

# Medicaid and Schools Program

Understanding FY22 Closeout & BCR Planning  
RMTS State Plan Changes (Pending CMS Approval)  
Misc. UMass Updates



**UMass Chan**  
MEDICAL SCHOOL



**Virginia Medicaid**

Department of Medical Assistance Services

**June 7, 2022**



# **FY22 Billing Compliance Review (BCR)**

School Divisions will need to complete a BCR with FY22 Cost Reports

# BCR for FY22

## School Divisions will need to complete a BCR with your FY22 Cost Report

- There are no changes to the instructions for FY22 – the process for you remains the same
- You must keep submitting interim claims!
  - Even if you're getting a lot of denials for reasons that you don't think you should be denied
  - Submit, submit, submit!!!
- If you believe you are receiving erroneous claim denials, you do not need to “fix” those claims and you do not need to resubmit those claims.

**\*Note: Keep submitting your transportation interim claims too!!**

# BCR for FY22

## UMass is making changes on our end:

- How we match delivered services to interim claims
- How we calculate the Billing Compliance Percentage
- How we apply the compliance rule that there must be evidence of interim claiming, per service type and quarter, to allow costs to be reimbursable in the cost report

# BCR for FY22

- DMAS and CMS program requirements mandate that schools must submit interim claims to MES MMIS for every individual Medicaid-qualified service that is delivered to a Medicaid-enrolled student.
- The BCR is the method used to calculate how well each school division complied with this requirement.
- The BCR calculates a Billing Compliance Percentage, which indicates the percentage of Medicaid-qualified services for which the school division has a corresponding **submitted** claim in MMIS.
- The BCR process randomly selects 50 students (or schools can choose to review all students) and calculates the percentage of Medicaid qualified services delivered to those students for which an interim claim was **submitted** through MMIS.

# BCR for FY22

- UMass will match each school division's self-reported delivered services per student and service type from the BCR to interim claims submitted through MMIS.

## Example Student:

Reported by School Division		BCR System Match (UMass)		
Medicaid-Qualified Services Delivered	Delivered Units	Paid Units	Denied Units	BCR "submitted" units
Speech Therapy	22	12	10	22
Occupational Therapy	36	6	20	26
Physical Therapy	10	0	0	0



UMass will "see" denied claims, and count them as submitted, meeting interim billing compliance requirement.

# BCR for FY22

- In cost settlement, to determine whether the costs for each service type are allowable for reimbursement for each quarter, UMass will check for “submitted” claims, rather than “paid” claims:

**Direct Medical Services Personnel Quarterly Summary**

Personnel Category	Personnel Cost	Indirect Cost	Subtotal	Interim Claims Exist?	Allowable Cost Subtotal
		9.40%			
Audiology	\$0.00	\$0.00	\$0.00	No	\$0.00
Billing Personnel	\$0.00	\$0.00	\$0.00	Yes	\$0.00
Medical Evaluation	\$0.00	\$0.00	\$0.00	No	\$0.00
Nursing	\$31,976.71	\$3,005.81	\$34,982.52	Yes	\$34,982.52
OT	\$41,132.04	\$3,866.41	\$44,998.45	Yes	\$44,998.45
Personal Care	\$5,428.06	\$510.24	\$5,938.30	No	\$0.00
Psychology	\$11,862.74	\$1,115.10	\$12,977.84	Yes	\$12,977.84
PT	\$3,982.68	\$374.37	\$4,357.05	Yes	\$4,357.05
Speech	\$124,008.91	\$11,656.84	\$135,665.75	Yes	\$135,665.75
<b>Total</b>	<b>\$218,391.14</b>	<b>\$20,528.77</b>	<b>\$238,919.91</b>	<b>No</b>	<b>\$232,981.61</b>

**Questions?**





# **RMTS State Plan Changes**

- Pending CMS approval

# **RMTS Changes Effective FY23 (presuming CMS approval)**

- New participants
- Newly reimbursable activities
- New questions and pre-defined answers
- Participant training focus
- Grace period for participants to respond
- Moment notifications/reminders
- Consequences of failing to meet 85% minimum participation
- RMTS Coordinator training

# RMTS: Potential 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: New Questions and Pre-Defined Answers

For each randomly selected moment, the participant will respond to the following questions:

1. What type of activity were you doing?
2. What specifically were you doing?
3. Was this activity pursuant to a student's IEP?
4. Who were you working or interacting with (please do not use actual names)?
5. Why were you performing this activity?

# RMTS: Participant 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
- RMTS “back to school” video available for your use:  
<https://www.youtube.com/watch?v=7NX1-tMeYQM>

# RMTS: Grace Period for Responses

- All assigned moments must be answered by participants within **3 school days** of the moment date
  - A “school day” is defined by your school division’s calendar, as configured in the RMTS system (separate from “work schedules”)

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
9 <b>Moment #1</b> Occurs 8:53am	10	11 <b>Moment #2</b> Occurs 1:47pm	12 <b>Moment #1</b> Expires 8:53am	13
16 <b>Moment #2</b> Expires 1:47pm	17 <b>Moment #3</b> Occurs 11:15am	18	19 <i>School Division Calendar: Non-Moment Day</i>	20 <i>School Division Calendar: Non-Moment Day</i>
23	24 <b>Moment #3</b> Expires 11:15am	25	26	27

# RMTS: Grace Period for Responses

- When UMass central coders request clarification of moment responses, participants must respond within 5 additional school days of the moment date.
- UMass will follow-up no more than 3 times to obtain clarification.
- RMTS Coordinators will be cc'd on coder follow-up messages beginning with the 2<sup>nd</sup> request for clarification.



# RMTS: Moment Notifications & Reminders

Automated emails will be sent to participants following this schedule:

- At the assigned moment time
- 1 hour after the moment time
- 1 day after the moment
- 1 day before the moment expires (cc to RMTS Coordinator & Supervisors)
- 4 hours before the moment expires (cc to RMTS Coordinator & Supervisors)

# RMTS: 85% Participation Rate Requirement

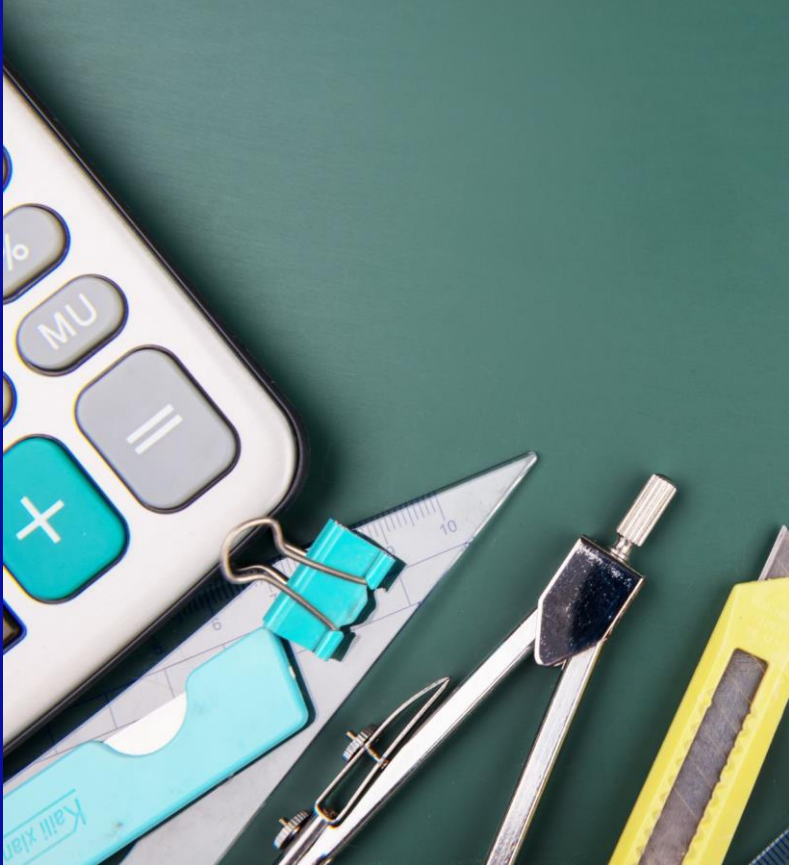
- The statewide time study must achieve a minimum participation rate of 85% per pool, per quarter
- Each LEA must achieve a minimum participation rate of 85% per pool, per quarter
- Failure to achieve the 85% minimum participation rate results in “making up for” the unanswered moments by categorizing them as non-reimbursable work activities, thus lowering the reimbursable time percentages
- Updated LEA RMTS Coordinator Instruction Manual will be shared soon – look for clarifications/updates to participation compliance section
- Shorter grace period will actually HELP improve compliance
- RMTS participant training is best strategy to ensure compliance

# RMTS Coordinator Training

- New LEA RMTS Coordinator Instruction Manual
- RMTS Coordinator training webinar(s) in August
- Feedback:
  - Do you prefer 2 “versions” of RMTS Coordinator training?
    - “Soup to Nuts” for new coordinators
    - “Updates” focus for experienced coordinators
  - Or do you prefer 1 longer training:
    - Intro/background/getting started – 1<sup>st</sup> time section
    - Updates, tips, strategies for success – 2<sup>nd</sup> time section  
(so those not interested in intro could join at this point)
    - Facilitated Q&A – 3<sup>rd</sup> time section  
(again, option to leave or join at this point)

**Questions?**

# UMass Misc. Updates



# Wrapping up the school year

- Gather final information regarding leaves of absence/terminations so Change of Status requests can be submitted no later than **July 8<sup>th</sup>**
  - Plan accordingly if your work schedule ends before then...
- UMass hopes to be able to open up the BCRs by the end of July... plan to start early and get it done!
- Other final thoughts







**Questions?**

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