

Notes from the LEA Workgroup meeting June 22<sup>nd</sup>

Friends and Colleagues,

Here is the link to the recording from the last LEA Workgroup meeting here

Here is the power point shared with the group here

## Notes from the June Meeting

Other items came up for discussion. One relates to erroneous UIS billing in S MAA and the other is on school-based immunizations. Since the LEA Workgroup won't meet in July, some of the immunization discussion topics are listed below. DHCS will be addressing immunizations at the AWG meeting on the 26<sup>th</sup> July. If you have questions about enrolling as a VFC provider, how to charge for immunizations by school staff, documentation requirements, please submit them prior to the 26<sup>th</sup> to [LEA@dhcs.ca.gov](mailto:LEA@dhcs.ca.gov)

### PPL on UIS in SMAA

A recently released PPL (June 9,2023) on UIS (Unsatisfactory Immigration Status) billing was brought up for discussion. It was noted that the reduction due to the inclusion in unallowable cost might be in error. The issue is what did DHCS agree to? Was it applying the 3% reduction to the Medi-Cal population or 3% to the Medi-Cal MERS rate. This might lead to an error of reducing the amount twice. Here is a link to the document. xxx THK is checking with DHCS but others should inquire through the portal above.

### Immunizations in Schools

DHCS will discuss this at the next LEA BOP meeting scheduled for July 26<sup>th</sup> beginning at 10:30. Please try to attend. One issue is billing using RMTS when clinics are often held other than normal school times. One suggestion is to develop an encounter rate similar to what has been done for vision, hearing screening or the IEP assessment rate.

There has been some discussion about it being difficult for schools to become Vaccine for Children (VFC) providers. THK reached out to districts who once enrolled in VFC have not found problems except for determining how to bill. The exception may be small districts with limited health staff. Here is an excellent background document done by LA County Health to help you understand the process.

## Agenda Items

**Outreach, Enrollments and Audits, Oh My!**

Jeremy Ford ([JFord@wested.org](mailto:JFord@wested.org)) provided an update on progress within DHCS. Checks have started to go out and backcasting is leading to more reimbursement in the future. DHCS will be sponsoring a series of training webinars this next year.

DHCS is soliciting questions around audits that will be discussed on the 26<sup>th</sup>. His presentation is in the attached PowerPoint.

One question came up about the reimbursement checks arriving and it being difficult to track back to invoices. THK agreed to contact DHCS after the call. DHCS was contacted and suggested that LEAs scan a copy of their letter they find confusing and submit to the mailbox. You might note what is confusing. DHCS will follow up.

### CMS Claiming Manual

Chuck Muirhead from Practi-Cal ([cmuirhead@practi-cal.com](mailto:cmuirhead@practi-cal.com)) presented on the new CMS claiming manual. The manual contains a great deal of flexibility for the state. There are several questions it brings up. It streamlines Parental Consent but the federal department of education and CMS are asking for more public input. The manual also allows for a reduction in RMTS moments for as low as 385 moments. Another issue is limiting the response time to 2-2 from California's current rate that allows four days for follow-up. States must adopt a SPA to implement program changes. For those submitting a SPA by the end of September 2023, the changes would go back to July 1<sup>st</sup> 2023, otherwise the changes will go back to the date of submission. Several school districts, county offices of education and school related groups have asked to meet on possible changes and implementation with DHCS Michelle Baass. She has already agreed to meet. A copy of the letter is below:



*A Union of Educators & Classified Professionals*



**RIVERSIDE COUNTY  
OFFICE OF EDUCATION**  
EDWIN GOMEZ, Ed.D.  
County Superintendent of Schools



**Santa Clara County  
Office of Education**



June 20, 2023

Michelle Baass, Director  
Department of Health Care Services  
1501 Capitol Avenue  
Sacramento, California 95814

RE: CMS New Guidance Documents; **Delivering Service in School-Based Settings: A Comprehensive Guide to Medicaid Services and Administrative Claiming.**

Dear Director Baass,

The purpose of this letter is to request that California submit in a timely manner an amended SPA for LEABOP services, an amended SMAA implementation plan, and an updated time survey methodology that allows for the greatest flexibility possible allowed by the new CMS guide on school-based Medicaid activities and services - **Delivering Service in School-Based Settings: A Comprehensive Guide to Medicaid Services and Administrative Claiming.** Further that DHCS should form a stakeholder's task force to provide input prior to the submissions to CMS.

The Guide states that "CMS and ED are supportive of school-based health programs and, where possible, encourage State Medicaid agencies to ease administrative burdens placed on school-based health providers to promote their participation in Medicaid and CHIP and thereby increase access to covered services". The Guide also encourages states to amend their State Plan Amendments for school-based services, their administrative claiming plan amendments, or amendments to time study implementation plans as soon as possible.

We are very encouraged by the new Guide and the federal support for more flexibility and efficiency.

We would ask that as the Director of DHCS, the single state agency responsible for the Medi-Cal program, that you immediately form a task force composed of state Medi-Cal officials, school organizations including employer and employee groups, a representative group of school districts, and CDE to propose amendments and updates to the SPA for LEABOP, the SMAA Manual, and the RMTS methodology that will reflect the flexibilities now allowed by CMS.

The Guide notes that any changes requested for FY 23-24 be submitted by September 30, 2023 can be implemented back to July 2023. Given that the federal government is open to a quick turnaround on proposed changes linked to the new Guide, we ask that this task force be formed at the earliest possible date. We are ready and eager to aid this effort.

We are excited by this opportunity to take advantage of greater flexibility in school-based health programs. We urge you to act quickly on this opportunity and urge you to include an array of LEA stakeholders in drafting proposed changes. We pledge our support and participation in these efforts.