

## Medicaid Fingerprinting / Background Check Requirements

All county boards of education were supposed to notify Terry Riley, WVDE Medicaid Coordinator, of the primary contact for Medicaid background checks by July 15, 2016. This information was initially requested via a weekly Superintendent Update and emails to the applicable listservs back in late May 2016. Terry began following up with county boards of education that had yet to name a primary contact during the month of July. As of August 1, 2016, 24 LEAs still had not named a contact.

Please see below for the original notification regarding the fingerprinting/background check requirements.

Fingerprinting/background checks are now required by Bureau for Medical Services (BMS) Policy for all staff that sign billing forms for Medicaid eligible students. This will apply to: Audiologists, School Psychologists, Speech Language Pathologists, Occupational Therapists, Physical Therapists, Registered Nurses, select bus drivers, bus aides, staff performing personal care services (Aide, Paraprofessional, Early Childhood Classroom Assistant Teacher (ECCAT), Autism Mentor, LPN, interpreter, sign support specialist, braille support specialist) and any staff billing Targeted Case Management. This would apply to both county employees as well as contracted staff.

Administrators and secretarial staff working with Medicaid paperwork are not required to be fingerprinted. Staff paid 100% with federal funds are not eligible to bill Medicaid.

The West Virginia Clearinghouse for Access: Registry & Employment Screening (WV CARES) manages fingerprinting for Medicaid in the private sector. The WVDE and WVDHHR/BMS will also work with WV CARES to process fingerprinting for Medicaid. Using WV CARES increases the time window between required background checks from three to five years. WV CARES will also notify districts of background check issues that arise during that time window for all employees processed through their system.

The estimated fingerprinting cost through Morpho Trust at this point is \$37.25 per person, but there is also a \$20 charge per staff member from WV CARES. The \$20 charge may potentially be covered with a grant through WV CARES for a limited time. For a staff member who works for two districts there would only need to be one background check, but each district would have the \$20 charge.

New staff will still need to have the current fingerprinting/background checks required for employment and/or certification. However, a new staff member signing Medicaid billing would also need the additional background/fingerprinting check through WV CARES. **It is the WVDE's position that the districts should cover the cost of the additional background check with WV CARES since that additional requirement does not apply to all employees.**

The various steps which county boards of education will need to perform are listed below:

#### STEP ONE:

Apply for an account with Safran/Morpho Trust USA. Several districts may already have an account for processing background checks. The recommendation to these counties is to create a new account which would be used exclusively for Medicaid background checks. These accounts would be setup for WV CARES' ORI number.

The application is also available in the forms and links section on-line at

<https://wv.l1enrollment.com/OpenNetworkPortal/spring/customer?execution=e1s1>

Click on forms and links. Click on Escrow Account link. The company is aware that WV Schools districts are not allowed to have an escrow account where they deposit funds in advance of the fingerprinting services. For school systems, the company will invoice the district after fingerprinting has occurred.

To directly access the application use this link:

<https://wv.l1enrollment.com/OpenNetworkPortal/customer/documents/escrow-account.pdf>

The application is rather straight forward. For the ORI number section use the following: WV CARES/WVPAC000Z. In the Deposit area indicate a request for a billed account, with net 30 day terms. Specific blanks on the application that don't apply can simply be marked "N/A". Processing the applications can take up to three weeks

#### STEP TWO:

Each district should designate a primary contact for the fingerprinting/background check requirements. The district's primary contact name and e-mail should be forwarded to Terry Riley at [tjriley@k12.wv.us](mailto:tjriley@k12.wv.us). While it is clearly a local decision as to who the primary contact will be, since the district's personnel office already handles the fingerprinting/background checks for regular employment and certification requirements, selecting someone from that office as the primary contact would be recommended to avoid confusion and duplicate fingerprinting appointments. Regardless of who is selected as the primary contact for the district, the new Medicaid fingerprinting/background checks should be a collaborative effort involving the Special Education Director, CSBO and Personnel Office.

#### STEP THREE:

Determine the specific staff that will need to be fingerprinted for the upcoming school year.

#### STEP FOUR:

When WVDE receives the official notice from BMS/WVDHHR that the process may begin, districts will have six months to complete the fingerprinting/background check process. Each staff member to be fingerprinted is required to complete a WV CARES self-disclosure application and consent form. This form will be sent to districts with additional instructions. It is important for staff to understand that a false statement on this form will lead to the staff member failing the background check and prevent them from billing fee-for-service Medicaid or being included on the Medicaid cost report.

STEP FIVE:

Morpho Trust offers fingerprinting at 26 West Virginia locations. The list of locations can be found at: <https://wv.l1enrollment.com/OpenNetworkPortal/spring/customer?execution=e1s1>  
Click on browse locations.

If a district or combination of districts, have more than 30 staff to fingerprint, Morpho Trust may schedule an on-site fingerprinting session. WVDE will work with the districts to schedule the mobile unit to come on-site, with regional visits if deemed appropriate by the districts.

**Mandatory** training sessions are being scheduled with WVCARES to train county board of education and RESA staff regarding the Medicaid background check requirements. The scheduled dates are as follows:

- Friday, September 23, 2016 – RESA 8 (Martinsburg)
- Tuesday, September 27, 2016 – RESAs 1 & 4 (Beckley)
- Thursday, September 29, 2016 – RESA 7 (Clarksburg)
- Tuesday, October 4, 2016 – RESAs 2 & 3 (Eddison Center, South Charleston, WV)
- Thursday, October 6, 2016 – RESAs 5 & 6 (Parkersburg)

Note that if the RESA employs staff who provide direct services for county boards of education that are billed to Medicaid by those county boards, the RESA must have background checks performed for those employees. The RESA must then provide a notification to the county boards of education that utilize the direct service employees that those employees have passed the background checks. If this is applicable to a particular RESA, the RESA must also follow the steps above to establish an account with WV CARES.

Districts that contract with companies for services would also need to obtain a copy of a letter indicating their staff members had passed the background check with WV CARES. This would be an individual letter for each staff member working in your county. WVDE recommends including the background check requirements in the annual contract with the vendor.