

FW: Flexibility with fee for service requirement

Glass, Anne <Anne.Glass@fldoe.org>

Mon 6/8/2020 11:43 AM

To: kitchepm@gm.sbac.edu <kitchepm@gm.sbac.edu>; currenrm@gm.sbac.edu <currenrm@gm.sbac.edu>; michael.green@bakerk12.org <michael.green@bakerk12.org>; Teri Ambrose <teri.ambrose@bakerk12.org>; angela.crews@bakerk12.org <angela.crews@bakerk12.org>; loyedjt@bay.k12.fl.us <loyedjt@bay.k12.fl.us>; rossmlm@bay.k12.fl.us <rossmlm@bay.k12.fl.us>; webbjg@bay.k12.fl.us <webbjg@bay.k12.fl.us>; edwarkf@bay.k12.fl.us <edwarkf@bay.k12.fl.us>; johns.barbara@mybradford.us <johns.barbara@mybradford.us>; jennings.aimee@mybradford.us <jennings.aimee@mybradford.us>; wratchford.cheryl@brevardschools.org <wratchford.cheryl@brevardschools.org>; shaw.april@brevardschools.org <shaw.april@brevardschools.org>; benton.arthur@brevardschools.org <benton.arthur@brevardschools.org>; Deneen D. Gorassini <Deneen.gorassini@browardschools.com>; Lisa-Ann M. Clarke <lisa-ann.clarke@browardschools.com>; staci.williams@calhounflschools.org <staci.williams@calhounflschools.org>; michelle.yoder@calhounflschools.org <michelle.yoder@calhounflschools.org>; gregory.griner@yourcharlotteschools.net <gregory.griner@yourcharlotteschools.net>; kate.raslavsky@yourcharlotteschools.net <kate.raslavsky@yourcharlotteschools.net>

Cc: richard.b.gary@gmail.com <richard.b.gary@gmail.com>; English, Nanci <Nanci.English@fldoe.org>; Patton, Chris <CPatton@sivicsolutionsgroup.com>; Accorsini, Julie <jaccorsini@sivicsolutionsgroup.com>; Romona Soppe <rsoppe@frontlineed.com>; Newman, Natasha <nnewman@pcgus.com>

Medicaid Contacts:

Please see the email string below from AHCA. AHCA is not providing flexibility in the fee for service requirement for administrative claiming. At least one claim for a date of service occurring during the quarter for therapy, behavior and nursing must be filed and paid. Many districts have expressed concern they may not have a billable service for nursing during Q2 (April – June). Your data manager (EMACS, Frontline, Sivic Solutions, PCG) will be in touch with you to provide further guidance.

Anne Glass
Medicaid Consultant
Florida Certified Contract Manager
[Student Support Services Project](#), USF
Bureau of Exceptional Education and Student Services
Florida Department of Education
325 West Gaines Street, Room 644
Tallahassee, Florida 32399
850-245-7838



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From: Jackson, Antraneise <Antraneise.Jackson@ahca.myflorida.com>
Sent: Friday, June 5, 2020 2:15 PM
To: English, Nanci <Nanci.English@fldoe.org>; Harrison, Logan <Logan.Harrison@ahca.myflorida.com>

Cc: Makesha.Griffin <Makesha.Griffin@ahca.myflorida.com>; Berry, Alycia <Alycia.Berry@ahca.myflorida.com>; Vergeson, Melissa <Melissa.Vergeson@ahca.myflorida.com>; Glass, Anne <Anne.Glass@fldoe.org>; Floyd Thomas, Erica <Erica.FloydThomas@ahca.myflorida.com>
Subject: RE: Flexibility with fee for service requirement

Hi Nanci,

Are the schools keeping track of the student's care outside of school care? Unless the school has knowledge of the child's interaction with their health plan and community providers I would not see how this would be possible to report unless parents are providing information or there is a feedback loop occurring. If the services are being provided by Medicaid health plans then this would not fall under the school district and would not be something the districts could report. If health plans are providing services this would not be a qualifier for the nursing requirement. Also regarding using nursing services with county health departments, if the CHD is covering any of the services for the school districts, they should be submitting an agreement between the districts and CHDs for the period that they are collaborating. If we do not have record of this contract then the CHDs would be billing under their normal FFS or rate reimbursement system and we would have no record of the connection between the recipient and the CHD to the school district. We currently have not received any new notice from any of the districts about CHD contracts for nursing services. There are a few that already have contracts with their CHDs on file from the pre-Covid-19 period, but none have submitted one post-Covid-19.

Antraneise Jackson, MPH
AHC Administrator
Clinical Compliance Monitoring
Bureau of Medicaid Quality
Agency for Health Care Administration
Phone: 850-412-4215
Antraneise.Jackson@ahca.myflorida.com

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From: English, Nanci <Nanci.English@fldoe.org>
Sent: Friday, June 5, 2020 2:06 PM
To: Harrison, Logan <Logan.Harrison@ahca.myflorida.com>; Jackson, Antraneise <Antraneise.Jackson@ahca.myflorida.com>
Cc: Griffin, Makesha <Makesha.Griffin@ahca.myflorida.com>; Berry, Alycia <Alycia.Berry@ahca.myflorida.com>; Vergeson, Melissa <Melissa.Vergeson@ahca.myflorida.com>; Glass, Anne <Anne.Glass@fldoe.org>
Subject: [External] Re: Flexibility with fee for service requirement

Currently, if the Department of Health is providing nursing services, the school is not required to make a referral. It is my understanding the districts notify AHCA the services are being provided by the Department of Health to satisfy the fee for service requirement during the monitoring process. During virtual learning the services would be provided by their health care plan, as Antraneise mentioned, below. Would the districts follow the same process to notify AHCA services are being provided by the student's health care plan?

Nanci English

Medicaid/EMACS Coordinator
[Student Support Services Project](#), USF
Bureau of Exceptional Education and Student Services
Florida Department of Education
325 West Gaines Street, Room 644
Tallahassee, Florida 32399
850-245-5075



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From: Harrison, Logan <Logan.Harrison@ahca.myflorida.com>
Sent: Thursday, June 4, 2020 12:59 PM
To: English, Nanci <Nanci.English@fldoe.org>; Jackson, Antraneise <Antraneise.Jackson@ahca.myflorida.com>
Cc: Makesha.Griffin <Makesha.Griffin@ahca.myflorida.com>; Berry, Alycia <Alycia.Berry@ahca.myflorida.com>; Vergeson, Melissa <Melissa.Vergeson@ahca.myflorida.com>
Subject: RE: Flexibility with fee for service requirement

Hi Nanci –

I found the following excerpt from the SDAC guide especially helpful for this:

Direct Billing Requirement

School districts participating in the SDAC program must meet the federal guidelines to be eligible to receive funding for referrals and care coordination activities as described in activity code 5. The school district must refer students to a Medicaid participating provider. Each school district must be an enrolled provider to participate in the SDAC program. At a minimum quarterly, one claim must be submitted for the following services:

- Therapies (PT, OT, SLP),
- Behavioral Health, and
- Nursing Services.

It is permissible to refer students to providers in the community to meet this requirement if they are a Medicaid eligible provider.

If claims are not submitted for the services referenced above or if documentation of referrals to the community providers are not maintained, activity code 5 cannot be reimbursed for the quarter determined to be out of compliance. Claims for this requirement must be submitted in accordance with the CMS 1500 Provider Reimbursement Handbook. Claims cannot be submitted after twelve months from the date of service to satisfy this requirement. There are no exceptions to this rule. Claims submitted for this rule must have a reasonable expectation to pay. The school district cannot submit these claims for this requirement if the student is ineligible or the service did not take place.

We would expect to see applicable referrals and the claims should be submitted for the direct services in accordance with the handbook referenced above (regardless of *how* the direct service is being provided, if the nursing service is provided, the claims should be submitted).

I hope this is helpful,

Logan

Ms. Logan Harrison - PROGRAM ADMINISTRATOR - SES



AHCA Bldg 3 Rm 2104 - BUREAU OF MEDICAID QUALITY
+1 850-412-3593 (Office) - Logan.Harrison@ahca.myflorida.com

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From: English, Nanci <Nanci.English@fldoe.org>
Sent: Thursday, June 4, 2020 11:19 AM
To: Jackson, Antraneise <Antraneise.Jackson@ahca.myflorida.com>
Cc: Griffin, Makesha <Makesha.Griffin@ahca.myflorida.com>; Harrison, Logan <Logan.Harrison@ahca.myflorida.com>; Berry, Alycia <Alycia.Berry@ahca.myflorida.com>; Vergeson, Melissa <Melissa.Vergeson@ahca.myflorida.com>
Subject: [External] Re: Flexibility with fee for service requirement

What information do you need from districts showing Medicaid health plans are providing nursing services in the home while students are in a virtual school environment to satisfy the SDAC fee for service requirement?

Nanci English
Medicaid/EMACS Coordinator
[Student Support Services Project](#), USF
Bureau of Exceptional Education and Student Services
Florida Department of Education
325 West Gaines Street, Room 644
Tallahassee, Florida 32399
850-245-5075



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From: Jackson, Antraneise <Antraneise.Jackson@ahca.myflorida.com>
Sent: Tuesday, June 2, 2020 10:34 AM
To: English, Nanci <Nanci.English@fldoe.org>
Cc: Makesha.Griffin <Makesha.Griffin@ahca.myflorida.com>; Harrison, Logan

<Logan.Harrison@ahca.myflorida.com>; Berry, Alycia <Alycia.Berry@ahca.myflorida.com>; Vergeson, Melissa <Melissa.Vergeson@ahca.myflorida.com>

Subject: RE: Flexibility with fee for service requirement

Good Morning Nanci,

Unfortunately, we are unable to waive or offer flexibility to the nursing services requirement. In order for administrative costs to be claimed there must be direct Medicaid services provided for students during the quarter. Medicaid health plans have been working extensively to ensure services and supports are provided to families during the COVID-19 pandemic and many of the services that would have been provided to students in the school are now being provided by health plans in the home. Since health plans have been working administratively to ensure Medicaid recipients are receiving necessary services it is important there is no duplication of reimbursement for services being provided by health plans and school districts since services are being provided within the homes by health plans.

Thank you,

Antraneise Jackson, MPH
AHC Administrator
Clinical Compliance Monitoring
Bureau of Medicaid Quality
Agency for Health Care Administration
Phone: 850-412-4215
Antraneise.Jackson@ahca.myflorida.com

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