

Meeting Overview

The LEA BOP Quarterly Meeting (QM) was hosted by the Department of Health Care Services (DHCS) on January 29, 2025, via webinar. Prior to the meeting, materials were distributed to participants via e-mail and are available on the DHCS website at: [LEA Quarterly Meeting Summaries \(ca.gov\)](https://www.dhcs.ca.gov/Programs/Pages/LEA-BOP-Quarterly-Meeting-Summaries.aspx). Approximately 280 attendees were present at the January 2025 meeting.

Quarterly Meeting Minutes

- » October 2024 meeting minutes are available [online](#).
- » Comments on the October 2025 Quarterly Meeting Minutes should be sent via e-mail to the LEA Inbox at LEA@DHCS.ca.gov.
 - If no feedback is received, the meeting minutes will be considered final.
 - If feedback that substantively changes the minutes is received, the modified minutes will be sent via e-blast and posted online.

Update from the California Department of Public Health (CDPH)

- » CDPH provided an update on achievements of the Office of School Health (OSH), including OSH guidance, policies, and resources on matters of public health importance (e.g., substance use, mental health, and developing the epinephrine standing order). OSH provides technical assistance to local health and education partners. Local partners can connect with OSH at SafeSchoolsTeam@cdph.ca.gov and learn more at [CA School Health Readiness Hub](https://www.cdph.ca/Programs/CID/DCDC/Pages/Imz/Pages/CA-School-Health-Readiness-Hub.aspx).

Local Governmental Financing Division (LGFD): Program Status Updates

Children and Youth Behavioral Health Initiative (CYBHI) Fee Schedule and the Impact on LEA BOP

- » DHCS discussed details of the concurrent participation in the CYBHI Fee Schedule and the LEA BOP, including how to ensure the CYBHI Fee Schedule

payments and LEA BOP reimbursements are not duplicated for services that may overlap between the two programs.

- » DHCS answered questions on the LEA BOP cost settlement process and requirements for LEAs participating in both CYBHI and the LEA BOP. Additional questions or requests for clarification on participating in both programs may be sent to LEA@DHCS.ca.gov.
- » Questions on the CYBHI Fee Schedule can be directed to DHCS.SBS@dhcs.ca.gov.
- » DHCS emphasized the importance of ensuring duplicate payments are not made for the same service/practitioner/student and provided best practices on the development of the Time Survey Participant (TSP) List and the impact of CYBHI Fee Schedule payments on the Cost and Reimbursement Comparison Schedule (CRCS).

Billing for Crisis Evaluations and Treatment Services

- » While the LEA BOP does not currently cover crisis evaluations or risk assessments, follow up crisis-related treatment services are billable if they are pursuant to a care plan.
- » DHCS is proposing to include crisis evaluation services in the next State Plan Amendment (SPA) and will update program partners with additional information as it becomes available.

SPA Update

- » DHCS is drafting two SPAs for submission to the Centers for Medicare and Medicaid Services (CMS) in 2025:
 1. **Expansion / “Clean-Up” SPA 1:** This SPA promotes participation by removing barriers, expands covered services and adds accompanying rates, expands qualified rendering practitioners, clarifies portions of the current State Plan and incorporates recent legislative updates (Assembly Bills 483 and 1722).
 2. **Reimbursement Methodology SPA 2:** This SPA brings DHCS into compliance with the 2023 CMS Comprehensive Guide to Delivering School-Based Services, clarifies/updates portions of the LEA BOP payment methodology, including removing “proxy” rates for many practitioner types, updating elements of the Random Moment Time Survey (RMTS) and clarifying the calculation of the Medi-Cal Eligibility Ratio (MER). Additionally, the RMTS Guide (also known as the Time Study Implementation Plan, or TSIP) will be submitted with this SPA for CMS review and approval, prior to anticipated implementation in July 2026.

- » The submission of two SPAs (instead of one) allows the LEA BOP to expand the program and allows LEAs to access additional federal funds in the short term, while waiting until the July 2026 compliance deadline to incorporate CMS requirements that will result in additional administrative burden to LEAs.
- » DHCS discussed an anticipated effective date of July 1, 2025, for SPA 1 and an anticipated effective date of July 1, 2026, for SPA 2. The finalized timelines for both SPA 1 and 2 approval and implementation will ultimately depend on the CMS review and approval timeline.

Reminders

Annual Report Reminder

- » The Fiscal Year (FY) 2024-25 Annual Report was due on November 30, 2024, and DHCS accepted submissions until December 20, 2024. As of January 28, 2025, DHCS has received 500 out of 588 reports.
- » DHCS reminded LEAs that they are required to complete and submit an Annual Report every year. LEAs that have not yet submitted their FY 2024-25 Annual Report should electronically submit the Report (with a digital signature) to LEA.AnnualReport@dhcs.ca.gov as soon as possible.

Summer 2025 Quarterly Meeting Date Change

- » The Summer 2025 Quarterly Meeting will be held on the first Wednesday in August (August 6, 2025). This adjustment should help accommodate everyone's schedules and the start of the school year as everyone is wrapping up their summer breaks.

Mental Health Coordination

- » On November 5, 2020, DHCS published [Policy and Procedure Letter \(PPL\) #20-051](#) regarding LEA coordination of mental health services with their respective Special Education Local Plan Area (SELPA), County Office of Education (COE), County Mental Health Plan (MHP), and Managed Care Organization (MCO).
- » Allowable mental health-related services may be covered under the LEA BOP by a qualified practitioner. LEAs may work with health plans and SELPAs to coordinate services and refer students to contracted community-based programs or approved qualified rendering practitioners.

Communication Resources

- » General Questions & TA Requests: LEA@dhcs.ca.gov
- » Compliance Forms & Documents: LEA.AnnualReport@dhcs.ca.gov

- » Annual Report Submissions: LEA.AnnualReport@dhcs.ca.gov
- » RMTS & TSP Lists: RMTS@dhcs.ca.gov
- » CRCS Submissions & Requests: LEA.CRCS.Submission@dhcs.ca.gov
- » Audit Questions & Reports: LEAAuditQuestions@dhcs.ca.gov
- » To receive LEA BOP program information and updates, please subscribe here: <http://apps.dhcs.ca.gov/listssubscribe/default.aspx?list=DHCSLEA>
- » New LEA Program Tool Box Webpage: <https://www.dhcs.ca.gov/provgovpart/Pages/LEAToolBox.aspx>

Program Summary Updates

Program Guide Updates

- » The FY 2023-24 CRCS webpage has been published. Various reports to support LEAs in completing the CRCS will be added soon, including the Annual Reimbursement Report, the Federal Medical Assistance Percentage (FMAP) Grouping Percentages Report, the Program Administrative Withhold Report, and the Specialized Medical Transportation Report.
 - The Certification of Zero Reimbursement (Form 6299A) is available to LEAs upon request from the LEA inbox at LEA@dhcs.ca.gov.
- » Starting with the FY 2023-24 CRCS, the LEA BOP Program Administration Withhold balance will be reconciled using the CRCS (details found on Worksheet A). Per Assembly Bill 483, a total withhold will be assessed to each participating LEA BOP provider, up to a maximum of five (5) percent of each LEA's total allowable Medicaid payments.
 - Using the CRCS to reconcile each LEA's administrative withhold (instead of the LEA's interim payments) allows DHCS to better ensure that each LEA contributes an equitable amount.
- » The CRCS will no longer include an allocation of indirect costs to contractor costs (object code 5800) per the May 2023 CMS Comprehensive Guide.
- » The COVID-related FMAP increase will conclude with the FY 2023-24 CRCS. As of January 2024, all reimbursements reverted to 50 percent federal matching funds.

Erroneous Withholds on Interim Settlements (RAD 709)

- » DHCS has implemented changes to the claims processing system to exempt Interim Settlement payments issued with Remittance Advice Details (RAD) Code 709 from the administrative withhold.

- » DHCS is continuing to explore options to return erroneously withheld funds to LEAs related to the processing of FY 2020-21 and FY 2021-22 interim settlements.

Unsatisfactory Immigration Status (UIS) Recoupment

- » In December 2021, [PPL #21-015R](#) was published advising LEA BOP providers that Medi-Cal beneficiaries with an unsatisfactory immigration status (UIS) would not be eligible for Federal Financial Participation (FFP).
- » DHCS will be initiating an Erroneous Payment Correction (EPC) for claims paid for Medi-Cal members with UIS to ensure that federal funding is not drawn down for these beneficiaries. The recoupment will cover dates of service from April 1, 2022, through June 26, 2023.
- » The EPC process will result in 100 percent recoupment of impacted LEAs' future check writes until the total outstanding amount is recouped. Recoupments will appear on RAD forms beginning December 30, 2024, under RAD code 0819: Void and resubmit of claims processed in error.
- » On January 3, 2025, DHCS sent e-mail notifications to LEAs that owe \$5,000 or more to DHCS as a result of this EPC.

Technical Assistance

- » DHCS has provided 20 Technical Assistance visits since the October Quarterly Meeting, which covered a variety of topics such as explaining audit adjustments with a 25 percent or greater difference between the reported amount and the final settlement amount, providing general LEA BOP overview information to new providers or staff, answering enrollment questions, and providing CRCS assistance. If you are interested in a Technical Assistance visit, DHCS encourages you to [submit your request](#) as soon as possible.

Afternoon Session

The afternoon session provided an overview of common audit adjustments and LEA BOP documentation requirements. DHCS also provided a recap of possible interim payment methodology flexibilities (presented in the 2023 CMS Comprehensive Guide to Delivering School Based Services) to prepare LEAs to respond to a provider survey asking for feedback on whether LEAs are interested in pursuing changes to the interim payment methodology. DHCS noted that they will hold a Payment Methodology Office Hour session on February 4, 2025, from 10:00 a.m. – 11:00 a.m. LEAs were advised that they could bring additional questions and comments on the payment methodology options to that meeting.

Common Audit Adjustments

- » Audits & Investigations (A&I) provided an overview of the pre-audit analysis (e.g., scoping tools, audit types) and common audit procedures and findings for allocation statistics, salary and benefit data, and contractor costs.
- » A&I additionally provided tips and best practices to avoid common audit adjustments including verifying allocation statistics prior to submitting the CRCS, maintaining proper documentation to support reported costs, and only including practitioner costs for individuals listed on the Participant Pool 1 TSP list.
- » A&I reminded LEAs that their assigned auditor is the primary point of contact for audit questions and information. Each assigned auditor will reach out to their LEAs to confirm points of contact, answer clarifying questions, send correspondence and documentation requests, and hold exit conferences.
- » Additional audit questions can be directed to LEAAuditQuestions@dhcs.ca.gov.

LEA BOP Documentation Training

- » The LEA BOP provided a documentation training on the proper handling, storage, and recording of Medi-Cal claims supporting information and documentation. The training provided an overview of various documentation and authorization requirements under the LEA BOP, best practices, and direct service moment documentation examples.
- » The LEA BOP reminded the LEAs that they are responsible to ensure that records are kept, maintained and readily retrievable to support services billed under the LEA BOP and that the absence of documentation can lead to a negative impact on their CRCS. Lack of sufficient service documentation is one of the most frequent reasons for large negative impacts to the amount reported on the cost report and the final settlement amount. It was emphasized that when A&I audits a provider, they are auditing the LEA (as a Medi-Cal provider), and they are not auditing their billing vendor. This training will be posted on the LEA BOP website shortly.

Next LEA BOP Quarterly Meeting: Wednesday, April 30, 2025,

10:30 a.m. – 3:00 p.m. Pacific Time

(Webinar via Microsoft Teams)