

# QUALITY ASSURANCE

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COMBINING INTERNAL AUDITS WITH LOCAL LEARNING

ANNE PAPA  
KENT ISD  
SUMMER 2018

## 2 TOPICS

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- Kent ISD Demographics
- MDHHS Policy Manual
- Who Comes to the Audit Table?
- Internal Audit Process
- District Sign-Up
- Selecting Claims
- Auditing Resources Provided by Kent ISD
- What the LEA/PSA Brings to the Table
- Reporting Findings
- Final Steps

### 3 KENT ISD DEMOGRAPHICS

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- Medicaid Billing Local Districts: 20
- Medicaid Billing Charter Schools: 8
- Special Education Staff: 2,200
- Special Education Students: 14,800
- Medicaid Eligible Students: 9100
- Medicaid Eligible Students w/ Direct Service: 8100
- Billing EO Program: Yes

## 4 MDHHS POLICY MANUAL

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### SECTION 3.1 QUALITY ASSURANCE

SBS providers must have a written quality assurance plan on file. SBS costs will be reviewed/audited by MDHHS for determination of medical necessity and to verify that all services were billed and paid appropriately. The purpose of the quality assurance plan is to establish and maintain a process for monitoring and evaluating the quality and documentation of covered services, and the impact of Medicaid enrollment on the school environment.

An acceptable quality assurance plan must address each of the following quality assurance standards:

- 5  Covered services are medically necessary, as determined and documented through appropriate and objective testing, evaluation and diagnosis.
- The IEP/IFSP treatment plan identifies which covered services are to be provided and the service frequency, duration, goals and objectives.
- A monitoring program exists to ensure that services are appropriate, effective and delivered in a cost effective manner consistent with the reduction of physical or mental disabilities and assisting the beneficiary to benefit from special education.
- Billings are reviewed for accuracy.
- Staff qualifications meet current license, certification and program requirements.
- Established coordination and collaboration exists to develop plans of care with all other providers, (i.e., Public Health, MDHHS, Community Mental Health Services Programs (CMHSPs), Medicaid Health Plans (MHPs), Hearing Centers, Outpatient Hospitals, etc.).
- Parent/guardian and beneficiary participation exists outside of the IEP/IFSP team process in evaluating the impact of the SBS program on the educational setting, service quality and outcomes.



6



what MY MOM thinks I do



what MY FRIENDS thinks I do



what MY BOSS think I do



what MY COLLEAGUES  
FROM OTHER DEPARTMENTS  
think I do



what I think I do



what I really do

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## 7 WHO COMES TO THE AUDIT TABLE

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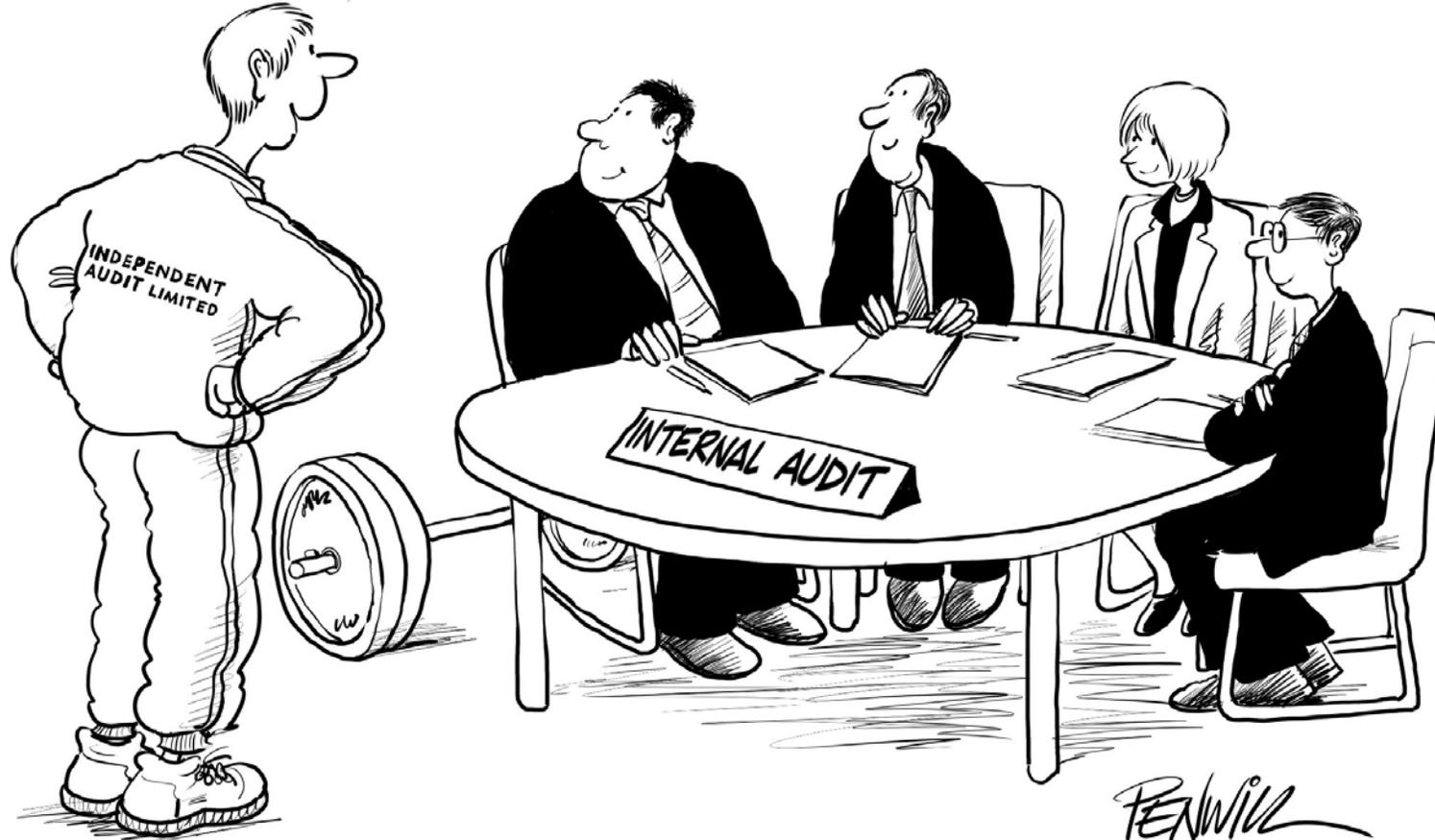
- Kent ISD Project Analyst (Me)
  - Kent ISD PowerSchool Coordinator (Susan Diederling)
  - Kent ISD PowerSchool Medicaid Support (Lynette Altman)
  - LEA/PSA Special Education Director
  - LEA/PSA Special Education Secretary
  - LEA/PSA Special Education Supervisor (if applicable)
  - LEA/PSA Special Education Staff Member (optional but encouraged)
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## 8 INTERNAL AUDIT PROCESS

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- Structured around and utilizes John Lambert's August 22, 2014 PowerPoint titled:  
An Audit Perspective to SBS – Student Claims
- Pages not directly relating to LEA/PSA claim audits removed to save time
- Stop/check points added for an opportunity to look after learning
- Districts complete folder cover page
- Process takes 2.5 hours
- Districts leave folder behind with all documentation for KISD quick review
- KISD tallies findings
- KISD copies folder and returns original to district

THINK OF ME AS  
YOUR PERSONAL  
TRAINER



## SY 2017-18 Internal Medicaid Review

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LastName	FirstName	DOB	Month Selected for Auditing	DistrictCode	StudentID			
First MET Date:	Active MET Date	IEP/IFSP Date	IEP/IFSP 2 Date					
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>					
Primary Service			Primary Provider Last	Primary Provider First	Provider Credentials	Electronic Signature	Training Confirmation	
<input type="text"/>			<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	
Related Services	Frequency	Duration	Direct or Consult	Secondary Provider Last	Secondary Provider First	Provider Credentials	Electronic Signature	Training Confirmation
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Notes:			<p>1- Is there evidence in the Evaluation and IEP/IFSP that the services provided are medically necessary? YES NO</p> <p>2- Does the IEP/IFSP include time-related measurable goals? YES NO</p> <p>3- Does the staff service logs include specific, detailed notes regarding the service provided? YES NO</p> <p>4- Does the monthly summary contain sufficient detail to sum up the entire month of services? YES NO</p> <p>5- Did all staff document services prescribed by the IEP/IFSP? YES NO</p> <p>6- Did the providers select the appropriate procedure code for the service provided? YES NO</p> <p>7- Does this review contain claims that did not meet audit standards and must be voided? YES NO</p>					
Speech Referral Date	<input type="text"/>	<div style="border: 1px solid black; height: 150px; width: 100%;"></div>						
OT Referral Date	<input type="text"/>							
PT Prescription Date	<input type="text"/>							
PCA Auth Date	<input type="text"/>							
Parent Consent Date	<input type="text"/>							
Procedural Safeguards:	<input type="text"/>							
Student Attendance	YES NO							
Staff Attendance	YES NO							
Evidence of Staff Supervision	YES NO NA							
Transportation Log	YES NO NA							
Is there a paid direct service claim on the same date transportation was claimed?	YES NO NA							

# || MEDICAL NECESSITY

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- MET
- Evaluations
- PLAAFP
- REED
- Referrals & Prescriptions

## 12 IEP/IFSP COVERED SERVICES/GOALS & OBJECTIVES

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- IEP or IFSP
- Referral Process
- Researching billing questions or issues
- Rules in electronic IEP
- Random checks
- Annual Quality Assurance

# 13 MONITORING PROGRAM EFFECTIVENESS OF IEP PLAN

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- Local level monitoring by admin, direct service & case management staff
- Team meetings local level
- Random checks
- Annual Quality Assurance
- KISD Assistant Director of Special Education (Monitoring)

# 14 BILLINGS REVIEWED FOR ACCURACY

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- Software logic
- Vendor validation (CompuClaim)
- Various reports
- Spot checking

# 15 STAFF QUALIFICATIONS

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- HR at time of hire
- Included on staff tip sheets
- LEA admin checks
- KISD itinerant new staff

## 16 ESTABLISHED COORDINATION W/OUTSIDE AGENCIES

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- Local district responsibility
- KISD Special Education Dept available for support

# 17 PARENT/GUARDIAN PARTICIPATION

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- Brochures
- One time parent consent
- PASE

## 18 DISTRICT SIGN UP

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- Four days pre-selected for district to select from and sign up
- Mandatory attendance
- Three days to choose from (fourth date is a “hidden” date)
- Up to ten districts per date
- Dates sent via Google Doc

## 19 SELECTING CLAIMS

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- All paid claims are downloaded
- One student is audited for an entire month of services from each LEA/PSA
- Visual error selection process
- High paid claim volume for one student
- Low paid claim volume for one student
- Evaluations, IEPs & REEDs

## 20 AUDIT RESOURCES SUPPLIED BY KENT ISD

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- Folder containing paid claims being audited & audit check sheet
- LARA web address
- MDE certification web address
- Procedure codes, claim details, provider notes and monthly summaries
- Speech referrals
- Occupational Therapy, Orientation & Mobility, Physical Therapy prescriptions
- Personal Care Authorization
- Transportation log

## 2 | WHAT THE LEA/PSA BRINGS TO THE TABLE

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- IEP
- MET and Evaluations
- Student Attendance
- Staff Attendance
- Staff Licensure and Certifications
- Personal Care Authorization (if applicable)



**“We back up our data on sticky notes because  
sticky notes never crash.”**

## 23 REPORTING FINDINGS



- Findings are reported to:
  - Business Officials
  - Special Education Directors
  - Staff Trainings

## 24 FINAL STEPS

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- Develop county-wide Action Plan
- All LEAs/PSAs required to implement Action Plan regardless of individual findings
- Paid claims not meeting audit standards are voided

# 25 QUESTIONS?

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## Contact Information:

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