### West Virginia School Based Health Services Medicaid Overview

July 12, 2021

Public Consulting Group, LLC



**Solutions that Matter** 

### Agenda

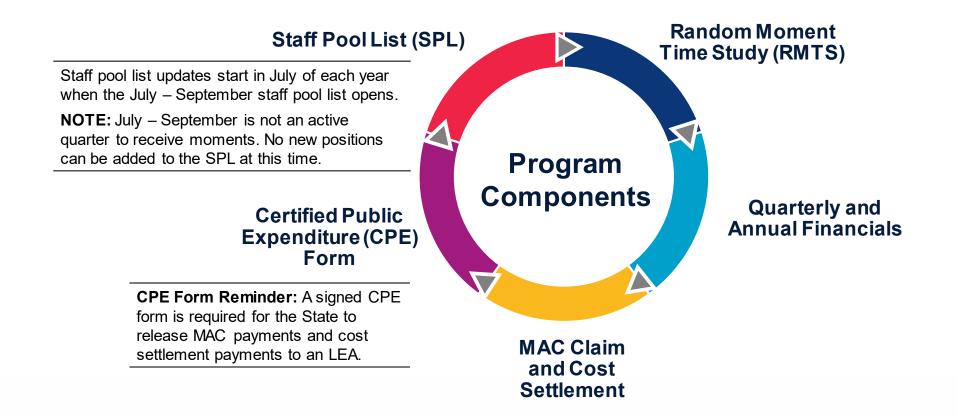
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### **WVSBHS Program Components**

### **SBHS Program Components**





### **SBHS Program Components**

The School Based Health Services (SBHS) program allows for a recovery of a portion of the costs associated with providing health-related services to Medicaid eligible special education students

#### **Fee-For Service (FFS) Annual Cost Report** Interim reimbursement for • Report to capture costs health-related services associated with providing the health-related services Involves logging services and associated service This is completed after the fiscal year ends and reflects dates of documentation service, not dates of payment

#### **Cost Settlement**

- Comparison of interim payments to what is reported for providing those health-related services
- Interim payments can only be retained if supported by reported costs

#### Medicaid Administrative Claiming (MAC)

- MAC is reimbursement for indirect costs of providing direct services: coordination of care, Medicaid outreach, medical training, etc.
- WV counties participating in SBHS are eligible to draw down funds from an additional Medicaid reimbursement stream
- MAC payments are in addition to cost settlement funds.

### **Medicaid Administrative Claiming**

### WV Medicaid Administrative Claiming

- The Medicaid Administrative Claiming (MAC) Program offers reimbursement for the costs of the administrative activities, such as outreach, that support the DHHR/BMS School Based Health Services program.
- These activities fall into several categories:
  - ✓ Medicaid Outreach
  - ✓ Facilitating Medicaid Eligibility Determination
  - ✓ Arranging Transportation Related to Medicaid Services
  - ✓ Translation Related to Medicaid Services
  - Program Planning, Policy Development, and Interagency Coordination Related to Medicaid Services
  - ✓ Medicaid-Related Training
  - ✓ Referral, Coordination and Monitoring of Medicaid Services



### **Typical MAC Reimbursable Activities**

• The following activities are examples of services which may be reimbursable under the MAC program.

Medicaid Outreach to families regarding the WV Medicaid program and available services	Attending an IEP meeting and discussing health- related services	Observing a child as part of the process for referring students for intervention services
Scheduling/ coordinating medical screens or mental health diagnostic services	Arranging Transportation Services to Medicaid Services	Arranging and Providing Translation (Oral, Sign Language, Braille Transcription) Regarding Medicaid Services, Outreach and Enrollment



# Random Moment Time Study (RMTS) and Staff Pool Lists

#### What is the SPL and RMTS?

#### Staff Pool List (SPL)



Random Moment Time Studies (RMTS)

The SPL is the foundation of both the MAC and Annual Cost Settlement process and is certified four times per year.

The SPL indicates who at your district provides services on behalf of the MAC/SBHS program.

Each district's SPL or "list" of staff employees is eligible to RMTS moments and respond to the survey.

July – September SPL is not an active quarter to receive moments. Only direct replacements can be made. No new positions can be added and no obsolete positions should be removed at this time. The RMTS process is a federally approved technique of producing a statistically valid sampling of randomly selected moments (one moment = one minute) that are assigned to randomly selected participants.

This study determines the portion of time individuals spend doing reimbursable activities.



### Who should be added to the four cost pools?

#### **Direct Service**

- Licensed Audiologist
- Audiologist Assistant
- Licensed Registered Nurse (RN)
- Licensed Occupational Therapist
- Licensed Occupational Therapy Assistant
- Licensed Physical Therapist
- Licensed Physical Therapy Assistant
- Certified Speech Language Pathologist
- Certified Speech Language Pathologist Assistant
- Licensed and State Certified Psychologist
- Licensed School Psychologist
- Licensed Psychologist Independent
   Practitioner

#### **Administrative**

- Contracted Medicaid Billing Specialist
- School Administrators Principals and Assistant Principals.
- State Certified Counselor
- Non-certified Psychologist/Psychologist
   Interns
- Non-certified Social Worker
- Psychologist Intern
- Special Education Administrator
- School Bilingual Assistant
- Speech Language Pathologist (Non-Masters Level and Non-Licensed)
- Program Specialist
- Other groups/individuals that may be identified by the LEA

#### **Targeted Case Management**

- Special Education Teacher
- Targeted Case Management Specialist
- Special Needs Care Coordinator

#### **Personal Care Providers**

- Personal Care Aide
- Classroom Aide
- Interpreter

<u>*Reminder*</u>: The participants certified each quarter must meet the provider credential and license requirements necessary to provide services.



### **July-September Certification Period**

#### **Reporting Cost for the July – September Quarter**

A Time Study is not conducted during the July – September quarter, but costs are reported for this period. RMTS results from subsequent quarters are averaged for the July – September calculation, and the April-June staff roster certified is used to determine the number of positions eligible for cost reporting.



#### The SPL will be open for updates and certification from July 19 – July 30.

During the certification period, **only direct replacements can be made**. Vacancies can be filled and existing positions can be replaced but **no new positions can be added** for the July – September quarter.

Coordinators should work together with Chief School Business Officials (CSBO) or treasurers to make these changes.

The certified SPL will populate the participants eligible to report costs.





## Only costs incurred by providers are allowable

 ✓ Report only those costs associated with specific individuals listed on the Staff Pool List (i.e. how much it costs to employ each staff person)



#### **Salaries**

Include all costs paid (gross) to the participant including any additional compensation

#### **Employee Benefits**

- Include all benefits paid to staff
- Some examples include:
  - ✓ Dental Insurance
  - ✓ Health and Accident Insurance
  - ✓ Life Insurance
  - ✓ Long-term Disability Insurance
  - ✓ FICA
  - ✓ Medicare
  - ✓ Tuition Reimbursement
  - ✓ Worker's Compensation
  - ✓ Teachers Retirement or Other Retirement Payments

#### **Staff Travel**

- Costs for specific staff related to travel for trainings
- Examples include:
  - $\checkmark$  Mileage to trainings
  - ✓ Conference related travel expenses

#### **Staff Professional Dues and Fees**

• Report by service the total costs for professional dues and fees associated with the staff listed in the Quarterly Financial Report.

#### **Contracted Staff Costs**

- Contracted Staff are only allowable to be included on the Administrative Staff Pool.
  - ✓ Example: SBHS Admin who are billing on-behalf of other LEAs



#### **Materials & Supplies**

- Materials & Supplies must be identified as used by the staff for which they are included
- Materials & Supplies can be identified using a "reasonable allocation method"
  - Some methods include headcount or FTE
- Please do not include any other costs used by direct medical service providers to deliver services to each individual student. These are reported as *direct medical-other costs* on the Annual Cost Report.

#### What Costs are Non-Allowable?

- Federal funds
  - ✓ The Claiming System requires that total costs be reported, with a separate column for reporting costs paid with Federal funds.
  - ✓ Staff who are 100% federally funded should not be included in the staff pool list
- State flow-through funds
  - ✓ Funds received from the Federal government by the State of West Virginia and then distributed to Local Education Agencies (LEA)
- Costs included in the Unrestricted Indirect Cost Rate calculation
  - ✓ Staff who are in the Indirect Cost Pool should not be included in the staff pool list to avoid double dipping



**Desk Reviews for the Administrative Claim** 

#### **Desk Review Overview**

#### **Purpose of the Desk Review**

Upon LEA certification of the Adminsitrative Claim, PCG begins the Desk Review process.

#### The Desk Review closely examines each LEA's reporting information, including:

Salaries and Contracted Staff Costs

**Employee Benefits** 

Staff Travel, Professional Dues and Fees

Materials and Supplies



### **Desk Review Overview**

LEAs reported costs are compared against state-wide thresholds. Outlier costs are identified and reviewed to ensure compliance.

- LEAs are responsible for reviewing the identified information and either:
  - ✓ Confirm the reported information is accurate; or,
  - ✓ Make any necessary adjustments.
- In some cases, a further follow up explanation could be requested if the LEA made any additional adjustments in response to the desk review process

#### Follow up clarification, even though it may seem redundant at times, is extremely important. For Example:

A Speech Pathologist does not work during the summer and receives their summer salary in a lump sum payment during the April-June quarter. Their regular quarterly salary may be reported as \$18,000, but the summer payout should increase it to \$35,000.

- When entering the salary an extra zero was added by the LEA and is now \$350,000.
- The LEA comments based on the edit check in the Claiming System because they expect the increase but doesn't actually review the salary for the participant.



**Calculating the Administrative Claim** 

### **Calculating the Claim**

## The main components used to calculate a claim include:

- ✓ Random Moment Time Study Results (Statewide)
- ✓ Quarterly Expenditure Data (District-Specific)
- ✓ Medicaid Eligibility Rates—MER (District-Specific)
- ✓ Unrestricted Indirect Cost Rates—ICR (District-Specific)
- ✓ Federal Financial Participation—FFP (State)

The claim is calculated by distributing the allowable costs and applying these factors.



### **Calculating the Administrative Claim**

Example Calculation for the ADMINISTRATIVE Cost Pool					
Cost Pool	Percent of Time Spent on Reimbursable Activity X	Total Costs Entered into Claiming System X	Medicaid Eligibility Rate X	General Admin Overhead Factor X	= Total Gross Claim Amount
Administrative	0.1405%	\$1,348,515	N/A	N/A	\$1,895
Administrative	0.00%	\$1,348,515	N/A	N/A	\$0
Administrative	0.00%	\$1,348,515	78.76%	N/A	\$0
Administrative	0.00%	\$1,348,515	78.76%	N/A	\$0
Administrative	0.03512%	\$1,348,515	78.76%	N/A	\$373
Administrative	0.21075%	\$1,348,515	78.76%	N/A	\$2,238
Administrative	5.65508%	\$1,348,515	78.76%	N/A	\$60,062
Administrative	17.00035%	\$1,348,515	N/A	5.77%	\$13,228

#### Example Administrative Cost Pool Total Gross Claim: \$77,796

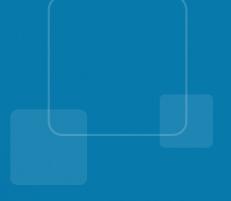
- The MAC claim is calculated by taking the Total Costs Entered by the District into the Claiming System and allocating them into each of the separate cost pools: **Direct Service, Targeted Case Management, Personal Care** and **Administrative Support.**
- Once four cost pools have been established, the total costs for each are separately
  multiplied through both the quarterly Statewide Random Moment Time Study (RMTS)
  percentages and the LEA's Medicaid Eligibility Rate (MER). The example calculation
  above is completed for each cost pool as reported by the LEA.



### **Calculating the Administrative Claim**

EXAMPLE LEA MAC CLAIM		
Description		Amount
Direct Service Providers	\$	29,770
Targeted Case Management	\$	6,621
Personal Care	\$	-
Administrative (see previous slide for calculation example)	\$	77,796
Gross Claim Subtotal	\$	114,187
Indirect Cost Rate (x 16.21%)	\$	18,510
Total Gross Claim Amount	\$	132,697
Federal Financial Participation (FFP) Rate		x 50%
Total Net Claim Subtotal	\$	66,349

### **Cost Settlement**



### **School Based Health Services: Overview**

## Counties incur costs for providing services to eligible special education students

 Medicaid will reimburse a portion of the costs counties incur based on what is allowable and outlined in the Centers for Medicare and Medicaid Services (CMS) approved state plan amendment

The **School Based Health Services (SBHS)** is based on counties' true cost of providing eligible direct medical services (DS), and specialized transportation services to Medicaid-eligible Individualized Education Program (IEP) students



Bill Medicaid Fee-For-Service (FFS) Interim Payments throughout the school year



Receive **Medicaid FFS** Interim Payments throughout the school year

Report DS & transportation costs on the Annual Cost Report after the close of the school year

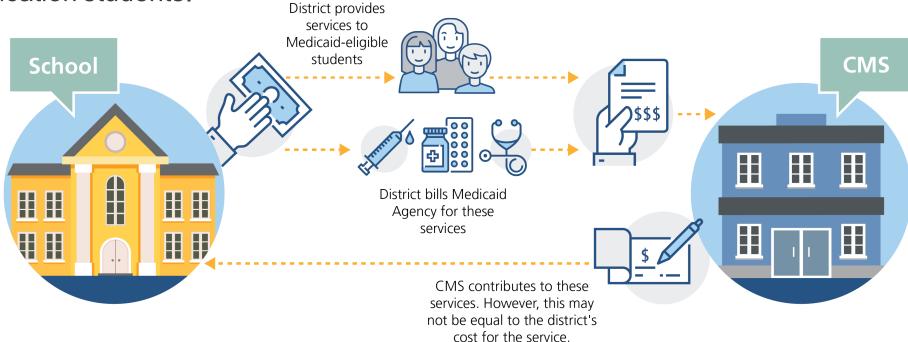


Reconcile costs through the **Cost Settlement** process



### Why is there a Cost Settlement Process?

Cost settlement ensures that counties are reimbursed appropriately with a cost-based reimbursement methodology to determine the actual cost of delivering SBHS related services to special education students.



Cost Settlement compares the actual cost incurred by LEAs to the Medicaid interim payments (received through regular Fee-for-Service billing).



#### **Cost Settlement Scenarios**

The Annual Cost Report is a requirement for LEAs to report their true costs for providing SBHS services in order to reconcile with the interim revenue received.

If the county's Medicaid Allowable Costs are less than the interim payments received, the county will **pay back the difference**, refunding the amount due.

Medicaid Allowable Costs	Interim Payments Received	Settlement Due
\$100,000	\$110,000	(\$10,000)
County owes back \$10,000		

If the county's Medicaid Allowable Costs exceed the interim payments received, the county will **receive a payment** for the amount due

Medicaid Allowable Costs	Interim Payments Received	Settlement Due
\$120,000	\$110,000	\$10,000
County is owed \$10,000		

# Difference Between the Quarterly and Annual Reports

### **Difference Between the Quarterly and Annual Reports**

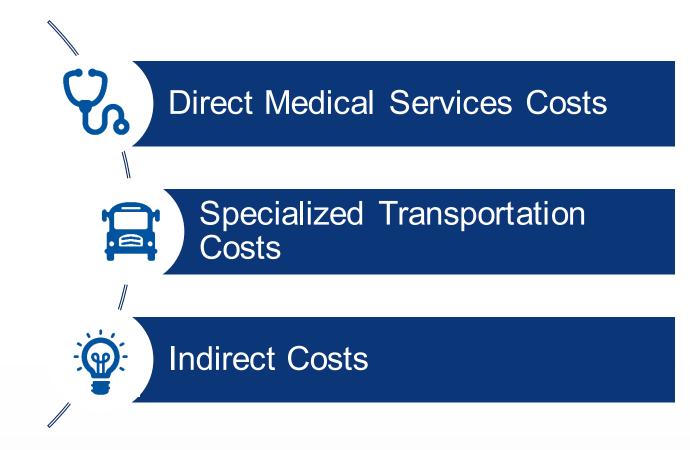
MAC (Quarterly) Medicaid Administrative Claiming	Annual Cost Settlement
Offers reimbursement for Medicaid allowable administrative activities, such as outreach, and activities that support Annual Services.	Supports the Delivery of Direct Medical Services and Specialized Transportation. Reimbursement is provided for medically necessary services that are provided to Medicaid eligible students.
Components of MAC Costs	Components of Direct Service Costs
Quarterly reporting	Annual reporting
Cash Based Accounting	Accrual Based Accounting
Medicaid Eligibility Rate (MER)	IEP Ratio
• ALL Staff must be included in the RMTS to report	Direct Service Contractor Costs are reported
costs	Direct Service Contract providers are <b>NOT</b> included
Costs for each of the four Staff Pools are reported	in the RMTS
	Administrative Costs are <b>NOT</b> reported
Cost report provides an additional reimbursement stream <i>in addition</i> to funding for provision of direct medical services	Cost report tied directly to the interim reimbursement that counties receive through Medicaid billing for direct medical services



**Claiming Allowable Costs for the Annual Cost Report** 

### **Annual Cost Report - Cost Reporting Elements**

The cost reimbursement methodology includes the following cost and data elements:





#### **Direct Medical Services Total Costs**



#### Salary, Benefits, and Contractors

- Direct Medical Service providers on the Staff Pool List and Direct Service Contractors are the only individuals included on the Annual Cost Report.
- Note that Administrative Personnel are not included on this report.

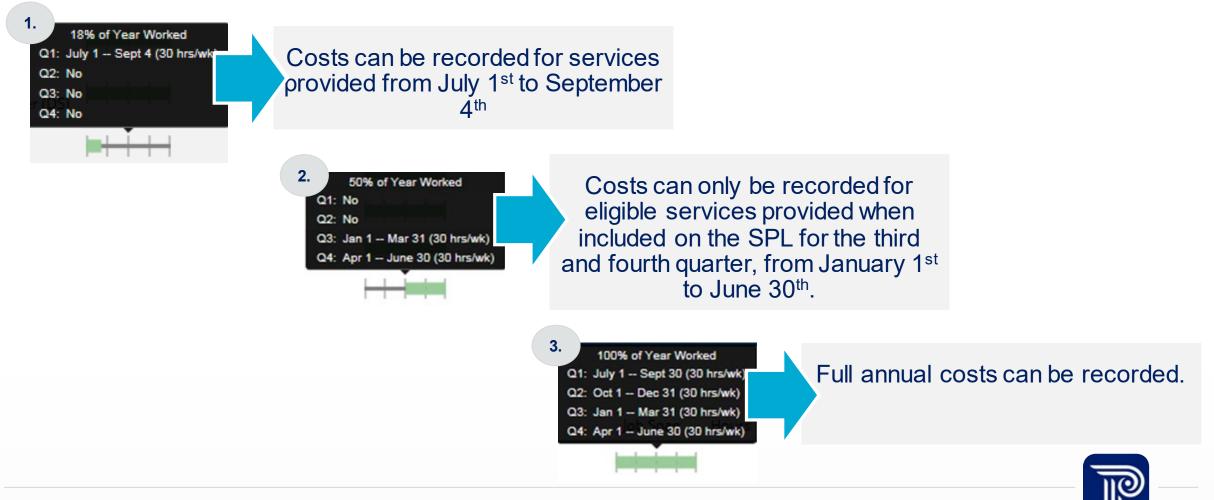
#### Materials and Supplies, Staff Travel & Training and Professional Dues and Fees

- Travel completed to attend a staff training
- Professional dues and fees specific to a provider's job at the county
- Materials and supplies on the CMS List of Allowable Materials and Supplies



### **Job Span Toolbar Examples**

#### Always refer to the Job Span Toolbar to determine allowable costs



### **Transportation Reimbursement**

#### Specialized Transportation Services include:

- Travel to and from a Medicaid covered direct IEP service to be rendered on school premises or another location.
- Specialized transportation is included on the IEP as a separate service.
- Use of a specially adapted vehicle (such as a specially adapted bus or van).

#### LEA's can report Specialized Transportation if:

- Vehicle has modified specialized equipment
- Transport occurs on the same day student receives a direct medical service
- Written in IEP (retain copies)
- Keep bus logs of one-way trips
- Bill Medicaid & log service





## **Specialized Transportation Costs**



DHHR has indicated that only a bus with a lift meets the criteria to provide specialized transportation.

Only buses with a lift and their associated drivers would be considered specialized transportation.

This vehicle must be used to transport a student who has specialized transportation listed in their IEP.

If these conditions are met, this cost may be included on the cost report as 'only specialized transportation.

An IEP alone is not enough to qualify transportation as specialized – Medicaid will not cover transportation costs for (as an example) a student with Speech Therapy in their IEP who is able to ride a regular school bus.



## **Transportation Costs**

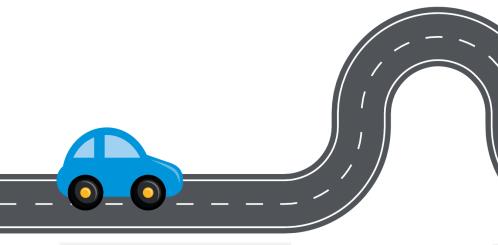


Counties may report salary and benefit costs for drivers, bus aides, and mechanics who provide specialized transportation

Counties may report costs for **Renting** or Contracting 99 specialized transportation services



Counties may report insurance for all vehicles which provide specialized transportation



Counties may **depreciate** costs for all vehicles which provide specialized transportation



Counties may report fuel and oil for all vehicles which provide specialized transportation

RENT

Counties may report repairs and maintenance for all vehicles which provide specialized transportation



## **Transportation Service Type: Only and Not Only**

	Only Specialized Transportation	Not Only Specialized Transportation	General Transportation Costs
Report When:	Costs that pertain only to providing specialized transportation services should be reported as 'Specialized Only'. These are costs that can be isolated from your general transportation costs.	If an LEA is unable to isolate special transportation costs from general transportation costs.	Any costs pertaining to transportation costs for only general education students <b>should not</b> be included.
Example:	Salaries and benefits coded to 227XX (Special Education Transportation) and buses with a wheelchair lift which transport only special education students.	A bus is adapted to transport special education students per their IEP, but also transports general students. Fuel costs may be listed as 'Not Only Specialized' if the total fuel cost includes fuel for both specialized vehicles and general transport vehicles.	Unallowable costs that include buses that only transport general education students (including related bus driver salaries) or fuel, maintenance, and insurance costs for these vehicles if separately available in the accounting system.
Ratio(s) Applied:	One-Way Trip Ratio ONLY	Specialized Transportation Ratio <u>AND</u> One-Way Trip Ratio	N/A



## **Unrestricted Indirect Cost Rate (UICR)**

The **Indirect Cost Rate** is used to include additional costs of doing business that cannot be easily identified within a particular grant, contract, or program, but are necessary for the general operation of the organization.

- Example: overhead costs, such as heating or electricity
- The UICR will be prepopulated in the system by PCG based upon data provided by WVDE
- LEA's without an approved ICR will use a default rate of 10%

### Example Calculation:

Net Direct Service Costs (less federal funds)	\$800,000
Indirect Cost Rate (10%)	.10
Indirect Costs	\$80,000
Net Direct Service Costs + Indirect Costs	\$880,000



## **Non-Allowable Costs: Federal Funds**

Costs paid for by the county using federal funds are not represented in the cost settlement calculation.

To assure federal funds are properly removed, the county must report costs as a gross amount (State, Local & Federal Dollars) and then identify the federal funds amount (Federal Dollars).

• The system will subtract out the federal funds and find the net.



Staff members or costs that are 100% federally funded should not be reported and should not be included in the RMTS staff pool list.



## **Financial Reporting Process & Timelines**

## **Financial Reporting Process**

	C	County Submits Cost Report	PCG performs in-depth Desk Reviews	PCG calculates MAC Claim or Cost Settlement
Annual Cost Report		Input Salaries, Benefits, Contractor Costs, Materials and Supplies, Staff Travel and Training, Professional Dues and Fees, and Specialized Transportation Costs, Certify Financials in Claiming System on an annual basis.	Reviews all report data for accuracy & completeness. Follows-up with LEA with data concerns and insufficient explanations. Desk reviews help protect LEAs from federal audits	PCG calculates counties' net settlement amounts and notifies LEAs CPE forms are ready for signature. Authorized Officer of the LEA (CEO, CFO, Superintendent) electronically signs CPE form in the Claiming System.
Quarterly Cost Reports		Input Salaries, Benefits, Administrative Contracted Staff Costs, Materials and Supplies, Staff Travel, Professional Dues and Fees. Certify Financials in Claiming System on a quarterly basis	Reviews all report data for accuracy & completeness. Follows-up with LEA with data concerns and insufficient explanations. Desk reviews help protect LEAs from federal audits	PCG calculates counties' net claim amounts and notifies LEAs CPE forms are ready for signature. Authorized Officer of the LEA (CEO, CFO, Superintendent) emails scanned copy of signed CPE form to wvsbhs@pcgus.com.

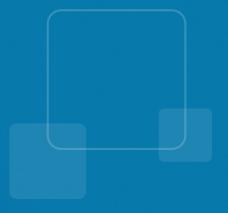
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## **Upcoming Dates and Timeline**

Туре	Description	Start	Deadline
MAC	Oct – Dec 2020 Quarterly CPE Collection	June 28, 2021	July 9, 20201
MAC	Apr – Jun 2021 Quarterly Financials	July 1, 2021	August 16, 2021
SPL	Jul – Sept 2021 SPL Certification	July 19, 2021	July 30, 2021
MAC	Jan – Mar 2021 Desk Reviews	July 19, 2021	August 6, 2021
SPL	Oct – Dec 2021 SPL Certification	August 6, 2021	September 8, 2021
MAC	Jul – Sept 2021 Quarterly Financials	October 1, 2021	November 15, 2021
MAC	Apr – Jun 2021 Desk Reviews	October 2021	TBD
ACR	FY21 Annual Cost Report	October 2021	December 31, 2021

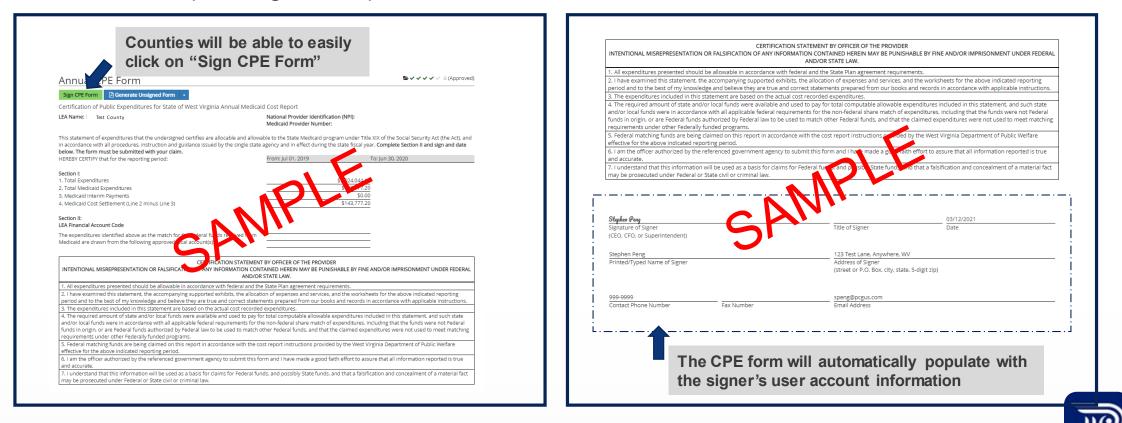
MAC = Medicaid Administrative ClaimingSPL = Staff Pool ListACR = Annual Cost Report

# **New CPE Form Feature**



## **Electronic CPE Form Signature**

Starting in December 2021, counties will sign MAC and Annual Cost Report CPE forms **ELECTRONICALLY** in the PCG Claiming System. When this feature is utilized, counties will no longer have to download, print, sign, and upload/e-mail their CPE forms.



## **Preparing for Electronic CPE Form Signature**

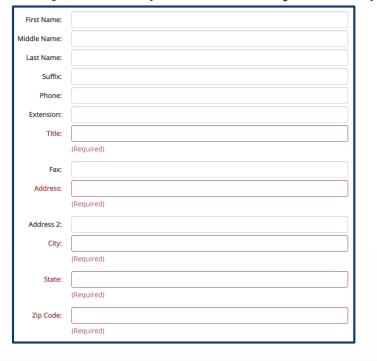
In order to prepare your county for the ability to utilize the electronic CPE form signature, please ensure that your user account information is **up-to-date** and **complete**. In order to check, please navigate to the claiming system at: <u>https://claimingsystem.pcgus.com/wv</u>

#### **Step 1**: Click "Users" > "Financial Users"

						Frzier : Aprijun zuzier Disuluc Diax		
Home	Users +	Staff Pool 👻	Calendar	Notifications	Configuration 🗸	Reports	About 🗸	
LISOTS	Financial	s Users						

### Step 2: Click your name

Name 木		Email	User Type	Location	Delete
Test, Account	~	testaccount@test.com	Financials Admin	Test County	×



**Step 3**: Complete or verify the required fields

## **Upcoming CPE Form Collection Type**

Collection Type	Description	Est Timeframe	
Non-Electronic	Oct – Dec 2020 Quarterly CPE Collection	July 2021	
Non-Electronic	Jan – Mar 2021 Quarterly CPE Collection	Oct 2021	
Electronic	Apr – Jun 2021 Quarterly CPE Collection	Dec 2021	
Electronic	Jul – Sep 2020 Quarterly CPE Collection	Dec 2021	
Electronic	FY21 Annual Cost Report CPE Collection	June 2022	

When the CPE form collection type switches to electronic (starting in December 2021) – this will be the only option available for counties to submit the CPE form.



# **Contact Information**



## **Contact Information**



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www.publicconsultinggroup.com



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