

LEA BOP APRIL QUARTERLY STAKEHOLDER MEETING MINUTES

April 24, 2024

Meeting Materials

- » Meeting materials were distributed to participants via e-mail and are available on the Department of Health Care Services (DHCS) website at: [LEA Quarterly Stakeholder Meeting Summaries \(ca.gov\)](https://www.dhcs.ca.gov/Programs/Pages/LEA-Quarterly-Stakeholder-Meeting-Summaries.aspx).
- » Approximate number of attendees: 240

Stakeholder Meeting Minutes

- » January 2024 meeting minutes are available [online](#).
- » Comments on the April 2024 Stakeholder 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.

Audits and Investigations (A&I) Updates

- » For the back casted Cost and Reimbursement Comparison Schedule (CRCS) reports for fiscal years (FYs) 2015-16 through 2017-18, A&I clarified that the final settlement amount takes the initial audit settlement into consideration. For example, if the initial settlement results indicate that the LEA owed DHCS \$1,000 and the amended settlement indicated that DHCS owed the LEA \$3,000, the LEA would receive a net payment of \$4,000.
- » Settlements will be issued to the LEA within approximately three weeks from mail and/or email received date.
- » Questions specific to your LEA's audit can be directed to: LEAAuditQuestions@dhcs.ca.gov.

Children and Youth Behavioral Health Initiative (CYBHI) Updates

- » Representatives from the DHCS Office of Strategic Partnerships (OSP) attended the meeting to provide an update to LEAs. DHCS is using a phased approach to implementation of the CYBHI statewide multi-payer fee schedule:
 - Phase 1 - Early Adopters (already selected to participate as "Cohort 1").
 - Phase 2 - Selection expansion for LEAs and community colleges with applications due June 30, 2024 ("Cohort 2").

- Phase 3 - Rolling Opt-In (applications open to all LEAs that meet operational readiness standards on/after July 2025).
- » DHCS discussed milestones for the multi-payer fee schedule. Over the last several months, OSP has focused on drafting guidance, identifying procedure codes and rates for services, educating Cohort 1 members through learning sessions and office hours, and selection of the Third-Party Administrator (TPA), Carelon Behavioral Health.
- » This summer claims submissions for Cohort 1 are expected to begin. The first date of service that is eligible for payment is July 1, 2024; however, actual billing cannot begin until cohort members have completed the onboarding process and DHCS has received Centers for Medicare & Medicaid Services (CMS) approval.
- » Please reach out to DHCS.SBS@dhcs.ca.gov with any questions.

LGFD Status Update Summary Highlights and Discussion Points

Mental Health Coordination

- » DHCS published [Policy and Procedure Letter \(PPL\) 20-051](#) on November 5, 2020, regarding 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).
- » The Local Educational Agency Medi-Cal Billing Option Program (LEA BOP) covers mental health-related assessment and treatment services (e.g., psychological assessments, psychosocial status assessments, health education/anticipatory guidance, and psychology and counseling treatments).
- » Allowable services may be provided to students by qualified practitioners and billed by participating LEAs. LEAs may refer students to contracted community-based organizations or approved qualified practitioners.

Electronic Cost Reporting

- » DHCS is streamlining the process for CRCS submission by implementing an electronic submission process using DHCS's Enterprise Cost Reporting System (ECRS). DHCS aims to transition to an electronic reporting process for the FY 2023-24 cost report, which is due March 1, 2025.
- » The CRCS will be submitted through an online portal or electronic form rather than the current Excel document that is posted on the LEA BOP website. The

electronic submission process will be a requirement for all LEAs. The new CRCS reporting process should lead to fewer rejected cost reports because the system provides an option to auto-populate information and identify errors before submission.

- » DHCS emphasized the importance of LEAs keeping their contact information updated, noting that prior to system implementation, DHCS will send out detailed information that will provide information on how to access the portal at the appropriate time.

State Plan Amendment (SPA) 15-021 and the 2023 Center for Medicare & Medicaid Services (CMS) Guidance

- » DHCS noted differences between SPA 15-021 and the 2023 CMS Guidance. The Ad Hoc Workgroup sub-committees are discussing these differences, and DHCS will report back on the next steps in a future meeting.
- » Even with the 2023 CMS Guidance, DHCS is operating under current policy until LEAs receive notice of updates, including interim claim submission requirements that are a part of the current State Plan methodology.
- » DHCS develops the Federal Medicaid Assistance Percentage (FMAP) Grouping Reimbursement Report using applicable aid codes based on student eligibility. Some aid codes are associated with enhanced funds for interim claims. The aid codes are based on the student's eligibility, which is how we identify those enhanced funds.
- » DHCS wants to ensure that LEAs are maximizing federal funding by receiving enhanced funds and encourages LEAs to submit interim claims for all Medi-Cal beneficiaries receiving covered LEA BOP services. Please note that DHCS is only able to identify these enhanced funds through interim claims and can then only develop the FMAP grouping report to verify these funds.

Data Use Agreement (DUA) FY 2025-2028

- » LEA BOP is drafting an updated DUA, which will be due toward the end of this calendar year.
- » DHCS plans to finalize the new DUA by mid-July, allowing LEAs ample time to review and submit the required document by the November 30 due date. DHCS will update LEAs with an e-blast as updates become available.
- » LEA BOP provided updates on the opt-in DUA that was developed last year in response to the termination of the Public Health Emergency.

- Although only a small number of LEAs took advantage of the revised DUA to assist with Medi-Cal redetermination work, DHCS recognizes the importance of possibly continuing to allow the DUA to cover these scenarios and will investigate the feasibility of maintaining the additional information in the next DUA update.

New Time Survey Participant (TSP) Equivalency Form Process

- » DHCS provided updates on the TSP Equivalency Request (EQ Form) and the submission process.
- » The information and EQ Form shall remain the same, but the submission process has changed. LEA Coordinators must now submit their EQ Forms for Pool 1 TSPs to their Local Education Consortia (LEC) Coordinator, who will then submit forms to DHCS. When DHCS completes the review, the analyst will send approval or denial to the LEC and include the LEA with their response. This process was changed to ensure everyone is in the loop and to streamline the process when new TSPs are added to the TSP list.
- » This change is currently effective; DHCS is updating PPL 20-031 to reflect the new approach.
- » DHCS noted that the TSP EQ Forms are due to DHCS 45 days before the start of the quarter. LEC Coordinators are not responsible for verifying applicable qualifications.

Fair Share Reimbursements/Surplus Funds Payments

- » DHCS provided an update on the LEA reimbursement withhold that covers costs associated with program-related and administrative functions.
- » DHCS conducts a Fair Share analysis to ensure that all LEAs contribute proportionately into the withholds. When funds are over-withheld, they are proportionately returned to LEAs.
- » DHCS has yet to settle several years' worth of Fair Share contributions, due to investigating and reconciling a surplus of funds in the withhold account. DHCS informed LEAs that the surplus amount is approximately \$1.5 million. DHCS thanked LEAs for their patience and emphasized that the payout of surplus funds is a departmental priority.

Ad Hoc Workgroup Application Process

- » DHCS provided updates on the Ad Hoc Workgroup and upcoming application process. The Ad Hoc Workgroup is identified in Welfare and Institution Codes

14115.8 and 14132.06 as a collaborative group exclusively of LEA providers and LEC representatives that work with DHCS on various school-based Medicaid subject areas.

- » DHCS developed an Ad Hoc Workgroup in FY 2023-24 and established sub-committees for various program areas such as Rate Rebasing, CMS 2023 Guidance Review, Provider Participation Agreement (PPA), Random Moment Time Survey (RMTS), and a Policy (Provider Manual/Policy & Procedure Letter) general group that focused on updates to the LEA BOP provider manual and PPLs.
- » Due to a large interest, DHCS has developed an application process and announced the opportunity (via the LEA BOP listserv on April 22, 2024) to join the upcoming FY 2024-25 Ad Hoc Workgroup.
- » Applications are due May 15, 2024, and all applications must be sent to the LEA inbox with the subject title, "Ad Hoc Workgroup Application FY 2024-25". DHCS will notify selected qualified candidates in July.
- » Please reach out to LEA@dhcs.ca.gov with additional questions and to submit an application.

Updating LEA Contact Information/Address Changes

- » The Annual Report is due November 30 each year. DHCS noted that if LEA information changes after the Annual Report is processed, but before the next report is due, it is important to promptly notify LEA BOP.
- » DHCS noted the following necessary updates:
 - Contact Information: To ensure that LEA BOP can contact the correct people for important program information.
 - Address Change: To ensure LEAs can receive warrants at the correct address.
 - Employer Identification Number (EIN): To avoid billing/claiming issues.
- » DHCS provided the following information on how to make updates:
 - Submit the first two pages of the Annual Report (Medi-Cal Provider Enrollment Information Sheet) to: LEA.AnnualReport@DHCS.ca.gov.
 - Subject: "UPDATE: Provider Contact/Address Change/EIN".
 - Safeguard communication that may contain confidential information or Protected Health Information.
 - "Encrypt" feature on Microsoft Outlook.
 - [SECURE] Subject: UPDATE: Provider Contact/Address Change/EIN.

Cost and Reimbursement Comparison Schedule (CRCS)

- » DHCS provided updates on the CRCS submission process. The FY 2022-23 CRCS was due March 1, 2024. Once submitted and accepted, LEAs will receive an e-mail from A&I confirming CRCS acceptance. Rejected CRCS submissions are required to be corrected and resubmitted in a timely manner. Currently, 330 CRCS reports have been accepted by A&I for FY 2022-23 out of approximately 525 providers.
- » DHCS reminded LEAs of the new Worksheet G on the CRCS for FY 2022-23 to gather data for rate rebasing. Worksheet G is not part of the cost settlement process and will only be used to help DHCS rebase the interim payment rates for the next FY. Rebased rates will be effective as of July 1, 2024.

Policy & Procedures Letter 21-025 Reminder

- » LEA BOP providers are required to submit the CRCS report annually to DHCS by March 1. DHCS has completed its outreach and collection of outstanding CRCS reports from the previous FY, spanning FY 2014 through 2022. DHCS will begin contacting LEAs regarding unfiled CRCS for FY 2022-23 in May 2024.
- » DHCS will be implementing [PPL 21-025](#) which outlines the process for addressing non-compliant LEAs with unfiled CRCS reports for FY 2022-23 and provides the following reminders on the compliance process:
 - LEAs that remain unfiled will be placed on a 100% withhold.
 - Continued unfiled status will lead to a Corrective Action Plan (CAP).
 - LEAs that fail to file the CRCS within the CAP timeline will be suspended from the Random Moment Time Survey (RMTS).
 - Failure to comply with the CAP will lead to disenrollment from the program and recoupment of all interim reimbursements received during the non-compliant period(s).

Utilizing Remittance Advice Details (RAD) to Reconcile CRCS Payments

- » DHCS provided updates on using RADs to reconcile CRCS payments when an LEA receives a check but cannot identify the specific source of the funds.
- » DHCS provided an example of a suggested approach, which included comparing RADs against the A&I Audit Exit Letter (Schedule 1 – Summary of Findings) and tracing it back to the amount listed on the A&I audit schedule by FMAP category.
- » Please reach out to LEA@dhcs.ca.gov with any additional questions or assistance.

Five Percent Withhold Payments (Assembly Bill 483)

- » DHCS provided an update on the impact of AB 483 on the amount withheld from LEA BOP interim payments. AB 483 authorizes DHCS to collect up to five percent of interim payments to fund program operations, versus the current program withhold amounts of one percent and two percent annually. DHCS will be amending the withhold amount, effective July 1, 2024.
- » AB 483 also shortens the audit process timeline and increases Technical Assistance (TA) provided to LEAs.

Technical Assistance (TA)

- » DHCS provided updates on the CRCS TA, which promotes outreach, program integrity, and maintaining compliance with annual reporting requirements.
- » DHCS also provided updates on TA regarding outreach to targeted and newly enrolled LEAs. AB 483 initiated the requirement for outreach and an offer of technical assistance to LEAs that show a 25 percent audit adjustment from their reported settlement amount compared to their audited settlement. This requirement is not scheduled to go into effect until July 2024, but DHCS has been offering TA to LEAs for the past few months and these efforts have led to more LEAs getting one-on-one assistance.
- » DHCS noted they provided 36 TA meetings from July 2023 through April 2024. In addition, DHCS has participated in 14 TA meetings since the January LEA BOP Quarterly Stakeholder Meeting.
- » LEAs in need of assistance can fill out the [Technical Assistance Form](#) and submit it to LEA@dhcs.ca.gov.
- » DHCS requested LEAs who have recently received a TA visit to complete the [TA Survey](#) to provide feedback on how to best develop future visits.

General Reminders

- » When sending Protected Health Information (PHI), use the "Encrypt" feature on Microsoft Outlook, found under the OPTIONS tab when creating a new email.
- » Stay updated with Listserv and subscribe or unsubscribe to LEA BOP e-blasts for updated program information at:
<http://apps.dhcs.ca.gov/listsubscribe/default.aspx?list=DHCSLEA>
- » DHCS provided the following contact information to reach out to regarding any specific questions relating to the LEA BOP:

- LEA@dhcs.ca.gov for general questions about the LEA BOP, CRCS, and technical assistance requests.
- LEA.AnnualReport@dhcs.ca.gov for compliance documents (Provider Participation Agreement, Annual Report, and Data Use Agreement forms).
- RMTS@dhcs.ca.gov for Random Moment Time Survey, Time Survey Participant, and Moment Questions.
- » DHCS provided the following Audits and Investigations (A&I) Mailboxes:
 - LEA.CRCS.Submission@dhcs.ca.gov to submit CRCS documents and extension requests.
 - LEAAuditQuestions@dhcs.ca.gov for general questions about an audit report or previously issued audit reports.

**Next LEA BOP Quarterly Stakeholder Meeting:
Wednesday, August 14, 2024, 10:30am – 2:00pm PT (Webinar via Webex)**

Afternoon LEA BOP Best Practices Sessions

RMTS – How to Get Your Time Survey Participants to be Responsive to Moments

- » DHCS facilitated a discussion on how to increase participant responsiveness to RMTS moments. The discussion was supported by Margie Bobe from Los Angeles Unified School District (LAUSD), who provided best practices and insights on how LAUSD promotes responses from their TSPs. General themes from the discussion included ensuring open lines of communication with TSPs, promoting a culture of gratitude, and establishing intentional and recurring trainings and resources for TSPs to access information. Overall, it is important for TSPs, management, and district/school leadership to understand the importance of responding to moments. The most effective way to encourage TSP participation in RMTS is to humanize the program and the process by making it accessible, understandable, positive, and inclusive. Additionally, it is important to make sure that your LEA/RMTS Coordinator is in the loop when responding or making changes to moments.

How to Participate in LEA BOP as a Consortia

- » DHCS facilitated a best practices session for consortia participants to ask questions regarding participating in LEA BOP and discuss questions about billing consortia. DHCS conducted an interactive discussion on the benefits and challenges of a consortium, helpful resources, guidance for forming a consortium, and the difference between Lead LEA and Member LEA roles. Debbi Conner, who serves as the LEA BOP Coordinator for the Mendocino County Office of Education billing consortium, shared the success and challenges faced as part of a billing consortium from a Lead LEA perspective.

Providing Services as a County Office of Education (COE)

- » County Offices of Education (COEs) were encouraged by DHCS to join the session on participating in LEA BOP as a COE provider. DHCS facilitated this session, which included a review of COE survey results from a DHCS-sponsored survey that was conducted earlier this year. Participants in the session were provided the survey link if their COE did not initially participate but would like to do so. This best practices session gathered information from COE participants on the successes and challenges of participating in LEA BOP as a COE, strategies that have been effective at building relationships with local districts, and identifying areas of support that may be helpful for COEs in the future. In addition, DHCS provided resources that may be helpful for COEs if they have any additional questions or would like assistance with COE-specific billing scenarios.