Backcasting proposal #4

Follow the protocol that CMS used in their audit:
   1. Identify the outlier districts. That's how the first 3 districts were selected.
   2. Review the outlier districts' programs and see if they are an "exception":
        A. Are they a COE that deals with special ed?
        B. Are they a district with a resource center model or clinic?
        These exceptions have been shown to have a high rate of SMAA
        claiming because they have staff that specifically outreach, link and follow
        students and their families with high needs for Medi-Cal services.

   3. Using data, you will be able to identify which districts are outliers fairly quickly.
   Use district RTC documentation that you already have and determine if they fall into
   an exception.

   4. If a district needs further review, then conduct an audit.

This process can be applied to any district that received $25,000 or more per invoice.