



California Community Colleges HEALTH & WELLNESS






Local Educational Agency Medi-Cal Billing Option: Pre-Enrollment Strategies

Local Educational Agency (LEA) Medi-Cal Billing Option Program allows colleges to use Medi-Cal funding to cover the costs of physical and behavioral healthcare for students. Colleges that are registered as LEA Medi-Cal providers may submit reimbursement claims to the California Department of Health Care Services (DHCS) for eligible care provided to Medi-Cal eligible students. California Community Colleges (CCC) are currently able to apply to become enrolled LEA Medi-Cal service providers.

As providers, CCC can offset the cost of delivering health services to students. *Table 1 lists the ways in which approved Medi-Cal billing providers may spend their LEA funds through the program.* These services include school-linked support services that benefit students and families; case-managed healthcare; mental health services; social assistance; and academic services. Note that funds through this program must supplement, not supplant, existing funds. Accepted claims will be reimbursed at 50% of their cost. The campus is required to allocate matching funds to pay the rest of the costs.

Table 1

 Behavioral Health Services	 Health Services	 Wellness Support Services
<ul style="list-style-type: none"> • Substance abuse prevention and treatment services • Family support and parenting education, including child abuse prevention and school-age parenting programs • Counseling, including family counseling and suicide prevention • Mental health services including primary prevention, crisis intervention, assessments and referrals, and training for faculty in the detection of mental health problems 	<ul style="list-style-type: none"> • Primary healthcare • Immunizations • Vision and hearing testing services • Dental services • Physical examinations, diagnostic and referral services • Prenatal care 	<ul style="list-style-type: none"> • Nutritional services • Onsite Medi-Cal eligibility workers • Case management services • Equipment for school-based health personnel • Academic support services, including tutoring, mentoring, employment, community service internships, and in-service training for faculty and administrators • Student development services including tutoring, mentoring, recreation, career development, and job placement

This guide is intended to help individual colleges/districts understand the opportunities and challenges of becoming a Medi-Cal provider. This guide is based on conversations with three CCC staff members who have successfully completed the enrollment process as well as staff from Medical Billing Technologies, Inc. (MBT). The goal is to ensure that campuses who enter the process know the steps that need to be completed; understand the probable timelines; and have realistic expectations about claims reimbursement. The final section of this document includes a checklist of activities for colleges who choose to move forward with the enrollment application.

Medical Billing Technologies, Inc.

MBT is a third-party billing vendor working with the CCC currently enrolled in the Medi-Cal billing program. MBT specializes in helping CCC navigate through the Medi-Cal billing process. Their systems can track claims for individual student services; create customized reports; and ensure administrative accountability. MBT will guide campuses through the enrollment process. All CCC who contributed to this resource reported that the support they received through MBT was invaluable. <https://www.mbt4schools.com>

History. In 2015, Governor Brown signed legislation allowing institutions of higher education to participate in the Local Educational Agency (LEA) Medi-Cal Billing Option Program. Prior to that, the program was limited to K-12 institutions and administered as part of Individualized Education Plans (IEPs). IEPs detail the services needed by individual students and act as a prescription for the state, stipulating what services it was required to provide. While the 2015 law expanded program access to the CCC, there have been challenges in integrating new institutions into program practices created for different systems.

System-Level Challenges. Most of the challenges experienced by CCC are a result of the fact that the program was designed for K-12 schools. While the 2015 legislation expanded the program to include community colleges and state universities, there has been lag in the process of updating the policies and protocols through which the program is implemented. Common challenges include:

- In the K-12 system, a physician's order is necessary to bill for health services, and it is uncertain if the protocol used within CCC Health Services will suffice.
- An IEP-centric orientation of the program has been partially resolved with the introduction of the "individualized school healthcare plan", however, there may be limits on the non-IEP services that can be provided to students.
- Misunderstandings about whether there are age restrictions that apply to the receipt of Medi-Cal benefits and a lack of consistency between state and federal law.
- Supervision requirements that a licensed, credentialed school nurse provide supervision to some staff, despite the fact that CCC do not employ this position. Upcoming legislation is expected to address this shortly.

State Plan Amendment. Each state has a State Plan that describes the nature and scope of its Medicaid program. In California, the State Plan is a contract between DHCS and the federal Centers for Medicare and Medicaid (CMS) that stipulates what services will be provided.

Contracts can only be modified through an approved State Plan Amendment (SPA). DHCS has had a SPA under review since 2015. This SPA requests comprehensive revisions to the program and has been under negotiation with CMS since submission. The 2015 SPA is expected to be finalized soon. However, this SPA does not address some key issues of concern for CCC. As a remedy, there is a movement to develop and submit a separate SPA that specifically addresses the needs of CCC. There is broad agreement that because this SPA will be significantly more limited in scope it is likely to be accepted in a much shorter timeframe than the 2015 SPA.

Current Context. At the time of this publication, twenty CCC are currently registered as LEA Medical providers. The consensus of the three campus leaders with whom we spoke is that going through the enrollment application process is a critical step in positioning CCC to take advantage of future funding opportunities but *not* a short-term solution to the immediate need for greater student health funding. Some CCC are submitting claims and receiving occasional reimbursements; other CCC have decided to hold off on submitting reimbursement claims until the SPA has passed and systems reform is achieved. Those that continue to submit claims noted that reimbursements were more routinely sent for mental health services than primary care services but acknowledged that these payments were still infrequent.

These campuses reported that MBT is an essential partner for them in this process. While this guide provides initial steps that CCC may take on their own, the strong recommendation of our interviewees is that CCC partner with MBT to complete the enrollment process. Partnership procedures are noted as optional in the guide.

Benefits of Enrollment. Despite the limited payments being disbursed to currently enrolled CCC, they were unanimous in their agreement that CCC should begin the pre-enrollment process as soon as possible. There are several reasons for this, including:

- As more CCC enroll, pressure increases on the system to make necessary reforms
- Because changes to the program administration are anticipated shortly, CCC should begin the enrollment now so that they are able to take advantage of a better-functioning system as soon as changes are made
- Setting up systems and infrastructure takes time; whether CCC partner with MBT or develop their own protocols for billing, there are institutional changes that can be initiated now
- The enrollment process can be lengthy; waiting until systems changes are achieved may mean missing out on future health service funding





Local Educational Agency (LEA) Medi-Cal Billing Option Program Pre-Enrollment Checklist for CCC

1. **Get Connected.**

- ✓ Sign up through the DHCS subscription notification to get updates on policies and practices. <http://apps.dhcs.ca.gov/listssubscribe/default.aspx?list=DHCSLEA>

2. **Identify the Official Signatories.** You will need signatures from “authorized representatives” who can enter into binding contracts.

- ✓ Confirm LEA Coordinator. Individual listed will coordinate the LEA program for the college
- ✓ Confirm Authorized Signer. Individual who can legally bind DHCS (Medi-Cal) applications on behalf of the College/College District

Tip: Obtain authority to sign on behalf of the college as Director of Student Health Center

Per enrollment guidelines, the following are authorized to sign applications on behalf of the college:

- Director of Students Health Program
- Campus President
- Chief Business Officer
- Campus Vice President
- Chief Executive Officer

NOTE: Deviations from the titles above have caused denial of applications.

- ✓ Schedule time with administrators to obtain signatures, as needed.
- ✓ If necessary, obtain Board approval on applications or a have Board-approved contract in place with MBT before moving forward.
- ✓ **Optional:** Complete MBT Request for Information Form. This is an internal document created by MBT, which lists some of the information that will be needed in order to assist with the LEA enrollment forms.

3. **Identify and Implement the LEA Medi-Cal Collaborative.** The Collaborative is composed of at least three persons with differing interests in the reinvestment of funds for the LEA Program.

- ✓ Confirm composition. Best Practice: Health Services Director, college fiscal department, other college department external to health services, community services provider, and other relevant members
- ✓ Identify meeting dates.

Tip: Build into existing committee as an agenda item at least twice a year

- ✓ Confirm decision-making process. Consensus, majority vote, etc.
- ✓ Identify plans for the use of Medi-Cal reimbursement funds. Reflect on input from different campus interests

4. **Apply for Your College's National Provider Identification (NPI) Number.** All billing providers (college) must obtain a Type 2 (organizational) NPI. This unique number will be used by DHCS to identify the college. This process can be lengthy and should be started as soon as possible.
 - ✓ Apply directly: <https://nppes.cms.hhs.gov>
 - ✓ **Optional:** MBT can assist the College using the data provided on the Request for Information Form.
5. **Complete the Provider Participation Agreement (PPA) for California Community College Districts, California State Universities, and Universities of California.**
 - ✓ Access the form here:
https://www.dhcs.ca.gov/provgovpart/Documents/ACLSS/LEA%20BOP/PPA%20AR/2018PPA_College_Update_3.pdf
 - ✓ The PPA contains two exhibits that are required to be on file, but do not need to be submitted to DHCS
 - **Exhibit A** - HIPAA Business Associate Addendum (BAA)
 - **Exhibit B** - Data File Description
 - ✓ Include NPI.
 - ✓ **Obtain Authorized Signature in blue ink or via e-signature (by clicking on the red flags found in the signature areas).**
6. **Complete the Medi-Cal Provider Enrollment Information Sheet (also referred to as the Annual Report).**
 - ✓ Download Annual Report documents prior to completing.
 - ✓ Complete the Medi-Cal Provider Enrollment Information Sheet.
 - Provide Payment/Mailing Address
 - Include LEA Contact Information
 - Include NPI *and* LEA Federal Employer Identification Number (EIN)
 - **Obtain Authorized Signature in blue ink or via e-signature (by clicking on the red flags found in the signature areas).**
 - ✓ Consortium Billing (if applicable)
 - ✓ Attachment 1: Certification of State Matching Funds
 - Specify the matching funds allocated for the year to cover salaries, benefits, and administrative costs for individuals who provide health services reimbursable under the LEA Program
 - **Obtain Authorized Signature in blue ink or via e-signature (by clicking on the red flags found in the signature areas).**
 - ✓ Attachment 1A: Annual Report Financial Statement Data

- Report yearly service provisions
- List unspent funds received in previous years
- Identify reinvestment of received revenue

Tip: estimate for individuals providing health services covered under the LEA program

- ✓ Attachment 2: Statement of Commitment to Reinvest
 - Confirm decision-making process and frequency of meetings. Consensus, majority vote, etc.
 - Describe use of anticipated funds, if received
- ✓ Attachment 2A: Statement of Commitment to Reinvest
 - **Obtain LEA Interagency Collaborative Partners Signature in blue ink or via e-signature (by clicking on the red flags found in the signature areas).**

7. **Complete the Data Use Agreement (DUA).** A DUA ensures the integrity and security of records. DUAs are required only if the CCC is using a third-party vendor to submit their claims. A DUA is required for non-providers (provider representatives, such as a billing vendor) to order and receive Medi-Cal eligibility information on behalf of the LEA.

- ✓ Download the form: <https://www.dhcs.ca.gov/provgovpart/Pages/DataUseAgreement.aspx>

If you opt to use a third-party vendor, such as MBT, then MBT can assist and submit the forms on your behalf.

Once the paperwork is submitted, review and approval of the college’s LEA enrollment applications can take up to 180 days (6 months). Upon approval of the LEA enrollment forms, if the College elects to use a third-party vendor, then Electronic Billing forms must be completed and submitted to specific DHCS departments.

The Electronic Billing forms allow the following:

- Access to the Medi-Cal website
- Access to Remittance Advice Details (claim payment/denial data) online and for vendor to receive claim payment/denial data as well (via electronic file)
- Vendor to be linked to the College as its LEA Billing vendor and submit claims on behalf of the College

Additional Resources

- California Department of Health Care Services Local Educational Agency Medi-Cal Billing Option website <https://www.dhcs.ca.gov/provgovpart/Pages/LEA.aspx>
- LEA Onboarding Handbook [https://www.dhcs.ca.gov/provgovpart/Documents/ACLSS/LEA%20BOP/Program Req and Info/2018 LEA Onboard Handbook.pdf](https://www.dhcs.ca.gov/provgovpart/Documents/ACLSS/LEA%20BOP/Program_Req_and_Info/2018_LEA_Onboard_Handbook.pdf)
- LEA Provider Manual <https://www.dhcs.ca.gov/provgovpart/Pages/LEAProviderManual.aspx>

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www.cccstudentmentalhealth.org

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