

POLICY UPDATES

- Comprehensive School Health Service (CSHS)
 - Providers
 - School Psychologists
 - Social Workers
 - School Nurses
 - Services
 - Preventative
 - Intervention
- Reimbursement will be similar to SBS, but these programs will not be connected

POLICY UPDATES (CONT.)

- School Prescription Policy
 - Currently under MDHHS review
 - Current practices have exposed the program to risks
 - Updates

COMPARISON OF PROVIDER MANUAL & STATE PLAN

Provider Manual

- Provides policy guidance to providers within the State of Michigan
- Easy to navigate
- SBS information is listed in the SBS chapters
 - SCHOOL BASED SERVICES
 - SCHOOL BASED SERVICES ADMINISTRATIVE OUTREACH PROGRAM CLAIMS DEVELOPMENT
 - SCHOOL BASED SERVICES RANDOM MOMENT TIME STUDY
- Can be more restrictive than the State Plan, but not less restrictive

State Plan

- Agreement between the State of Michigan and CMS on how the Medicaid program is to be administered
- VERY difficult to navigate
- SBS information is listed in sections:
 - Supplement to Attachment 3.1-A, Pages 13a.1 –
 13a.9
 - Supplement to Attachment 3.1-A, Page 36a
 - Attachment 4.16-A, Pages G-2 G-9
 - Attachment 4.19-B, Pages 4 & 14 17
 - Page 158

AMENDMENT PROCESS

Provider Manual Update

- Accomplished at the state level
 - Bulletin changes
 - Proposed comment
 - Final bulletin (Becomes active policy)
 - ~200 days
 - Technical changes
 - No bulletin necessary
 - 90 180 days

State Plan Amendment

- Must be coordinated with, and approved by CMS
 - After appropriate notices the State submits the State Plan Amendment (SPA) to CMS
 - CMS has 90 days to approve the SPA
 - CMS can stop the process with a Request for Additional Information (RAI)
 - The State has 90 days to respond to the RAI

RISK OF UNEXPECTED CONSEQUENCES

Provider Manual Update

- Low
 - Input from Medicaid leadership
 - Input from public comment
 - Update can be stopped if necessary

State Plan Amendment

- High
 - Dependent on current CMS guidelines
 - Possible changes to any opened pages or companion pages
 - Unwanted changes may still take affect even if SPA is stopped

BALANCING THE LISTS

List of Needs/Wants

- Add Free Care/ 504 services
- Expand list of approved providers
- Add additional services
- General updates

List of Concerns

- Changes to RMTS response times
- Changes in RMTS methodology

CURRENT RISKS ASSOCIATED WITH A SPA

- Reduction in RMTS Response Times
 - May have more impact for Michigan than any other state
- Changes in RMTS Methodology
 - Changes the way non-responses are handled
 - Changes the way non-working/non-paid moments are handled

RMTS RESPONSE CHANGE

- Current: 5 days prior notice, 10 days to respond
- Proposed: 0 prior notice, 2 days to respond
- Current 2 day response rate = nearly 85%
 - Not an accurate of estimate of future response rate
 - Not possible to predict the effect of no prior notice of moment on the response rate
 - Paper notification slows notification down

CONSEQUENCES OF RESPONSE RATE DROPPING BELOW 85%

- 85% response rate is different than 85% claims rate
 - Claims rate is comparison of claims to prior years
 - Response rate is the percentage of RMTS moments returned within the allowable time
- Consequences of response rate dropping below 85%
 - Below 85% response rate the RMTS sample becomes an invalid sample
 - To remedy this non-countable moments become countable non-productive response
 - This drives the RMTS percentage down = less funds available to the ISDs/LEAs

AT SOME POINT THE STATE PLAN WILL BE REOPENED - HOW DO YOU PREPARE?

- Work on obtaining accurate responses the first time
- Work on quick turn around on RMTS response
 - Helps to prepare for shorter response time requirements
 - May increase accuracy
- Start exploring paperless options if your ISD still uses paper notification

WORK GROUPS

- Technical Assistance
 - First meeting Fall 2018
- Finance
 - First meeting MISBS Conference 2018
- Codes
 - First meeting Awaiting on hiring of coding specialist

QUESTIONS FROM THE FIELD

- What if a sub is only in place 29 days during a quarter, but has been a long-term sub for over 30 days in the previous quarter? Can they bill?
- Can a Physician Assistant sign a script instead of a doctor? What about a nurse practitioner?
- For a teacher as the TCM, how many service entries do we need to have each month?
- I am trying to remember how many years providers need to keep their records on file for Medicaid Audits.
- In my LINKS groups I have up to 3-4 target students and then maybe 20 gen ed students all working on social skills and team building, etc. In your Dec newsletter it said that groups larger than 8 students is not eligible for reimbursement.
- I am wondering if personal care and social worker services are included in the claims that count for the 85% monthly billing quota?

QUESTIONS?

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