

ADMINISTRATION AND AUDIT CHECKLIST

The "Administration and Audit Checklist" is meant to assist LEAs in meeting the basic administration and management requirements of the LEA BOP. It is designed to help you submit and retain the required documents and double-check the information you submit to avoid common errors. LEAs are not required to submit this checklist to DHCS. LEAs are ultimately responsible for administrative functions and should be familiar with the <u>LEA BOP website</u>, department policies, program regulations, and the <u>LEA BOP Provider Manual</u>, which is the primary resource guide for this program and contains additional program requirements for the LEA BOP.

How to Use the Checklist

Each of the following tables in the checklist has three columns. Use the first column to indicate when the step is complete. The middle column shows the required documents to gather for submission, program requirements, or common errors to avoid. The last column is a place for you to provide the file path for the document or link to other relevant resources. Blank lines have been included for individual use.

Figure 1. Timeline of Key Program Administration Dates and Activities

Q1	Q2 RMTS Moments	Q3 RMTS Moments	Q4 RMTS Moments
JUL AUG SEP • AUG Prepare Quarter 2 Time Survey Participant list	OCT NOV DEC OCT Collect Annual Medi-Cal Eligibility Ratio data NOV Prepare Quarter 3 Time Survey Participant list NOV 30 Annual Report Data Use Agreement (submit once every three years)	• FEB Prepare Quarter 4 Time Survey Participant list • MAR 1 Submit Cost and Reimbursement Comparison Schedule	MAY 15 Submit claims by May 15 to ensure they get paid within the fiscal year JUNE (Optional) Review Time Survey Participant list to prepare for next year

Services billed and cost tracked all -

*Time Survey Participant list due dates are based on your LEC contract



Practitioner and Service Log Checklist

Done	Service Log Requirements	Notes
	Proper documentation of service must include:	
	☐ Student's name	
	Student's date of birth	
	☐ Date of service	
	☐ Place of service	
	 Description of service, including detailed documentation of time spent with student to bill for time-based procedure codes 	
	 Name (or agency), title, and signature of the person rendering service, and supervisor's signature, if required 	
	Progress and case notes	



Review to Avoid Common Errors

Done	Service Log Requirements	Notes
	Confirm that the student's progress, concerns, observations, assessment, or plan are documented.	
	Update written prescriptions for all individual therapy/treatment services annually and maintain them in the student's files.	
	Check that the student had an Individualized Health and Support Plan (e.g., IEP, IFSP, Individualized school healthcare plan, plan of care, treatment plan, nursing plan) at the time of service.	
	Ensure the services are medically necessary.	
	Confirm that the practitioner's license and/or credential were active for the date of service.	
	Check that Ordering, Referring, or Prescribing (ORP) Practitioners are in place for each service. Each services section of the provider manual defines which practitioners are authorized as ORP practitioners. The practitioner's NPI number must be included in the claim, and they must be enrolled as a Medi-Cal ORP provider.	
	Ensure the rendering practitioner is qualified within their scope of practice.	



For Specialized Medical Transportation Services, you will want to review these additional documentation requirements.

Done	Specialized Medical Transportation Services	Notes
	Transportation must be to or from an on-site/off-site medical service for IEP/IFSP students.	
	Any mileage billed must be supported by odometer documentation or a mapping system.	
	Billed one-way trips must be supported by a transportation trip log (trip, mileage, pick-up, and drop-off locations for each child).	
	Transportation Services must only be billed for a day when the student received a Medicaid-covered service (other than transportation) at the service site, and both the covered service and the transportation are authorized in the student's IEP or IFSP.	



Random Moment Time Survey (RMTS) Checklist

The Random Moment Time Survey (RMTS) is a time study mechanism that California uses to determine the amount of time spent on activities throughout a participant's workday. For the LEA BOP, the time measured is turned into Direct Medical Services Percentage, which directly impacts the Cost and Reimbursement Comparison Schedule. It is important to maintain the Time Survey Participant (TSP) list and ensure timely responses to moments to correctly allocate time and cost in LEA BOP. Review the DHCS RMTS website for more information on the program.

Done	Managing RMTS	Notes
	Identify LEA's SMAA/RMTS coordinator annually.	
	Include all qualified and employed health service practitioners in Participant Pool 1 as a TSP.	
	Remind TSPs to complete their moments, as needed, to achieve the required 85% moment response rate.	
	Update the TSP list quarterly or by the deadline set by your LEC to match the current list of employed practitioners.	
	Save Code 2A documentation showing that billable activities occurred during the moment(s).	



Review to Avoid Common Errors

Done	Managing RMTS	Notes
	Review coded moments to make sure they are coded correctly.	
	Submit TSP Equivalency request forms 45 days before the next quarter for any staff person who will perform qualified activities using a job classification that is not on the approved list.	



CRCS Submission Checklist

Under the LEA BOP, LEAs must annually certify that the public funds expended for LEA BOP services are eligible for federal financial participation (FFP). DHCS must reconcile the interim Medi-Cal reimbursements received by LEAs with the costs to provide the Medi-Cal services. The Cost and Reimbursement Comparison Schedule (CRCS, or "cost report") is used to compare each LEA's total actual costs for LEA BOP services to interim Medi-Cal reimbursement for a specific state fiscal year. Continued enrollment in the LEA BOP is contingent upon the annual submission of a CRCS.

Done	Documents to Gather	Notes
	Completed CRCS	
	Completed and signed Certification and Signature Document	
	Completed Source Documents (see below)	

Source Documents (aka Grouping Schedules/Bridging Documents)

Done	Documents to Gather	Notes
	Production log containing columns for:	
	Practitioner name	
	Job classification	
	Service dates	
	Units of service	
	The financial log containing resource and object codes for all salary, benefits, and other costs documented on the CRCS.	



Done	Documents to Gather	Notes
	Contractor log including contractor or agency name, total amount paid, and total hours paid for all contractor costs documented on the CRCS submission checklist.	

Review to Avoid Common Errors

Done	Documents to Gather	Notes
	Calculate the Medicaid Eligibility Rate (MER) correctly.	
	Check that the data entry on the CRCS Excel file matches the data on the source documents (correct negative/positive numbers, percentages input).	
	Remove any student identifying information and/or practitioner Social Security Numbers/addresses/phone numbers from the production log.	
	Cross-check the practitioners listed by quarter with your TSP list to ensure that only practitioners who are on the TSP list for the quarter marked moments during the quarter.	

Submit documents to: lea.crcs.submission@dhcs.ca.gov. Due March 1, for the previous school year (July 1 through June 30). For example, the CRCS for 2023-24 school year is due March 1, 2025.



Record Retention

Keep records for a minimum of three years from the date of submission of the CRCS or until the final audit settlement is complete, whichever comes later (W&I Code, Section <u>14170</u>).

Note: If an audit and/or review is in process, LEA providers shall maintain documentation until the audit/review is completed and all appeal rights have been exhausted, regardless of the three-year record retention time frame. Records need to be maintained even if the student graduates.

In addition, for record-keeping purposes, LEA providers should carefully review the full text of the W&I Code, Chapter 7 (commencing with <u>Section 14000</u>) and, in some cases, Chapter 8. Other record keeping requirements of the Medi-Cal program are found in the *Provider Regulations* <u>section of the Part 1 Medi-Cal provider manual</u>.

Save all documents to internal drive for audits and record retention for at least three years or until the final audit settlement is complete.

