FY 2023-2024 Cost and Reimbursement Comparison Schedule (CRCS) Check-In Meeting #2

Department of Health Care Services February 26, 2025 1:30 – 2:30 P.M.



Agenda

- 1 Check-In Meeting Logistics
- FY 2023-24 CRCS Update / Resources
- 3 Submitted Questions and Answers
- 4 Next Steps

CRCS Check-Ins: Guiding Principles

- 1. Guided forum with opportunity for attendees can ask questions.
- 2. Participation is optional you only need to join if you have questions.
- 3. If we are unable to answer a question, we will respond directly to the person that asked the question after today's meeting.
- 4. Meetings provide clarity on CRCS forms/instructions and LEAs will need to interpret how guidance applies to their specific situation.

Check-In Meeting Logistics

- » Today is the second (and final) FY 2023-24 CRCS Check-In Meeting.
- » Submit questions in the Q&A or raise your hand to ask a question.
- » Questions after today's check-in can be submitted to LEA@dhcs.ca.gov.

CRCS FY 2023-24: Submission Window Updates

- » CRCS for FY 2023-24 is due on March 1. However, CRCS submissions through Monday, March 31, 2025, will be considered as filed timely.
- >> The extended filing period is only for the FY 23-24 CRCS.
 - The extension will <u>not</u> impact the due date for interim and final settlements (when the CRCS is submitted timely by March 31).
 - Interim settlements will be issued by March 1, 2026.
 - Final settlements will be issued by September 1, 2026.
- Extension requests (for approval of submissions after March 31) must be sent to: LEA.CRCS.Submission@DHCS.CA.GOV

CRCS Resources for FY 2023-24

The CRCS webpage, located on the LEA BOP Website, will contain all resources to complete the CRCS.

FY 2023-24 CRCS Landing Page:

- » Direct Medical Service Percentages (posted).
- >> FY 2023-24 Forms and Instructions (**posted**).
- » Certification and Signature Document (posted).
- » A report of billed one-way trips for specialized medical transportation (posted).
- » Annual Reimbursement Report (posted).
- » FMAP Grouping Reimbursement Percentages Report (posted).
- » Program Administration Withhold Report (pending posting).

CRCS Training / Check-In Resources

- » FY 2023-24 CRCS training was provided on December 13, 2024.
- » FY 2023-24 <u>CRCS Check-In #1</u> was on January 22, 2025.
- Training slides were sent (with the CRCS forms and instructions) to the LEA BOP listserv on January 13, 2025.
- » Additional CRCS resources are available on the LEA BOP website under the "Cost and Reimbursement Comparison Schedule" link.

Questions & Answers



Questions to Address in Today's Check-In

- 1. Can you explain the Program Administration Withhold Report and the impact on the CRCS?
- 2. When reviewing the Specialized Medical Transportation Report on the CRCS webpage, the total paid amounts listed are much less than what is in our system. Is the report wrong?
- 3. Can we claim costs for a practitioner if they only appear on the production log one time?
- 4. Why are CRCS Production Logs / Bridging Documents important to submit with the CRCS?

Question 1: Can you explain the Program Administration Withhold Report and the impact on the CRCS?

- » DHCS will be reconciling withholds using the CRCS, effective FY 23-24:
 - Assembly Bill (AB) 483, chaptered into Welfare and Institutions Code Section 14115.8(k)(1) in October 2023, allows DHCS to annually collect <u>up to five</u> <u>percent</u> of total Medicaid payments allocable to LEAs for program administration costs.
 - Prior reconciliation of withholds was based on interim claiming, not total payments to LEAs.
 - Since AB 483 was effective on January 1, 2024, the total authorized withhold amount calculated on the CRCS will be based on half of the LEA's annual Medi-Cal maximum reimbursable cost (calculated in Worksheet A, row 'af').

Program Administration Withhold Report (continued)

- » Starting with the FY 23-24 CRCS, the administrative withhold will be reconciled on the CRCS to ensure equitable payment across LEAs.
- >> The Program Administration Withhold Report represents the total amount the LEA paid in FY 23-24 withholds.
 - Amount will include the withhold collected from claims that were paid in FY 23-24.
 - Amount will include the *erroneous* withhold collected on interim settlement payments (when applicable).
- The total withholds paid in FY 23-24 will be compared to the total maximum allowable withhold amount to equitably reconcile all LEAs.

Snapshot of Program Administration Withhold Report

» LEAs will input the total amount from the Program Administration Withhold Report on Worksheet A, row 'ah'.

Program Administration Withhold Report:

NPI ↓1	To	otal Amount Withheld in Fiscal Year 2023-24
1111111111	\$	20,000.00
1003018631	\$	24,630.05
1003113663	\$	12,164.76
1003170986	\$	11,642.09



CRCS, Worksheet A:

62	af. Total Medi-Cal Maximum Reimbursable Cost (sum of x through	\$ 379,195
63	ag. Total Authorized Withhold Amount	\$ 9,480
64	ah. Total Withhold Amount Collected in FY 23-24	\$ 20,000
65	ai. Withhold to be Collected/(Refunded) to LEA (ag - ah)	\$ (10,520)
66	aj. Interim Medi-Cal Reimbursement through the FI	\$ 100,000
67	ak. Other Health Coverage	\$ 150
68	al. Total Reimbursement (aj + ak)	\$ 100,150
69	am. Overpayment/(Underpayment) (al - (af-ai))	\$ (289,565)

Impact of the Program
Administration Withhold
Reconciliation:

Underpayment Amount (cost vs. interim payment)	\$279,045
+ Refund for Withhold Overcollection	<u> 10,520</u>
Total Underpayment Amount	\$289,565

Question 2: When reviewing the Specialized Medical Transportation Report on the CRCS webpage, the total paid amounts are much less than what is in our system. Is the report wrong?

- The Specialized Medical Transportation Report provides detail by LEA as of December 19, 2024.
 - Includes total paid amount for one-way trips (T2003) and units of service (which represent total billed one-way trips).
 - The report reflects claims in the system as of the report date, which is prior to the oneyear claiming limit.
- If you are seeing a higher amount in your system, it is likely that your LEA submitted claims after the report date.
- » LEAs have the option of using the posted report or their internal billing systems to obtain more current information.
 - Please note that LEAs must keep all supporting documentation for audit.

Question 3: Can we claim costs for a practitioner if they only appear on the production log one time?

- Submitting interim claims for LEA BOP covered services is a best practice that is strongly encouraged by DHCS (when applicable), but it is not an explicit requirement to include a practitioner's costs on the CRCS.
- » Practitioners may be included in the CRCS if their LEA BOP covered services met LEA BOP billing requirements.
 - LEAs must be able to substantiate services when no/minimal claims have been submitted.
 - If your LEA can substantiate that the practitioner met LEA BOP billing requirements, they may be included on the CRCS.

Practitioners Without Interim Payments

- If the LEA reports practitioners without interim billings on the CRCS, the LEA must be able to support costs with documented covered services
 - ✓ Did the practitioner meet the qualifications **to bill for the covered service** per LEA BOP requirements found in the Provider Manual <u>(loc ed rend)?</u>
 - ✓ Was the practitioner supervised, if necessary? Is this documented?
 - ✓ Did the practitioner record services (in a portal or hard copy)?
 - ✓ Did the practitioner document to the extent required for billing purposes?
 - ✓ In an audit, could the LEA support that the practitioner provided covered LEA BOP services? Could they readily locate supporting documentation?
- If NO to any of the above, do not include these practitioner costs on the CRCS!

Question 4: Why are Production Logs / Bridging Documents important?

- » A&I uses these documents to reconcile practitioner costs reported on the CRCS.
- » A **Production Log** identifies all employed and contracted practitioners that rendered LEA BOP covered services during the state fiscal year.
- Production Log (in Excel) is part of the CRCS submission package. Must contain the following fields (by quarter for employed practitioners):
 - Practitioner Name
 - Practitioner Job Classification
 - Total Units of Service
 - Total Interim Medi-Cal Reimbursement
- >> The Production Log should **not** contain any student-identifying information or practitioner social security numbers when submitted to DHCS.

Bridging Documents (continued)

- » A Bridging Document (in Excel) must also be submitted as part of the CRCS submission package.
- Provides detail for employee salary and benefits costs (by quarter), contractor costs, other costs, and transportation costs that are reported on the CRCS.
- » Bridging Documents must trace back to an LEA's sources, such as General Ledger/Payroll.
- The LEA's Bridging Documents must contain the following:
 - Practitioner Name
 - Practitioner Job Classification
 - Resource / Object Codes
 - Federal Expenditures / Funding
 - Contractor Amount Paid, Hours Paid, Vendor / Agency / Company Name
 - Grand totals for each category (totals will reconcile to the CRCS worksheets)

GENERAL Q&A



Section 2: Next Steps

Submitting the FY 2023-24 CRCS

- » Download documents from the CRCS webpage (or sent via e-blast), as available:
 - Template and Instructions
 - Certification Form
 - Annual Reimbursement Data
 - Percentage of Reimbursement by FMAP Grouping Report
 - Program Administration Withhold Report
 - Direct Medical Service Percentages by Region
 - Specialized Medical Transportation (optional)
- Complete the Excel template.
- » Gather your documentation.
- Certify the costs on the electronic Certification Form.

FY 2023-24 Submission Package

- » A complete submission package for FY 2023-24 includes:
 - 1. Completed Excel file.
 - 2. PDF of the signed Certification Form (total underpayment/overpayment must reconcile to the Certification Worksheet on the Excel file).
 - Grouping Schedules or Bridging Documents used to prepare the CRCS.
 - 4. Production Log identifying LEA BOP units/encounters billed during the cost reporting year.

Submit complete submission package in one email to: <u>LEA.CRCS.Submission@dhcs.ca.gov</u> by March 31, 2025.

QUESTIONS

Please submit additional questions to the LEA BOP inbox:

LEA@DHCS.CA.GOV

