

**Macomb ISD**  
**School Based Health Services Program**  
**QUALITY ASSURANCE PLAN**

**MDHHS POLICY**

The Michigan Department of Health and Human Services (MDHHS) Medicaid Provider Manual dated July 1, 2018 includes the following language regarding Quality Assurance for School-Based Services.

SBS providers must have a written quality assurance plan on file. SBS costs will be reviewed/audited by the MDHHS for determination of medical necessity and to verify that all services were billed and paid appropriately. The purpose of the quality assurance plan is to establish and maintain a process for monitoring and evaluating the quality and documentation of covered services, and the impact of Medicaid enrollment on the school environment.

An acceptable quality assurance plan must address each of the following quality assurance standards:

- Covered services are medically necessary, as determined and documented through appropriate and objective testing, evaluation and diagnosis.
- The IEP/IFSP treatment plan identifies which covered services are to be provided and the service frequency, duration, goals and objectives.
- A monitoring program exists to ensure that services are appropriate, effective and delivered in a cost effective manner consistent with the reduction of physical or mental disabilities and assisting the beneficiary to benefit from special education.
- Billings are reviewed for accuracy.
- Staff qualifications meet current license, certification and program requirements.
- Established coordination and collaboration exists to develop plans of care with other providers (i.e., Public Health, MDHHS, Community Mental Health Services Programs (CMHSPs), Medicaid Health Plans (MHPs), Hearing Centers, Outpatient Hospitals, etc.)
- Parent/guardian and beneficiary participation exists outside of the IEP/IFSP team process in evaluating the impact of the SBS program on the educational setting, service quality and outcomes.

**Macomb ISD**  
**School Based Health Services Program**  
**QUALITY ASSURANCE PLAN**

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## **I. Purpose and Intent of the Quality Assurance Plan**

Macomb Intermediate School District, as a provider of School Based Health Services reimbursed under the State's Medicaid Program, has established a quality assurance program. The policies and procedures associated with the Macomb ISD Quality Assurance Program are described within this formal quality assurance plan. The purpose of the plan is to establish a process for monitoring and evaluating the quality with which reimbursable School Based Health Services are rendered. Additionally, the quality assurance plan sets forth the guidelines for ensuring the fiscal integrity of services reimbursed by the Medicaid Program.

The Macomb ISD quality assurance plan reflects the overall approach to ensuring and reviewing the necessity, appropriateness, and intensity/level of services provided, as well as required documentation to support service provision and Medicaid billing.

The Macomb ISD quality assurance plan addresses policies and procedures for the following:

- Assurance that Special Education services are provided to any student who is determined to be in need of such services regardless of the student's or parent's financial status to pay for such services, or Medicaid eligibility.
- Medicaid covered services which are provided by professional personnel employed or under contract by Macomb ISD or its constituent local districts, and the manner in which these services are provided to eligible students.
- Required professional credentials and licensure of personnel providing Medicaid covered services to eligible students.
- Assessments, evaluations and tests generally rendered to students to determine the type and level of need for services.
- Development of service plans (i.e., IEP/IFSP) for students determined to be in need of Medicaid reimbursable School Based Health Services.
- Authorization of services and service plans by appropriately credentialed personnel and referral for services by physicians when necessary and/or appropriate.
- Determination that School Based Health Services which are reimbursed by Medicaid are appropriate and medically necessary based upon related assessments, evaluations and testing.
- Guidelines for documenting service provision, including service plans, service records and progress notes, and the maintenance of such documentation.

- Nature and frequency of periodic reviews and monitoring programs to ensure that the guidelines and requirements set forth in the quality assurance plan are followed.

Macomb ISD is confident that the policies and procedures described in the quality assurance plan assure the Michigan Department of Health and Human Services / Michigan Department of Education and the Medicaid Program that services reimbursed by Medicaid comply with Federal and State related requirements and regulations.

The specific quality assurance guidelines and policies and procedures identified above are described in greater detail in subsequent sections of this plan.

## II. Organizational Structure

### A. Overview

The Macomb Intermediate School District (MISD) provides services to 21 local public school districts and to all non-public schools within its boundaries. MISD is comprised of 508 square miles in Southeastern Michigan. The 21 districts include most of Macomb and parts of Oakland and St. Clair Counties. MISD's districts serve a total of approximately 150,000 students.

MISD serves as a link between the State Department of Education and local school districts. It also furnishes programs and services that single districts find difficult or impossible to provide and collects and checks vast amounts of data required by the State Department of Education.

The Macomb Intermediate School District is a legally constituted intermediate school district established to provide coordination and supplementary services to local school districts and acts as a link between basic educational units and the State education authority.

The Intermediate School District also contains within its jurisdiction a large population of special education students, approximately 20,000 in number. Macomb ISD coordinates the provision of educational and related services for all students with special needs and serves as a regional monitor for the Michigan Department of Education as a means of guaranteeing all students have access to a free and appropriate public education regardless of their disability.

**Exhibit 1** on the following page depicts the 21 local districts which comprise Macomb Intermediate School District.

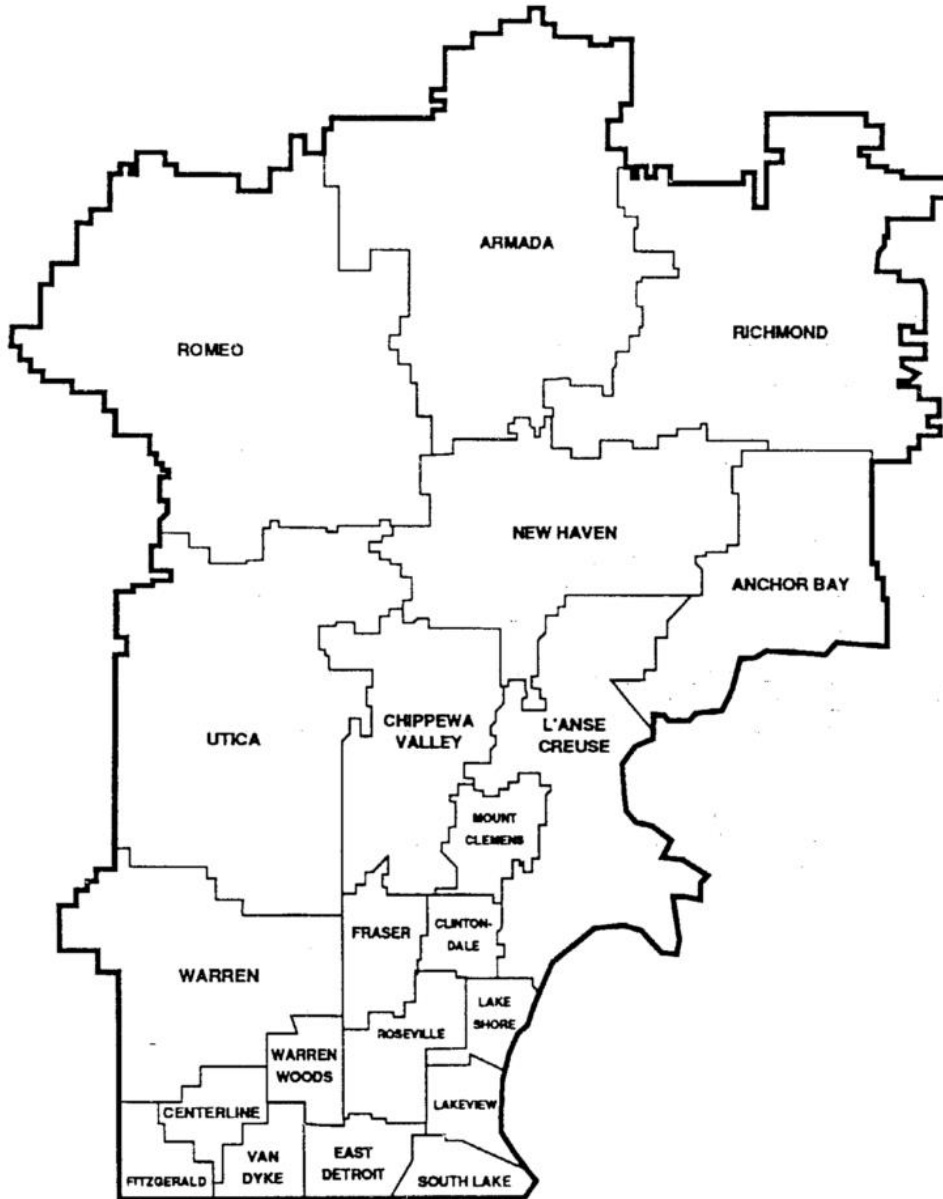
Macomb ISD assures that a full continuum of programs and services are available through the MSID and its constituent local districts. The continuum represents a full range of categorical programs/services, from least restrictive to most restrictive, at each educational level (preprimary through secondary). This may include various alternative programs and service arrangements, such as, cooperative agreements with LEAs, the ISD or state agencies.

Any person, age 0-25, who resides within the Macomb Intermediate School District and is identified as special education through the Individual Education Planning Committee process, will be provided with appropriate programs and /or services by their local district, the ISD or other approved providers through a contract or agreement.

To the maximum extent appropriate, special education eligible students shall be educated with non-handicapped students. Assignment to special classes, separate

schools, regular hospitals, institutions or non-school settings will occur only when the

# MACOMB INTERMEDIATE SCHOOL DISTRICT





nature and severity of the handicap is such that education in a regular class, with the use of supplemental instructional aides and/or services, cannot be successfully achieved.

**Exhibit 2** presents the various programs and services which are provided throughout Macomb County. For Center Programs, each program has a designated catchment area. The following programs and services are offered by Macomb Intermediate School District:

- Infant and Preprimary Program. Macomb ISD operates the Macomb Infant Preschool Program (MIPP) for 0-3 year olds. Special education staff provides a wide range of educational and related services. Children in this program are scheduled therapy and instructional services. Center staff may make home visits and hold regular parent group meetings.
- Center Programs and Services. Center Programs and services have been established throughout the ISD. **Exhibit 3** identifies the MISD Center Programs.
- Macomb Educational Assessment Center operates to provide a full continuum of evaluation services for students suspected of having a handicapping condition and those identified as special education eligible. This center, operated by the ISD, serves as a supplementary support for evaluating special education eligible or suspected eligible students throughout Macomb County.
- Consultant Services. The MISD has available special education consultants specializing in most eligibility areas. These consultants are available to assist local districts in the evaluation, program planning and placement process for handicapped children.
- Homebound and Hospitalized Services will be provided to eligible students who are confined due to physical and/or health reasons.
- Itinerant Physical and Occupational Therapy Services are provided by Macomb ISD to eligible students in their local school district. Therapy is provided with an IEPC recommendation and a valid physician prescription.
- The Orientation and Mobility Specialist provides individualized diagnostic and instructional services to visually impaired students in local school districts, Center Programs, the neighborhood and other realistic travel settings.

**Exhibit 4** represents the Macomb ISD organizational chart depicting the relationship of the ISD and the local districts in planning, coordinating and providing services to students with special needs.

PROGRAMS OPERATED WITHIN THE M<sup>U</sup>~OMB INTERMEDIATE SCHOOL DISTRICT DIAGNOSTIC SERVICES PROGRAMS

DISTRICT	ECI	TCI	SCI	EI	LD	RE	ECDD	SL	VI	FOOIB	SKI	AI	RR	MEFP	PSY	SSW	SPL	EBRH	OT	FT	TC
Anchor Bay	X	AWB	A	*X	X	ULR	X	FZ	E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
Armada	X	AWB	A	*X	X	ULR	X	FZ	E	ZMUV	A	A	*X	A	C	C	X	X	A	A	X
Center Line	X	AWB	A	*X	X	ULR	X	FZ	E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
Chippewa Valley	X	AWB	A	*X	X	ULR	X	FZ	E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
Clintondale	X	AWB	A	*X	X	ULR	X	FZ	E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
East Detroit	X	AWB	A	*X	*X	ULR	X	FZ	*E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
Fitzgerald	X	AWB	A	*X	X	ULR	X	FZ	E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
Fraser	X	AWB	A	*X	X	ULR	X	*FZ	E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
Lake Shore	X	*X	A	*C	X	ULR	X	FZ	E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
Lakeview	X	AWB	A	*X	X	*ULR	X	FZ	E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
L'Anse Creuse	X	AWB	A	*X	X	ULR	X	FZ	E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
Mt. Clemens	X	AWB	A	*X	X	ULR	X	FZ	E	*ZMUV	A	A	*X	A	X	X	X	X	AX	AX	X
New Haven	X	AWB	A	*X	X	ULR	X	FZ	E	ZMUV	A	A	*X	A	C	C	X	X	A	A	X
Richmond	X	AWB	A	*C	X	ULR	X	FZ	E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
Romeo	X	AWB	A	*C	X	ULR	X	FZ	E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
Roseville	X	AWB	A	*X	X	*ULR	X	FZ	E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
South Lake	X	AWB	A	*X	X	ULR	X	FZ	E	ZMUV	A	A	*X	A	X	X	X	X	A	A	X
Utica	X	AWB	A	*X	X	*ULR	X	FZ	E	*ZMUV	A	A	*X	A	X	X	X	X	AX	AX	X
Van Dyke	X	AWB	A	*X	X	ULR	X	FZ	E	*ZMUV	A	A	*X	A	X	X	X	X	AX	AX	X
Warren Con	X	*X	A	*X	X	ULR	X	FZ	E	ZMUV	A	A	*X	A	X	X	X	X	AX	AX	X
Warren Woods	X	AWB	A	*X	X	ULR	X	*FZ	E	*ZMUV	A	A	*X	A	X	X	X	X	AX	AX	X
MISD		*X	X	*X					X		X	*X		X	X	X	X	X	X	X	X

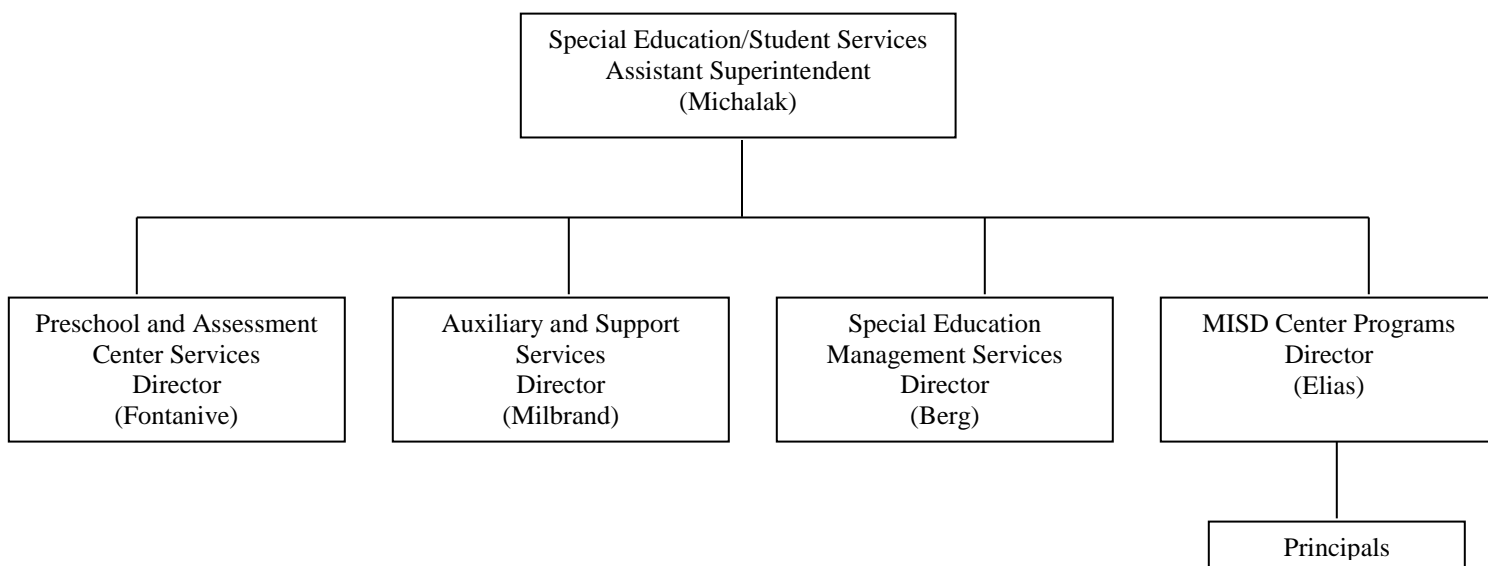
\*Programs not available at all levels. KEY: X = District Providing; L = Lakeview M = Mt. Clemens R = Roseville U = Utica V = Van Dyke W = Warren Consolidated Y = Y-L'Anse Creuse Z = Warren Wd  
 \* = R1832 Program  
 \* = East Detroit F = Fraser  
 \* = District Contracting C = District Contracting  
 \* = District Contracting

## CENTER PROGRAMS AND SERVICES

District of Operation	Program or Service	Comments
Lakeview	Hearing Imp. (HI)	Preschool/Elem./Jr. High-Oral/ Sr. High-Oral and Total Communication
Roseville	Hearing Imp.	Preschool/Elem./Jr. High-Total
Utica	Hearing Imp.	Preschool/Elem./Jr. High/Sr. High-Oral
Macomb ISD	HI Teacher Consultants	-
Mt. Clemens	PI/OHI	Preschool/Elementary
Utica	PI/OHI	Preschool/Elementary
Van Dyke	PI/OHI	Preschool/Elementary
Warren Woods	PI/OHI	Junior/Senior High
East Detroit	Visually Imp. (VI)	Operates all programs Preschool/Elementary
Frazer	SLI	Language-Based Programs
Warren Woods	SLI	Language-Based Programs
Macomb ISD	TCI/SCI/SXI	Separate Facilities
Macomb ISD	TCI/SCI/SXI	Serving 3-to 26-year-olds
Lake Shore	TCI	LEA Operated Programs
Warren Consolidated	TCI	LEA Operated Programs
Macomb ISD	SEI	Center Programs
Macomb ISD	SEI	Center Programs
Macomb ISD	SEI	Center Programs
Macomb ISD	SEI	Center Programs
Macomb ISD	AI	ISD Center Programs
Macomb ISD	AI/TC	
Macomb ISD	AI	LEA Program
Macomb ISD	VI/TC	Visually Impaired
Macomb ISD	HI/TC	Hearing Impaired
Macomb ISD	O&M	Orient./Mobil. Spec.
Macomb ISD	PT/OT	Phys./Occup. Therapist
Macomb ISD	Mich.Rehab.Serv.	Coordinates Vocational Programs with MRS
Macomb ISD	MIPP	Providing services for 0 to 3- year-olds

**ADMINISTRATION OF SPECIAL EDUCATION PROGRAMS  
AND SERVICES**

**LEADERSHIP AND EDUCATIONAL ACCOUNTABILITY CHART**



**ADMINISTRATION OF SPECIAL EDUCATION PROGRAMS  
AND SERVICES**

**LEADERSHIP AND EDUCATIONAL ACCOUNTABILITY  
IDENTIFICATION OF THE ADMINISTRATIVE AND SUPERVISORY PERSONNEL  
AUTHORIZED TO IMPLEMENT LOCAL SPECIAL EDUCATION PROGRAMS  
AND SERVICES**

ANCHOR BAY Superintendent Director	MOUNT CLEMENS Superintendent Director
ARMADA Superintendent Director	NEW HAVEN Superintendent Director
CENTER LINE Superintendent Director	RICHMOND Superintendent Director
CHIPPEWA VALLEY Superintendent Director	ROMEO Superintendent Director
CLINTONDALE Superintendent Director	ROSEVILLE Superintendent Director
EAST DETROIT Superintendent Director	SOUTH LAKE Superintendent Director
FITZGERALD Superintendent Director	UTICA Superintendent Director Supervisor Supervisor Supervisor
FRASER Superintendent Director	VAN DYKE Superintendent Director
LAKE SHORE Superintendent Director	WARREN CONSOLIDATED Superintendent Director Supervisor Supervisor
LAKEVIEW Superintendent Director	WARREN WOODS Superintendent Director
L'ANSE CREUSE Superintendent Director Supervisor, Youth Home	

Note: All Directors hold State approval

## B. Responsibility for Quality Assurance Program

Responsibility for the development and implementation of the quality assurance plan for School Based Health Services shall reside with Macomb ISD. The Superintendent or his designee will appoint an individual who will be responsible for coordinating the following:

- Developing the quality assurance plan. At a minimum, the quality assurance plan should be reviewed annually and revised as appropriate.
- Implementing the guidelines, policies and procedures detailed within the plan, including appropriate communication to Macomb ISD personnel and professional provider personnel.
- Establishing monitoring and record review functions. It is expected that the coordinator of this program will participate on the record review committee and review monitoring reports.
- Coordinating any necessary training programs for provider personnel in an effort to more effectively meet the requirements of the School Based Health Services Program.
- Communicating with the Michigan Department of Health and Human Services (MDHHS) and Michigan Department of Education (MDE) in areas relevant to the School Based Health Services Program and the delivery of special education services to students.

### **III. School Based Health Services**

#### **A. Overview**

The Education of the Handicapped Act Amendment (PL 99-457), later to be reauthorized as the Individuals with Disabilities Education Act (IDEA), and Medicare Catastrophic Care Act (PL 100-360) clarified its intent that other agencies (State and/or Federal) and private sources share in the responsibility for funding health related services that the education system is required to provide to children with disabilities under IDEA.

In 1992, State agencies, including Michigan Departments of Social Services, Education, and Management and Budget, entered into an agreement to develop a way to utilize Medicaid as a funding mechanism for health related services provided by public schools in Michigan. As a result of this interagency effort, the School Based Health Services (SBHS) Program reimbursed under the Medicaid Program was created.

#### **B. Medicaid Reimbursable Services**

Macomb ISD has carefully reviewed the materials provided by the Departments of Human Services, Community Health and Education and intends to participate fully in the Medicaid School Based Health Services Program. To this end, services provided by Macomb ISD which may be reimbursed under this Medicaid Program include, but are not limited to:

- Speech, Language and Audiology, including testing, evaluations, and treatment services
- Occupational Therapy, including evaluations and treatment services
- Physical Therapy, including evaluations and treatment services
- Nursing Services, including direct service intervention
- Psychological, Counseling and Social Work, including testing, evaluations, and treatment services
- Developmental Testing
- Orientation and Mobility, including evaluations and treatment services
- Personal Care Services

- Targeted Case Management
- IDEA Assessments
- Special Transportation

It is understood that services must be medically necessary as determined by objective and/or subjective testing and evaluation or other diagnostic means. Services which are evaluative, diagnostic and treatment related are covered if they correct or ameliorate any defects or conditions or teach compensatory skills for deficits that directly result from a medical condition.

It is customary that these services, including the general level of need for such services, are detailed in the student's Individual Education Plan (IEP). Each student receiving special education and related services in Macomb County has a current IEP on file.

### C. Determination of Need and Evaluation for Services

Macomb ISD complies with Michigan Rules pertaining to the identification, referral, evaluation, and placement of students in a service delivery program.

Diagnostic services for all students with disabilities are provided and conducted in accordance with IDEA and PA 451. Diagnostic services can be delivered either independently or on a collaborative basis as appropriate. Diagnostic services staffing needs are evaluated and assessed on an annual basis to assure that appropriate services are available to all students with disabilities.

Upon evaluation and review of a student's handicapping condition, a written Individual Education Program (IEP) will be developed. The IEP or plan assures the provision of a free and appropriate public education, in the least restrictive environment; to the maximum extent appropriate, to meet the needs of the individual. The plan also includes:

- A statement of the student's present level of academic achievement and functional performance (PLAAFP)
- Statement of annual goals including short-term objectives
- Appropriate objective criteria and evaluation procedures and schedules for determining whether the objectives are being achieved
- An identification of the least restrictive environment program and related service options which were considered
- A statement of the specific ancillary and other related services to be provided, including any special considerations for transportation needs



- The projected dates for initiating service(s) and the anticipated duration of the service(s)

#### D. Service Provision

Prior to the provision of services, a written, formal IEP is required. The specific services and the frequency and duration of the service will be identified in the IEP.

Specific School Based Health Services to be claimed to the Medicaid Agency for reimbursement shall be identified in the IEP.

In order to submit logs to Medicaid for Occupational Therapy and Physical Therapy services, a physician referral/prescription is required annually (a stamped physician signature is not acceptable). The IEP document or its appendices will contain information regarding the physician referral/prescription for services.

In order to submit logs to Medicaid for Personal Care Services, authorization must be obtained annually (a stamped signature is not acceptable). Authorizations may be procured from a physician or "other licensed practitioner" operating within the scope of their practice. The State definition of "other licensed practitioner" consists of Registered Nurse (RN), Registered and Certified Occupational Therapist (OT), Licensed Physical Therapist (LTP), Master of Social Work (MSW), or Licensed Speech Language Pathologist (SLP).

In order to submit logs to Medicaid for Speech, Language and Hearing Services, a physician referral must be obtained annually (a stamped physician signature is not acceptable).

For nursing and school health services, appropriate physician orders will be obtained as needed. Records of physician orders for medication and other nursing services will be maintained by the school nurse.

The need or appropriateness for physician involvement, other than that identified above, prior to or during the provision of services will be dependent upon the individual needs and student's disability.

Periodic reviews of services and/or re-evaluation of the student will be performed in order to assure the continuing need for the School Based Health Services.

### **IV. Provider Personnel Qualifications**

#### A. Compliance With School Based Health Services Criteria

In order to submit logs to Medicaid for reimbursement of School Based Health Services, providers of services must meet specific educational and/or professional qualifications within the scope of their service area. Only services provided by personnel with the following credentials will be reported to Medicaid:

➤ For Speech, Language and Audiology services:

- A fully licensed speech-language pathologist (SLP);
- A licensed audiologist in Michigan, or
- A Speech-Language Pathologist (SLP) and/or audiology candidate (i.e., in the clinical fellowship year or having completed all requirements but has not obtained a license), under the direction of a qualified SLP or audiologist. All documentation must be reviewed and signed by the appropriately-credentialed SLP or licensed audiologist, or
- A limited licensed speech language pathologist, under the direction of a fully licensed SLP or audiologist. All documentation must be reviewed and signed by the appropriately licensed supervising SLP or licensed audiologist.

➤ For Occupational Therapy services:

- A certified and Registered Occupational Therapist in Michigan (OTR), or
- A Certified Occupational Therapist Assistant (COTA) registered in Michigan and under the direction of a currently-Michigan-registered OTR (i.e., the COTA's services must follow the evaluation and treatment plan developed by the OTR and the OTR must supervise and monitor the COTA's performance with continuous assessment of the beneficiary's progress). All documentation must be reviewed and signed by the supervising OTR.

➤ For Physical Therapy services:

- A Licensed Physical Therapist (LPT) in Michigan, or
- A Certified Physical Therapy Assistant (CPTA) in Michigan and under the direction of a licensed physical therapist in Michigan (i.e., the LPT supervises and monitors the CPTA's performance with continuous assessment of the beneficiary's progress). All documentation must be reviewed and signed by the appropriately licensed supervising LPT.

➤ For Nursing services:

- A licensed Registered Nurse (RN) in Michigan, or

- A Licensed Practical Nurse (LPN) in Michigan (LPN cannot bill for evaluations/assessments)
- For Psychological, Counseling and Social Work services:
  - A licensed physician or psychiatrist in Michigan, or
  - A fully licensed psychologist in Michigan, or
  - A limited-licensed psychologist under the supervision of a licensed psychologist, or
  - A temporary limited-licensed psychologist under the supervision of a licensed psychologist, or
  - A licensed master's social worker in Michigan, or
  - A limited licensed master's social worker under the supervision of a licensed master's social worker, or
  - A licensed professional counselor in Michigan, or
  - A limited licensed counselor under the supervision of a licensed professional counselor
- For Developmental Testing service:
  - A fully licensed psychologist (Doctoral level) in Michigan, or
  - A limited-licensed psychologist (Master's or Doctoral level) under the supervision of a licensed psychologist, or
  - A licensed master's social worker in Michigan, or
  - A limited licensed master's social worker under the supervision of a licensed master's social worker, or
  - A licensed physician or psychiatrist in Michigan
- For IDEA Assessment service:
  - A certified and Registered Occupational Therapist (OTR), or
  - A certified Orientation and Mobility Specialist (O&M), or
  - A Licensed Physical Therapist (LPT), or
  - An American Speech-Language Hearing Association (ASHA) certified Speech-Language Pathologist (SLP) with a current Certificate of Clinical Competence (CCC), or

- A licensed audiologist, or
- A fully licensed psychologist (Doctoral level), or
- A limited-licensed psychologist (Doctoral level) under the supervision of a licensed psychologist, or
- A licensed professional counselor, or
- A limited-licensed counselor under the supervision of a licensed professional counselor, or
- A licensed master's social worker, or
- A limited-licensed master's social worker under the supervision of a licensed master's social worker, or
- A licensed physician or psychiatrist (MD or DO), or
- A registered nurse (RN)

#### B. Verification of Provider Personnel Qualifications

At the beginning of each school year, the coordinator of the quality assurance program or his/her designee, will review the qualifications of provider personnel. Records will be reviewed to assure compliance with:

- Licensure requirement, as necessary
- Registration requirement, as necessary
- Approval by the State Board of Education, as necessary
- Requirements for continuing education

Prior to submitting logs for services provided by Macomb Intermediate School District personnel (employed or contracted), verification will be made by the billing agent that the provider meets the criteria for the logged service.

As new provider personnel are employed or contracted during the school year, verification of their qualifications will be made by the billing agent prior to submitting Medicaid logs for services rendered.

Services rendered by provider personnel who are 100% federally funded shall not be processed for submission to the Medicaid Program.

Provider Licensure/Credentials and Special Education Personnel Approvals are

monitored and maintained centrally at Macomb ISD in the Special Education Management Services Department. Providers and Special Education Directors are notified of pending licensure/certification and temporary approval expirations.

Staff qualifications are included on the Macomb ISD website Medicaid link for all staff involved in Medicaid billing. The site is updated whenever a Medicaid School Based Services Program Policy change occurs. Changes in staff licensure requirements for Medicaid logging are also communicated to district Special Education Directors/Supervisors and Macomb ISD Program Principals, who advise Macomb ISD Special Education Management Services Department of changes to staff logging status.

### C. Staff Development

Macomb ISD has instituted policies, procedures and programs to ensure that all staff providing special education services to children are appropriately qualified and continue to develop professionally in their respective service areas. **Appendix A** describes the staff development programs at MISD.

### D. Sanctioned Providers

At the beginning of each school year, the Macomb ISD Medicaid Office will review the licensure status of staff providers by accessing the US Department of Health and Human Services Office of Inspector General List of Excluded Individuals search engine (<http://exclusions.oig.hhs.gov/>), to verify that sanctions have not been imposed that would exclude the staff providers from logging Medicaid services. If sanctions are found, logging privileges will be suspended. Logging privileges will not be reinstated until the sanctions have been rescinded.

For staff that adds on after the initial check at the beginning of the school year, verification that sanctions are not imposed will be performed at the time the request is made by their district/supervisor, before they will be allowed to access the Medicaid logging system.

### E. Deficit Reduction Act (Employee Education about False Claims Recovery)

Pursuant to Section 1902(a) (68) of the Social Security Act, Macomb ISD, as the Medicaid Provider for School Based Services for 21 districts in Macomb County, is required to comply with Section 6032 of the Deficit Reduction Act (DRA) of 2005. Macomb ISD is subject to this act because we receive or make at least \$5 million in annual aggregate payments from the federal Medicaid program.

A section of the law entitled "Employee Education About False Claims" cites three (3) requirements; 1) Establish written policies for employees and contractors about the

False Claims Act; 2) Establish detailed provision in these policies for detecting fraud, waste and abuse, as well as administrative remedies for false claims; 3) Inform all providers about these policies and their rights to be protected as whistleblowers.

The Federal False Claims Act, among other things, applies to the submission of claims by healthcare providers for payment by Medicare, Medicaid and other federal and state healthcare programs. The False Claims Act is the federal government's primary civil remedy for improper or fraudulent claims. It applies to all federal programs, from military procurement contracts to welfare benefits to healthcare benefits.

The False Claims Act prohibits among other things:

- Knowingly presenting or causing to be presented to the federal government a false or fraudulent claim for payment or approval;
- Knowingly making or using, or causing to be made or used a false record or statement in order to have a false or fraudulent claim paid or approved by the government.
- Conspiring to defraud the government by getting a false or fraudulent claim allowed or paid; and
- Knowingly making or using, or causing to be made or used, a false record or statement to conceal, avoid, or decrease an obligation to pay or transmit money or property to the government.

Any person who knowingly attempts to defraud the federal government is liable to the United State Government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages which the Government sustains because of the act of that person.

"Knowingly" means that a person, with respect to information: 1) has actual knowledge of the information; 2) acts in deliberate ignorance of the truth or falsity of the information; or 3) acts in reckless disregard of the truth or falsity of the information.

Enforcement:

The United States Attorney General may bring civil actions for violations of the False Claims Act. As with most other civil actions, the government must establish its case by presenting a preponderance of the evidence rather than meeting the higher burden of proof that applies in criminal cases. The False Claims Act allows private individuals to bring "qui tam" actions for violations of the False Claims Act.

Protection for "Whistleblowers":

Federal and state law prohibit any retaliation or retribution against persons who report suspected violations of these laws to law enforcement officials or who file "whistleblower" lawsuits on behalf of the government.

To report Medicaid provider fraud:

Call the Attorney General's 24-hour Hotline at 800-24-ABUSE (800-242-2873);  
e-mail [hcf@michigan.gov](mailto:hcf@michigan.gov) or

Visit the Attorney General's web site at <http://www.michigan.gov/ag>

## **V. Service Documentation and Record Keeping**

### **A. Documentation Requirements**

It is the responsibility of the coordinator of the quality assurance program, or his/her designee, to inform Macomb ISD provider personnel of the documentation requirements associated with the School Based Health Services Program. At a minimum, service documentation must include:

- Evaluations, tests and other diagnostic reports
- IEP related documentation detailing the condition and service needs of the student
- Physician's referral/prescription/authorization for services, as necessary
- Service records identifying:
  - the type of service
  - the date of service
  - the duration of the service or the type of intervention (e.g., modality)
  - the provider who rendered the service
- Monthly progress notes

Macomb ISD has established uniform policies pertaining to the development of IEP related documents, including evaluations and diagnostic reports. These policies shall continue in practice. Although, it is not required that all Macomb provider personnel maintain service records and progress notes in a uniform manner, the specific information necessary to support the reimbursement of a service is required.

Macomb ISD will assist provider personnel to identify the most efficient manner to document service provision. Service records shall be consistent with the requirements set forth by the Medicaid Agency for the School Based Health Services Program.

#### B. Location of Service Documentation

A contractor will assist Macomb ISD in preparing and submitting Medicaid logs. The contractor shall meet all requirements associated with log submission as set forth by the Medicaid Agency.

Prior to submitting a log to the Medicaid Program, services shall meet the requirements for:

- Medical necessity
- Evidence of documented need for services in the IEP
- Provision by qualified provider personnel
- Evidence of supporting service documentation
- Third party liability

All service record documentation supporting a Medicaid log shall be maintained by Macomb ISD and its contractor.

#### C. Billing Software

PowerSchool Special Education™ Service Capture module, which is the software used by district staff to record reimbursable services, contains logic that allows users to enter only those procedures allowed for their specific discipline.

#### D. Billing Agent

Public Consulting Group, Inc, a contractor who acts as the billing agent, has the necessary compliance checks in place to ensure that all services submitted to Medicaid on behalf of Macomb ISD, meet all policy requirements for reimbursement. The billing agent tracks service times/frequencies, provider credentials, and all other billing requirements and prevents over-billing. The MISD Medicaid Office conducts informal reviews and runs reports on a regular basis to check the validity of logged and logged encounters.



## E. Parental Consent

Macomb ISD has provided the districts with brochures explaining the SBS program, which are to be given to all parents of all students receiving Special Education services. See **Exhibit 5**.

Parental consent forms are also presented to parents at IEP/IFSP meetings in order to obtain their approval for SBS logging. If consent was given on or after March 18, 2013, it is considered a one-time consent and only the Medicaid Notice for Rights and Protections will be given to parents/guardians at subsequent IEP/IFSP meetings.

If parents are not present at the IEP meetings, all districts will make at least two attempts to obtain consent to log Medicaid services by mailing the forms home to parents for signature and return to the district.

Parental consent status is recorded in the student information system.

- Refused – Consent signed by parent and “No” checked on the form.
- Consent Given
  - Consent signed by parent and “Yes” checked on the form.
  - Consent signed by parent and neither box checked on the form.
- Unknown – IEP/IFSP and consent page was not checked “yes” or “no” and no signed consent can be found.
- Consent date:
  - Date written by parent is used
    - if consent is signed by parent and no date is written by parent:
      - IEP date on the document is used.
        - If IEP date is not present on signed document but a stamped received date is present, the stamped date is used.
          - If neither an IEP date nor stamped date is present, the scanned date is used.

**ALL Macomb County school districts participate in the School-Based Services Program**

Check the back of this brochure to call for more information.

- Anchor Bay Schools
- Armada Area Schools
- Center Line Public Schools
- Chippewa Valley Schools
- Clintonville Community Schools
- East Detroit Public Schools
- Fitzgerald Public Schools
- Fraser Public Schools
- Lake Shore Public Schools
- Lakewind Public Schools
- L'Anse-au-Loup Public Schools
- Macomb Intermediate School District
- Mount Clemens Community Schools
- New Haven Community Schools
- Richmond Community Schools
- Romney Community Schools
- Roseville Community Schools
- South Lake Schools
- Utica Community Schools
- Van Dyke Public Schools
- Warren Consolidated Schools
- Warren Woods Public Schools



**If you have questions**

about the School-Based Services Program, contact the local district Special Education staff listed below:

or call the

**Macomb Intermediate School District**  
 Medicaid School-Based Services Office

**586.228.3343**

**Katy Irwin, Special Education Accountant**



**Macomb Intermediate School District**

44001 Garfield Road  
 Clinton Township, MI 48034-1100  
 Phone: 586.228.3300  
 Fax: 586.228.4420  
[www.misd.net](http://www.misd.net)

**Board of Education**

- John A. Borgomrowski, President*
- Max D. McCullough, Vice President*
- Charles C. Milonas, D.D.S., Treasurer*
- Theresa J. Gense, Secretary*
- Edward V. Farley, Trustee*
- Michael R. DeVault, Superintendent*
- Beth Albert, Assistant Superintendent, Special Education/Student Services*
- Dr. Thomas Koopke, Director, Special Education Management Services*

**Medicaid School-Based Services Program**



**Macomb Intermediate School District**

44001 Garfield Road  
 Clinton Township, MI 48038  
 P: 586.228.3300  
 F: 586.228.4420  
[www.misd.net](http://www.misd.net)

## What is the Medicaid School-Based Services Program?

Since 1993, the State of Michigan has participated in a federal program called School-Based Services. The program assists school districts by providing partial reimbursement for medically-related services that are listed on a student's Individualized Educational Program (IEP) or Individualized Family Service Plan (IFSP). Although this partial reimbursement is available only for students who are Medicaid eligible, services are provided to all students with disabilities regardless of their Medicaid eligibility status.

The Michigan School-Based Services Program is under the direction of the Michigan Department of Community Health.



# Medicaid School-Based Services Program

## Is there a cost to me to participate in the program?

There is no cost to the parent/guardian for IEP specified services provided to students while they are at school.

## Will participation in the program impact my family's Medicaid benefits?

Participating in the School-Based Services Program DOES NOT impact a family's Medicaid services, funds, or limits. Michigan operates the School-Based Services program differently than the Family Medicaid program. The School-Based Services program DOES NOT affect your family's Medicaid benefits in any way.

## What do I have to do to make sure my child's services are eligible for partial reimbursement through the Medicaid School-Based Services Program?

To make sure your child's school can benefit from the Medicaid School-Based Program, you must give written consent at the IEP meeting, granting your school district permission to provide services and bill Medicaid for the services. The consent form is usually presented to parents at the IEP meeting. Be sure to have your district special education representative review your rights regarding the consent form.

## What type of services does the School-Based Services Program cover for children?

Speech & Language    Occupational Therapy    Physical Therapy    Nursing  
Psychological/Social Work    Personal Care    Orientation & Mobility

## **VI. Monitoring and Record Review**

### **A. Overview**

The coordinator for the quality assurance program shall implement and oversee monitoring and record review functions.

Monitoring guidelines will be established and implemented in a timely fashion. The monitoring process will be ongoing. The process will include procedures for:

- Assessing minimal standards of compliance with program requirements
- Assessing the operational aspects of the School Based Health Services Program in Macomb County
- Identifying and implementing corrective action as determined necessary

Together, the ongoing monitoring function and the record review process will provide the assurances that Macomb ISD will operate a Medicaid reimbursement program for School Based Health Services which satisfy the requirements of the Michigan Department of Health and Human Services and the Department of Education.

### **B. Monitoring**

Macomb ISD assesses performance in terms of:

- Ongoing compliance with certification requirements
- Compliance with provider personnel qualifications
- Evaluations, service planning and service delivery as they relate to the School Based Health Services Program
- Service documentation
- Maintenance of records for Medicaid logging
- Logging and provider personnel cost submissions

### **C. Record Review**

A detailed checklist of required elements of the student's records is matched against the actual documentation.

#### D. Reporting of Findings

Findings from the monitoring and the record reviews shall be recorded by the coordinator of the quality assurance program. The coordinator will review the findings to determine the appropriate course of action to be taken, if any.

If corrective action is indicated, the coordinator will take immediate steps to implement the recommended actions.

#### E. Macomb ISD Monitoring and Evaluation

In addition to the periodic monitoring of the School Based Health Services program, Macomb ISD has in place a comprehensive monitoring and evaluation program of the ISD's special education program and services. The Continuous Improvement and Monitoring System (CIMS) is the system used by the state to promote positive outcomes and ensure compliance with the Individuals with Disabilities Education Act (IDEA) of 2004 and the Michigan Administrative Rules for Special Education.

Collectively, the monitoring guidelines established for the school based health services program and the formal ISD monitoring (CIMS) and evaluation program assure that the needs of children are identified and met and that special education services are provided in an appropriate manner by qualified professionals.

##### ➤ F. MISD Medicaid Office Record Review

In addition to the periodic monitoring of the School Based Health Services program, the Macomb ISD Medicaid Office continually conducts informal record reviews and periodically utilizes the checklist found in **Appendix B** for a more formal record review.

The Medicaid office conducts record reviews to monitor:

- Student eligibility or qualifying criteria is identified on the current IEP/IFSP.
- Covered services are documented through appropriate and objective testing, evaluation and diagnosis
- Services are rendered in accordance with each student's Individualized Education Program (IEP)
- Evaluations are conducted by the Multidisciplinary Evaluation Team or MET. Once the initial evaluations are completed, the evaluation team develops a written MET report with an eligibility recommendation. An Individualized Educational Program (IEP) meeting is then scheduled. The IEP team reviews the

MET report, as well as any other information, and decides whether or not a child is eligible for special education services, including medically-related services

- Service specific physician orders/referrals/authorizations are present
- IEP/IFSP treatment plan identifies which covered services are to be provided and the service frequency, duration, goals and objectives

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## QUALIFIED PERSONNEL

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upgrade skills of the allied health staff and therapists.

2. Suicide Prevention Task Force: In cooperation with the local districts, crisis teams have been established to deal with crisis in the schools.
3. Cooperative Learning: Working with teachers in assisting with social skills.
4. Microcomputers for the HI and VI: Installation of the computers and curriculum applications.

### D. Parent in-service

Parent groups are provided in-service education based upon their needs and interests. The MISD has professional personnel who are available upon request to provide parent in-service programs.

### E. Standards for in-service training

In-service training will be directed through the four levels of training as they are defined in the Record of Personnel Development Activities (RPDA). The RPDA is a Michigan State Department of Education checklist that establishes a range of criteria for personnel development activities. It will be used to approve and monitor such activities funded under Personnel Development of Title VI.

1. Awareness training: This type of training focuses primarily on attitudinal change. Included in this category are training sessions which include public relations, such as informing school personnel and the public about the needs and skills of handicapped children.
2. Knowledge training: This type of training focuses primarily on cognitive change. In contrast to awareness training, knowledge training is of a longer duration, the information is more detailed, and the participants are expected to retain this information. Some examples of topics appropriate for this category of training are: characteristics of children with one or many types of handicapping conditions; due process procedures; education in the least restrictive environment; individual education programs; classroom management, etc.
3. Skill practice: This type of training usually follows awareness and knowledge training. This training focuses on producing behavioral change in the participant in a controlled setting such as a practicum or lab situation. In many instances, the trainee will actually work with handicapped children, parents or school staff as an integral feature of this type of in-service training.
4. Skill application: This type of training also focuses on behavioral change. In contrast to skill practice, skill application emphasizes behavioral change which is learned and demonstrated in the trainees' own work environment, in their current position, and in their own school.



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## QUALIFIED PERSONNEL

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### **A. Macomb Staff Development Center**

The Macomb Staff Development Center currently is a consortium of 20 school districts in Macomb County, operating under the direction of the Macomb Staff Development Center Policy Board. These 20 school districts elected to join together in a consortium to govern and disperse the staff development funds allocated through the Michigan Department of Education.

The Macomb Staff Development Center offers a variety of services to teacher and administrators within the consortium. Through the consortium, staff are trained in what is effective in-service. The goal of the center is to assist districts and teachers in improving the quality of their in-services. Such planning considerations as the needs of the adult learner and the planning of effective in-services are stressed.

In addition to improving the quality of the in-services, the center has assisted local districts and special education programs in writing their own mini grants for technology. There is an ever-increasing need to have assistance to locate grant money for special projects. This center has assisted and coordinated this operation. Special grants for special education teachers have been written in cooperation with the Curriculum Resource Consultant.

### **B. Needs assessment**

During the school year, all special education teachers are surveyed using the Special Education Services Annual Needs Assessment form (20554-SCCS) to determine the needs of the special education teachers specifically. The results of the needs assessment will be incorporated into the in-service plans for the next year.

### **C. Personnel development activities**

In-service programs for personnel development are available through and in cooperation with the following:

1. Macomb Staff Development Center
2. MISD consultants in individual disability areas
3. County Directors of Special Education
4. County professional organizations
5. Beal Library and Classroom Media Library of the MISD.

In addition to the in-service programs provided by the MISD, some personnel development in-services presented through the Special Education Learning Materials Center have been:

1. AREN - American Rehabilitation Education Network: Teleconference to



## **QUALIFIED PERSONNEL**

### **I. STAFFING NEEDS**

All personnel, both general and special education, who are employed must meet qualifications required by federal and state law or state program regulations. Recognizing that quality programming can be achieved only through quality staffing, every effort will be made to recruit superior staff members.

In cases where special education personnel are employed by local districts, local administrators will be responsible for interviewing, recommending and hiring personnel. An intermediate district supervisory group will, upon request, assist in the selection of local special education personnel.

More specifically, professional personnel, including special education teachers, social workers, psychologists, supervisors, and directors will hold credentials which conform to the Special Education Code, Parts 4 and 5, Rules 340.1771-92, 95-99, Part 9, Rules 340.1012 and 340.1152.

Paraprofessionals may be hired and employed by both the local and the intermediate School District. The role of the paraprofessional is to assist professional personnel in carrying out their responsibilities to handicapped children. Paraprofessionals will be hired in accordance with Special Education Rules.

The Macomb County Special Education Mandatory Advisory Coordinating Council (SEMACC) reviews local and intermediate districts' staffing needs. This council meets several times each year to assess and approve requests for additional personnel. SEMACC is a subcommittee of the Macomb County Superintendents' Association.

The MISD assures, through the state-mandated monitoring and complaint processes, that unserved or underserved students are provided appropriate special education programs and/or services.

(Refer to Section 1.6, "Programs Operated Within the Macomb Intermediate School District", page 42.) Actual staffing varies little from year to year. Changes are reported on an annual basis to the State Department.

### **II. IN-SERVICE**

In-service education is considered to be one of the primary goals of local and intermediate departments of special education. The delivery of this service is based essentially on the needs of a specific district. The service is by no means limited to special education personnel. With the mainstreaming of children into the least restrictive environments, it is essential to provide in-service training to general education classroom teachers to enable them to handle the special education child in their classroom as well as become knowledgeable about how to obtain additional supportive assistance.

