

Medicaid Updates

Extended Telehealth Flexibility

On Thursday, March 21, 2024, the South Carolina Department of Health and Human Services (SCDHHS) released a [bulletin](#) announcing a further extension of telehealth flexibilities issued during the COVID-19 federal public health emergency (PHE). Previous telehealth flexibility for school-based services has now been extended by SCDHHS through Dec. 31, 2024. This extension aligns with a similar policy announced by the Centers for Medicare and Medicaid Services that extended telehealth flexibilities issued during the COVID-19 federal PHE for Medicare providers through Dec. 31, 2024.

Please review the SCDHHS bulletin [24-010](#) in its entirety to ensure that you are in compliance with Medicaid's requirements. Please reach out to your district's assigned Education Associate should you have any questions and/or concerns.

Transition to EdPlan SC from Enrich- Potential Medicaid Impact

On February 23, 2024, the Office of Medicaid Services (OMS) shared a memo with all district assigned Medicaid Coordinators via email which provided information regarding the new IEP system, EdPlan and how the transition could possibly impact districts' Medicaid program, if the district has utilized Enrich to retain Medicaid documentation that support Medicaid billing/reimbursement. Please be sure that your district reviews the memo in its entirety and follow-up with your district's Special Education Director and/or the Office of Special Education Services (OSES) should you have any questions and/or concerns regarding the current or future IEP systems' capabilities and limitations. Should you have any questions specific to Medicaid requirements or policies, please reach out to the Office of Medicaid Services (OMS) at Medicaidservices@ed.sc.gov or your district's assigned Education Associate (EA).

Updated OMS Webpage

Please take a moment to review and familiarize yourself with the updated Office of Medicaid Services webpage. While all of the previous categories/sections remain, additional categories/sections have been added. The new categories/sections have been added to assist districts in navigating the webpage and locating information more easily or to share new information and resources. Please reach out to your district's assigned EA should you have any questions or concerns regarding the new webpage layout.

All trainings and documents that are currently available on the webpage will be reviewed and updated by August 1, 2024, in preparation of the 2024 – 2025 academic school year. Please review the 2023 documents that are currently available on the webpage and begin saving any documents that you deem necessary. It is important that you save the documents which you need because the documents will not be archived on the OMS webpage, and therefore, will not be readily available should you need them.

SCDHHS Provider Trainings

On Wednesday, February 21, 2024 the South Carolina Department of Health and Human Services (SCDHHS) published a [bulletin](#) announcing upcoming Healthy Connections Medicaid provider training opportunities that are available March 2024 – May 2024. Training topics include Medicaid Basics, Comprehensive Web Tool, Overview of Claim-level Adjustments and Third-Party Liability (TPL), and Maximus Managed Care Enrollment Trainings. To schedule a training, please email providertrainings@maximus.com. If you have questions, please contact Michelle LeMoine at (803) 834-9956 or MichelleWLeMoine@maximus.com. To register for a workshop, please visit the Medicaid eLearning site, www.medicaidelearning.com, or call the Provider Service Center (PSC) at (888) 289-0709 and select option 1. Additional training resources for providers are also available online through the Medicaid eLearning site.

Quality Assurance (QA)

QA Review Trends

Below are common findings/deficiencies that have been frequently cited during the QA reviews. These areas of concern must meet Medicaid policy requirements as reflected below.

- Documentation Sequence: For Medicaid billing purposes, documentation must be completed in sequential order (i.e., The referral for services must be obtained first, the evaluation/reevaluation must follow the referral, and then the treatment plan must be completed to meet the student's needs that are identified within evaluation/reevaluation).
- Clinical Service Notes (CSNs):
 - Per the LEA Manual the clinical records must be current, meet documentation requirements and provide a clear descriptive narrative of the services provided and progress toward treatment goals. The information in the clinical services notes must be clearly linked to the goals listed on the IEP/IFSP/IHP. For example, descriptions should be used to clearly link information from goals to the interventions performed and progress obtained in the clinical service notes. Clinical records should be arranged logically so that information may be easily reviewed, copied and audited. The information in the clinical services notes must be clearly linked to the goals listed on the IEP/IFSP/IHP. For example, descriptions should be used to clearly link information from goals to the interventions performed and progress obtained in the clinical service notes. When completing CSNs, all entries must be made by the provider delivering the service and must be accurate and inclusive of all components. CSNs for School-based Rehabilitative Services

(SBRS) must also be recorded immediately. All clinical service note entries made by a staff who requires supervision must be cosigned by the supervisor unless otherwise indicated in the Local Education Agencies (LEA) Provider Manual for a specific Medicaid reimbursement service.

- Each CSN must be signed, dated, and titled (electronically or handwritten by the provider).
- 90-Day Progress Summary: The progress summary must be written by the provider, contain the provider's signature and title as well as the date written and must be filed in the child's clinical record. Additionally, the supervising therapist must review and initial each progress summary completed by the assistant if applicable.
- Special Needs Transportation (SNT) Logs: When submitting SNT logs for your district's QA review, the district should only submit SNT logs for the student identified on the student list. The district does not need to submit logs for every student participating in the SNT program.
- SNT Driver Certification: The SCDE Driver Certificate for the bus driver associated with the student identified on the student list must be submitted for the year in review (i.e., July 1, 2022 - June 30, 2023).
- Error corrections: Error corrections must be made in accordance with the LEA Provider Manual's requirements. Errors must be corrected by drawing one line through the error, enter the correction and add signature/initials and date next to the correction. If warranted, an explanation of the correction may be appropriate.
- Third-Party Liability (TPL) Letters: The TPL letter which states that a third-party insurer does not cover a service must be present in each student's file, when applicable, to cover the year in review. The TPL letters received for academic year (AY) 2023 – 2024 have been posted to the OMS' [webpage](#) under the Third-Party Liability (TPL) section. As letters are received, they will continue to be posted to the OMS webpage.
- SCDHHS Reasonable Effort Form: The Reasonable Effort form should be used and present in the student record when a school district cannot obtain an Explanation of Benefits (EOB) or a letter of denial from the TPL insurer. Once all options to obtain a payment or sufficient response from the primary insurer have been exhausted the Reasonable Effort Form must be completed in its entirety and include the staff's signature and date. The Reasonable Effort form can be located in the Forms section of the LEA Provider [Manual](#) on the SCDHHS website.
- Eligibility Verification: The district should verify students' eligibility each academic year. The eligibility verification check conducted via the SCDHHS web tool for each academic year should be present in the student's file. The documentation should include a date stamp from the applicable website and the date stamp must reflect a date within the academic year in review. The eligibility verification via the web tool is essential for the OMS as it is the only way to determine if the student has a primary/third-party insurer (which the district would need to bill prior to Medicaid and include

the appropriate documentation of the third party's denial or partial payment in the record).

- Annual Documentation: Districts must ensure that the necessary documentation to support all services rendered and billed during the review period is present in the student's file. It is possible that multiple referrals/physician's orders, evaluations/assessments, reevaluations/reassessments, and/or treatment plans would need to be submitted to cover all services rendered and billed during the entire review period (e.g., if services were rendered from March 1, 2022 through May 6, 2022, and there is an assessment dated March 6, 2021, which would expire on March 5, 2022, there must be an additional reevaluation/reassessment submitted to cover billed dates of service after March 5, 2022).
- Signature Sheet: The signature sheets must include the staff's printed name, signature, and initials. All components must be present.
- Personnel Records: All credential checks that were conducted during the review period (i.e., July 1, 2022 – June 30, 2023) must be date and time stamped during the review period (i.e., July 1, 2022 – June 30, 2023).
 - Signature Date: All documentation must include the signature date.
 - Individualized Education Program (IEP): The IEP must clearly identify the service (e.g., OT or PT) that will be utilized to address each goal.
 - Electronic Signatures: SCDHHS signature requirements have not changed, and no exceptions regarding required signatures have been made. Documents must contain a physical or electronic signature which must be present on all required documents. SCDHHS does accept electronic signatures that are derived within the electronic health system that is being utilized. Both of ENRICH's electronic signature options (i.e., drawn and type) are permitted by the SCDHHS when signing applicable student documentation within the EHR. Any documents that do not include required signatures are subject to recoupment of funds for Medicaid services billed. Providers using alternative signature methods like electronic signatures need to be aware of the potential for misuse (i.e., signing other staff's signature and documents). Medicaid documentation must be signed by the author(s) of the documentation, and the individual whose name is on the alternate signature method and the provider are responsible for its authenticity.

Please review the [SCDHHS LEA Manual](#) and the [SBRs trainings](#) posted on the OMS webpage to ensure compliance with documentation requirements. If you have any questions, please contact your assigned Education Associate (EA).

Corrective Action Plans (CAPs)

CAPs must be submitted within 30 days from the date that the district accepts the OMS' follow-up report via the QA Application. The 2023 – 2024 Corrective Action Plan

Overview [training](#) has been posted on the OMS' webpage to assist districts with CAP completion. Please review the training and reach out to your district's assigned EA should you have any questions. It is important to ask any questions that you may have as soon as possible to ensure that your CAP is completed appropriately and submitted within 30 days from the acceptance of your district's follow-up report.

CAP Submission

Districts have seven days to accept the Follow-Up Report from the date of receipt. Once the district has accepted the follow-up report via the OMS QA application, the district must complete and submit a CAP to address the findings/deficiencies identified within the follow-up report. The district must carry out the following to successfully complete and submit the CAP:

- Once the follow-up report is accepted by the district, the district will have 30 days to submit a CAP.
- The district must review the Summary section tab of the CAP section within the OMS QA Application and then indicate in the "Response" field the action(s) that will be taken to address/correct each discrepancy and ensure that the discrepancy is prevented in the future.
- The date of implementation must be entered and saved.
- Please ensure to enter comments in the "Comments" sub tab in the CAP section of OMS QA Application and click save.
- Go to the Completion sub tab, click the check box in the yellow area.
- Click the green submit button to complete the process.

Finance

SDAC Invoices

The OMS submitted seventy-four (74) SDAC invoices to the South Carolina Department of Health and Human Services (SCDHHS) on behalf of school districts for the October, November, and December 2023 quarter. The total claimable expenses submitted to SCDHHS were \$2,455,092.08. Thank you for a job well done!

Training

The OMS held two (2) School District Administrative Claiming (SDAC) finance training sessions on February 27, 2024, that was attended by 110 district staff. Thank you to those who attended, and if you would like the OMS to provide additional SDAC finance training to your district, please contact Ophelia McClary at omccclary@ed.sc.gov.

Third Quarter SDAC Financial Data

Each district's JFM 2024 SDAC quarterly cost data and signed invoice are due by April 26, 2024. Please see the SDAC calendar for all submission dates. If you have questions concerning the SDAC finance requirements, please contact Ophelia McClary at omccclary@ed.sc.gov.

School District Administrative Claiming (SDAC)

SDAC Fourth Quarter Samples

The fourth quarter's Random Moment Samples (RMS) will be released on April 5, 2023, with sample dates ranging from April 10, 2024, through May 24, 2024. Districts' SDAC Coordinators should work with the district's sample participants daily on completing fourth quarter SDAC samples. Remember, all samples must be completed by the sample participant or marked absent by the SDAC Coordinator (when applicable) within two business days of the RMS due date and time.

If you have any questions, please contact Ronette Weeks by email at rmweeks@ed.sc.gov or by phone at (803) 734-3913 for assistance.

Special Needs Transportation (SNT)

SNT Application

The districts' input of the ridership log data was reviewed by OMS during March. All districts received an email with information concerning missing logs from July 2023 through January 2024. Please review and key any missing logs to ensure optimal reimbursement for transportation claims.

If you have any questions or need assistance, please reach out to Ronette Weeks at rmweeks@ed.sc.gov.

Monthly & Quarterly Meetings

Quarterly QA District Meeting/Training

Thank you to the 174 district representatives that attended the OMS QA quarterly meetings on March 13, 2024. We look forward to continuing to work alongside districts and ensuring that districts receive the assistance and guidance needed. The date for the next QA quarterly meetings is scheduled for June 2024. There will be two sessions available for districts to attend. During the quarterly meetings, training will cover RBHS services. Meeting invitations will be sent to the DEIM assigned Medicaid Coordinators, RBHS Coordinators, and Special Education Directors.

The quarterly meetings are open to all LEA service providers and staff (e.g., Medicaid Coordinators, Medicaid Billing Clerks, etc.). Any district staff deemed appropriate by the district are welcome to attend. Please submit questions and topics that you would like to be discussed to your district's assigned EA or the OMS at medicaidservices@ed.sc.gov on or before Friday, May 21, 2024.

Monthly SDAC Meeting

The monthly SDAC meeting was held on March 20, 2024. There were 46 SDAC Coordinators representing 43 districts in attendance for the March meeting. The meeting included a review of frequently asked questions (FAQs) and new application updates. Thanks to all that were in attendance.

The next meeting is scheduled for April 17, 2024. The meeting invitation and link will be sent two weeks prior to the meeting. If you have any questions or need assistance, please contact Ronette Weeks by email at rmweeks@ed.sc.gov or by phone at (803) 734-3913 for assistance.

Monthly SNT Meetings

The monthly SNT meeting was held on March 20, 2024. There were 81 SNT Coordinators representing 58 districts in attendance for the March meeting. The meeting included a review of FAQs and an open forum to discuss any SNT issues. Thanks to all that were in attendance.

The next meeting is scheduled for April 17, 2024. The meeting invitation and link will be sent two weeks prior to the meeting. If you have any questions or need assistance, please contact Ronette Weeks by email at rmweeks@ed.sc.gov or by phone at (803) 734-3913 for assistance.

TELL US

What topics would you like us to address in the monthly newsletter? It is our goal to support our districts and give them all the information that they need to be successful in billing and providing Medicaid Services. Send all topics to our office email address medicaidservices@ed.sc.gov.