

Children First



PUBLIC
CONSULTING
GROUP

Developing Tools to Document Services – Two Experiences

Overview of Past Audit Experiences
Implementation Steps to Continuously Review Service
Documentation
NAME Conference

September 27, 2007

Agenda



- Introduction of Presenters

- Review the Iowa Experience
 - Program Background
 - Documentation Reviews
 - Sample Forms
 - Online Tutorial

- Review the Chicago Experience
 - Total Service Documentation
 - History of Audits and Documentation Requests
 - Audit Process
 - Communicating Results to Staff

Introduction of Presenters



- Dann Stevens, Medicaid Consultant for Iowa Dept of Education

- Iowa Medicaid staff from 1993 to 2002
 - Primarily worked in Managed Health Care (MHC)
 - From 1999 to 2002, Program Manager for MHC

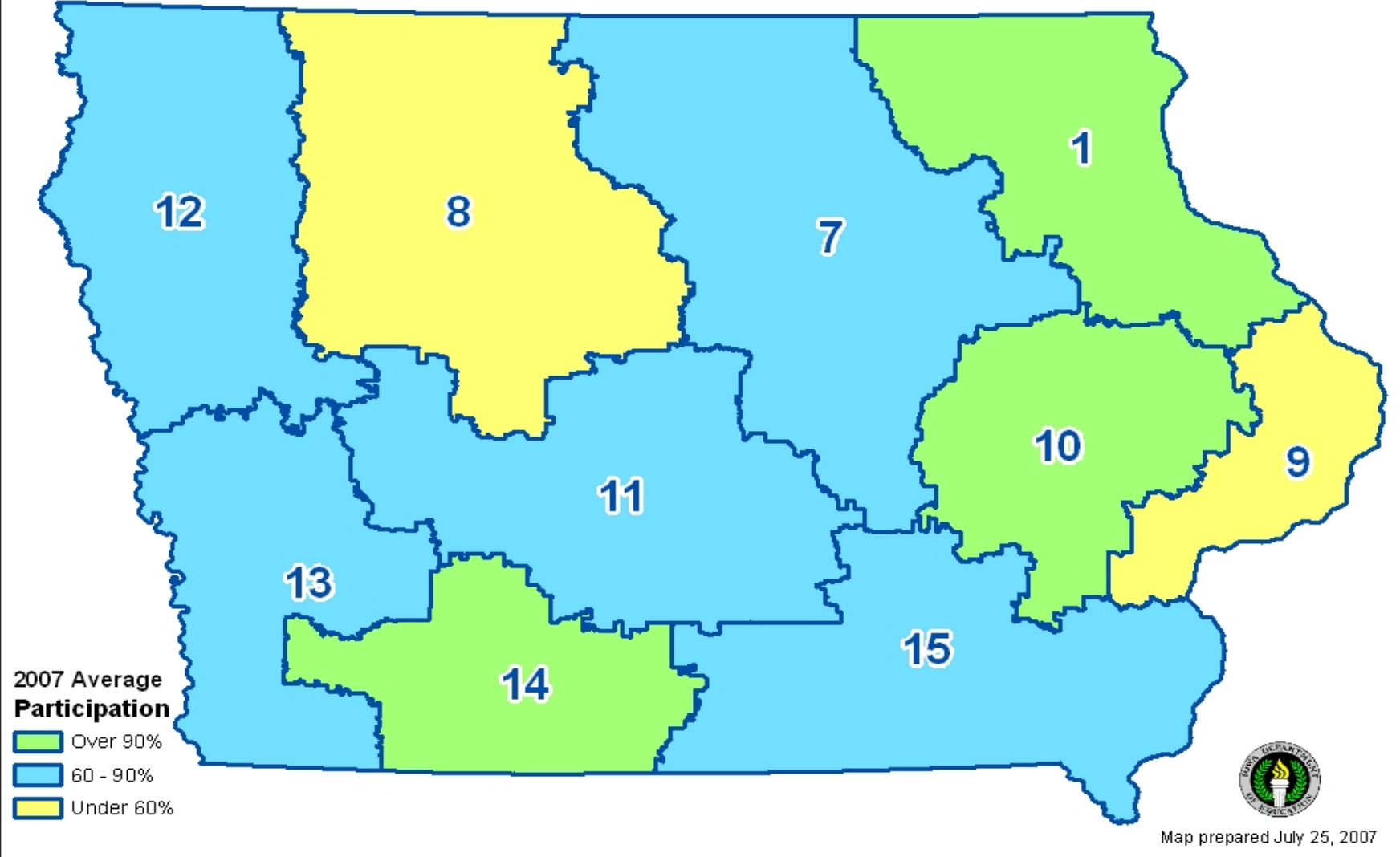
- Iowa Department of Education since 2002
 - New position
 - Part of interagency agreement
 - Provide TA to districts and regional agencies
 - Covering Part B and Part C of IDEA 04
 - Does NOT cover MAC



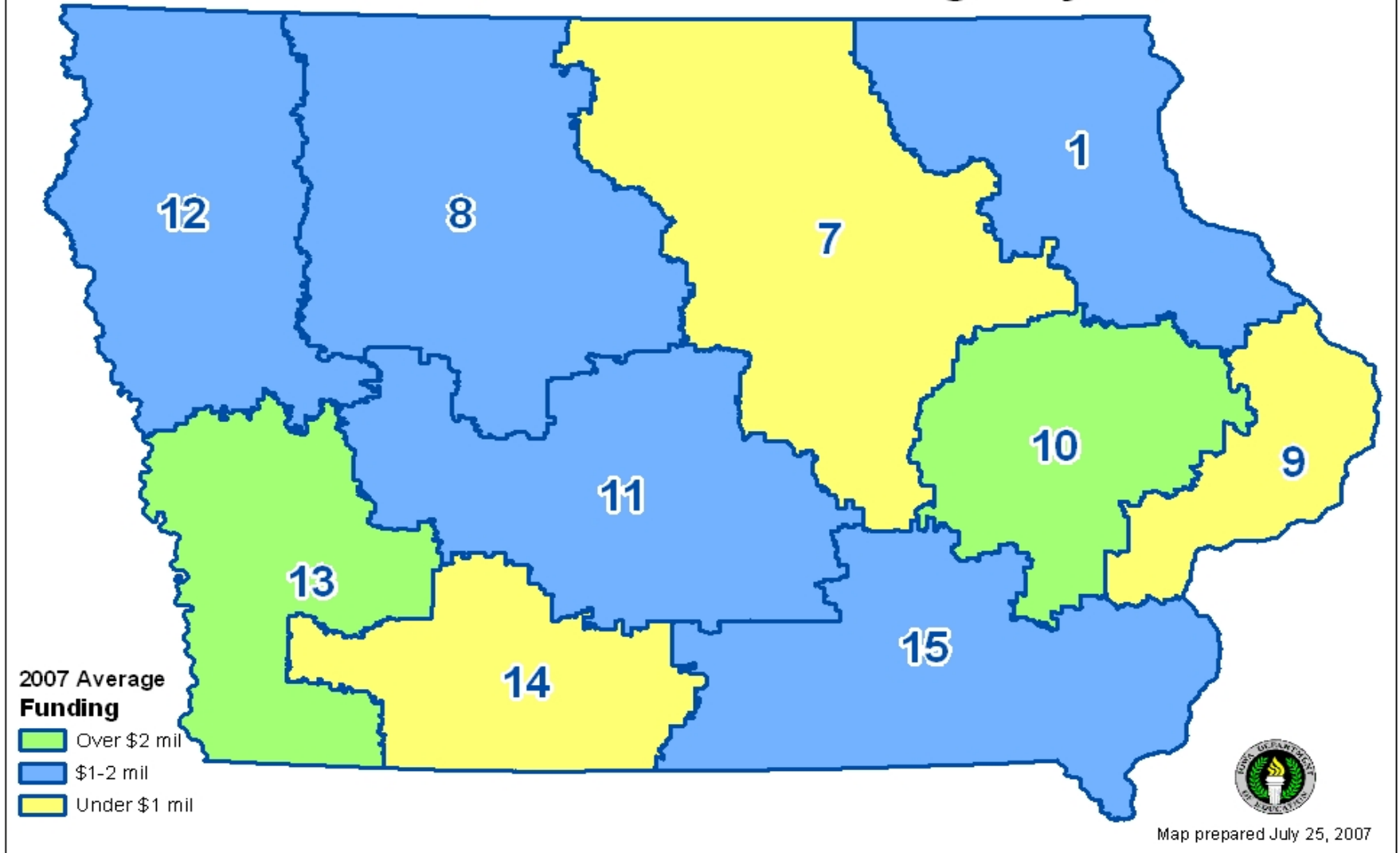
Reviewing the Iowa Experience

- There are about 75,000 active IEPs in Iowa
- Of those, about 25,000 are Medicaid students
- There are 365 Local Districts (LEA) in Iowa
 - Provide more common direct services (Nursing, health/behavior assistance, transportation)
 - Medicaid added services in March 2001
 - Claim volume has increased to \$14 million annually in SFY06
- There are 10 Regional Agencies (AEA)
 - Provide Special Education Support Services (Speech, PT/OT, etc)
 - State Legislature mandated Medicaid claiming in 1988
 - Claim volume is steady at \$6 million annually
- The Dept of Education created the Medicaid Consultant position in February 2002

LEA Federal Medicaid Participation - By AEA



LEA Federal Medicaid Funding - By AEA





Reviewing the Iowa Experience

- Documentation Reviews
- DE contracted with a provider peer-review organization in 2001
 - Look at AEA claiming
 - Provide feedback on compliance
 - DE Medicaid Consultant designed example documentation form
- DE contracted with the same organization in 2003
 - Look at LEA claiming
 - Provide feedback on compliance
 - Provide a tool for ongoing monitoring
 - Designed example forms for each service
- DHS (Medicaid agency) began audits of all provider types in 2005
 - Looked at 4 LEAs and 4 AEAs
 - Results were mixed with varying levels of compliance
 - Use of the DE designed form was compliant

Reviewing the Iowa Experience



- Documentation Training Plans
- DHS contracted with a vendor to design tutorial for “non-traditional” providers
 - This was in 2005-06
 - Resulting product needed many edits
 - Content language was not educationally oriented
- DE plans for online tutorial in 2007-08
 - Looked at the DHS product as a base
 - Customized language and format for education providers
 - Three different provider types (AEA, LEA and Infant/Toddler)
 - There are two components for each type (Policy and Coding)
 - Policy will address IEP and coverage language
 - Coding will address documentation requirements and claim data

Reviewing the Iowa Experience



- Current Documentation related links
 - Iowa Medicaid Enterprise web site

<http://www.ime.state.ia.us/Providers/>

- Iowa Department of Education web site (Medicaid section)

<http://www.iowa.gov/educate/content/view/717/588/>

Reviewing the Chicago Experience – Total Service Documentation



- Total Service Documentation = All Health Related Services Delivered to all students must be documented electronically

- Undocumented Services = Undelivered Service

- Why Document all services?
 - Revenue v. Potential Due Process Liability
 - Accountability
 - Complete Information

Chicago Overview



Teachers – 3,985

- 3,805 Teachers
- 180 Citywide Itinerant Teachers

Clinical Support – 1,616

- 367 School Social Workers
- 263 School Psychologists
- 202 School Nurses
- 83 Health Service Nurses
- 58 LPN Nurses
- 337 Speech Pathologists
- 78 Speech Paraprofessionals
- 39 Physical Therapists
- 111 Occupational Therapists
- 79 Hearing Vision Techs

Aides – 3,148

- 2,650 Paraprofessionals (includes CWA's)
- 459 Bus Aides

Disability Breakdown

- 1,925 (3.7%) Autism [AUT]
- 3,341 (6.4%) Behavior Emotional Disorder [EBD]
- 3,942 (7.5%) Cognitive Disorder, Mild;/Moderate [EMH]
- 1,833 (3.5%) Cognitive Disorder, Moderate/Severe [TMH]
- 649 (1.2%) Cognitive Disorder, Severe/Profound [SPH]
- 1,573 (3.0%) Developmental Delay [DD]
- 575 (1.1%) Hearing Impairment [HI]
- 30,726 (58.6%) Learning Disability [LD]
- 11 (<0.1%) Multiple Handicaps [MH]
- 973 (1.9%) Other Health Impairment [OHI]
- 518 (1.0%) Physical Impairment [PHY]
- 5,948 (11.3%) Speech and/or Lang. Impairment [SPL]
- 233 (0.4%) Traumatic Brain Injury [TBI]
- 194 (0.4%) Visual Impairment [VI]

52,441 Total Sped. Students

History of Audits and Documentation Requirements



■ **Justification of Provided Services**

- Federal Audits -OIG, PERM, CMS
- State Audits – Illinois Department of Healthcare and Family Services (HFS)
- Documentation Required:
 - Case notes / Progress Notes
 - Copy of the active Individual Education Plan
 - Staff Credential
 - Student Attendance Records
 - Prescription / Referral if required by service types
- Frequency –
 - PERM audits – Selected services requested monthly
 - CMS / OIG – Frequency is approximately every 3 years
 - HFS audits – typically once every 2-3 years

■ **Child Related Issues**

- How do you prove a child is still alive?
 - IL OIG contacted district in regards to services billed for a couple of children that their records indicated had passed away before the date of service
- Documentation Collected:
 - Annual attendance records
 - Copies of Subsequent IEPs
 - Student Graduation or Record Transfer requests

■ **Outcomes**

Audit Process



1. Services are sampled from all documented services
 - a) 3 schools per month selected
 - b) 10 students per school
 - c) All provided services reviewed for each student regardless of discipline

2. Review Process
 - a) Letter sent to each school requesting a meeting with local case manager
 - b) List of required documents is specified in the letter
 - c) Case Manager obtains copies of required information
 - d) Information compared to documented information

Audit Process



1. Follow-up Process

- a) Any information unavailable at the review meeting is sent to the reviewer
- b) Issues or discrepancies discussed with Case Manager and Central Office contact
- c) Any information, such as case notes, that can not be provided are treated as incomplete and noted in the results

2. Documentation of Results

- a) All issues are documented and summarized in a monthly review letter
- b) Summarized results are sent to Central Office contact and local case manager
- c) Adjustments are filed for all services submitted for reimbursement in error

Communicating Results to Staff



- Adapting Staff Trainings
- Corey H Schools

Questions



Questions?

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