



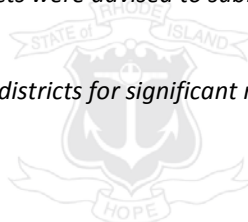
Summary of 2014 Local Education Agency (LEA) Medicaid Technical Review

In 2014, The Executive Office of Health and Human Services performed technical reviews for 24 Local Education Agencies (LEAs) seeking Medicaid reimbursement for Medicaid direct services and Administrative claims submitted for reimbursement during calendar year 2013. Below is an account of the schools (out of 24 districts visited) that had findings requiring attention, per category, which required a Medicaid action plan. The submission and adherence to the Medicaid Action Plan will support compliance with the guidelines outlined in The Medicaid Direct Service Guidebook for LEAs and The Medicaid School Based Administrative Claiming Guide, which is available at <http://www.eohhs.ri.gov/ProvidersPartners/ProviderManualsGuidelines/MedicaidProviderManual/LocalEducationAgency.aspx>. It is encouraged that districts review this document with relevant personnel.

Medicaid Direct Services

- **Parental Consent** - 13/24 districts were missing Parental Consent. In adherence with requirements of RIDE in conjunction with requirements issued by the Office of Special Education Programs (OSEP), parental consent must be obtained before Federal funding (Medicaid) can be accessed. EOHHS recommended that the districts detail a comprehensive description of their methods for obtaining parental consent within their Medicaid Action Plans.
- **Individual Education Programs (IEPs)** – 6/24 districts had at least one IEP that was not current. 7/24 districts had at least one IEP where the billed service was not clearly specified. The LEA must ensure that the need for the service is clearly documented in the students' IEP. EOHHS recommended that the District's policies and procedures for documenting services within the students' Individualized Education Programs should be consistent with the requirements described in the Medicaid Direct Services Guidebook for Local Education Agencies August 2010.
- **Progress Notes** – 4/24 districts were missing progress notes. Although it is a RIDE requirement to have progress notes detailed within the students' IEP, it is recommended, for audit purposes, to have the provider notate progress on the actual provider logs as well. EOHHS recommended that the district's practice for documenting progress notes should be consistent with the requirements described in the Medicaid Direct Services Guidebook for Local Education Agencies August 2010.
- **Span Dating**– 3/24 districts did not consistently use span dating. EOHHS recommended that when an LEA provides services such as 1:1 Personal Care Attendant or when billing for a student in a Day Program for consecutive units of time on a daily or monthly basis, that the units of time are totaled and billed as one claim.
- **Provider Qualification** - 2/24 districts did not have documentation of staff certifications/licenses. EOHHS recommended the districts' initiate obtaining provider credentials prior to the onset of services and should be consistent with the requirements described in the Medicaid Direct Services Guidebook for Local Education Agencies August 2010.
- **Attendance** - 7/24 districts had an inadequate ability to present accurate attendance records. EOHHS recommended that districts' should maintain attendance records for at least 10 years after the service date. The District should also perform at least annual quality assurance checks to ensure that services rendered have the required attendance records to support the claim.
- **Diagnosis** - 4/24 districts did not have a documented diagnosis for the reviewed student. EOHHS recommended districts' practice should reflect the policies and procedures for documenting a student's diagnosis as described in Addendum J: Primary Education Disability and Diagnosis Codes in the Medicaid Direct Services Guidebook for Local Education Agencies, August 2010.
- **Billing units incorrect** - 10/24 districts were advised to submit an adjusted claim in order to correct inaccurate units of service billed.

EOHHS did recoup funds from 5/24 districts for significant non-compliance and/or inaccurate billing.



As a reminder, the EOHHS revised the Medicaid Direct Services Guidebook and Medicaid School-Based Administrative Claiming Guide for Local Education Agencies. The guidebooks, effective 9/1/14, include the most comprehensive overviews of the information needed for LEA's to participate as Medical Assistance Providers in the Rhode Island Medicaid program. Both documents can be viewed on the EOHHS website at: <http://www.eohhs.ri.gov/ProvidersPartners/ProviderManualsGuidelines/MedicaidProviderManual/LocalEducationAgency.aspx>

LEAs should be aware that when sending in the required Certification of Matching Funds Letter, it should be addressed to:

Jason Lyon
Assistant Administrator
Executive Office of Health and Human Services
74 West Road Hazard Building #74
Cranston, RI 02920