

## Monroe County Intermediate School District

School Services Program Quality Assurance Plan

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# Quality Assurance Plan for Monroe County Intermediate School District Fee for School Services program

The Michigan Department of Health and Human Services (MDHHS) requires that a written quality assurance plan be on file. This plan documents the procedures that Monroe County Intermediate School District (MCISD) has in place to verify the medical necessity of services. Additionally, the plan illustrates that MCISD has a process in place to make sure that claims are valid.

The Medicaid Provider Manual dated January 1, 2015 states:

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

- 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, Department of Health and Human Services (DHHS), 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 School Services program on the educational setting, service quality and outcomes."

#### Local Monroe County School Districts:

#### **Airport Community Schools**

11270 Grafton Rd. Carleton, MI 48117 Phone: 734-654-2414 Fax: 734-654-4014

Web Site: <a href="www.acspublic.com">www.acspublic.com</a> SPL Contact: Theresa Carrell tcarrell@airportschools.com

#### **Bedford Public Schools**

1623 W. Sterns Rd.
Temperance, MI 48182
Phone: 734-850-6000
Fax: 734-854-6099
Web Site: www.mybedford.us
SPL Contact: Shelly Haise

#### **Dundee Community Schools**

shelly.haise@mybedford.us

420 Ypsilanti St. Dundee, MI 48131 Phone: 734-529-2350 Fax: 734-529-5606

Web Site: <a href="www.dundeecommunityschools.org">www.dundeecommunityschools.org</a>
SPL Contact: Kimberly Worden
Kimberly.Worden@dundee.k12.mi.us

#### **Ida Public Schools**

3145 Prairie St. Ida, MI 48140 Phone: 734-269-9003

Fax: 734-269-2294
Web Site: www.idaschools.org
SPL Contact: Chad Baas
Chad.baas@monroeisd.us

#### Jefferson Schools

2400 N. Dixie Highway Monroe, MI 48162 Phone: 734-289-5550 Fax: 734-289-5574

Web Site: <a href="www.jeffersonschools.org">www.jeffersonschools.org</a> SPL Contact: Karen Strazzulla kstrazzulla@jeffersonschools.org

#### **Mason Consolidated Schools**

2400 Mason Eagles Drive Erie, MI 48133 Phone: 734-848-5475 Fax: 734-848-2516

Web Site: <a href="www.eriemason.k12.mi.us">www.eriemason.k12.mi.us</a>
SPL Contact: Dana Blair
blair@eriemason.k12.mi.us

#### Monroe Public Schools

1275 North Macomb St.
Monroe, MI 48162
Phone: 734-265-3000
Fax: 734-265-3001
Web Site: www.monroe.k12.mi.us
SPL Contact: Cassandra Shook
shook@monroe.k12.mi.us

#### **Summerfield Schools**

17555 Ida West Rd. Petersburg, MI 49270 Phone: 734-279-1035 Fax: 734-279-1448

Web Site: <a href="www.summerfield.k12.mi.us">www.summerfield.k12.mi.us</a> SPL Contact: Kimberly Worden Kimberly.worden@monroeisd.us

#### **Whiteford Agricultural Schools**

6655 Consear Rd. Ottawa Lake, MI 49267 Phone: 734-856-1443 Fax: 734-854-6463

Web Site: <a href="www.whiteford.k12.mi.us">www.whiteford.k12.mi.us</a> SPL Contact: Marissa Tebbe-Cousino Marissa.tebbe-cousino@whiteford.k12.mi.us

#### **CHARTER SCHOOLS SERVED**

#### New Bedford Academy

6315 Secor Rd. Lambertville, MI 48144 Phone: 734-854-5437 Fax: 734-854-1573

Web Site: www.newbedfordacademy.net

#### **Triumph Academy**

3000 Vivian Rd. Monroe, MI 48162 Phone: 734-240-2610 Fax: 734-240-2785

Web Site: www.triumphcharteracademy.org

#### Computer Software Billing Programs: PowerSchool Special Education (PSSE) and Relay

Three web-based programs are utilized by MCISD for seeking Medicaid reimbursement for the health services provided in our schools. Our special education School Services Program (SSP) participants use a program called PowerSchool Special Education Service Capture to record their services. The program allows our staff to record the date of service, time of service, length of service in minutes, procedure provided, group size if applicable, and progress report if applicable. In addition, providers enter notes, along with the areas covered and assessed. General education nursing providers document directly in Relay. C4S mental health providers document in BHWorks.

PowerSchool Special Education also houses electronic determination of medical necessity and Plan of Care (POC) documentation. Providers are responsible for ensuring all documentation is complete and accurate. Reports within the system support with annual review due dates. C4S documents are in a cloud-based storage system for school nurses. Mental health providers use BHWorks.

Relay is the software program used to submit the claims through the state Champs computer system. Relay creates the 270, 271, 837, and 835 files.

Both computer programs have built in validations to ensure compliance with federal and state regulations in claim submission. The validations include the following:

- Ensuring the services being submitted are documented on the IEP/IFSP/POC
- Student does not have medical TPL
- Parental consent to submit services are on file
- Appropriate prescriptions and referrals are on file
- Duplicate services are not submitted
- The monthly allowable services are not exceeded
- Monthly summaries are completed before claims are released

#### **Designated Case Management**

Relay ensures compliance with submitting services that are medically necessary and are a part of a student's IEP/IFSP/POC. The program checks for the following services before submitting Designated Case Management claims:

Speech and Language Services
Social Work Services
Psychological Services
Physical Therapy
Occupational Therapy
Orientation & Mobility Services
Nursing & Personal Care Services

#### **Transportation**

Specialized transportation is reported for both students who do not need special accommodations, and those that require a wheelchair lift as documented in the student's IEP/IFSP. All specialized transportation is documented in the IEP/IFSP of the student transported and must pass the validation process.

## Third Party Liability

The Medicaid eligibility files are configured to mark the students as not Medicaid eligible in our system when there is medical third-party liability present. Therefore, any services documented would not be built into an 837 file for submission.

## **Maximum Number of Units Submitted Validation**

This utility checks to make sure that the maximum number of units submitted does not exceed the number of units allowed monthly.

#### **Incorrect Claims**

If a claim has been submitted incorrectly, it can be voided in the Champs system.

## **Age Validation**

Relay has an age validation check so that claims are not submitted for students age 21 and older.

#### Reports

We have many reports that assist our staff with compliance when submitting claims. The reports include:

#### **Compliance Reports for Providers**

- MCISD Incomplete Service Records for Provider
- MCISD Medicaid Consent Needed
- MCISD Missing Case Management For Providers
- MCISD Missing Monthly Summary Report for Providers
- MCISD Prescriptions Needed By Student
- MCISD Provider Notes By Provider
- MCISD PT Scripts Expiring within 60 Days
- Monthly Summaries Needed

If staff do not comply with submitting services, they are removed from their district staff pool list and salary/benefits are subtracted from the quarterly reports.

#### Attendance

There is a calendar feature in PowerSchool for Special Education that allows us to prevent billing for days when school is not in session by setting the days "off" per school district. On non-school days, providers are unable to document services. We do open the calendars for staff who service students in the home outside of the normal workday.

#### **Transportation**

- 1. Each quarter, MCISD Administrative Assistant will send a spreadsheet to each Transportation Manager to review special transportation bus numbers and drivers.
- 2. Any changes will be reported to MCISD Administrative Assistant. Changes that occur within each quarter may be reported at any time.
- 3. MCISD Administrative Assistant enters transportation services manually into the Relay program.
- 4. Bus drivers submit bus run logs weekly. Logs may be submitted electronically to Kim.Torrance@monroeisd.us.
- 5. MCISD Administrative Assistant creates the transportation encounters by checking the names of the students transported on each bus, as documented on the log submitted by each driver. The software program allows the MCISD Administrative Assistant to add and remove students on bus lists.
- 6. As backup documentation, paper and electronic logs are saved and filed in CEO.
- 7. The software system validates billable trips by verifying a health-related service was provided the same day of transport. If there was no health service recorded that day, the encounter is marked not billable and is not extracted for reimbursement. Specialized transportation is reported for both students who do not need special accommodations, and those that require a wheelchair lift as documented in the student's IEP/IFSP. All specialized transportation is documented in the IEP/IFSP of the student transported and must pass the validation process.

#### **School Service Providers and Procedures**

The participants in the program receive training in documentation and RMTS upon employment by the ISD or LEA. In addition, they receive documentation in the form of billing guidelines (tip sheets), and messages or announcements via PowerSchool Special Programs. The School Services office is available to answer questions. The School Services Program Monitor attends staff meetings to communicate updates and changes in procedures, as needed. In addition, a record review is held periodically to monitor the program. Oversight reviews look for proper documentation to substantiate billing such as personal logs, schedules, speech referrals, occupational therapy and physical therapy prescriptions, IEP and evaluation documentation, and

attendance records. Staff credentials are verified before staff can participate in the School Services program. The Human Resources Department at MCISD keeps a record of all MCISD hired staff, their credentials, and expiration dates. LEA HR departments maintain records of their hired staff.

#### Speech Services

The speech pathologists at MCISD have been trained in proper billing procedures. In addition, we utilize our computer system to monitor speech referral requirements. A referral is obtained for all existing students receiving speech at the beginning of each new school year. When speech is added to an IEP the first time or when we enroll a new student to the district needing speech services, the referral is obtained when the IEP is finalized. We utilize a report to capture the names of any students who do not have a required speech referral on file. All documentation supporting the speech services can easily be found in our image archive system.

## Social Work Services/MH Providers

The social workers/MH team have been trained in proper billing procedures. Evaluations, POC/IEP participation, REED participation, counseling, and therapy are reported by the school social workers at MCISD. The social workers have been instructed to report crisis intervention for all students they service if the students receiving crisis intervention services have an active IEP/IFSP, which complies with federal/state regulations. Crisis Intervention by school social workers and/or school psychologists may be added to the IEP of MCISD students in the event crisis interventions are an ongoing issue for these students and prevents them from meaningful participation in the school.

## Occupational Therapists/Physical Therapists

Physical Therapists obtain their own prescriptions and are responsible for making sure they have the proper documentation before either providing services (PTs) or billing these for reimbursement (PTs and OTs). The prescriptions are scanned into our computer system for a permanent record. This is monitored like the speech referral procedure. We utilize a report to identify any that are missing or expiring within 30 days. Occupational Therapy referral requirements are monitored using our computer system. A referral is obtained for all existing students receiving speech at the beginning of each new school year. When OT is added to an IEP the first time or when we enroll a new student to the district needing OT services, the referral is obtained when the IEP is finalized. We utilize a report to capture the names of any students who do not have a required OT referral on file. All documentation supporting the OT services can easily be found in our management system.

#### **Nurses**

Some of the nurses who participate in the School Service Program are located at our center program for severely disabled students. The group of students they service are primarily diagnosed as (SXI) severely multiply impaired with many medical requirements. Students with other primary disabilities who receive nursing services have chronic medical conditions and may receive services in their local district.

## **Physical Therapy Assistants**

As required, our physical therapy assistants are assigned a physical therapist(s) who oversee their therapy and documentation. The supervisors are assigned by student, so the PTA may have more than one Physical Therapy Supervisor. This is often determined by which district the PTA services students in. Medicaid documentation is approved by the supervising therapist through our management system. A report is used to determine services requiring approval.

## **Certified Occupational Therapy Assistants**

As required, our COTAs are assigned an occupational therapist(s) who oversee their therapy and documentation. The COTA may have more than one OT Supervisor. This is often determined by which district the COTA services students in. Medicaid documentation is approved by the supervising therapist through our management system. A report is used to determine services requiring approval.

## Limited Licensed Therapists for Speech and School Social Work

As required, limited license therapists are assigned a supervising, fully licensed therapist to oversee their service delivery and documentation. Medicaid documentation is approved by the supervising therapist through our management system. A report is used to determine services requiring approval.

## Orientation & Mobility

Our Orientation & Mobility Specialist reports vision services for students that help them learn to travel in many environments. Prescriptions for orientation & mobility services are kept on file.

#### **Personal Care Services**

Our personal care providers are teacher assistants located at the Educational Center, within our Early Childhood programming. These providers log their services in the PowerSchool for Special Education Service Capture software and keep a paper log sheet of the services they provide. These log sheets are scanned and kept on file for auditing purposes.

#### Evaluations

The Initial and Three-Year IDEA Evaluations are conducted to determine which services should be included on the student's IEP/IFSP. School psychologists and ancillary staff administer assessments, review medical records, complete observations, and interview parents and other staff to determine what services the students need. Documents are created and housed in our electronic system, PowerSchool for Special Education Special Education, and can be shared with other members of the student's multidisciplinary team. In addition, team meetings are held to discuss evaluation results and formulate goals and objectives for the IEP/IFSP.

All IEPs and IFSPs are kept electronically in the system, as well as the student's cumulative file, and can be viewed to ensure that staff are billing medically necessary services. Our system keeps the billing within the date range of their IEPs/IFSPs. In other words, providers cannot bill for services if an active IEP/IFSP is not in place. General education documentation related to Medicaid expansion of the School Services Program is kept electronically.

## **Medicaid Eligibility**

Every student in the student database is checked through the State Medicaid program at the beginning of each month. The eligibility status is imported into the system. All students with TPL (medical) are reflected as not Medicaid eligible and services will not be sent for reimbursement for those students.

## **Monitoring/Peer Record Review**

The responsibility of the School Services Program Monitor is to review documentation for accuracy. As all encounters are electronic, this is very accessible. In reviewing these, it is verified that the treatment notes correspond to the procedures chosen. The dates and time of the procedure can be looked at as well as the student's treatment and progress notes.

In addition, peer record reviews may be held periodically to determine the quality and accuracy of billing. Any corrective action needed is reported to the Directors of Special Education and/or a Special Education Supervisor for the corresponding staff member.

## **Website**

A website for the School Services providers has been set up. They can log into the website to obtain tip sheets for billing, instructions for entering encounters, video tutorials, and newsletters documenting the correct procedures to follow.

http://www.monroeisd.us/departments/specialed/servicesprograms/medicaidservices/

#### **Coordination/Collaboration with Outside Agencies**

Coordination and collaboration with outside agencies have been established. This is particularly true for the Early Intervention staff. Various agencies are listed on the IFSPs and an Early On Authorization to Share Information form is signed by all families. Some examples of the agencies are Community Mental Health, Monroe County Health Department, Kellogg Eye Center, University of Michigan Hospital, and Monroe County Juvenile Court.

#### Parental Involvement and Consent

The parental and student feedback on the School Services program is monitored through case management. The School Services Program Monitor has access to parent/guardian satisfaction through treatment and progress notes of case management activities that discusses all health-related services. In addition, the parents of our Early On students are often active participants in the home therapy and classroom activities of our youngest populations. The transdisciplinary model is used to service our 0 to 2 populations, which requires significant parent/guardian

participation and feedback. We encourage cooperation with outside agencies regarding the coordination of services.

Parental notification and consent to bill Medicaid is requested to submit student information. Parents receive progress on goals and objectives at all marking periods. Notification and consent to treat is obtained annually.

## **Additional Quality Control**

The sanctioned provider website is checked on a regular basis, and each HR Department is responsible for checking credentials and maintaining personnel files.

<u>LARA Health License Verification</u>

#### **PCG Claiming System**

- 1. Quarterly, MCISD Administrative Assistant creates an excel spreadsheet of active Staff Pool List (SPL) participants per LEA from the MIAOP claiming site. PCG Claiming System
- 2. MCISD Program Administrator sends an email to the identified SPL Contact at the LEA with a memo (Attachment A) and attachments needed to complete the work including:
  - Due date for changes to be sent to MCISD Program Administrator
  - A copy of active SPL participants
  - A Staff Pool List Quarterly Update Sheet, including necessary fields to make changes (such as shift type, email address, etc.)
  - AOP Info and AOP Non-Standard Job Information forms
    - New staff to AOP lists are asked to sign and return the Non-Standard Job Information form. These are scanned and filed electronically in CEO.
- 3. MCISD Program Administrator sends a follow up email the identified LEA SPL contact who has not provided updates one week prior to due date.
- 4. MCISD Program Administrator sends a follow up email up to due date of certification. Phone calls are made, as needed.
- 5. MCISD Program Administrator will make changes to the SPL in accordance with confirmed updates from local district SPL contacts. If no changes are submitted, SPL will be certified with no changes, unless there is a direct violation to the requirements of the SPL with existing personnel that are discovered through internal monitoring processes.

## **Training for New SPL Members**

- 1. New personnel are sent an email welcoming them to the program and provided training information (Attachments B, C, D). In-person training is also available.
- 2. New Personal Care Providers are trained by MCISD Administrative Assistant.

#### **Random Moment Time Studies**

Random Moment Time Study compliance is closely monitored by MCISD Administrative Assistant. Notifications are automatically sent to participants from PCG before and after their moment.

In addition to these notifications, MCISD Administrative Assistant sends late notices and offers support.

MCISD Program Administrator is notified on all late notices sent by MCISD Administrative Assistant. MCISD Program Administrator contacts personnel and direct supervisors on an "as needed" basis to ensure compliance with completing the RMTS.

#### **Quarterly Financial Reports**

- 1. Quarterly, MCISD Business Office logs into <u>PCG Claiming System</u> to download the quarterly SPL spreadsheet. A Cognos report is pulled for salary/fringes, efinance report is pulled for instructional materials.
- 2. Information in imported back to <u>PCG Claiming System</u> and is certified by MCISD Assistant Superintendent for Business and Administrative Services.
- 3. LEAs are responsible for completing and certifying their own quarterly financial.

#### **Annual Financial Reports**

- 1. MCISD Accounting Supervisor will forward the Annual SPL list when received from PCG.
- 2. LEAs will be required to compile the Facility Settlement data and input that data for Medical Costs and Transportation Costs into CHAMPS. LEAs will then submit it to the ISD.
- 3. MCISD Accounting Supervisor will review the LEA data and submit to the State.

## **Attachment A: Memo to LEA Business Managers**

#### Memorandum

To: Staff Pool List (SPL) Contacts

From: Shawna Dippman, Supervisor and Planner/Coordinator

Date:

Re: Quarter 1 Staff Pool List and Calendar

It is time for updates to the staff pool list (SPL). We are going to try a new format to ensure accuracy of staff pool lists:

- Attached you will find a copy of the current staff pool list along with a blank spreadsheet. Please review the current SPL and make any changes on the blank spreadsheet. Please note: there are tabs at the bottom of the spreadsheet for the appropriate staff pool list categories (AOP, Case Management, and Direct Service).
- For anyone being added to the SPL under the category of AOP, attached are two forms.
   The first is a Non-Standard Job Information Form which needs to be returned to me and kept on file. The second is an informational letter for new AOP staff to help them understand their role in the Medicaid School Services (SCHOOL SERVICES) program.
- ALL new staff in Case Management or Direct Service SPL will need training to carry out their responsibilities as part of the Medicaid SCHOOL SERVICES program.
- Feel free to contact me at <a href="mailto:shawna.dippman@monroeisd.us">shawna.dippman@monroeisd.us</a>, or 734.342.8620.

Thank you for your time. All changes to the SPL for the (list quarter) need to be to me by (date).

As a reminder, please keep me updated throughout the quarter of any direct replacements or updates to email addresses and contact information. These are changes that may be made at any time and will ensure the accuracy of your SPL. This includes maternity leaves and FMLA.

Sincerely,

Shawna Dippman

Hello,

You have been added to your district's Medicaid School Services Staff Pool List as a member of the Administrative Outreach Program. As a result, you will receive Random Moment Time Studies as part of the Medicaid School Services program.

The Administrative Outreach Program receives partial reimbursement for the administrative costs to identify and help students who are considered "at risk" for various health problems and direct them toward proper resources. This program generates revenue by tracking the time spent on Outreach activities by school personnel, and by factoring the district's expense for staff providing these services.

As a participant, you may be randomly selected to complete Random Moment Time Studies. The time study design logs only what the participant is doing at one moment in time. A random moment consists of one minute of work done by one employee, both chosen at random, from among all such minutes of work that have been scheduled for all designated staff statewide. The RMTS measures the work effort of each group of approved staff involved in the time study process by sampling and analyzing the work efforts of a randomly selected cross-section of each staff pool. The RMTS methodology employs a technique of polling employees at random moments over a given time and tallying the results of the polling over that period. The method provides a statistically valid means of determining the work effort being accomplished in each program of services.

Random Moment Time Studies (RMTS) are used to track the time spent on activities that identify potential obstacles and impediments to students becoming successful. This component of the program reimburses ISDs and districts for distributing information about Medicaid benefits to students and their parents/guardians/families. You will receive your RMTS electronically via your district's email system.

For more information about the Administrative Outreach Program, see this website:

**School Based Medicaid Services** 

Video Tutorial for AOP

Thank you!

**Attachment C: DCM Email** 

Hello,

You have been added to your district's staff pool list as a participant in the Medicaid School Services Program. There are two components to the program. The first is completing Targeted Case Management documentation, IEP participation documentation, and Monthly Progress Summary documentation, in our electronic system (PowerSchool Special Education which is accessed through the website tienet.jcisd.org). The other part of the program is completing Random Moment Time Studies (RMTS).

As a participant, you may be randomly selected to complete a Random Moment Time Study. The time study design logs only what the participant is doing at one moment in time. A random moment consists of one minute of work done by one employee, both chosen at random, from among all such minutes of work that have been scheduled for all designated staff statewide. The RMTS measures the work effort of each group of approved staff involved in the time study process by sampling and analyzing the work efforts of a randomly selected cross-section of each staff pool. The RMTS methodology employs a technique of polling employees at random moments over a given time and tallying the results of the polling over that period. The method provides a statistically valid means of determining the work effort being accomplished in each program of services.

Please see the attached guidance to support your successful completion of RMTS, as well as helpful tips and tricks for your regular monthly documentation. Contact me with any questions!

## <u>Targeted Case Management Video</u>

Attachments:
General Information
RMTS Must Knows
RMTS at a Glance
TCM Tip Sheet
DCM Exemplary Examples

Thank you!

Hello,

You have been added to your district's staff pool list as a participant in the Medicaid School Services Program. There are two components to the program. The first is completing Direct Service documentation, Evaluation documentation, IEP participation documentation, and Monthly Progress Summary documentation, in our electronic system (PowerSchool Special Education which is accessed through the website tienet.jcisd.org). The other part of the program is completing Random Moment Time Studies (RMTS).

As a participant, you may be randomly selected to complete a Random Moment Time Study. The time study design logs only what the participant is doing at one moment in time. A random moment consists of one minute of work done by one employee, both chosen at random, from among all such minutes of work that have been scheduled for all designated staff statewide. The RMTS measures the work effort of each group of approved staff involved in the time study process by sampling and analyzing the work efforts of a randomly selected cross-section of each staff pool. The RMTS methodology employs a technique of polling employees at random moments over a given time and tallying the results of the polling over that period. The method provides a statistically valid means of determining the work effort being accomplished in each program of services.

Please see the attached guidance to support your successful completion of RMTS, as well as helpful tips and tricks for your regular monthly documentation. Contact me with any questions!

#### Service Capture Overview

Attachments:
General Information
RMTS Must Knows
RMTS at a Glance
Corresponding Tip Sheet for Direct Service Area
Exemplary Examples
Internal Audit Form

Thank you!