

### **Centers for Medicaid and Medicare Services (CMS)**

CMS sets the broad policies for Medicaid as a whole – including the school-based program. Each state is then permitted to make their own state Medicaid plan as long as it aligns to those policies. CMS policies are notoriously over general and often difficult to interpret. They also may change over time – forcing the state Medicaid plans to change as well.

#### CMS Responsibilities:

1. Set the broad guidelines of what is allowable in the school-based Medicaid program
2. Approve State Medicaid Plan Amendments (SPA)
3. Approve the reimbursement methodology for the school-based program

### **Office of the Inspector General (OIG)**

The OIG is the auditor for the federal government. They conduct reviews of many programs – including the Medicaid program. When they come to audit a state's school-based Medicaid program, they will look at a randomly selected number of LEAs and their Medicaid documentation. This is why you must keep all your school-based Medicaid documentation on file for 5 years. Since they only review a small amount of the documentation for a state, they take that review and use it to make a guess at what might be deficient across the entire state. If the LEA they select happens to be missing 60% of their documentation, they will assume the entire state is missing 60% of their documentation. Based on their review of how a state has implemented their program, they may recommend that the state return funds to CMS if they find the program deficient in anyway. Just like in the RMTS, one LEA's performance affects all LEAs.

#### OIG Responsibilities:

1. Audit the school-based Medicaid program
2. Detail any deficiencies they find in the program
3. Make recommendations to return an appropriate amount of funds if deficiencies are found

### **Louisiana Department of Health (LDH)**

The Louisiana Department of Health (LDH) administers the Medicaid program in the state of Louisiana. They take the guidelines from CMS and determine what Louisiana will include in the program. This includes the type of providers that will be allowed in the school-based program, the CPT code list, the fees associated with those codes and the way the reimbursements will be done. LDH is also responsible for the Random Moment Time Study, the cost reports, cost settlements and the program audits. LDH does not determine what services a provider can provide.

#### LDH Responsibilities:

1. Determine what programs will be included in the school-based Medicaid program
2. Determine what reimbursement methodology will be used for the school-based Medicaid program
3. Submit any State Plan Amendments to CMS to make changes to the program
4. Set the fee schedule and CPT codes for the school-based program
5. Update the administrative code to reflect any changes in the school-based program
6. Write the LDH school-based program manual

#### LDH Contact:

Anissa Young-Ned – Medicaid Program Supervisor

[anissa.young-ned@la.gov](mailto:anissa.young-ned@la.gov)

Fola Shobamowo – Medicaid Monitor

[Afolasade.Shobamowo@la.gov](mailto:Afolasade.Shobamowo@la.gov)

In addition to staff at LDH, LDH also contracts with Postlewaite and Netterville (P&N) for certain aspects of the program. The LDH Responsibilities that are contracted out to P&N are:

P&N Responsibilities:

1. Administer the Random Moment Time Study
2. Compiling the Cost Reports
3. Performing audits of the program
4. Providing training on the Random Moment Time Study

PNG Contacts:

Jason Coker

[jcoker@pncpa.com](mailto:jcoker@pncpa.com)

### **Louisiana Department of Education (LDOE)**

The LDOE is responsible for supporting LEAs in their implementation of the school-based Medicaid. That includes working with LDH to translate the medical components into LEA language, combining LDOE requirements and LDH requirements into single guidance documents, providing resources and trainings, advocating for changes LEAs need to the program and providing generalized support to LEAs as they implement the program.

Responsibilities:

1. Being an advocate for LEAs with LDH on the school-based Medicaid program
2. Providing resources and trainings to LEAs on implementation of the program
3. Providing general support for LEAs as they implement the program

LDOE Contact:

LDOE is in the process of hiring a full-time staff member to support this program. Until they are hired, all questions can be directed to:

[sbmp@la.gov](mailto:sbmp@la.gov)

### **Local Education Agency (LEA)**

Each LEA is responsible for correctly implementing the school-based Medicaid program. That means ensuring compliance with all relevant regulations from both LDOE and LDH. Within an LEA, there are a variety of responsibilities that are held by different people.

1. LEA Leader (Superintendent)

Responsibilities:

- Provide overall supervision to the program
- Ensure the appropriate individuals are assigned the appropriate tasks
- Work with the business manager to ensure all Medicaid eligible services are paid for with general funds rather than IDEA funds

2. School Leader

Responsibilities:

- Ensure providers are able to provide their services with limited barriers
- Ensures all providers are following LEA protocols on service provision and documentation

3. LEA Business Manager

Responsibilities:

- Make every reasonable effort to ensure that Medicaid reimbursable services are paid for with general funds and not IDEA funds
- Correctly complete the cost report(s) and submit them by November 30<sup>th</sup> each year
- Understand and plan for two ways funds come to the district:
  - Interim Billing
  - Cost Settlement
- Provide all necessary payroll and vendor records for the audit

4. LEA SBMP Coordinator (may be the same person as the RMTS Coordinator)

Responsibilities:

- Oversee all aspects of the SBMP
- Ensure they fully understand the program by utilizing the SBMP Resource Library and reaching out to [sbmp@la.gov](mailto:sbmp@la.gov) with any questions
- Stay up-to-date on all program changes by:
  - Monitoring the LDOE SBMP website
  - Reading all emails that come from LDOE, LDH or the contracted auditor from P&N
- Provide up-to-date contact information to LDOE, LDH and the contracted auditor from P&N
- Communicate any LEA changes to LDOE, LDH and P&N as needed
- Ensure all providers have proper documentation that meet the SBMP requirements
- Implement policies and procedures to ensure program compliance
- Work with all vendors to ensure they meet all program requirements
- Ensure all providers (including vendors) are properly licensed and keep copies of their license on file
- Ensure all PCS workers meet the required training standards
- Ensure all students for whom the LEA is billing have the appropriate parental consent signed and on file
- Ensure the annual parental consent notice is sent out to parents
- Work with the LEAs 3<sup>rd</sup> party biller (if applicable)
- Work collaboratively with the LEA leader, school leader(s) and service providers to remove barriers to service provision for students
- Work collaboratively with the Business Manager to:
  - ensure Medicaid billable services are paid for with general funds instead of IDEA funds
  - ensure that any additional fund brought in by the Medicaid program are spent on additional medical services for students
- Work collaboratively with other LEAs to develop and implement best practices for the SBMP

5. RMTS Coordinator (may be the same as the SBMP Coordinator)

Responsibilities:

- Oversee the RMTS
- Ensure all participants complete their moments
- Ensure the correct individuals and their correct schedules are included in the time study
- Ensure the schools calendar is accurate in the RMTS system
- Complete all quarterly updates no later than 3 days prior to the start of the new quarter

6. Service Providers (both employees and vendors)

Responsibilities:

- Ensure their license is valid and up-to-date
- Be aware of their scope of practice and ensure they are always practicing within it
- Research and fully understand the CPT code they are billing before they bill. Note – the responsibility of selecting the appropriate CPT code for a service is solely the providers.
- Ensure proper service authorization and parental consent is in place prior to providing a service
- Correctly document all service provision
- Bill in accordance with LEA policies
- Complete all RMTS (if applicable) in the allotted time frame
- Gather and store all documentation to back up all RMTS in accordance with LEA policies
- Immediately report any billing concerns or questions to the SBMP Coordinator