School Health Services (SHS) Program Department of Health Care Policy and Financing (Department)

Annual Training
Program Compliance
August 2021



Agenda

Introduction
Comprehensive Reviews
Licensure Updates and Reminders
Potential Findings and Next Steps
Resources and Reminders
Program Resources and Contacts





Introduction

Acronyms

Acronym	Full Names
BOCES	Board of Cooperative Educational Services
CAP	Corrective Action Plan
CDE	Colorado Department of Education
<i>DORA</i>	Department of Regulatory Agencies
DS	Direct Service
FTP	File Transfer Protocol
IEP	Individualized Education Program
MAC	Medicaid Administrative Claiming
NLC	Nurse Licensure Compact
NSPCB	National School Psychology Certification Board
OD	October – December
PCG	Public Consulting Group
SHS	School Health Services
SIT	Strategic Intervention Training
SLP	Speech Language Pathologist
SPL	Staff Pool List



Interactive Activity #1

Use the annotation tool to place a star stamp on 'Yes' if you have participated in a Comprehensive Review or 'No' if you have not.

Have you participated in a Comprehensive Review?

No Yes



Comprehensive Reviews

Comprehensive Review Overview

- Comprehensive Reviews for each participating district examines costs and ratios reported for the most recent certified annual cost report and one quarterly Medicaid Administrative Claiming (MAC) cost report
- Districts are responsible for providing requested documentation by the due date given in the notification email
- Districts have the option of requesting an entrance call to clarify documentation requirements and answer questions
- The validation will include a review of information certified by the district in the PCG Claiming System, direct medical credentials for the period selected for review, and Individualized Education Program (IEP)/Other plans of care documentation for the period selected for review
- Upon completion of the review of this information, a summary report will be provided with the results of the review. If errors are identified, districts must correct the errors in the PCG Claiming System



What is Reviewed?

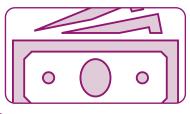
The Comprehensive Review examines all areas of the SHS Program

 As a result of the Comprehensive Review, additional steps and/or training may be required

Payroll costs All transportation costs Service logs IEPs and/or other medical plans of care Direct medical other costs (receipts/invoices) Licensure



Documentation Reminders



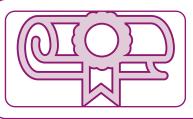
Payroll

- Fund/account codes
- Dates of service (Annual)/Paid dates (MAC)
- Salary and benefits broken out separately



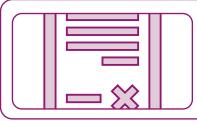
Direct Medical Other Costs

Receipt not necessarily needed if the name of the item, fund/account code, and purchase price are listed on the report



Licensure

Licensure should cover the entire time the provider was included on the Staff Pool List (SPL) during the fiscal year



IEPs/Other Plans of Care

IEP/other plans of care documentation covers the selected dates of service

Timeline

Notified via email that the district was selected

District is sent their Summary Report containing the results of their review

District uploads documentation to File Transfer Protocol (FTP) site

Results are sent to the Department for review

PCG reviews the documentation and sends any necessary follow up questions to the district

Districts will receive their data request workbook closer to when they complete their desk review

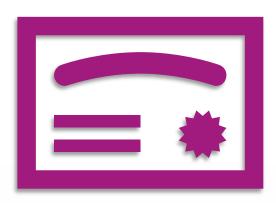
- Districts will have 20 calendar days from the date on the notification email to upload the required documentation
- The Colorado Department of Education (CDE) will reach out to selected districts for parental consent forms

Licensure Updates and Reminders

Additional License Review

An independent license review will be conducted in August/September once districts/Board Of Cooperative Educational Services (BOCES) have certified their SPLs for October – December (OD) 2021. Licensure requests will be for the following provider types:

- Applied Behavior Analyst
- Speech Language Pathologist Assistant
- School Psychologist
- Nurse Practitioner



Applied Behavior Analyst

Provider qualifications quick reference for direct services can be found in Appendix 2 of the SHS Program Manual:

Required Certification

Nationally certified as a Board Certified Behavior Analyst (BCBA) or from the Behavior Analyst Certification Board (BACB)

Documentation to be Collected

Coordinators should keep a copy of either one of the required certifications or a screen shot copy that includes the website's address.



Speech Language Pathologist Assistant

Provider qualifications quick reference for direct services can be found in Appendix 2 of the SHS Program Manual:

Required Certification

Support personnel who, following academic and/or on-the-job training, perform tasks prescribed, directed, and supervised by Colorado Department of Regulatory Agencies (DORA) certified or CDE licensed Speech Language Pathologists. They must practice under the general supervision of a licensed Colorado Speech Language Pathologist (SLP).

Documentation to be Collected

Coordinators should keep the current CDE license or DORA certification of the supervising SLP.

School Psychologist

Provider qualifications quick reference for direct services can be found in Appendix 2 of the SHS Program Manual:

Required Certification

Master's degree or higher, in behavioral, health sciences or education with an endorsement of school psychology operating under the supervision of a DORA licensed doctorate level Psychologist

Documentation to be Collected

Certification from the NSPCB and supervising Psychologist credentials



Nurse Practitioner

Provider qualifications quick reference for direct services can be found in Appendix 2 of the SHS Program Manual:

Required Certification

Current DORA as a Nurse Practitioner

 Temporary worker or military spouse providers with a Nurse Licensure Compact (NLC) are exempt from the DORA requirement

Documentation to be Collected

Coordinators should keep the current DORA or print/save a screen shot of the Nurse with the NLC.

Licensure Reminders

All up to date license requirements are documented in the SHS Program Manual, Section 2 – Covered Services and Appendix 2 – Provider Qualifications



All new providers added to SPLs in the Direct Service (DS) cost pool should provide coordinators with the appropriate credentials necessary to participate in the SHS Program



New time study participants added to district/BOCES SPLs starting in OD20 will be subject to selection for licensure review as part of comprehensive program reviews in September 2021



Both new and existing time study participants should be trained on all other medical plans of care that stand alone

Breakout Session

- 1. What areas of compliance has your district been focused on over the past year?
- 2. Are there any areas of program compliance that you are concerned about or have outstanding questions?
- 3. Does your district have any helpful compliance tips, templates, or processes that would be helpful to other districts?

Potential Findings and Next Steps

Scoring

The Comprehensive Review consists of 12 performance standards if transportation costs are reported or 8 if no transportation costs are reported

- Each standard is graded as either a Pass/Fail
 - For example, if one of the sampled individual's payroll documentation does not match costs reported in the PCG Claiming System it would be marked as a "Fail"
- The overall score and resulting next steps for each district will be based on the costs reported



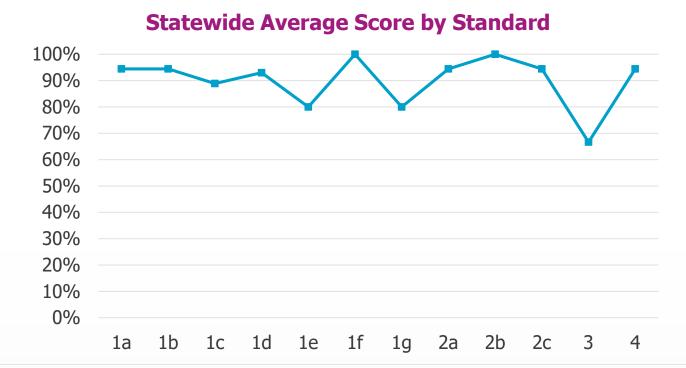
FY 2020-21 Comprehensive Review Scores

Standard	Review Topic	Compli ant	Total Possible	Score
1a	Annual Salaried and Contracted Costs	17	18	94.44%
1b	Direct Medical Costs	17	18	94.44%
1c	Licensure	16	18	88.89%
1d	Transportation Payroll Costs	14	15	93.33%
1e	Transportation Other Costs	12	15	80.00%
1f	Transportation Equipment Depreciation Costs	15	15	100.00%
1g	General and Statistical Information	12	15	80.00%
2a	Service logs	17	18	94.44%
2b	Attendance logs	18	18	100.00%
2c	IEP	17	18	94.44%
3	Quarterly Payroll/Salaried and Contract	12	18	66.67%
4	Comprehensive Review	17	18	94.44%

Comprehensive Review Results

FY 2020-21 comprehensive reviews analyzed FY 2019-20 program requirements and cost reporting data

- 18 districts were reviewed
 - 3 did not report transportation costs (4 standards were not applicable)



Comprehensive Review Findings

Standard 3 – Quarterly direct service and administrative payroll/salaried and contracted staff costs

- Do not report costs associated with service providers that have expired licensure, do not meet program requirements, or do not provide services to students
- Verify dollar amounts reported for all staff on your roster are accurate

Standard 1e - Transportation Other Costs

- Verify that only allowable transportation other costs are included in the total amount reported
 - Review cost data to remove costs associated with software, radios, car washes, non-allowable portions of insurance, etc.
- Do not round cost data being entered

Standard 1g - General and Statistical Information

 Ensure one-way transportation trips ratio denominator includes a count of ALL students with specialized transportation on their IEP/IFSP

Strategic Intervention Training

Districts that receive a "Fail" on ANY performance standard will be required to attend a Strategic Intervention Training (SIT)

- SITs provide additional targeted training on the specific failed performance standard(s)
- It is required that the appropriate district staff attend the SIT
- SITs are available to all districts throughout the year
 - Only those required to attend a SIT need to complete the attendance form

Resources		
♣ Instructions for Accessing the Strategic Intervention Trainings		
≛ 2018-2019 SHS Program Calendar		
♣ PCG Claiming System - Annual Cost Reporting User Guide		
♣ SHS Program Manual & Newsletters		
♣ CO SHS Electronic Desk Review Fact Sheet		
♣ Instructions for Accessing the Desk Review Training		
▲ JM19 MAC Quarterly Refresher Training		
♣ Annual Training Presentation 2018		
♣ RMTS At A Glance Handout		
♣ District RMTS Coordinator User Guide		
≛ CO SPL Refresher Training AJ19		
≛ SPL Decision Tree		
♣ Quarterly Cost Reporting Financial User Guide		
♣ Quarterly Cost Reporting in the New Claiming System FAQs		
♣ Online Quarterly Claim and CPE Form Training		



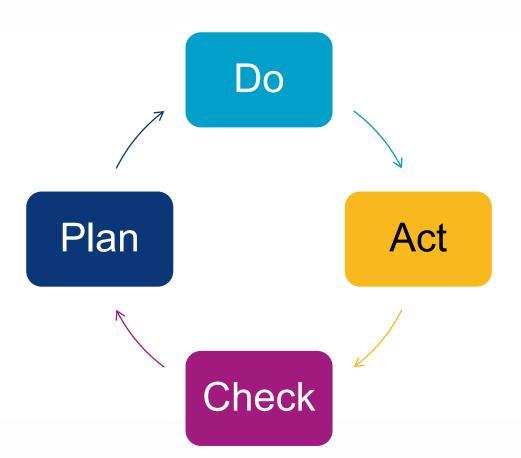
SITs Continued

SIT notification and a link to the specific training will be located on the PCG Claiming System dashboard

- Contact the PCG help desk if an individual needs access to the PCG Claiming System to complete the SIT
- Once you view the required SIT training(s) please complete the SIT completion form to confirm attendance

Scoring Category	Name of Training	Video Link
1A-1B	Annual Direct Medical Costs	Play recording
1C	Provider Licensure	Play recording
1D-1G	Annual Specialized	Play recording
	Transportation Costs	
2A-2C	Billing and Service	Play recording
	Documentation	
3	Quarterly MAC Financials	Play recording

Corrective Action Plan



Districts who receive a score of 8/12 (5/8 if they do not report transportation) or lower will be issued a Corrective Action Plan (CAP)

- Districts will receive formal notification of a CAP and additional targeted training on the failed performance standards
- It is up to the discretion of the Department if districts may be selected again for another comprehensive review the following year based on final review results

Interactive Activity #2

Using the chat box please rate your confidence 1-10 (10 being very confident), if your district is selected for a Comprehensive Review this year

Program Resources and Contacts

Program Resources

Free Care resources can be found in the following locations:



School Health Services Program: colorado.gov/pacific/hcpf/school-health-services



PCG Claiming System: claimingsystem.pcgus.com/co

- Free Care recorded Webinars
- Free Care FAQs
- User Guides
- Stakeholder information
- Program Manual
- Program Calendar

- Training schedule
- Newsletters
- Fact Page
- Annual training PowerPoint presentations
- Staff Pool List Decision Tree

Contact Information

If you have any questions, please feel free to contact us!



Department

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Phone: 303-866-3131

PCG

Annual Help Desk

Email: cocostreport@pcgus.com



Phone: 866-317-0223

RMTS/MAC Help Desk

Email: cormts@pcgus.com

Phone: 866-766-9015



Solutions that Matter

Appendix

Comprehensive Review Scoring Rubric

Scoring Rubric

Scoring Category	Performance Standard Description	Required Documentation	Performance Rating
1a	No variance in salaried and contracted documentation provided and annual cost report	Salaried and Contracted Costs	Pass/Fail
1b	No variance in direct medical other costs documentation provided and annual cost report	Direct Medical Costs	Pass/Fail
1c	Licensure provided covers all time periods individual was listed on staff pool list and reported costs	Licensure	Pass/Fail
1d	No variance in salaried documentation provided and annual cost report	Transportation Payroll Costs	Pass/Fail
1e	No variance in transportation documentation provided and annual cost report	Transportation Other Costs	Pass/Fail
1f	No variance in transportation documentation provided and annual cost report	Transportation Equipment Depreciation Costs	Pass/Fail

Scoring Rubric Continued

Scoring Category	Performance Standard Description	Required Documentation	Performance Rating
1g	Documentation provided supports one- way trip ratio denominator and transportation services IEP student's ratio	General and Statistical Information	Pass/Fail
2a	Documentation provided support claims billed. This includes service logs	Service logs	Pass/Fail
2b	Documentation provided support claims billed. This includes attendance logs	Attendance logs	Pass/Fail
2c	Documentation provided support claims billed. This includes the IEP Ratio	IEP	Pass/Fail
3	Contracted/salaried employee costs provided by the district show no variance in the claiming system cost report	Direct Service & Admin. Payroll/Salaried and Contract	Pass/Fail
4 www.publicconsult	District met the timeline in which documentation was due	N/A	Pass/5il