

General Questions

Q1. Will the PowerPoint for this training be distributed to all attendees?

A. Yes. The training materials will be distributed to all attendees, along with the questions and answers from the April 8, 2020 training and all future trainings

Specialized Medical Transportation

Q2. Slide #12: If the IEP team determines that a student requires specialized medical transportation, will A&I accept that as a valid justification?

A. A&I aligns their audits with the LEA Program requirements for billing specialized medical transportation. LEAs may bill for specialized medical transportation services if **all** of the following conditions are met:

- Transportation is provided in an approved mode of transportation (litter van, wheelchair van, or specially adapted vehicle)
- Transportation services are pursuant to the student's IEP or IFSP
- Another IEP or IFSP Medi-Cal covered service is provided on the same day as the specialized medical transportation service

Q3. Slide #12: Are the requirements for billing transportation aligned with federal requirements or more restrictive than what CMS mandates in their regulations?

A. The requirements for billing specialized medical transportation under the LEA Program are not more restrictive than federal requirements. The LEA Program is following CMS guidance with respect to specialized medical transportation services, and these requirements are included in State Plan Amendment (SPA) 15-021, which was recently approved by CMS.

Q4. Slide #12: What if a student requires transportation because the student has a walking impediment? The student does not require specialized restraints; however, the district has to send a special bus to transport the student to and from school because the student lives close enough to school to typically be considered a "walker" but is unable to walk to school due to their medical condition. Would the district be able to bill for specialized transportation for providing a specially adapted bus for this student?

A. If the IEP/IFSP Team determines that the use of a litter van, wheelchair van, or other specially adapted vehicle accommodates the student's disability, the district would be able to bill for specialized medical transportation, assuming they meet the criteria that the student receives another IEP/IFSP Medi-Cal covered service on the same day as the transportation service.

Q5. Slide #12: Can specialized medical transportation be billed in the following “Speech Only” scenario: (1) a student is provided transportation in an eligible vehicle; (2) transportation is listed in their IEP; (3) the only other billable service in the IEP is speech therapy; and (4) speech services are provided at school on the date of transportation?

A. Yes. Specialized medical transportation can be billed in this scenario, since this scenario meets all of the required components for billing specialized medical transportation services:

- Transportation is provided in an approved mode of transportation (litter van, wheelchair van, or specially adapted vehicle)
- Transportation services are pursuant to the student’s IEP or IFSP
- Another IEP or IFSP Medi-Cal covered service is provided on the same day as the specialized medical transportation service

Q6. Slide #16: What if an instructional aide is assigned to a student but he/she is not a trained health care aide (THCA)? Is this considered a covered adaptation?

A. Yes. The presence of a one-on-one aide would qualify as an adaptation, as long as the presence of the aide accommodates the student’s disability per the student’s IEP or IFSP.

Q7. Slide #16: Can there be clarification on the aide accompanying an IEP student with an eligible service? Some students require an aide for safety that is not necessarily medically necessary (medical vs. education needs are different).

A. The presence of an aide qualifies as an adaptation, as long as the one-on-one presence of the aide accommodates the student’s disability per the student’s IEP or IFSP.

Q8. Slide #16: Please confirm that the IEP student who has an aide accompanying them on the bus does NOT need to be in a bus that is specially adapted (i.e., just the aide alone qualifies as specialized transportation)?

A. A specially adapted vehicle is necessary to accommodate the LEA eligible beneficiary’s disability. The presence of an aide qualifies as an adaptation, as long as the one-on-one presence of the aide accommodates the student’s disability per the student’s IEP or IFSP. However, the presence of an aide on a general education school bus is not a billable specialized transportation service under the LEA Program.

Q9. Slide #17: If there are 5 students on a bus that are eligible for transportation reimbursement, can LEAs bill for all 5 round trips, plus mileage, even though they are on the same bus taking the same trip?

A. Yes. LEAs can bill for each of the 5 students, assuming all documentation and billing requirements are met. Effective as of FY 2019-20, the interim reimbursements for those specialized medical transportation trips will be settled against costs using the CRCS.

Q10. Slide #18: In a prior training, it was advised that LEAs could either claim transportation on the CRCS or submit claims for reimbursement. Can LEAs now do both?

A. LEAs do not have a choice between claiming transportation on the CRCS or submitting claims for reimbursement. From FY 2019-20 onward, all interim reimbursements for specialized medical transportation services will be settled against costs using the CRCS. If the LEA is going to participate in billing for specialized transportation services, they must submit interim claims and costs on the CRCS.

Q11. Slide #19: How will "All" students with transportation in their IEP be calculated? The number of students eligible for transportation changes daily depending on the outcome of the IEPs that are held that day. For example (during the 2019-2020 school year): (1) a student is eligible at the beginning of the school year but becomes ineligible for transportation at his annual IEP on 3/02/2020; (2) a student has an initial IEP and becomes eligible for transportation on 12/10/2019; or (3) a student leaves the District on 10/15/2019 and is no longer on the transportation log. Do we take an average for the year, average for the quarter, or the number of students that are eligible at the beginning or end of the month?

A. The denominator in the Medi-Cal One Way Trip Ratio is defined as the total count of all one-way trips for special education students with specialized transportation in their IEP/IFSP. This count includes all one-way trips for students riding specialized vehicles regardless of whether a medical service was provided on the same day and excludes special education students riding on buses transporting general education students. Assuming all the students described above were provided specialized transportation, each of the three students' one-way trips should be included in the count of all one-way trips for special education students with specialized transportation in their IEP/IFSP. If this count cannot be identified, LEAs should not continue billing transportation services.

Q12. Slide #19: From FY 2019-20 onward on the CRCS, what audit documentation will be required to substantiate the number of one-way trips for the "All" students with transportation in their IEP or IFSP?

A. The LEA will need to be able to produce documentation supporting the count of all students with transportation in the IEP/IFSP.

Q13. Slide #21: Are the dispatchers that keep track of bus routes included in the CRCS?

A. No. Dispatchers are not included in the CRCS. Personnel costs are limited to the following job categories: Bus Driver, Substitute Driver, Attendant, and Mechanic.

Q14. Slide #21: Please provide the definition of an "Attendant," and if a THCA is included in this definition, will their salary and benefits be included in both the transportation and THCA provider category on the CRCS?

A. Additional guidance will be provided at the June 3, 2020 CRCS Revisions training.

Targeted Case Management (TCM) Services

Q15. Slide #22: We contract our transportation services. The contractor supports multiple districts. Is transportation information included differently on the CRCS? I'm not sure how the district is billed for depreciation costs, etc.

A. If an LEA contracts with a vendor to provide all specialized medical transportation services, the LEA will only report expenditures under "Contract – Transportation Services" and "Contract – Transportation Equipment" on Worksheet E.2 of the CRCS. The LEA will not report costs on E.1 or E.3. The costs reported on E.2 will reflect the amount paid to the contractor to provide specialized medical transportation services.

Q16. Slide #26: Mileage should be printed out for documentation purposes if a non-direct route is taken, like using MapQuest?

A. Yes. MapQuest can be used to substantiate mileage or other mapping software such as Google Maps. The printout of the route's mileage should be maintained in the student's file as documentation.

Q18. Slide #34: To clarify, TCM services must be included in an IEP or IFSP? An individual health care plan is insufficient?

A. Yes. Upon approval of SPA 15-021, TCM services will only be billable under the LEA Program per an IEP or IFSP. SPA 16-001, which DHCS is preparing to submit to CMS shortly, will expand coverage of TCM services to the entire Medi-Cal population, including Individualized Health and Support Plans (IHSPs) and other "Care Plans."

Q19. Slide #41: What is an agency-approved case management course? Is there a list of approved DHCS courses? Who approves these courses if it is not DHCS?

A. The LEA is responsible for approving and making available the case manager training course.

Q20. Slide #42: Can you bill for a Program Specialist and a Nurse for TCM on the same day for the same student? For more clarification, a Program Specialist might bill for reviewing the goals and services for a student on 4/1/20. The nurse is also reviewing the care plan and medical history for the same student on 4/1/20. Can they both bill TCM on 4/1/20?

A. For TCM services, the daily limit of 32 units is applied per beneficiary per provider. Therefore, both the Program Specialist and the Nurse can bill for TCM on the same day for the same student. However, as stated on Slide 39, DHCS recommends that each Medi-Cal eligible student is assigned one case manager who has the ability to provide students with comprehensive TCM services.

Q21. Slide #45: Has the TCM Certification Form template been distributed? If not, when will it be and how will we access it?

A. The TCM certification form has not been distributed to LEAs. DHCS will send out the certification form as an attachment to a forthcoming PPL upon approval of SPA 15-021.