Local Educational Agency Medi-Cal Billing Option Program (LEA BOP) Advisory Work Group (AWG) Meeting Minutes August 3, 2022

Location

Due to the Governor's Executive Order N-33-20 that proclaimed a State of Emergency as a result of COVID-19, the August 2022 Advisory Workgroup meeting was hosted via WebEx. The online meeting included a morning session focused on the Department of Health Care Services (DHCS) status updates, and the afternoon session included a review of State Fiscal Year (SFY) 2021-22, and a look forward to SFY 2022-23.

Handouts

The following meeting materials were sent to the LEA BOP list (an email subscription list): August 2022 AWG Agenda; August 2022 AWG Status Update; and June 2022 AWG Meeting Minutes.

<u>Purpose</u>

The purpose of the AWG meetings is to improve the LEA BOP. The emphasis of the meeting is to strategize various goals and activities aimed at enhancing both the Medi-Cal services provided on school sites and access by students to these services, and increasing federal reimbursement to LEAs for the cost of providing these services while maintaining compliance with LEA BOP requirements. DHCS welcomed participants to submit questions electronically through the webinar platform and indicated that questions would be answered throughout the meeting.

Review of Meeting Minutes

Due to the online format of the AWG, the Local Governmental Finance Division (LGFD) asked stakeholders who have comments about the meeting minutes to email suggestions to the LEA Inbox at <u>LEA@dhcs.ca.gov</u>. If no feedback is received via the LEA Inbox, the June 2022 AWG minutes will be considered final.

California Department of Education (CDE) Updates

- The CDE provided updates on several new initiatives from the Office of School Based Health Programs (OSBHP):
 - OSBHP posted the intent to award the lead LEA BOP billing specialist to Santa Clara County Office of Education.
 - The grant award notification (GAN) was sent out, and upon receipt of the signed GAN, work can begin.
 - In the next couple of weeks, interviews will be conducted for the Social and Emotional Learning Education Programs Consultant (EPC) position.

- The Nurse consultant and Medi-Cal EPC positions have been reposted.
- OSBHP was awarded another \$150,000 from the Blue Shield Foundation to continue offering Youth Mental Health First Aid (YMHFA) at no cost to LEAs.
- The Wellness Education Lab, with Wellness Together, is an online suite of training modules on anxiety and mental wellness for staff, parents, and families being launched soon. Modules will be available in English and Spanish, and for students 13 and older.
- CDE plans to release a Technical Assistance Request for Application (RFA) to select up to 3 organizations that will provide technical assistance to 25 LEAs on Medi-Cal billing. OSBHP will share the RFA with DHCS to share with the group.
- For more information, please reach out to Rico Patrino at rpatrino@cde.ca.gov.

Audits & Investigation (A&I) Updates Cost Reporting and Tracking Section

The LGFD reviewed the claims reimbursement process and reminded stakeholders of LEA BOP's classification as a Certified Public Expenditure (CPE) program, which provides cash flow payment via interim reimbursements, and final cost settlement on an annual basis.

Cost Reporting and Tracking Section (CRTS): Cost and Reimbursement Comparison Schedule (CRCS) and Certification of Zero Reimbursement (CZR) Reports - Submission Update (as of 7/7/2022)

A&I shared the following table to provide an update on CRCS reports received, accepted, and rejected per SFY.

				CZR	
State Fiscal		Total	CRCS's	(DHCS	
Year (SFY)	Received	Participants	Accepted	2437a)	Rejections
2020-21	515	633	497	39	18
2019-20	479	624	474	35	4
2018-19	516	618	505	26	11
2017-18	566	609	564	40	2
2016-17	563	593	559	35	4
2015-16	559	596	556	33	3
2014-15	561	584	555	31	6

- If stakeholders have not received a rejection or a confirmation that their CRCS has been accepted, they should e-mail the CRCS submissions inbox at <u>LEA.CRCS.Submission@dhcs.ca.gov</u>.
 - When submitting, please include the organization name, and ensure that the correct PDF is attached.

- A stakeholder asked whether A&I could share the percentage of rejections that occurred due to each type of error.
 - o DHCS responded that they are not able to track this information at this time.
 - However, the following most common rejection errors were reviewed during the meeting.
 - Missing PDF Certification or Excel file.
 - Documents not all submitted in one email.
 - SFY 2021 TSP list missing.
 - Multiple unnecessary pages attached to the PDF.
 - Full PDF report submitted.
 - Over/Underpayment amount does not match on the PDF Certification page and Excel file.
 - Missing worksheets from the CRCS template.
 - PDF document is unclear to read.

Special Programs Section (SPS) - CRCS Audit Update (as of 7/6/2022)

A&I shared the status of audits for four SFYs, and the total reimbursement withheld due to lack of CRCS submission. When a CRCS is not submitting certifying how funds were spent for LEA BOP services, the entire interim reimbursement must be recovered from the LEA.

State Fiscal Year	Number of CRCS Forms Received	Total Participants	Audits Issued	LEAs on withhold due to not submitting a CRCS	Total Amount of Withhold for LEAs not submitting a CRCS
2014-15	525	535	525	10	\$93,093
2015-16	524	537	524	13	\$2,107,355
2016-17	527	538	526	11	\$1,487,750
2017-18	526	539	0	13	\$1,007,917

- SPS is currently focusing on issuing the completed audits for SFYs 2016-17, 2017-18, and 2020-21. They will continue issuing the completed audits for SFY 2016-17, then start issuing audit reports for SFYs 2017-18 and 2020-21.
- The best way to resolve any auditing questions is to reach out to the auditor by e-mailing questions to <u>LEAAuditQuestions@dhcs.ca.gov</u>.
- A stakeholder asked if DHCS can provide an idea of what SFY 2017-18 audits will entail, and when the SFY 2017-18 audit reports will be released.
 - DHCS replied that past 2022 trainings have provided an overview of the audit process, but that specific questions can be sent to LEAAuditQuestions@dhcs.ca.gov.
 - SPS is on schedule to issue all SFY 2017-18 audit reports by the end of August 2022.

DHCS- Fiscal Intermediary (FI) Updates

<u>Unsatisfactory Immigration Status (UIS) Population</u>

- System Development Notice (SDN) 21051 was implemented on June 20, 2022, to deny payments for services rendered to UIS beneficiaries.
 - The effective date for this policy is July 16, 2021, per Policy and Procedure Letter (PPL) 21-015.
 - An LEA's Remittance Advice Detail (RAD) report will show denied claims with the RAD code 9908: "Recipient not eligible for Federal Financial Participation (FFP)."
 - An Erroneous Payment Correction (EPC) will be forthcoming to recoup erroneously paid claims associated with the UIS population, effective for dates of service on or after July 16, 2021.

Screening for Adverse Childhood Experiences (ACEs)

- Two new procedure codes (G9919 and G9920) are being added to the FI system to allow billing for ACEs screenings, effective July 1, 2022.
- FI updates are expected to be implemented on August 22, 2022.
- LEAs should wait to submit claims for G9919 and G9920 until after the implementation date (the expected date is August 22, 2022).
- LEA BOP Provider Manual updates are in progress to reflect these new procedure codes.
- A stakeholder asked which practitioners will be permitted to bill for ACEs Screenings.
 - DHCS referred stakeholders to view <u>PPL 22-009R</u> to view who is qualified to bill.

COVID-19 Vaccine Counseling Modifier

- DHCS is adding the "CR" modifier to designate COVID-19 vaccine counseling services. COVID-19 counseling claims with the "CR" modifier will be limited to reimbursement for one unit of service (representing 15 minutes).
- LEAs should wait to submit claims using the CR modifier until after the implementation date of August 22, 2022. The effective date for this change will be July 1, 2021.
- DHCS is in the process of establishing a one quarter timeliness extension, allowing claims with dates of service from July 1, 2021, to September 30, 2021, to be adjudicated until October 31, 2022.
 - An e-blast will be sent to LEAs when the "CR" modifier is implemented and available to reimburse COVID-19 counseling services.
- The LEA BOP Provider Manual updates are in progress to reflect the new procedure code/modifier combinations.

Post-Partum Benefit Expansion

- Medi-Cal beneficiaries that qualify for services under Aid Code 76 will be eligible for reimbursement for LEA BOP services effective April 1, 2022.
- FI updates are expected to be implemented by August 22, 2022.
- Claims erroneously denied eligibility for this aid code will be paid through an EPC.

Associate Marriage and Family Therapist (AMFT)/Registered Associate Clinical Social Worker (ACSW) Expansion of Covered Services

- Expansion is effective July 1, 2021, allowing AMFTs and ACSWs to be reimbursed for psychosocial status assessments and health education/anticipatory guidance services provided that all applicable supervisory requirements have been met.
- FI updates will add the HM and HL modifiers to existing CPT codes, which were implemented on June 21, 2022.
- LEA BOP Providers should have submitted claims for dates of service back to July 1, 2021 and received a denial no later than June 30, 2022.
- A forthcoming EPC will process reimbursement for denied claims back to July 1, 2021.
 - DHCS will share additional information on this EPC as it becomes available.
- A stakeholder asked if the Education Code allows these practitioner types to provide IEP assessments.
 - DHCS affirmed that the ACSWs and AMFTs were recently added as qualified practitioners for psychosocial status assessments as well as non-IEP health education/anticipatory guidance. These updates can be found in the <u>LEA BOP Provider Manual</u> in Section *loc ed serv psych*.

<u>Claims Processing Timeliness Extension Due to Data Match Delay</u>

- DHCS previously notified the LEA BOP Providers that they could bill for services provided on or after September 1, 2020, through May 31, 2021, up until June 30, 2022.
- Stakeholders have informed DHCS that claims submitted over the one year claiming limit were denied.
- The denied interim claims will not be paid out via interim reimbursement, due to the fact that the SFY 2020-21 cost settlement process will be underway shortly.
- A stakeholder asked what would happen to an LEA if they do not submit their cost report.
 - DHCS emphasized that cost reports are mandatory.
 - If LEAs need an extension, they should request one as soon as possible from LEA.CRCS.Submission@dhcs.ca.gov.
 - LEAs who fail to submit a CRCS will be placed on a 100% withhold on future interim reimbursement, have interim reimbursements received

during the reporting period recouped, and may be terminated from the LEA BOP after a certain period of time without progress.

SFY 2022-23 Rate Inflation

- New inflated SFY 2022-23 rates were implemented on July 25, 2022.
- New rates will be paid for dates of service on or after July 1, 2022.
- An EPC is forthcoming to reimburse LEAs for claims submitted with dates of service (DOS) on or after July 1, 2022 through July 25, 2022.
- The LEA BOP Provider Manual has been updated with the new rates.

DHCS-LGFD Updates

Compliance Documents

- Providers who do not submit compliance documents may be put on a reimbursement withhold and/or terminated from the LEA BOP. LEAs that still need to submit documents should send them to: LEA.AnnualReport@dhcs.ca.gov.
- Data Use Agreement (DUA) DUAs were due November 30, 2021.
 - A Two-Party DUA is specifically for LEA BOP Providers who do not have a vendor but handle the data match files in-house. This agreement is only between DHCS and the LEA BOP Provider.
 - A Tri-Party DUA is specifically for LEA BOP Providers who utilize a billing vendor to determine Medi-Cal eligibility using the LEA BOP data match process. This agreement is between the DHCS and the LEA BOP Provider and their billing vendor.
 - When a DUA has not been received, LEA BOP providers will not be able to access Medi-Cal eligibility Data Match information because this would be a breach of Protected Health Information (PHI).
 - DHCS has received 556 DUAs with Addendum to Attachment A as of July 21, 2022.
 - 12 non-compliant LEAs will be disenrolled from the LEA BOP for failing to submit both the DUA and the Attachment A Addendum.
- Annual Report (AR) ARs were due November 30, 2021.
 - DHCS has received 528 ARs out of 558 LEAs as of July 21, 2022.
- Provider Participation Agreement (PPA) Addendum PPA Addendums were due November 1, 2021.
 - DHCS has received 544 PPA Addendums out of 588 LEAs as of July 21, 2022.

Eligibility Data Match Update

 Data Match access has been restored for 520 LEAs that submitted both a DUA and the DUA Addendum to Attachment A.

- LGFD sent out an e-blast reminder for the final May 31, 2022, document submission deadline.
- 39 LEAs submitted compliance documents and are awaiting DHCS completion of the data release process so they may access the data match.
- The final data release is in the process of completion and LEAs will be notified when access is restored.
- For all compliant LEAs, the first batch of data was released on March 25, 2022. The second batch was released on May 10, 2022.

Medi-Cal Eligility Rate

 An e-blast was sent out in May 2022, informing LEA BOP Providers to use the LEA's enrollment data as of May 25, 2022, and the data match output file for May 2022, in order to calculate the numerator for the Medi-Cal Eligibility Ratio (MER) on the SFY 2021-22 CRCS.

CRCS Reports SFY 2016-17 - Due 8/31/2022

- The SFY 2016-17 CRCS and supporting files will be posted on the LEA BOP website.
- Reports should be submitted to <u>LEA.CRCS.Submission@dhcs.ca.gov</u>.
- LEAs that need assistance determining their Medi-Cal Eligibility Rate (MER) for any CRCS period should complete Attachment A of PPL 22-001 and submit the form to LEA@quidehouse.com.
 - Once submitted, the LEA will receive an e-mail within three business days of submission letting it know the request has been received.
 - Guidehouse personnel will reach out to LEAs that have submitted requests and provide assistance with determining an alternative MER methodology.

LEA BOP Provider Manual Updates

- An updated consolidated Provider Manual PDF will be added to the LEA BOP website. The individual Provider Manual sections, published on the LEA BOP website, contain the most up-to-date information. The PDF is only updated occasionally to allow for easy searching of the entire LEA BOP Provider Manual.
- Minor updates have been published related to the transportation and hearing sections of the Provider Manual.
- DHCS is working to develop a new section specific to EPSDT services.

Policy and Procedure Letters (PPL)

No new PPLs have been published since the June 2022 AWG meeting.

LEA BOP E-Blasts:

• June 1, 2022 Advisory Work Group Meeting Information

•	June 3, 2022	Timeliness Reminder for Associate Marriage and Family Therapists and Associate Clinical Social Workers Historical Claims
•	June 7, 2022	Request for Applications for a lead LEA BOP Medi-Cal Billing Specialist
•	June 10, 2022	Timeliness Reminder for Associate Marriage and Family Therapists and Associate Clinical Social Workers Historical Claims
•	June 17, 2022	Correction to FFP Qualified Field and MER Assistance Deadline
•	June 21, 2022	Timeliness Reminder for Associate Marriage and Family Therapists and Associate Clinical Social Workers Historical Claims
•	June 23, 2022	2020/21 CRCS Transportation Addendum
•	June 24, 2022	State Fiscal Year 2022/23 LEA BOP Rates
•	June 28, 2022	Timeliness Reminder for Associate Marriage and Family Therapists and Associate Clinical Social Workers Historical Claims
•	June 28, 2022	2020/21 CRCS Transportation Addendum
•	July 8, 2022	Call for Agenda: School-Based RMTS and SMAA Calls
•	July 19, 2022	July School-Based RMTS and SMAA Call

LEA BOP Technical Assistance (TA) and Site Visits

- DHCS provided one TA site visit since the June 2022 AWG Meeting.
- One of the LEA BOP Operations Unit's purposes is to provide training and TA site visits.
- The LEA Operations Unit is planning enhanced outreach and training in collaboration with the new expansion contractor, WestEd. Please feel free to submit ideas and requests for training to the <u>LEA@dhcs.ca.gov</u> inbox or directly to the Operations team.
- DHCS stated that there are two upcoming TA site visits. Anyone interested in a TA site visit should fill out the request form.

LEA BOP E-mail Inboxes

- LEA@dhcs.ca.gov
 - This inbox is for general LEA BOP questions and technical assistance requests.
- LEA.AnnualReport@dhcs.ca.gov
 - This inbox is for submitting and requesting extensions of compliance documents that include the following:
 - PPAs
 - DUAs
 - DUA Attachments

- DUA Addendums
- ARs
- RMTS@dhcs.ca.gov
 - This inbox is for Random Moment Time Survey (RMTS), Time Survey Participants (TSP), and moment questions. LEA Operations will respond.
- LEA.CRCS.Questions@dhcs.ca.gov
 - This inbox is for questions about the CRCS and requests for CRCS audit copies. LEA Operations will respond.
- LEA.CRCS.Submission@dhcs.ca.gov
 - This inbox is for submitting CRCS documents and requests. CRTS in A&I will respond.
- LEAAuditQuestions@dhcs.ca.gov
 - o This inbox is for general audit report questions. SPS in A&I will respond.

Student Behavioral Health Incentive Program (SBHIP)

- DHCS provided an overview of SBHIP progress.
- The State budget allocated \$389 million for three program years for incentive payments paid to Medi-Cal managed care plans (MCPs) to build infrastructure, partnerships, and capacity for school behavioral health services.
- SBHIP Timeline:
 - By June 1, 2022: MCPs have the option to submit Project Plans on an accelerated timeline. MCPs that submit Project Plans early will receive the allocated funds for the Project Plan on an accelerated timeline.
 - By December 31, 2022: MCPs are required to submit their County Needs Assessment and Project Plan. MCPs that submitted Accelerated Project Plans are required to submit their first Bi-Quarterly Report.
- SBHIP Technical Assistance Resources:
 - Office Hours:
 - Every 2nd Tuesday of the month from 3:00pm 4:00pm PT
 - Every 4th Thursday of the month from 9:00am 10:00am PT
 - If you would like to receive a standing calendar invitation for these Office Hour Sessions, please e-mail Jackie Yim (hyim@guidehouse.com) and she will add you to the invitation.
 - SBHIP Mailbox: E-mail TA questions to sbhip@guidehouse.com.
 - SBHIP Webpage: www.dhcs.ca.gov/services/Pages/studentbehavioralheathincentiveprogram
 - Individualized TA Support: Available upon request, please reach out to the SBHIP mailbox.
 - A stakeholder asked if DHCS could summarize the role of the county offices in the SBHIP project aside from obtaining signatures from LEAs and assisting with assessments.
 - DHCS responded that county offices collaborate with DHCS, MCPs, LEAs, County Behavioral Health, and other stakeholders to help MCPs select collaborative partners and student population(s), assist with required county-level needs assessment activities as appropriate, address

project-related implementation questions as appropriate, and sign MOUs with MCP partners.

Public Health Emergency (PHE) Unwinding

- The COVID-19 PHE will terminate soon, and millions of Medi-Cal beneficiaries may lose their health insurance coverage.
- A top goal of DHCS is to minimize beneficiary burden and promote continuity of coverage for our beneficiaries.
- How stakeholders can help:
 - o Become a DHCS Coverage Ambassador.
 - The <u>DHCS Coverage Ambassadors</u> will deliver important messages to Medi-Cal beneficiaries about maintaining Medi-Cal coverage after the PHE ends.
 - Download the Outreach Toolkit on the <u>DHCS Coverage Ambassador</u> webpage.
 - Join the DHCS Coverage Ambassador mailing list to receive updated toolkits as they become available.

What is a Coverage Ambassador?

- DHCS Coverage Ambassadors will deliver important messages to Medi-Cal beneficiaries about maintaining Medi-Cal coverage after the COVID-19 PHE ends.
- Ambassadors will be trusted messengers comprised of diverse organizations that will make coverage information accessible, considerate to cultural and linguistic needs of the beneficiary populations.
- DHCS Coverage Ambassadors will connect Medi-Cal beneficiaries at the local level with targeted and impactful communication.
- o Ambassadors may include, but are not limited to:
 - Local County Offices
 - Health Navigators
 - Managed Care Plans
 - Advocates
 - Stakeholders
 - Providers
 - Clinics/Healthcare Facilities
 - Legislative Offices/Other State Agencies

A Coverage Ambassador's Communication Goals

- Educate Raise awareness of actions beneficiaries need to take and when they need to take them in order to maintain coverage.
- Engage Engage community partners with necessary tools for reaching beneficiaries.
- Provide Consistency Create a consistent voice across community partners.

Communications Strategy Phase One: Encourage Beneficiaries to Update Contact Information

Launch this phase immediately.

- Conduct a multi-channel communication campaign to encourage beneficiaries to update contact information with county offices.
- Distribute flyers in provider/clinic offices, social media, call scripts, website banners.
- Communications Strategy Phase Two: Watch for Renewal Packets in the mail. Remember to update your contact information!
 - o Launch this phase 60 days prior to COVID-19 PHE termination.
 - Remind beneficiaries to watch for renewal packets in the mail and update contact information with county office if they have not done so yet.
- On May 17, 2022, DHCS released <u>Medi-Cal COVID-19 PHE Operational</u> <u>Unwinding Plan</u>. The two primary purposes of this document are to:
 - Describe DHCS' approach to unwinding or making permanent temporarily flexibilities implemented across the Medi-Cal program during the PHE.
 - Describe DHCS' approach to resuming normal Medi-Cal eligibility operations following the end of the PHE.
- Additional Questions and Concerns? Contact us at Ambassadors@dhcs.ca.gov.
- A stakeholder asked whether CMS or HHS will be issuing the PHE termination warning.
 - o This announcement will be issued by the HHS, who will provide a 60-day notice. On July 15, 2022, the PHE was extended until October 15, 2022.

New Website Layout

- DHCS updated the layout of the LEA BOP webpage, and walked through the following changes:
 - An announcements banner was added, which will be updated bi-weekly.
 - o The contact information page has been updated.
 - o PDF versions of all e-blasts will be posted.
 - The CRCS and Rates pages are more accessible and contain updated documents.
 - A new PDF of the entire Provider Manual will be posted soon, but the individual sections posted contain the most recent updates.

Alternative Format Notification

- To best align with Federal and State laws and protect the rights of persons with disabilities, all LEAs, LECs, LGAs, and their subcontractors must provide free auxiliary aides and services.
- When providing Alternative Format choices, the requestor's choice must be honored unless better methods are being offered. Alternative Formats include, but are not limited to:
 - Braille
 - Large print (20-point Arial Font)
 - Audio format
 - Accessible electronic format (such as a data CD)
 - Closed Captioning
 - Text-to-Speech
 - Voice-to-Text

- Managed Care beneficiaries and their representatives may only request one Alternative Format each and can do so through:
 - DHCS' online Alternative Format Selection Application (AFSA) system at the following link: https://afs.dhcs.ca.gov.
 - o Staff within their LEA, LEC, LGA, or their subcontractor's agency.
 - o Telephone number 1-833-284-0040.
- If the LEA, LEC, LGA, or subcontractor gets a request, the applicable document must be provided within two (2) months of the request and must be encrypted if requested by the beneficiary.
- DHCS believes that many schools are likely already in compliance but will be working with the correct staff to identify what format is in place.

LEA BOP Subcommittees

 The PPL Review subcommittee is currently recruiting members. Please reach out to LEA@dhcs.ca.gov if interested.

Mental Health Coordination (PPL #20-051)

- On November 5, 2020, DHCS published 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).
- The LEA BOP covers mental health related assessment and treatment services, including psychological assessments, psychosocial status assessments, health education/anticipatory guidance, and psychology and counseling treatments.
- Allowable services covered under the LEA BOP may be provided to students by qualified practitioners and billed by participating LEAs.
- LEAs may refer students to contracted community-based programs or approved qualified rendering practitioners.
- LEAs may coordinate services with MCOs or County MHPs, as well as their SELPAs.

CRCS Training Calendar

Reporting Period	CRCS Due Date	Training Date	
SFY 2018-19		AWG Meeting	
	January 31, 2023	October 5, 2022	
	_	1pm-3pm PT	

General Reminders

- Address Change: Please submit the first two pages of the Annual Report (AR) (Medi-Cal Provider Enrollment Information Sheet) to: LEA.AnnualReport@dhcs.ca.gov.
- When sending information that may contain Protected Health Information (PHI), must send the e-mail securely.
 - Subject: [SECURE] Billing Question for LEA ABC
- Subscribe to LEA BOP e-blasts for updated program information at: http://apps.dhcs.ca.gov/listsubscribe/default.aspx?list=DHCSLEA.

LEA BOP Afternoon Session

- DHCS led a review of State Fiscal Year 2021-22, highlighting accomplishments and trainings conducted, and provided a look forward to what is planned for SFY 2022-23.
- Attendees asked if copies of the afternoon slides could be made available to participants. DHCS indicated that they would post the slides on the AWG Meeting page of the LEA BOP website in the coming weeks.

Next Meeting

• Date/Time: October 5, 2022, at 10:30am PT (Webinar via WebEx)