. This will ultimately impact the net Overpayment/(Underpayment) on the Certification page of the CRCS form
 - LEAs should not budget for the amount identified on the Certification page
 - LEAs will not be required to correct and resubmit their FY 2006-07 and 2007-08 CRCS forms to DHCS
 - DHCS will correct the issue internally for each LEA and A&I will make an audit adjustment during the reconciliation of each submitted CRCS form
 - For the FY 2008-09 CRCS, LEAs should continue to prepare and submit their completed CRCS forms to DHCS by November 30, 2010

Local Educational Agency
Ad Hoc Workgroup Meeting
October 6, 2010 Meeting Minutes

- DHCS will also correct the issue internally for each LEA and A&I will make an audit adjustment during the reconciliation of each submitted CRCS form
- The IRUS Report issue will be addressed during the CRCS training webinar
- The Workgroup expressed the documentation retention period of three years from the date the CRCS form is submitted
 - A&I acknowledged that due to the delay of FY 2006-07 and 2007-08 CRCS submissions, LEAs may have issues retrieving service documentation and records because the timing of the reconciliation process is beyond three years from claim date of services
- The Workgroup also discussed the Standardized Account Code Structure (SACS) change for recording sub agreements for contractor costs and object codes 5100 and 5800
- A&I will be scheduling their second pilot audit
- After their pilot audits are completed, A&I plans to conduct a CRCS training specifically addressing audit process, findings and documentation information

IRUS Reports

- The 2006 SPA implementation resulted in the claims processing issues and EPCs that were implemented over the years, making it difficult for LEAs to track units and reimbursement information by procedure code and modifier combinations for the FY 2006-07, 2007-08 and 2008-09 CRCS
- A&I has determined that the IRUS Reports generated from the paid claims data should eventually be phased out
 - The onus should be on the LEAs to track units and reimbursement information that are reported on the CRCS
 - A&I expressed their concern that LEAs are too reliant on the IRUS Reports
 - LEAs are instructed to utilize the IRUS Report information and verify the reasonableness between the LEA's internal accounting system and the IRUS Report and accurately input reimbursement and units of service information on the CRCS form
- The Workgroup expressed several concerns regarding their inability to capture actual units paid and reimbursement received from Medi-Cal
 - LEAs typically track billed units and reimbursement submitted to Medi-Cal
 - LEAs typically do not reconcile billed claims with paid claims information
 - This would require a line by line reconciliation to determine what claims were submitted and paid or denied
- After the Workgroup discussion, DHCS will discuss the choices and determine what the best approach is for LEAs reporting units of service and reimbursement information on the CRCS

Local Educational Agency
Ad Hoc Workgroup Meeting
October 6, 2010 Meeting Minutes

National Alliance for Medicaid in Education (NAME) Conference

The Workgroup briefly discussed the NAME conference, which was held September 22-24, 2010, and some of the presentations that they attended.

Workgroup Subcommittee Reports

Communications Subcommittee

- The Subcommittee is targeting three different groups to help increase LEA communications
 - Special Education Local Plan Area (SELPA) directors
 - County Office Finance Subcommittee (COFS)
 - California County Superintendents Education Services Association (CCSESA)

Training Subcommittee

- The Subcommittee received a few service documentation examples from the LEA Workgroup; however can use more examples of relevant and quality LEA service documentation
 - Service documentation is intended to supplement the self-audit checklist and show DHCS Audits and Investigations Medical Review Branch real world examples
- The Workgroup discussed potential future trainings and the use of video teleconference and utilizing CDE satellite sites
- In addition, the Workgroup discussed focused trainings and targeting the people who should be attending the trainings

Services Subcommittee

- The Workgroup discussed the formal request to DHCS to begin reviewing and researching new potential services to expand the LEA Program and DHCS October update
- The Workgroup expressed interest in reviewing the services currently included in the SPA and come up with a plan of action for developing new services to expand the LEA Program

Next Meeting

Wednesday, December 1, 2010 10:30am – 3:00pm at Natomas USD