PROGRAMMATIC CHANGES RELATED TO EXPANDED OPTIONS FOR MEDICAID REIMBURSEMENT OF SCHOOL-BASED SERVICES

MAY 2022

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Please put your questions in Q&A
What aspects of the program will change?*

**RMTS**
- New Participants (staff)
- Newly Reimbursable activities

**AAC**
- Newly Reimbursable Costs
- Specialized Transportation

**Cost Reports**
- Newly Reimbursable Costs
- New Compliance Review Process

*Pending approval from the Centers for Medicaid and Medicare Services, these changes will go into effect July 1, 2022.
Is there an IEP?

Reimbursement will be calculated separately
Impact of Separation of Reimbursement Calculations for IEP / Non-IEP Services

- Participation in Non-IEP service reimbursement is optional for school divisions
- The opportunity to receive additional reimbursement will be there for your division when you’re ready, for the services you choose
- This “protects” the IEP reimbursement program so that it remains virtually “untouched” by the expansion
Random Moment Time Study

- New participants
- Newly reimbursable activities
- Training focus
RMTS: New Participants

- LEA staff pools remain the same
- Newly “Medicaid qualified” staff have been added to the existing pools:
  - **Therapy Services Pool**: Speech therapist, OT, OT assistant, PT, PT assistant, audiologist
  - **Nursing, Psychological and Medical Services Pool**: Clinical psychologist, school psychologist, psychiatrist, clinical social worker, school social worker, substance abuse treatment practitioner, psychiatric clinical nurse specialist, billing personnel, physician, RN, LPN, nurse practitioner, personal care asst., psych technician, behavior analyst, asst. behavior analyst, behavior technician, professional counselor, marriage and family therapist, school counselor
RMTS: New Reimbursable Activities

- **Direct Services**: provision of Medicaid-qualified health care services, regardless of whether pursuant to an IEP
  - IEP and Non-IEP covered direct health care services will be captured and quantified under separate activity codes (categories) for cost reimbursement purposes

- **Administrative Services**: work activities that are pursuant to Public Health Guidelines
  - Includes training, care coordination, public health program planning, investigating or monitoring communicable diseases, infection control and disease prevention
RMTS: Training Focus

- The critical link between how staff respond to their RMTS and reimbursement is prompting a renewed effort to incorporate better RMTS training into all direct service staff training programs and materials.
- This week’s practitioner training sessions will include information about the RMTS.
Administrative Activity Claiming

- Newly reimbursable costs
- Specialized transportation
- Claim filing schedule and deadlines
AAC: Newly Reimbursable Costs

- Newly reimbursable costs:
  - There’s **no additional work** that LEAs need to do to receive reimbursement for the work activities that are pursuant to Public Health Guidelines
  - Time staff spend doing these activities (such as training on public health topics/procedures, public health program planning, investigating or monitoring communicable diseases, infection control and disease prevention, etc.) is captured through the RMTS and applied to your AAC
AAC: Specialized Transportation

- Specialized transportation reimbursement is moving to a quarterly process, and the costs will be filed with your quarterly AAC
- Interim billing for specialized transportation will no longer be required
- Simplification of the process overall
- Information session will be held for Medicaid Coordinators to review the new process
Due to the changes to the RMTS activity codes required to capture the “expanded” work activities, in FY23 (school year ‘22-‘23) the Q1 FY23 AAC will be calculated using the average RMTS percentages from Q2-Q4 FY23. Therefore, there will be a delay in the timing of when LEAs will be able to submit their Q1 AAC.
Beginning FY23 AAC will follow the timeline below. Submission deadlines extended by 90 days.

<table>
<thead>
<tr>
<th>Quarter (FY)</th>
<th>Quarter Dates</th>
<th>Earliest Deadline to Submit AAC</th>
<th>Certification Deadline</th>
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</thead>
<tbody>
<tr>
<td>1 *</td>
<td>July 1st - Sept 30(^{th}) *</td>
<td>Jan 15(^{th}) *</td>
<td>Jan 22(^{nd})*</td>
</tr>
<tr>
<td>2</td>
<td>Oct 1st - Dec 31st</td>
<td>April 15th</td>
<td>April 22(^{nd})</td>
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<tr>
<td>3</td>
<td>Jan 1st - March 31st</td>
<td>July 15(^{th})</td>
<td>July 22(^{nd})</td>
</tr>
<tr>
<td>4</td>
<td>April 1st - June 30th</td>
<td>October 15th</td>
<td>October 22nd</td>
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* Note: Q1 FY23 AAC will be filed with the Q4 FY23 AAC, by October 15, 2023
AAC: Claim Filing Schedule & Deadlines

- While the FY23 Q1 AAC (7/1-9/30/22) is not due until October 2023, there will still be a payment cycle for previous quarter AAC claims submitted and certified by the October and December 2022 deadlines.

- This will be an opportunity for LEA’s who are behind on AAC submissions to catch up.
For all AAC, as always, all claims must be submitted within 7 quarters and 15 days from the end of the quarter in which the expenditures were incurred.

- Example:

  QE 12/31/22 must be submitted by 10/15/24
Cost Report

- Newly reimbursable costs
- New compliance review process
Cost Report: Newly Reimbursable Costs

- If your LEA participates in reimbursement for services outside of an IEP, then your LEA can include costs for providing those services, including:
  - Staff costs
  - Materials & supplies
  - Capital Equipment depreciation
New Compliance Review Process

- Implementation of new Review and Audit program in FY23. This will occur regardless of expansion approval. More details to come.
- Elimination of the Billing Compliance Review (BCR)
- Implementation of new procedures to gather data for calculation of Parental Consent rate
- Information session will be held for Medicaid Coordinators to review the new process
Transition Period

- The expansion begins July 1 but the FY22 cost reports won’t be settled until 2023 so there will be a transition period where activities are occurring for both the current and new program.
- LEA’s will need to continue to submit interim billing for transportation claims with service dates in FY22.
- LEA’s will need to complete BCR one last time for FY22 cost settlement.
Q&A