

From: English, Nanci <Nanci.English@fldoe.org>
Sent: Monday, April 15, 2024 4:53 PM
Subject: Medicaid In Schools Guidance

Dear Medicaid Contacts,

Tip of the week - April 15, 2024:

School District Administrative Claiming (SDAC)

Pursuant to the [Delivering Services in School-Based Settings Guide](#), claimed administrative activities **must** be necessary and reasonable for the operation of the Medicaid program and properly allocable to it. (page 51)

Pursuant to the Agreement Between the Agency for Health Care Administration and the County School District for the Provision and Reimbursement of Administrative Claiming Activities in the [SDAC guide](#) (page 1-3 through 1-6), the County School District agrees to the following terms:

1. The time accounting system used by the County School District or its contractor **must** comply with the requirements contained in OMB Circular A-87 and 45 CFR.
2. The County School District **must** follow the policies and procedures contained in the AHCA "School District Administrative Claiming Guide."
3. Any recoupment of funds due to an audit exception, deferral or denial deemed appropriate by CMS or AHCA **will** be the responsibility of the County School District, even after withdrawal from the program.
4. The County School District **will** maintain (or coordinate a contractor's assistance in maintaining) an AHCA/CMS approved administrative claiming program to include training, the use of standardized sample forms, sampling, the development and maintenance of clearly identifiable cost accounting pools and the application of sample percentages to accounting pools in a manner which will document the process for audits.
5. The County School District **will** submit claims to AHCA for administrative activities on a quarterly basis. Each claim **shall** be accompanied by an AHCA certification of funds form indicating that sufficient funds were available to support the non-federal share of the cost of each claim.

6. The County School District ***shall*** maintain and be able to produce within specified time frames requested records and material for CMS or AHCA audits.

7. The County School District ***will*** designate an employee to act as liaison with AHCA for issues concerning this agreement.

Please note:

There are three SDAC groups currently operating in Florida.

FDOE provides a compliant Electronic Medicaid Administrative Claiming (EMACS) program at ***no*** cost and ***no*** contract to districts for their participation in the quarterly Random Moment Time Sample (RMTS) through the EMACS group. AHCA approved training is provided to each EMACS participant completing their RMS form.

District specific approved RMTS training ***should*** include the purpose of the program, participant qualifications, and the need for supporting documentation that assists the group in applying the appropriate activity code.

Claimable codes ***must*** be related to outreach activities that focus on or support a Medicaid covered service or eligibility requirements for Medicaid or Medicaid covered services. The participant response ***must*** include enough information to support a claimable code or additional information ***will*** be collected from the participant until the group has enough supporting documentation to apply the appropriate code.

The SDAC quarterly claiming workbook contains the certification of state (public) expenditures incurred by the district. The state Medicaid agency ***should*** receive your district's SDAC cost report (claiming workbook) within 18 months from the last day of the last month in the claimed quarter to meet the Centers for Medicare and Medicaid Services (CMS) two year deadline for payment.

To support the inclusion of the costs for each participant in the SDAC claim, the following supporting documentation may be requested by an auditor: The Medicaid Eligibility Ratio (MER) calculation, indirect cost rate calculation, employee activity details, employee rosters, employee position descriptions, employee leave approvals, employee schedules, payroll records, contracts, medical provider qualifications, time study source documents, training materials, time study manuals, and the cost report.

If a school district utilizes multiple staff to manage and support the Medicaid in Schools programs (Certified School Match and School District Administrative Claiming), the district must identify one staff member as the primary district Medicaid contact who is responsible for the district's Medicaid program. The state Medicaid agency ***must*** be notified of any changes in the primary district Medicaid contact.

If you have any questions, please let me know. Share with consultants and staff as appropriate. Have a great week!

Nanci English, MPA, Medicaid in Schools Project Consultant

[Medicaid in Schools Program](#)

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Please note that Florida has a very broad public records law. Most written communications to or from state officials are public records available to the public and media upon request.