

LEA Medi-Cal Billing Option Program Cost and Reimbursement Comparison Schedule (CRCS) Issue

CRCS Issue

The CRCS Audit Pilot Project uncovered a global CRCS issue impacting the Fiscal Year (FY) 2006/07, 2007/08 and 2008/09 CRCS. The issue relates to the Interim Reimbursement and Units of Service (IRUS) Reports that were prepared and sent to LEAs by the Department of Health Care Services (DHCS). The IRUS Report summarizes paid claims data (units of service and reimbursement) by specific procedure code and modifier combinations.

The IRUS Reports contains erroneous “Units of Service” for initial treatment services for all LEAs. 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 information on the IRUS Report incorrectly sums the total units billed (1, 2, or 3 units depending on the initial treatment time), instead of singularly reporting the total number of initial treatment service claims reimbursed.

CRCS Impact

The IRUS Report overstates the Total Units (Worksheets A-4 and B-4, Column B), therefore overstating the calculation of Total Minutes (Worksheets A-4 and B-4, Column C) and the Medi-Cal Hours Reimbursed for Services (Worksheets A-4 and B-4, Column E). The Medi-Cal Hours Reimbursed for Services flows to Worksheet A-3/B-3 and is used to calculate the Percent of Time Providing LEA Services (Worksheet A-3/B-3, Columns G, I, K and M). The Percent of Time Providing LEA Services flows to Worksheets A and B (Columns E and G) and is used to calculate the estimated Cost of Providing LEA Services in Columns F and H. This will ultimately impact the net Overpayment/(Underpayment) on the Certification page of the CRCS form.

All LEA **initial treatment services** are impacted, including:

- Psychology Counseling Treatment – group and individual
- Speech Therapy Treatment – group and individual
- Audiology Treatment
- Physical Therapy Treatment
- Occupational Therapy Treatment

See the attached for a complete list of procedure code and modifier combinations impacted and the corresponding CRCS row numbers on Worksheets A-4 and B-4.

DHCS Corrective Action Steps

LEAs will not be required to correct and resubmit their FY 2006/07 and 2007/08 CRCS forms to DHCS. **DHCS will correct this issue internally** for each LEA and Audits and Investigations (A&I) will make an audit adjustment during the reconciliation of each submitted CRCS form.

LEA Action Steps for FY 2008/09 CRCS

LEAs should continue to prepare their FY 2008/09 CRCS forms and submit their completed CRCS to DHCS by November 30, 2010. **DHCS will correct this issue internally** for each LEA and Audits and Investigations (A&I) will make an audit adjustment during the reconciliation of each submitted CRCS form.

**LEA Medi-Cal Billing Option Program
Worksheet A-4 CRCS Rows Impacted by IRUS Error**

| Service Description | Procedure Code | IFSP (TL) or IEP (TM) Modidier | Other Required Modifier(s) | FY 2006/07 and 2007/08 CRCS Form Row | FY 2008/09 CRCS Form Row |
|--|----------------|--------------------------------|----------------------------|--------------------------------------|--------------------------|
| Psychologists | | | | | |
| IFSP Psychology Counseling, Individual Treatment - Initial | 96152 | TL | AH | 1m | 1g |
| IEP Psychology Counseling, Individual Treatment - Initial | 96152 | TM | AH | 1o | 1i |
| IFSP Psychology Counseling, Group Treatment - Initial | 96153 | TL | AH | 1q | 1k |
| IEP Psychology Counseling, Group Treatment - Initial | 96153 | TM | AH | 1s | 1m |
| Social Workers | | | | | |
| IFSP Psychology Counseling, Individual Treatment - Initial | 96152 | TL | AJ | | 2g |
| IEP Psychology Counseling, Individual Treatment - Initial | 96152 | TM | AJ | | 2i |
| IFSP Psychology Counseling, Group Treatment - Initial | 96153 | TL | AJ | | 2k |
| IEP Psychology Counseling, Group Treatment - Initial | 96153 | TM | AJ | | 2m |
| Counselors | | | | | |
| IFSP Psychology Counseling, Individual Treatment - Initial | 96152 | TL | - | | 3g |
| IEP Psychology Counseling, Individual Treatment - Initial | 96152 | TM | - | | 3i |
| IFSP Psychology Counseling, Group Treatment - Initial | 96153 | TL | - | | 3k |
| IEP Psychology Counseling, Group Treatment - Initial | 96153 | TM | - | | 3m |
| Speech-Language Pathologists | | | | | |
| IFSP Speech Therapy, Individual Treatment - Initial | 92507 | TL | GN | | 7g |
| IEP Speech Therapy, Individual Treatment - Initial | 92507 | TM | GN | | 7i |
| IFSP Speech Therapy, Group Treatment - Initial | 92508 | TL | GN | | 7k |
| IEP Speech Therapy, Group Treatment - Initial | 92508 | TM | GN | | 7m |
| Audiologists | | | | | |
| IFSP Audiology, Individual Treatment - Initial | 92507 | TL | - | | 8g |
| IEP Audiology, Individual Treatment - Initial | 92507 | TM | - | | 8i |
| Physical Therapists | | | | | |
| IFSP Physical Therapy Individual Treatment - Initial | 97110 | TL | GP | | 9g |
| IEP Physical Therapy Individual Treatment - Initial | 97110 | TM | GP | | 9i |
| Occupational Therapists | | | | | |
| IFSP Occupational Therapy Individual Treatment - Initial | 97110 | TL | GO | | 10g |
| IEP Occupational Therapy Individual Treatment - Initial | 97110 | TM | GO | | 10i |
| Physicians/Psychiatrists | | | | | |
| IFSP Psychology Counseling, Individual Treatment - Initial | 96152 | TL | AG | | 11g |
| IEP Psychology Counseling, Individual Treatment - Initial | 96152 | TM | AG | | 11i |
| IFSP Psychology Counseling, Group Treatment - Initial | 96153 | TL | AG | | 11k |
| IEP Psychology Counseling, Group Treatment - Initial | 96153 | TM | AG | | 11m |

**LEA Medi-Cal Billing Option Program
Worksheet B-4 CRCS Rows Impacted by IRUS Error**

FY 2006/07,
2007/08 and
2008/09 CRCS
Form Row

| Service Description | Procedure Code | Required Modifier(s) | Form Row |
|--|----------------|----------------------|----------|
| Psychologists | | | |
| Non-IEP/IFSP Psychology Counseling, Individual Treatment - Initial | 96152 | AH | 1c |
| Non-IEP/IFSP Psychology Counseling, Group Treatment - Initial | 96153 | AH | 1e |
| Social Workers | | | |
| Non-IEP/IFSP Psychology Counseling, Individual Treatment - Initial | 96152 | AJ | 2c |
| Non-IEP/IFSP Psychology Counseling, Group Treatment - Initial | 96153 | AJ | 2e |
| Counselors | | | |
| Non-IEP/IFSP Psychology Counseling, Individual Treatment - Initial | 96152 | - | 3c |
| Non-IEP/IFSP Psychology Counseling, Group Treatment - Initial | 96153 | - | 3e |
| Speech-Language Pathologists | | | |
| Non-IEP/IFSP Speech Therapy, Individual Treatment - Initial | 92507 | GN | 7a |
| Non-IEP/IFSP Speech Therapy, Group Treatment - Initial | 92508 | GN | 7c |
| Audiologists | | | |
| Non-IEP/IFSP Audiology, Individual Treatment - Initial | 92507 | - | 8a |
| Physical Therapists | | | |
| Non-IEP/IFSP Physical Therapy Individual Treatment - Initial | 97110 | GP | 10b |
| Occupational Therapists | | | |
| Non-IEP/IFSP Occupational Therapy Individual Treatment - Initial | 97110 | GO | 11b |
| Physicians/Psychiatrists | | | |
| Non-IEP/IFSP Psychology Counseling, Individual Treatment - Initial | 96152 | AG | 12e |
| Non-IEP/IFSP Psychology Counseling, Group Treatment - Initial | 96153 | AG | 12g |