

**Local Education Agency Medi-Cal Billing Option Program
Ad Hoc Workgroup Meeting
April 2, 2014 Meeting Minutes**

Location: Natomas Unified School District (USD)

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|-----|-------------------|--|
| 1. | Rick Record | DHCS, Safety Net Financing Division (SNFD) |
| 2. | Cheryl Ward | DHCS, SNFD |
| 3. | Angelia Johnson | DHCS, SNFD |
| 4. | Martin Alvarez | DHCS, A&I Financial Audits Branch (FAB) |
| 5. | Michael Donohue | DHCS A&I FAB |
| 6. | Christine Wilhite | Butte County Office of Education (COE) |
| 7. | Lisa Chaney | Fresno COE |
| 8. | Margie Bobe | Los Angeles USD |
| 9. | Tracy Cole | Natomas USD |
| 10. | Jeremy Ford | Oakland USD |
| 11. | Cathy Bennett | Sacramento City USD |
| 12. | Angela Jones | San Bernardino COE |
| 13. | Janice Holden | Stanislaus COE |
| 14. | Rob Roach | Twin Rivers USD |
| 15. | Kevin Harris | Navigant Consulting, Inc. |
| 16. | Gloria Eng | Navigant Consulting, Inc. |

Handouts

Each participant was emailed an electronic copy of the following: Workgroup Meeting Agenda, February 2014 Meeting Minutes, April DHCS Status Update Summary, LEA Workgroup Breakout Group Instructions and prep materials. In addition, a copy of the FY 2012/13 LEA Medi-Cal Billing Option Program Annual Accounting of Funds Summary Report was distributed at the meeting.

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.

Review of Meeting Minutes

The Workgroup reviewed the February meeting minutes. The minutes were discussed and approved. Meeting minutes will be posted on the LEA Medi-Cal Billing Option Program website.

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DHCS A&I Updates

- A&I FAB is working on reviewing FYs 2009/10, 2010/11 and 2011/12 CRCS submissions.
 - 800 minimal reviews have been conducted by auditors.
- A&I Audit Review and Analysis Section (ARAS) started sending letters to FY 2011/12 CRCS non-submitters, notifying LEAs that a withhold on future claims will be placed if a CRCS is not received.
 - Approximately 120 LEAs have not submitted yet.
- A&I FAB completed their follow-up with LEAs that have not submitted a CRCS report in FYs 2006/07, 2007/08 or 2008/09.
 - A&I FAB is currently issuing the audit reports now.

DHCS SNFD Status Updates

FY 2012/15 PPA / FY 2011/12 Annual Report (AR) Process (no change)

- SNFD has received 546 PPA/ARs to date. Of these, 540 are approved, 6 require corrections and 6 are new LEAs to the LEA Medi-Cal Billing Option Program.
- 11 LEAs have not submitted an AR.

FY 2011/12 Annual Accounting of Funds Report

- Report summary will be distributed and discussed at the Workgroup meeting.
- The Workgroup discussed the FY 2012/13 LEA Medi-Cal Billing Option Program Annual Accounting of Funds Summary Report and the methodology of collecting and returning the proportionate withhold to LEAs.
 - In previous years, SNFD manually started and stopped the withhold collection when the caps were reached. Due to the proportionate withhold collection, the withholds are collected for the entire fiscal year.
- Posting date TBD.

FY 2012/13 Rate Inflation EPC

- SNFD is working with Xerox to implement the EPC.
- Estimated implementation: April 2014 (subject to change).
- The Workgroup discussed the timing of the FY 2013/14 rate inflation and rate rebasing implementation to be compliant with SPA 03-024 (SPA requires rebasing to be done by summer 2014).
 - SNFD is currently considering the impact of Random Moment Time Study (RMTS) on rate inflation and rate rebasing, and is holding off on rate inflation and rate rebasing.

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FY 2012/13 Quarterly Reimbursement Report

- Report is on hold until FY 2012/13 Rate Inflation EPC is implemented.
- The Workgroup discussed the FY 2012/13 reimbursement rates and the potential issue of reimbursement rates rounding up or down incorrectly.
 - The Workgroup will identify the procedure codes that may be incorrectly rounding for SNFD review.
 - SNFD to review the information and discuss with ITMB and test sample claims to determine if the reimbursement rate is accurate.

Cost Settlement Withholds

- ITMB is optimistic that Xerox will be able to update the claims processing system to eliminate withholds on cost settlements by implementing an OIL, not a SDN, and projects a summer 2014 implementation.
- The Workgroup discussed the impact of over-collected withholds on CRCS cost settlements that have been already issued to LEAs.
 - CRCS cost settlements that have been issued were applied withholds.

2.5% and 1% Withhold Over-collections

- Over-collected withholds for A&I FY 2011/12, A&I FY 2012/13 and SB 231 FY 2012/13 are being reviewed and will be reimbursed to LEAs (dates TBD).

Site Visit Compliance Review Materials

- Draft compliance review package is under SNFD review.
- The goal of the site visits is to provide technical assistance to LEAs and not conduct pre-audit checks.
- SNFD intends to implement the site visit reviews in FY 2014/15.

LEA Onboarding Handbook

- Final draft is under SNFD review.
- Draft Onboarding Handbook will be available for reference during the LEA Medi-Cal Billing Option Program Model Workgroup meeting breakout session.

2014 LEA Medi-Cal Billing Option Program Documentation Training

- Scheduled for April 29, 2014 (9:00 a.m. to 11:00 a.m.)
- SNFD notified LEAs via eblast through CDE SELPA distribution and SNFD LEA contact list.
- Webinar will be recorded and posted on the DHCS video page (under Quick Links).

RMTS

- Currently RMTS is on hold until DHCS and the Stakeholders are able to determine the best possible implementation strategy to include both administrative claiming and direct billing.

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- The Workgroup discussed concerns of the LEA Medi-Cal Billing Option Program implementing RMTS for the fee-for-service program.
 - SNFD has conducted some preliminary background research on RMTS.
 - The Workgroup counseled the need for SNFD to be proactive on evaluating how RMTS could be properly operationalized in the LEA Medi-Cal Billing Option Program, the pros/cons and the impact for LEAs.
 - Additionally, if CMS requires RMTS to be implemented and the state plan is opened for CMS review, additional new services and/or practitioners should be added to expand the LEA Medi-Cal Billing Option Program.
 - The necessary new services and/or practitioners' research and background information must be conducted prior to new SPA submittal so SNFD is ready to move forward if the state plan is opened up.
- The Workgroup suggested that the June 2014 Workgroup meeting include a breakout session to discuss the different RMTS models and specifically itemize issues that SNFD has put on hold/delayed due to RMTS indecision/timing.
- SNFD noted the other areas of the LEA Medi-Cal Billing Option Program that are currently moving forward. These include the transportation regulations package, telehealth implementation, program requirements regulations package, and TCM SPA 12-009.

Telehealth

- According to B&P Section 2290.5(a)(3), the telehealth provider must be licensed in order to provide telehealth at a distant site.
 - The Workgroup discussed that the telehealth provider must be licensed in the state of California.
- SNFD and the Office of Legal Services (OLS) discussed the ASHA-equivalent credentialed speech-language pathologists. OLS supports W&I Code Section 14132.72 and requires the telehealth provider be licensed.
- OLS will provide SNFD with a Position Statement.
- SNFD and co-chairs will review OLS Position Statement, meet with CASHA and determine next steps regarding licensure issue.
- SNFD is moving forward with telehealth implementation for licensed SLPs.
- The new Telehealth section and revised Speech Therapy section of LEA Provider Manual is with management for approval and will be provided to co-chairs for review.
- Additional sections of the LEA Provider Manual will be updated (loc ed bil cd, loc ed bil ex and loc ed rend).
- Telehealth rate table and utilization controls will be established and must be implemented in the claims processing system.

Elimination of SLP Code 92506

- As of January 1, 2014, CMS eliminated CPT code 92506 (Evaluation of speech, language, voice, communication, and/or auditory processing) and replaced it with four new, more specific evaluation codes:

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- 92521 Evaluation of speech fluency (eg, stuttering, cluttering)
- 92522 Evaluation of speech sound production (eg, articulation, phonological process, apraxia, dysarthria)
- 92523 Evaluation of speech sound production (eg, articulation, phonological process, apraxia, dysarthria) with evaluation of language comprehension and expression (eg, receptive and expressive language)
- 92524 Behavioral and qualitative analysis of voice and resonance
- The four new codes were developed by ASHA, in collaboration with the American Medical Association.
- 92506 included many different evaluation procedures and the new codes reflect smaller components of the original 92506.
- Implementation deadline is July 1, 2014.
- SNFD is currently trying to identify the appropriate person at CMS to ask if the State must implement all four of the new CPT Codes to replace 92506.
- The Workgroup recommended SNFD/NCI research how other states are implementing this change in their school-based programs. SNFD considerations should include rate structure and reimbursement, LEA provider guidance, how it applies to initial/triennial, annual or amended assessments.
 - Cathy Bennett to reach out to NAME contacts to question how other states may be transitioning from procedure code 92506.

ICD-10 Update

- ICD-10 implementation has been delayed until at least October 1, 2015.

Targeted Case Management (TCM) Billing Documentation

- SNFD and CDE discussed the documentation requirements of TCM for the LEA Medi-Cal Billing Option Program and IDEA.
 - Per IDEA requirements services identified on an IEP/IFSP must be a related service and directly provided to the student. TCM is a function of an IEP.
 - SNFD may consider allowing LEAs to allow the TCM “care plan” reference the “IEP/IFSP” and identify the TCM services that will be provided to the student. The IEP should describe the specific related service(s) to assist the student in accessing necessary medical or educational services.

NCI Staffing

- Navigant announced a change in Project Manager beginning in April. Former Project Manager will come back to lead work product for SNFD and the Workgroup.
- Reduced NCI task requirements/hours from SNFD equate to no concerns about ability to provide continuing consulting expertise to SNFD and Workgroup.

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Workgroup Breakout Session

The goal of the Workgroup breakout sessions is to brainstorm challenges and barriers in smaller workgroups, and use combined expertise to provide guidance to DHCS and suggest planning and solutions.

- Workgroup members split into two groups to discuss two topics: 1) Review and evaluate the content of the draft LEA Transportation Mileage Documentation Guide and determine how the information should be distributed/communicated to LEAs, and 2) Identify internal school district models/sample organizational charts to assist LEAs with effective administration of the LEA Medi-Cal Billing Option Program.
- Each group was provided a flip chart and pens to document their breakout topics and goals of the topic. The groups then presented their potential breakout topics to the larger group. SNFD/NCI will review the information and recommendations.

Next Meeting

- SNFD tentatively scheduled for Wednesday, May 28, 2014 10:30am-4:00pm at DHCS.
- The Workgroup recommended that SNFD provide a summary of the year's breakout sessions, status and progress. In addition, the meeting should focus on planning for FY 2014/15, as well as recommended breakout sessions.