

### **General Questions**

**Q1. I did not receive this presentation. Can it be emailed to me?**

A. The CRCS training slides were sent via e-blast prior to the training. If you did not receive this e-blast, please e-mail [LEA@dhcs.ca.gov](mailto:LEA@dhcs.ca.gov) for a copy.

**Q2. Can I please be added to the list to receive LEA BOP e-blasts?**

A. Yes, the e-blasts are sent using the LEA BOP subscription e-mail service. Please sign up here (note that you can remove an e-mail using the same link):  
<http://apps.dhcs.ca.gov/listssubscribe/default.aspx?list=DHCSLEA>

### **Public Health Emergency (PHE) Questions**

**Q3. Is DHCS Coverage Ambassador a formal status or just a term for those participating in communications?**

A. A DHCS Coverage Ambassador is not a formal status. For additional information regarding Coverage Ambassadors, please refer to:  
<https://www.dhcs.ca.gov/toolkits/Pages/PHE-Outreach-Toolkit.aspx>.

**Q4. The slides presented today that address unwinding the PHE would be a helpful resource. Can these slides be shared?**

A. Yes, a copy of these slides will be sent upon request to the LEA BOP mailbox: [LEA@dhcs.ca.gov](mailto:LEA@dhcs.ca.gov). In addition, these slides will be presented at every DHCS presentation until the termination of the PHE.

**Q5. Will there be a lag or grace period between the end of the PHE and the end of the PHE accommodations?**

A. As the federal government has not yet distributed PHE termination guidance, a grace period is yet to be determined. However, the federal government has communicated that they will provide states with 60 days' notice prior to the PHE termination. DHCS is preparing now for the termination of the PHE and will provide guidance to LEAs on the PHE termination date as soon as it is available.

**Q6. Are there temporary accommodations in the LEA BOP that will end when the PHE ends? What are those and what is the timeline for expiration?**

A. The federal government has not yet provided a timeline for PHE termination. However, certain policies in the LEA BOP will be modified upon termination of the PHE. These policies include some flexibilities granted to LEAs related to telehealth services, as well as the removal of the temporary Federal Medicaid Assistance Percentage (FMAP) increase of 6.2% that was added to interim LEA BOP payments during the PHE. In addition, the 85% compliance threshold for RMTS participation will become effective again once the PHE has terminated. DHCS is preparing for the termination of

the PHE and will provide guidance to LEAs via a Policy and Procedure Letter (PPL) will additional details once the PHE termination date is announced.

**Q7. Was the FMAP increase related to the PHE or is it permanent?**

A. Yes, the FMAP increase of 6.2% was a result of the PHE and is not permanent. Once the PHE termination date is announced, DHCS will begin the process to revert the FMAP back to California's standard 50 percent. The increased FMAP of 56.2 percent is available until the end of the quarter in which the PHE terminates. DHCS will let LEAs know when the FMAP will revert back to 50 percent for interim payment of LEA BOP claims.

**Student Behavioral Health Incentive Program (SBHIP) Questions**

**Q8. Is the list of MCPs that have submitted the Letter of Intent by March 15 available to the public?**

A. While DHCS will not be publicly distributing this list, all 58 counties and all MCPs are participating in SBHIP.

**California Department of Education (CDE) Updates Questions**

**Q9. What is the timeline for the RFAs being released?**

A. The CDE will be releasing three RFAs regarding technical assistance for LEAs in the next several months, starting in May 2022 when CDE announces the RFA for the Lead LEA BOP Billing Specialist. DHCS will announce these opportunities to LEAs via e-blast when the RFAs are published by CDE. In addition, CDE will host information webinars on these RFAs and DHCS will share login details with LEAs via e-blast as this information becomes available.

**Q10. Is there a website for CDE's new school-based office? Nothing is coming up on Google.**

A. Not currently, but CDE is in the progress of establishing a website for the new Office of School Based Health.

**Practitioner and Time Survey Participant (TSP) Questions**

**Q11. Can a substitute Trained Health Care Aide (not part of the RMTS TSP List) bill for services using T1004? This person is not a permanent employee.**

A. All billable direct medical service practitioners must be actively participating in RMTS (on the TSP list and responding to any assigned moments). Substitutes should not bill for LEA BOP services. You can also review the RMTS manual for the substitution and vacancy policy: <https://www.dhcs.ca.gov/provgovpart/Pages/School-Based-RMTS.aspx> (Section 6).

**Q12. Do service-specific practitioners need to become Ordering, Referring, and Prescribing (ORP) practitioners, with their own NPI numbers?**

A. Yes, any **licensed** practitioner that orders, refers, or prescribes an LEA BOP treatment service must enroll as an ORP through the [PAVE portal](#).

**Q13. Do ORP practitioners require their own NPIs?**

A. Yes, ORP practitioners require their own NPIs.

**Q14. Can you confirm that licensed Speech-Language Pathologists (SLPs), Occupational Therapists (OTs), and Physical Therapists (PTs) are allowed to enroll as ORPs at this time?**

A. DHCS will confirm with Provider Enrollment Division whether they are ready to accept applications for SLPs, OTs, and PTs. The updated regulations package that will require licensed speech-language pathologists, licensed audiologists, licensed physical therapists and licensed occupational therapists to enroll as ORP providers is expected to be effective at some point in the April 2023 to June 2023 timeframe. However, DHCS recognizes that some LEAs will want to move forward with enrolling practitioners now and will discuss this issue with Provider Enrollment and confirm the enrollment timeline for LEAs.

**Q15. What is an estimated timeline for when licensed SLPs, OTs, and PTs will be able to enroll as ORPs?**

A. DHCS will confirm the timeline for enrollment and provide an update to LEAs at future Advisory Workgroup Meetings.

**Q16. Will student orders be valid for 12 or 24 months?**

A. Prescriptions, referrals, and recommendations are valid for 12 months from the date of the order.

**Q17. Are Orientation and Mobility (O&M) practitioners also able to enroll as ORPs?**

A. O&M services must be authorized by physicians or other licensed practitioners of the healing arts within the scope of their practice. The practitioner that orders O&M services must be licensed, per Federal regulations. For example, O&M prescriptions could come from an occupational therapist or a nurse, but not an O&M specialist, since they are not a licensed practitioner.

**Q18. In the CCR, Title 5, Section 3051.12. Section 3051.12 (b)(1)(c) refers to specialized physical health care providers and states that “Qualified” means the ability to demonstrate competence in Cardio-Pulmonary Resuscitation. What does DHCS require to confirm this competency? Also, is this required of THCAs who only provide Activities of Daily Living?**

A. The CPR requirement noted in Ed Code is specific to those THCA's that provide specialized physical healthcare services. There are no additional regulations that DHCS has identified that require THCA's that only provide ADL assistance to demonstrate competence in CPR. As for THCA's that provide specialized physical healthcare services, DHCS expects that LEA's are following the CDE requirements for THCA's. LEA's should be able to provide documentation, which could include the CPR certification card.

### **Cost and Reimbursement Comparison Schedule (CRCS) Questions**

**Q19. If we already filed the CRCS for SFY 2015-16 and SFY 2016-17, do we need to complete the amended form and resubmit?**

A. Yes, all LEA's must resubmit the older CRCS forms using the new CRCS template. The older template does not meet State Plan Amendment 15-021 requirements related to LEA cost settlement for the backcasted years (SFY's 2015-16 through 2019-20). All new templates will be posted on the LEA BOP website and on the Cost and Reimbursement Comparison Schedule (CRCS) page. Due dates for each CRCS reporting period are also listed on the CRCS page.

**Q20. On the certification form, what information goes in the RMTS administrative unit that is labeled "Orange" in the example form?**

A. The information in this area is where the LEA will report which administrative unit they belong to for the RMTS. In the example CRCS used in the training, the LEA has a contract with Region 8, the Orange County LEC for RMTS. Please include which LEC/LGA you belong to in this area (list either the region number or region name, or both).

**Q21. Did DHCS send out the CRCS SFY 2015-16 for backcasting?**

A. No. Those documents will be posted on the [LEA BOP website](#) ([CRCS webpage](#)) soon. DHCS will send out an e-blast when they are available.

**Q22. Is there a published list of LEAs who have and have not submitted CRCS reports for various Fiscal Years? With so much turnover in the districts and COEs, some are unsure about this.**

A. The LEA BOP Operations Unit and A&I are reaching out to the individual LEA's regarding their delinquent CRCS reports.

**Q23. Can DHCS publish a list of LEAs showing the type of audit settlement that was done? If there has been turnover at the LEA, those who are new in their roles won't know if a minimal review was conducted or if there are actual audit results that they should look for.**

A. DHCS will look into this and see whether A&I has this information readily available. In the meantime, please send a request to [LEA.CRCS.Questions@dhcs.ca.gov](mailto:LEA.CRCS.Questions@dhcs.ca.gov) to request this information for your LEA, if needed.

**Q24. Can you show the exact page(s) from an audit that will be used for the amended CRCS?**

A. If your LEA received a **minimal** review, you will rely on the as-submitted CRCS as your audited data for the backcasted CRCS reports. If your LEA received a **limited or field** audit, the CRCS training slides from April and June 2022 will include this information. In addition, the CRCS instructions will provide detailed guidance on which audit report schedules to use in completing your SFY 2015-16 through 2018-19 CRCS.

**Other Questions**

**Q25. Are we going to get more information on Alternative Format Requirements?**

A. An e-blast regarding the Alternative Format Request Plan Deadline was sent on March 11, 2022. DHCS is currently in the process of collecting feedback and will revise the Policy and Procedure Letter (PPL) to include additional information.

**Q26. How could a new coordinator find out the status of our submitted or missing Data Use Agreement (DUA) or other documents?**

A. Please send an e-mail to the LEA inbox at [LEA@dhcs.ca.gov](mailto:LEA@dhcs.ca.gov) for your request. The Operations Unit will respond regarding the status of any LEA BOP compliance documents.

**Q27. While our district has submitted everything, we are not able to access our data. Why are we not approved to have our info released?**

A. Please send an e-mail to the LEA inbox at [LEA@dhcs.ca.gov](mailto:LEA@dhcs.ca.gov) for your request. The Operations Unit will check to ensure that the LEA has submitted all required documents necessary to restore access to the MOVEit server.

**Q28. What is the status of the LEA BOP site visits?**

A. DHCS has provided five technical assistance site visits in SFY 2021-22. In addition, DHCS has provided technical assistance to LEAs through a series of four weekly one-hour CRCS Check-In Meetings to guide LEAs and stakeholders through the CRCS backcasting process and to respond to questions on a consecutive weekly basis from February 17 through March 10. The LEA BOP Operations Unit will be conducting training and outreach with an expansion contractor in the future. DHCS is responsive to requests for training and ongoing site visits. If you are interested in requesting a site visit, please read the following document:

[https://www.dhcs.ca.gov/provgovpart/Documents/ACLSS/LEA%20BOP/Program\\_Req\\_and\\_Info/Tech\\_Assist\\_Req\\_6300.pdf](https://www.dhcs.ca.gov/provgovpart/Documents/ACLSS/LEA%20BOP/Program_Req_and_Info/Tech_Assist_Req_6300.pdf). Site visits will occur virtually.

**Q29. Can you confirm whether Form 6029 is required to change an LEA's address?**

A. The easiest way for DHCS to change an LEA's address is to go through the LEA-BOP inbox, as DHCS will need to contact Provider Enrollment Division to make the edit. Please submit requests to the LEA inbox is [LEA@dhcs.ca.gov](mailto:LEA@dhcs.ca.gov).