

**BALTIMORE COUNTY PUBLIC SCHOOLS**

**DATE:** June 14, 2005

**TO:** **BOARD OF EDUCATION**

**FROM:** Dr. Joe A. Hairston, Superintendent

**SUBJECT:** **OFFICE OF THIRD PARTY BILLING ANNUAL REPORT 2003-2004**

**ORIGINATOR:** J. Robert Haines, Deputy Superintendent, Business Services

**RESOURCE PERSON(S):** Barbara Burnopp, Executive Director for Fiscal Services  
Charles Tyler, Fiscal Supervisor, Third Party Billing

**INFORMATION**

The attached is an update on the Office of Third Party Billing for the 2003 –2004 school year. Information provided includes a historical overview, major accomplishments, revenues and expenses, training reports, and next steps for the Third Party Billing Program.

\* \* \* \* \*

- Appendix I – Third Party Billing Annual Report 2004

# **Baltimore County Public Schools**

## **Office of Third Party Billing**

### **Annual Report**

**2003-2004 School Year**

**Report Composed by:  
Charles Tyler, Jr., Fiscal Supervisor  
Office of Third Party Billing  
March 2005**

# **BALTIMORE COUNTY PUBLIC SCHOOLS**

**Division of Business Services  
Department of Fiscal Services**

**Office of Third Party Billing  
Charles Tyler, Jr., Fiscal Supervisor**

**Suzanne Belt  
Accountant**

**Kay Crofoot  
Administrative Secretary**

**Debra Henninger  
Autism Waiver Facilitator**

**Amanda Killian  
Data Clerk**

**Susan Lidard  
Data Clerk**

**Jane Mullen  
Infants & Toddlers Administrative Secretary**

**Nadine Ruocco  
Data Clerk**

**Report prepared by:  
Office of Third Party Billing  
March 2005**

**OFFICE OF THIRD PARTY BILLING  
2003-2004 ANNUAL REPORT**

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# Office of Third Party Billing

## Annual Report

### July 2003 – June 2004

#### I. Historical Overview

The Third Party Billing Program commenced in the spring of 1992 as a collaborative effort between Baltimore County Public Schools (BCPS) and the Baltimore County Department of Health (BCDH). The Third Party Billing Program is a systemwide effort of the BCPS designed to recover health care costs from Medicaid for health care services rendered to BCPS students. Related services are provided and submitted for billing by speech/language pathologists, occupational therapists, physical therapists, audiologists, psychologists, nurses, and social workers. Transportation services provided to special education students were added as a billable service in 1999. Currently, there are 5,730 eligible special education students identified for Third Party Billing in Baltimore County. These students constitute 40.92% of the special education population and 5.25% of the students attending BCPS.

Beginning with the 1993-94 school year, Medicaid approved regulations for the billing of case management services. Baltimore County was the first jurisdiction in the state to submit case management claims to Medicaid. Case management data is submitted by special education teachers or speech/language pathologists who coordinate special education services for students. A portion of the case management funds is returned to each school participating in the program, based upon the number of case management encounter data forms submitted.

In 2002, the Maryland State Department of Education (MSDE) in conjunction with the Department of Health and Mental Hygiene (DHMH) developed and implemented the Autism Waiver program. The Autism Waiver program is specifically designed to assist the most severely autistic children in our society. In order for a child to qualify for the program the parent must be willing to institutionalize their child if the waiver does not work and must also declare the child as a family of one. The Autism Waiver has approximately 900 slots statewide for the 2003-2004 school year.

Funds recovered from the Third Party Billing Program supplement existing program budgets by funding staff positions and supplies and equipment for several programs:

#### STAFF

- 5 speech/language pathologists
- 5 Psychologists
- 54 special education teachers
- 10 school social workers
- 3 pupil personnel workers
- 24 instructional assistants
- 9 interpreters
- 23 health assistants

#### SUPPLIES & EQUIPMENT

- speech/language therapy
- psychology
- social work
- occupational therapy
- physical therapy
- nursing services
- school-based health centers

## **II. Major Accomplishments of the Office of Third Party Billing**

- Held 71 school-based training sessions for 553 special education teachers and administrators
- Increased identification of special education Medicaid-eligible students by 3.83% over FY 2003 (See Exhibit A)
- Revised and improved Third Party Billing Encounter Data Form to facilitate compliance with regulations
- Conducted 2 training sessions for 160 IEP chairpersons regarding case management procedures
- Monitored all Encounter Data Forms received from schools in order to determine compliance of schools
- Expanded Medicaid eligibility file for all special education students with assistance of schools
- Worked collaboratively with Office of Internal Audit in order to perform annual monitoring of Third Party Billing encounters
- Issued 146 Certificate of Achievement awards to schools (See Exhibit G)
- Updated Case Management, Related Services, and Infants and Toddlers training manuals
- Provided all Related Services office heads with accountability reports detailing the number of forms submitted by provider
- Updated Administrator's Guide to Accessing Third Party Billing Funds
- Updated programming/procedures to comply with the Health Insurance Portability and Accountability Act of 1996, known as HIPAA
- Increased funds through the Autism Waiver program

## **III. Special Education Medicaid Population**

Presently, the BCPS has 5,730 Medicaid-eligible special education children for whom encounter data forms are collected and claims submitted to Medicaid. This figure constitutes 5.25% of the children currently receiving special education services. Exhibit A denotes the increase in BCPS students who are eligible for the Third Party Billing program by fiscal year. The increase from the 2003-2004 school year was 211, a 3.83% increase. This accomplishment is directly correlated to the heightened efforts of principals, IEP chairs, special educators, and related service providers to secure additional Medicaid information from parents. The Office of Third Party Billing has also modified its own internal procedures to assist in the Medicaid determination process. On a weekly schedule, the data in the student data tracking system is matched against the data in the Third Party Billing system. The result is a report of students who are new to special education. This list is checked using the electronic verification system in order to determine Medicaid eligibility, schools are informed of the status of the student, and Encounter Data Forms are submitted for reimbursement. Exhibit B shows the process for a Third Party Billing registration.

## **IV. Training Sessions**

In support of Master Plan Goal 8.4 and related activities, the Office of Third Party Billing provides an array of training sessions to BCPS employees. These sessions include related service provider training sessions, IEP chair training sessions, and school-based training sessions.

Related service provider training sessions are usually refresher meetings designed to communicate new information regarding billing procedures to continuing employees. Separate training sessions are held for related service providers who are new to BCPS. These training sessions are more intensive and are designed for employees who have a varied knowledge of billing requirements and procedures. Each attendee receives a *Related Service Training Manual*, which is revised annually in order to ensure accurate information for school-based staff. Enclosed, as Exhibit C, is a chart of the percentage of Related Service Encounter Data Forms received by discipline.

Training for all IEP chairs is completed annually in conjunction with the Office of Special Education. The sessions are designed to provide an overarching approach to the Third Party Billing Program. In addition, the sessions show the IEP chairs how to ensure accountability in the submission of case management Encounter Data Forms.

The Office of Third Party Billing also provides school-based training sessions, which allow the special education teachers and other service providers the opportunity to ask detailed questions in a small group setting. All meeting attendees receive a *Case Management Training Manual*, which is revised on an annual basis. Exhibit D delineates the training sessions provided during the 2003-2004 school year.

For the 2003-2004 school year, the Office of Third Party Billing provided its annual survey to all school-based training session participants. The results of the survey are attached as Exhibit E.

Based upon the various comments made by the participants in the training sessions, the Office of Third Party Billing implemented some changes including providing the survey to training participants no later than two weeks after the session and developing a list of common mistakes for those who are new to completing Third Party Billing forms.

## **V. Third Party Billing Revenue**

A graph of Third Party Billing revenues is attached as Exhibit F. For fiscal year 2004, the Office of Third Party Billing generated a total of \$10,440,423 in revenue.

## **VI. Incentive Programs**

The Office of Third Party Billing has a strong incentive program in place in order to increase the potential reimbursement for services and to hold schools and offices accountable for the documentation of services.

One of the largest components of the incentive program is the return of a portion of the case management funds to each school. The Principal, IEP Chair, and Case Managers are given the opportunity to determine how the returned funds can be utilized to support, expand, and enhance special education and health-related services in schools. The funds are allocated based upon a percentage of the data submitted. This process ensures equity in the distribution of funds based upon the number of special education Medicaid-eligible students at each school. Individual schools have received from \$25 to \$30,000 annually for their special education programs through this initiative.

The Certificate of Achievement is an additional incentive for schools. Commenced in 1996, the Office of Third Party Billing produces a Certificate of Achievement for each school that submits 95% or more of its potential case management encounter data. The awards are presented to principals, and many of these awards can be seen displayed in school lobbies and showcases. A chart delineating the number of schools that have received this award in the past six years is attached as Exhibit G.

## **VII. Accountability**

A major reason for the success of the Third Party Billing program is accountability. To assist schools and related service office heads who are accountable for the submission of Encounter Data Forms, the Office of Third Party Billing sends accountability reports on a bimonthly basis. This report shows each case management Encounter Data Form submitted, the procedure code, date of service, and provider name. The school-based staff can use this report as a receipt to ensure that all data were received and to determine what data have not been submitted. Typically, the dissemination of this information leads to a large increase in the encounter data submitted to the Office of Third Party Billing.

The Office of Third Party Billing also produces reports on Encounter Data Forms for all related services office heads. This report allows the office head to monitor the staff at each school. In many instances, the submission of Encounter Data Forms can be linked directly to the caseloads of providers. The use of real-time data as a monitoring tool is an important factor in holding staff accountable for documenting services rendered to special education Medicaid-eligible students.

## **VIII. HIPAA Compliance**

In 1996, President Clinton signed into law the Health Insurance Portability and Accountability Act, known as HIPAA. The HIPAA regulations include two components, the privacy component and the electronic data transaction component. The privacy component requires that all records containing medical information be kept and maintained in a manner to ensure that privacy is not breached. In order to comply with the Federal regulations, the Office of Third Party Billing instituted procedures for staff to lock all filing cabinets containing medical information and has implemented a process where screen-saver passwords are placed on computers to prevent access to sensitive information.

The second component of HIPAA compliance is the electronic data transaction component. This change requires BCPS to use a new format for billing which will allow for a standardized billing process across the Nation.



## **IX. Interagency Medicaid Monitoring Team**

The Interagency Medicaid Monitoring Team was created by the Maryland State Department of Education (MSDE) and the Department of Health and Mental Hygiene (DHMH) as a result of the report issued by the Office of the Inspector General (OIG) of the United States on the State of Maryland. One of the major findings in the report stated that the MSDE and DHMH lacked proper oversight of the Medicaid program in the schools. The mission of the team is to review records annually of each school system to ensure compliance with the Federal and State regulations. The Interagency Medicaid Monitoring Team has reviewed Baltimore County Public Schools records twice. The Office of Third Party Billing has worked collaboratively with several offices to make changes to enhance the Third Party Billing Program and to ensure compliance.

For fiscal year 2005, the following changes have been instituted for the Program and school based providers:

1. The Third Party Billing Registration Form has been amended to include parental approval of the case manager. This issue was previously detailed on the IEP. This form is to be submitted to the Office of Third Party Billing for every special education student.
2. The Third Party Billing Encounter Data Form has been modified to include the amount of time spent providing the case management activity that has been selected for billing. Each procedure now has a coding structure that allows the Office of Third Party Billing to analyze the time spent providing the specific service. As the state will be making revisions to the Medicaid rates in fiscal year 2005, the time factor could play an important role in the amount of funds reimbursed in the future.
3. The Third Party Billing computer-based system has been upgraded in order to perform a check of the certification of the provider prior to billing. This check will ensure that only claims submitted by providers who meet the minimum qualifications for Medicaid billing will be billed and submitted to Medicaid.
4. The Case Management Activity Detail Log has been revised for school-based providers to include their credentials. By detailing their credentials, providers who do not meet the minimum requirements to bill Medicaid should be eliminated from the process.
5. The Case Management Activity Detail Log has been placed on the Third Party Billing website so that school-based staff can download the form and maintain the data electronically.
6. Logs used by speech language pathologists, occupational therapists, and physical therapists will be edited to include the signature of the provider on each page of the log.

The office heads of Health, Counseling, Social Work, and Psychology will be developing a standardized form to be used by providers of their respective disciplines. The form will serve the purpose of a log to document that a service was provided to the student. The document will be required to meet the minimum billing standards as set forth by Medicaid.

## **X. Self-Monitoring of Processes**

The Office of Third Party Billing has a very rigorous process for monitoring all encounter data that is received in the office. For example, all encounter data forms are reviewed for errors, and the erroneous forms are returned to providers for corrections. In addition, the computer database verifies the accuracy of the date of the service and verifies that the services are actually included in the IEP of the student.

Based upon the OIG audit, the MSDE has mandated that each local education agency set up a self-monitoring process and have it approved by the MSDE. The Office of Third Party Billing has worked collaboratively with the Office of Internal Audit and MSDE to develop a more comprehensive self-monitoring process. The results of the self-monitoring work performed by the Office of Third Party Billing and the Internal Auditors are enclosed as Exhibit H.

## **XI. School-Based Health Center Billing**

BCPS has been billing for school-based health center services provided to students since 1995. BCPS bills private insurance companies and Medicaid annually for school-based health center services. Exhibit I details the number of services provided by school-based health centers annually since 1995. Exhibit J details the funds generated by School-Based Health Center Services. Since the process has been centralized, the revenue from the program increased steadily.

## **XII. Autism Waiver Program**

In 2002, the Maryland State Department of Education (MSDE) in conjunction with the Department of Health and Mental Hygiene (DHMH) developed and implemented the Autism Waiver program. The Autism Waiver Program is specifically designed to assist the most severely autistic children in our society. In order for a child to qualify, the parents must be willing to institutionalize their child if the waiver does not work and must also declare the child as a family of one. The Autism Waiver has approximately 900 slots statewide for the 2003-2004 school year.

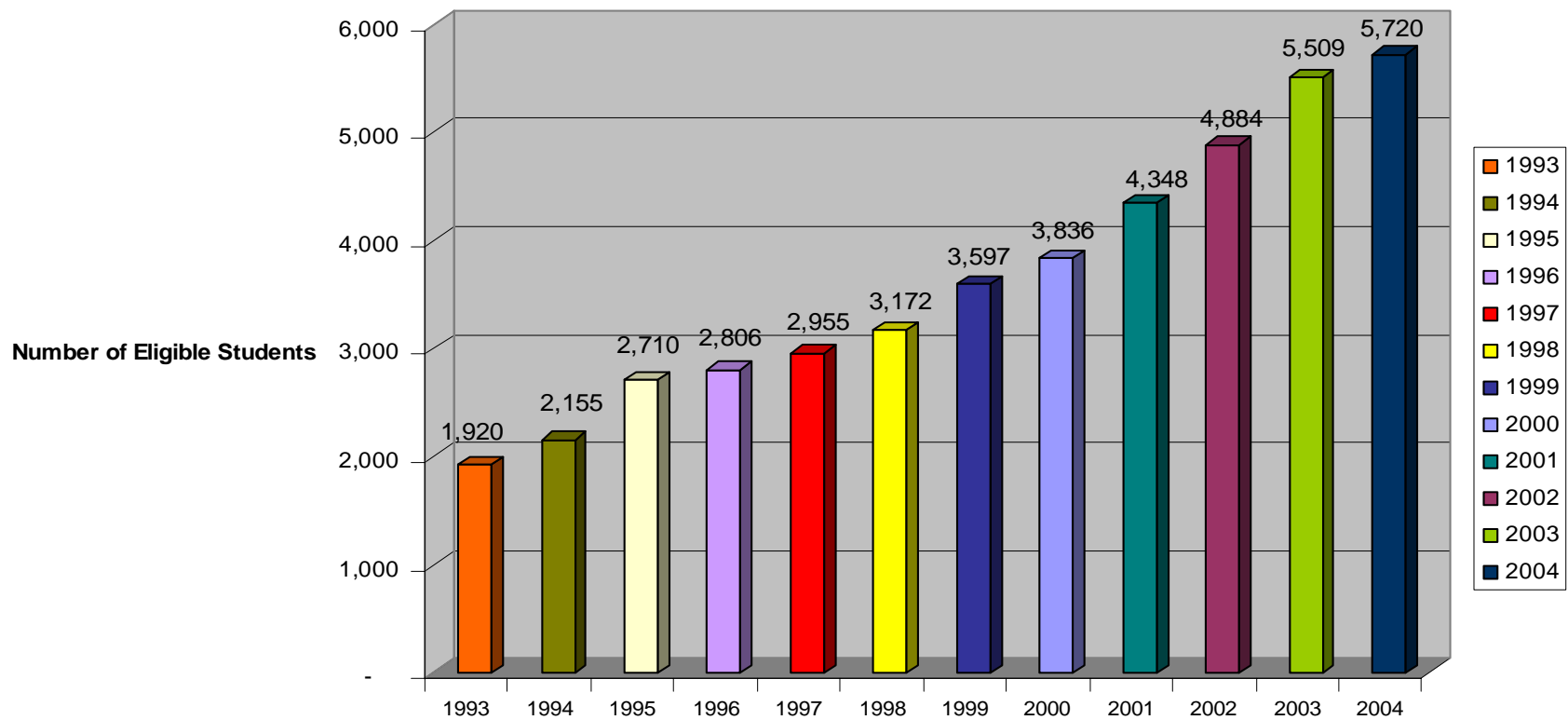
During the 2002-2003 school year, many changes were made regarding the BCPS Autism Waiver Program. One of the biggest changes was the movement of the Autism Waiver Facilitator into the Office of Third Party Billing. Since this change, parents of children on the Autism Waiver have seen an increase in customer service and communication through the program. The Office of Third Party Billing has produced quarterly Autism Waiver newsletters, which are sent to parents and guardians to provide them with current information.

To date, the Autism Waiver program has 89 children enrolled, and has generated \$1,595,341 for day habilitation and service coordination.

The Office of Third Party Billing has also implemented suggestions and changes to the Autism Waiver Program administration based upon a survey of parents conducted in July 2003.

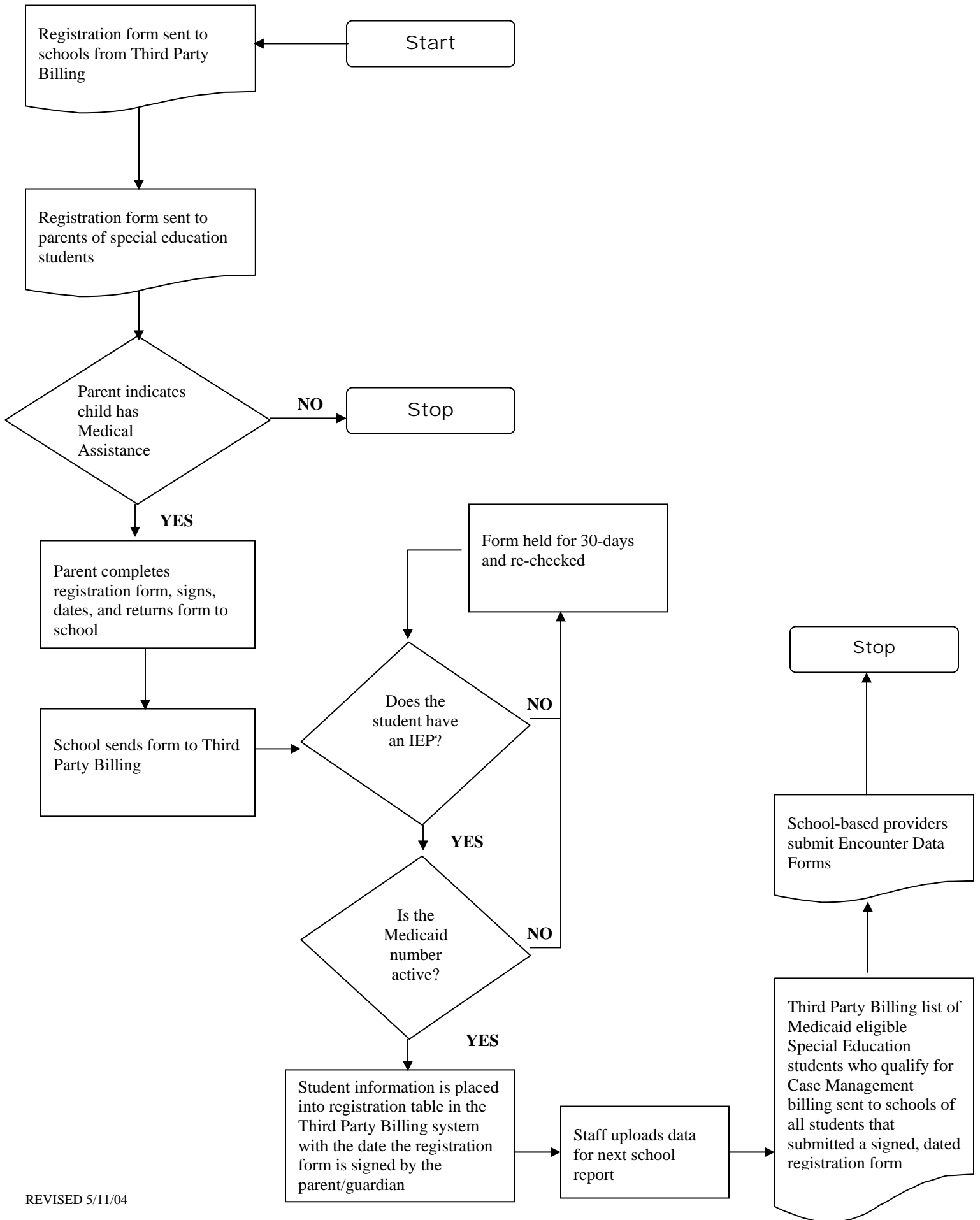
# EXHIBITS

## Students Eligible for Baltimore County Public Schools Third Party Billing Program by School Year

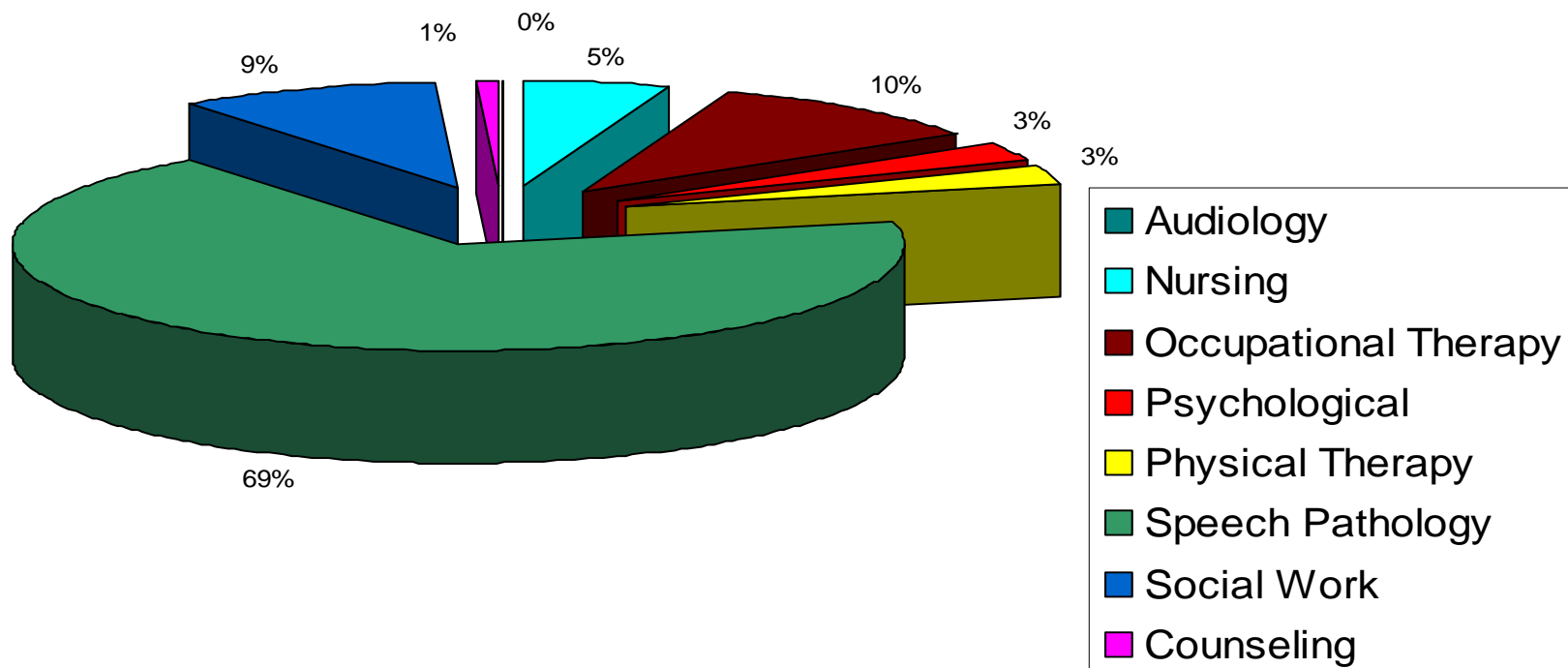


# Process For A Baltimore County Public Schools Third Party Billing Registration

Exhibit B



**Baltimore County Public Schools  
Percentage of Related Service Encounter Data Forms Received  
by Discipline 2003-2004 school year**



**BALTIMORE COUNTY PUBLIC SCHOOLS**  
**THIRD PARTY BILLING STAFF DEVELOPMENT TRAINING SESSIONS**  
**2003-2004 School Year**

School Name	Contact Person	Title	Number of Staff Trained	Date of Meeting
Arbutus Elementary	Phillip Byers	Assistant Principal	5	October 8, 2003
Baltimore Highlands Elementary	Barbara Shields	Assistant Principal	6	September 4, 2003
Battle Grove Elementary	Sabina Offley	Assistant Principal	6	August 29, 2003
Bedford Elementary	Tracy Faddis	Assistant Principal	4	September 9, 2003
Berkshire Elementary	Sharon Marquette	Assistant Principal	4	October 9, 2003
Campfield Early Childhood Learning	Lydia Blake	Assistant Principal	12	September 20, 2003
Carney Elementary	Mary Kriebel	Assistant Principal	8	October 1, 2003
Catonsville Elementary	Peggy DeCrispino	Assistant Principal	6	August 26, 2003
Cedarmere Elementary	Sandi Wilkins	IEP Chairperson	5	September 29, 2003
Chase Elementary	Patricia Blair	Assistant Principal	4	September 2, 2003
Chatsworth School	Lenore Chapman	Principal	16	September 16, 2003
Chesapeake High	Michele Patras	IEP Chairperson	8	September 11, 2003
Chesapeake Terrace	Laura Wilson	Facilitator	6	September 26, 2003
Colgate Elementary	Joyce Cummings	Assistant Principal	6	August 27, 2003
Deep Creek Elementary	Joyce Schultz	Assistant Principal	7	August 29, 2003



**BALTIMORE COUNTY PUBLIC SCHOOLS**  
**THIRD PARTY BILLING STAFF DEVELOPMENT TRAINING SESSIONS**  
**2003-2004 School Year**

School Name	Contact Person	Title	Number of Staff Trained	Date of Meeting
Deer Park Elementary	Theresia Lafferman	Assistant Principal	6	August 27,2003
Deer Park Middle Magnet	Kalisha Miller	IEP Chairperson	8	September 12, 2003
Dundalk Middle	Eric Depkin	SP. Ed. Dept. Chair	7	October 7, 2003
Eastwood Center	Lisa Sundquist	Principal	8	August 18, 2003
Featherbed Lane Elementary	Renee Johnson	Assistant Principal	8	September 15, 2003
Fifth District Elementary	Carol Quental	Principal	5	August 28, 2003
Fort Garrison Elementary	Arlene Bekman	Assistant Principal	5	September 8,2003
Franklin Elementary	Deborah Erickson	Assistant Principal	7	October 21,2003
Fullerton Elementary	Donna Bergin	Assistant Principal	7	November 6,2003
General John Stricker Middle	Barbara Victor	SP. Ed. Dept. Chair	13	August 21, 2003
Gunpowder Elementary	Cheryl Whittaker	Assistant Principal	5	September 30,2003
Halethorpe Elementary	Jill Bordenick	Principal	7	October 27, 2003
Halstead Academy	Jill Carter	Principal	9	August 26, 2003
Hawthorne Elementary	Jacob Little	Assistant Principal	9	September 2, 2003
Hebbsville Elementary	Bradley Palmer	Assistant Principal	9	September 11, 2003

**BALTIMORE COUNTY PUBLIC SCHOOLS  
THIRD PARTY BILLING STAFF DEVELOPMENT TRAINING SESSIONS  
2003-2004 School Year**

School Name	Contact Person	Title	Number of Staff Trained	Date of Meeting
Home and Hospital	Vicky Ciulla	Principal	10	April 4, 2003
Inverness Center Middle	Sherri Franklin	IEP Chairperson	3	September 26,2003
Johnnycake Elementary	Monique Wheatley-Phillip	Assistant Principal	8	September 12, 2003
Kingsville Elementary	Susan Peterson	Assistant Principal	5	October 10, 2003
Lansdowne Elementary	Donald Setzer	Assistant Principal	5	October 9, 2003
Lansdowne Middle	Rene Bienenstock	SP. Ed. Dept. Chair	5	October 14, 2003
Loch Raven Academy	Dr. Brenda Rainwater	IEP Chairperson	8	September 10, 2003
Logan Elementary	Linda Whalen	Assistant Principal	5	August 29, 2003
Lutherville Laboratory Elementary	Stephanie Fanshaw	Assistant Principal	4	November 12, 2003
Maiden Choice Center	Nancy Briganti	Assistant Principal	23	November 26, 2003
Mars Estates Elementary	Roger Proudfoot	Principal	10	October 27, 2003
Milford Mill Academy	Venus Williams	IEP Chairperson	8	September 24,2003
New Town Elementary	Nashae Bennett	Assistant Principal	5	August 20, 2003
New Town High	Denise Jennings	IEP Chairperson	3	August 22, 2003
Norwood Elementary	Nancy Fox	Assistant Principal	6	September 25, 2003

**BALTIMORE COUNTY PUBLIC SCHOOLS**  
**THIRD PARTY BILLING STAFF DEVELOPMENT TRAINING SESSIONS**  
**2003-2004 School Year**

<b>School Name</b>	<b>Contact Person</b>	<b>Title</b>	<b>Number of Staff Trained</b>	<b>Date of Meeting</b>
Old Court Middle	Sandra DeMar	IEP Chairperson	10	September 8, 2003
Overlea High	Mary Lou McHugh	IEP Chairperson	10	September 15, 2003
Pikesville Middle	Kathleen Pelletier	SP. Ed. Dept. Chair	10	October 13, 2003
Pine Grove Middle	Elizabeth Neville	IEP Chairperson	6	October 10, 2003
Pleasant Plains Elementary	Maureen Partilla	Assistant Principal	4	September 2, 2003
Randallstown High	Vickie Watts	IEP Chairperson	10	September 16, 2003
Red House Run Elementary	Patricia Lawton	Principal	11	September 23, 2003
Riderwood Elementary	Patricia Murphy	Assistant Principal	7	August 22, 2003
Sandalwood Elementary	Lisa Dingle	Assistant Principal	4	October 21, 2003
Sandy Plains Elementary	Linda Whalen	Assistant Principal	7	September 8, 2003
Scotts Branch Elementary	Deborah Favinger	Assistant Principal	6	August 22, 2003
Seventh District Elementary	David Lukes	Assistant Principal	6	December 16, 2003
Shady Spring Elementary	Nancy Kline	Assistant Principal	5	September 2, 2003
Southwest Academy	Lisa Spencer	IEP Chairperson	16	October 8, 2003
Sparrows Point High	Alvina Danna	SP. Ed. Dept. Chair	5	August 21, 2003

**BALTIMORE COUNTY PUBLIC SCHOOLS  
THIRD PARTY BILLING STAFF DEVELOPMENT TRAINING SESSIONS  
2003-2004 School Year**

School Name	Contact Person	Title	Number of Staff Trained	Date of Meeting
Sparrows Point Middle	David Lige	SP. Ed. Dept. Chair	4	November 17, 2003
Stemmers Run Middle School	Judi Grewell	SP. Ed. Dept. Chair	12	August 21, 2003
Victory Villa Elementary	Martha Dembeck	Assistant Principal	4	September 3, 2003
Westchester Elementary	Betty Pettiford	Assistant Principal	4	October 22, 2003
Westowne Elementary	Patricia Vogel	Assistant Principal	7	October 8, 2003
White Oak School	Regina Martini	Principal	35	August 26, 2003
Winand Elementary	Robin Rupprecht	Assistant Principal	7	September 10, 2003
Winfield Elementary	Elliott Burgess	Principal	5	October 17, 2003
Woodbridge Elementary	Sherri Boxer	Assistant Principal	4	October 22, 2003
Woodlawn High	Michellaine Fields	IEP Chairperson	12	October 20, 2003
Woodlawn Middle	Alice Jones	SP. Ed. Dept. Chair	18	August 5, 2003
		<b>Total Staff Trained</b>	<b>553</b>	

**BALTIMORE COUNTY PUBLIC SCHOOLS**  
**THIRD PARTY BILLING**  
**School Based Training Session Evaluation**  
**SUMMARY**  
**2003-2004**

	<b>YES</b>	<b>NO</b>
1) Was this training session beneficial to you? If not, how could it be improved?	355	3
2) Has the training session clarified your Third Party Billing responsibilities? If not, what is still confusing?	352	5
3) Have you gained additional knowledge about Third Party Billing as a result of this session?	351	5
4) Was the presenter knowledgeable about the subject?	358	0
5) Did the presenter answer all of your questions? If not, please list your questions?	354	4
6) Do you feel that the Case Management Training Manual is user friendly and will serve as a resource to you? If not, how can it be improved?	346	2

Overall, how would you rate this training session? *(please check one of the boxes)*

Excellent **293**    Good **57**    Average **7**    Poor **0**    Total surveys **357**

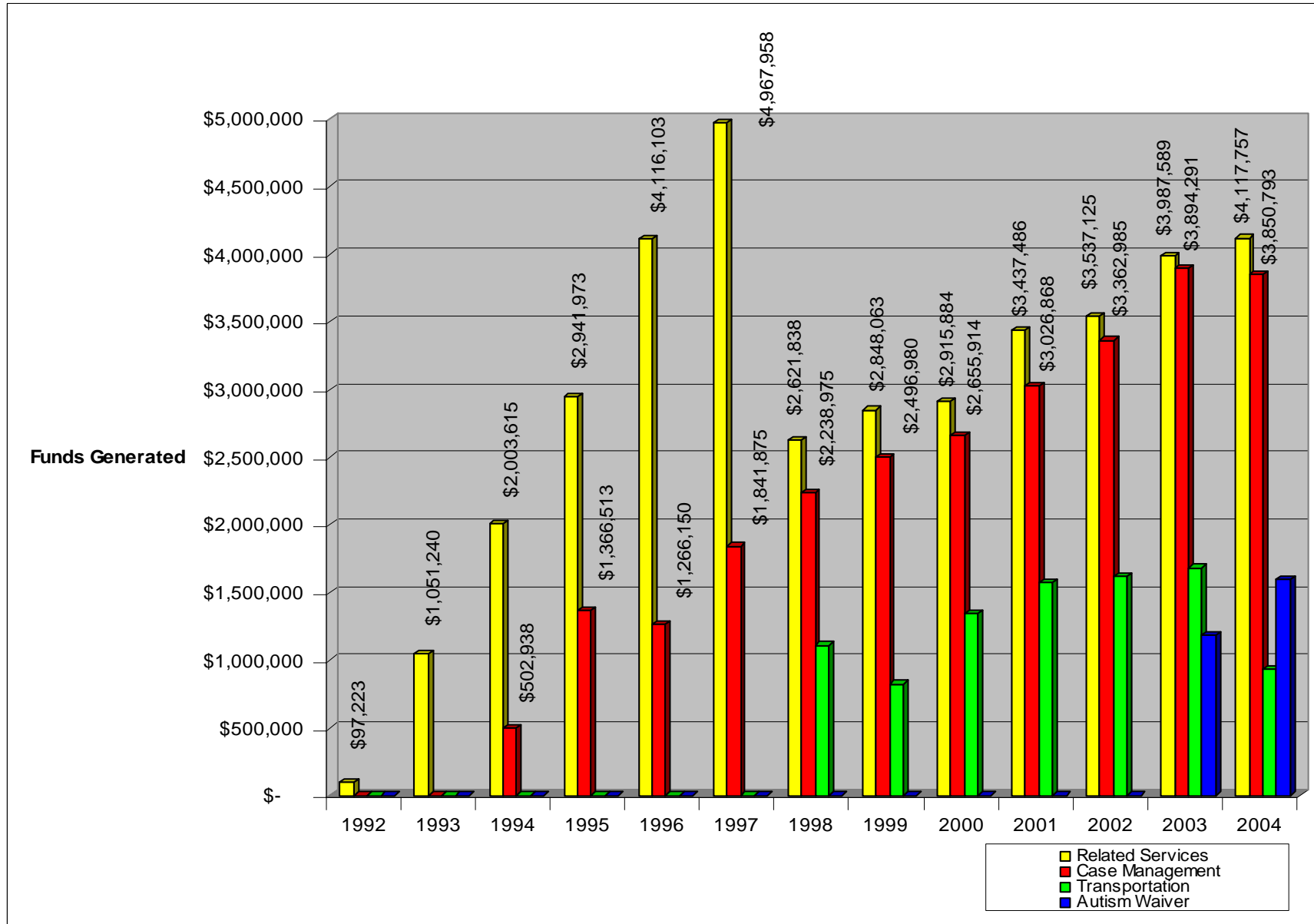
**COMMENTS & SUGGESTIONS (SUMMARY):**

- *Charles always does an excellent job explaining and answering any and all questions. His easy-going manner and slow rate of speech are positive. (3)*
- *The information about the audit process was particularly helpful to understand. (2)*
- *Thank you for the training! Thanks for the pens! (14)*
- *Thank you! For the eight years I've been with the county, I have never had formalized training on Third Party Billing. Charles is wonderful!!!*
- *Excellent Job, Charles! (Great as always) (13)*
- *I find Charles an excellent Third Party Billing advisor. If he isn't sure of something, he finds out and gets right back to you.*
- *Training is critical and should be required!*
- *Please continue to try and get this program on line.*
- *If there is any way to decrease the amount of paperwork/copying, this would be wonderful!*
- *Charles and/or his staff have always been available to help with problems or simply offer general information when needed. He is a pleasure to work with. (2)*

- *Charles always does an excellent and very thorough job. I know that after one of his training sessions, my staff will not only be able to properly complete their encounter forms, but understand why we need to do things the designated way. (3)*
- *I have discussed the training at Evening High and recommended the training to that special education staff.*
- *We should receive the funds from related services at the school level.*
- *Mr. Tyler is very knowledgeable of Third Party Billing. His training sessions are interactive, and he is thorough in his presentations. (20)*
- *I think Charles Tyler is a gift to your office!!!!*
- *Thanks for coming and clarifying some points! (3)*
- *It is always nice to see Charles. His sense of humor and positive attitude make the task involved with Third Party Billing much less burdensome! (3)*
- *As always, most beneficial! (4)*
- *Painless and informative! Thank you! (4)*
- *It is always a pleasure to work with Charles Tyler and Third Party Billing.*
- *Much clearer understanding of Third Party Billing procedures! (5)*
- *Love the pens and chocolate! Keep them coming! (3)*
- *Always informative! (6)*
- *Charles is an excellent resource- very knowledgeable and brings a very motivational presentation to an otherwise “dry” but very important subject.*
- *Mr. Tyler did an excellent job of making us aware of all the changes for this year’s case managers. He is always very friendly and informative. We look forward to his visits! (18)*
- *We always have this training at the beginning of the year. It’s very helpful because as we gain or lose staff, there is always someone still remaining to assist new staff members, so new staff people aren’t lost to what they have to do.*
- *It was very helpful and needed! (3)*
- *Manual very helpful! (2)*
- *This training session was very informative. All questions were answered. Thanks for your support! (6)*
- *It is always a pleasure to have Mr. Tyler visit! His assistance was greatly appreciated!*
- *Is there any way that the money for the procedures and treatments that the nurses bill for could come back to our school? Our children have extensive medical needs and it would really be a benefit to us. (2)*
- *The training was clear and well organized!*
- *I’m very grateful for Charles’ help. Thank you!!!*
- *I appreciate your keeping the meeting moving along. Sufficiently long to cover the material but not prolonged unnecessarily. Thanks for the pens!*
- *Super job!!*
- *Charles is very knowledgeable and explains things very clearly.*
- *Mr. Tyler always presents the information in a very professional manner. The staff training sessions presented by him are always useful. He continues to encourage our school to strive for excellence.*
- *Could we have more time for questions?*
- *I knew most of the information because I have been responsible for Third Party Billing for four years at my school.*
- *Thank you for coming to Victory Villa. You really clarified significant fears. Hopefully 100% will be consistent and no forms will be returned for corrections.*

- *The training session was nice, but I'm glad we received the workbook. That helped more. I think that doing a practice one would have help to see the changes (procedure, outcome statement)*
- *I felt this was a refresher for those familiar with the process, which I am not.*
- *I thought the session was very informative! Thanks for the great pen, too!*
- *Provide RED pens!*
- *Mr. Tyler provided our school with the necessary information for Third Party Billing.*
- *I still need help with filling out the Third Party Billing form.*
- *I don't feel as though we are kept up-to-date or fully informed as how to get the most funds back to our school. Special Education depends on these funds to service the children.*
- *Please try to schedule training session during school hours! Thanks!!*
- *Longer time allowed for individual questions would be very beneficial*
- *Last year was my first year doing Third Party Billing. I found the training last year and this year to be informative. I think it would have been even more helpful to me last year if the teachers new to Third Party Billing actually watched a sample form being filled out during the training. When it was time for me to fill my first forms out, I needed another special education teacher to sit down with me and walk me through it.*
- *The training session did not completely clarify my responsibilities but it is a start!*
- *Entirely too much paper work; keeping the log is redundant.*
- *The training was beneficial, but could have been shortened. I only needed updating, not retraining.*

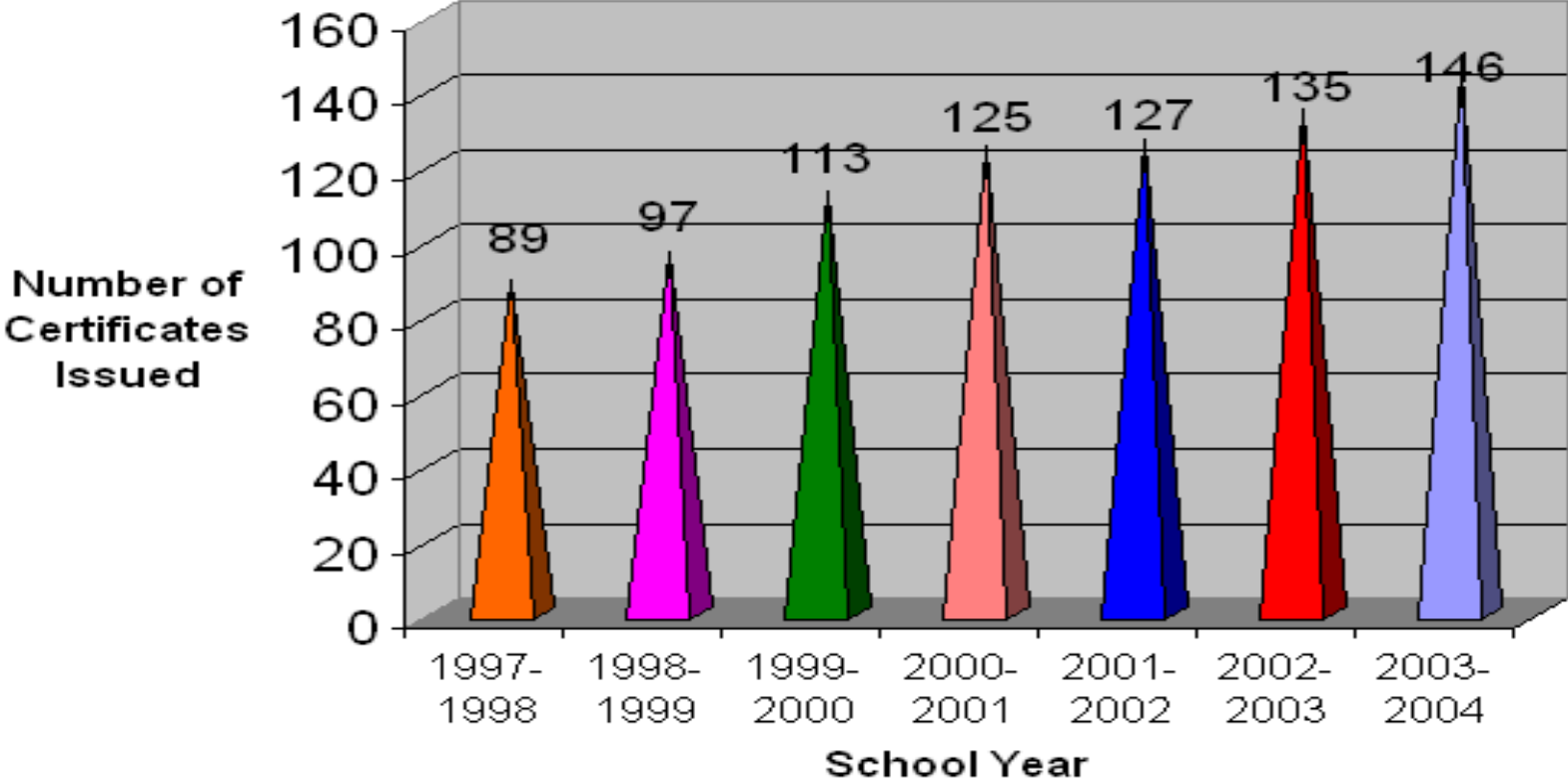
**Baltimore County Public Schools  
Office of Third Party Billing  
Funds Generated by Program by School Year**



MSDE and DHMH approved changes in the billing for nursing services thus leading to the decrease in revenue for school year 1997-1998.



# Number of Schools Receiving the Third Party Billing Certificate of Achievement



**BOARD OF EDUCATION OF BALTIMORE COUNTY****Office of Third Party Billing**

1946-P Greenspring Drive  
Timonium, Maryland 21093

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Fiscal Supervisor

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**MEMORANDUM****March 21, 2003****Medicaid Monitoring Process****Provision of Health-Related Services, Service Coordination, and  
Transportation**

Based upon the Maryland State Department of Education survey questionnaire, the following will address each issue in the survey:

The Baltimore County Public Schools has maintained a monitoring and oversight process for the billing of claims since the program started in 1992. In many instances, the billing program is utilized as a tool in order to maintain accountability and consistency. Several system verification checks are denoted below:

- Student enrollment information
- IEP verification
- IEP service verification
- School calendar/snow closing verification
- Provider title verification

A flowchart of the billing process for an encounter data form is attached as Exhibit A.

Since the December, 2001 visit from the Office of the Inspector General, Baltimore County Public Schools has instituted some changes. The primary change pertains to the availability of clinical notes for services that are billable, particularly case management. The Baltimore County Public Schools has instituted a new form for providers to complete. The case management activity detail log was introduced to providers in October, and is designed to meet the medical model level of documentation suggested by the OIG. The log is completed by the provider on a monthly basis, and is maintained in the confidential file of the student.

The Office of Third Party Billing is working collaboratively with the Office of Transportation in order to determine an appropriate manner to track bus usage.

The internal self-monitoring process, including a record review, will be conducted on an annual basis. This review will be a collaborative effort between the Office of Third Party Billing and the Office of Internal Audit.

A review of the findings from the Baltimore County Public Schools self-monitoring process is attached as Exhibit B. (See **Exhibit H, Page 3 and 4**)

## Revenue Allocation and Expenditure Reconciliation

Based upon decisions made by the Superintendent and his staff, the Office of Third Party Billing prepares the budget for the allocation of Medicaid funds. Medicaid funds are allocated to three areas. First, funds are allocated to the Office of Third Party Billing for the administrative costs associated with Medicaid billing. Second, funds are budgeted to the Offices of Special Education, Health Services, School Social Work, Psychology, and Transportation for positions and supplies. Third, funds are allocated to individual schools for special education and health services.

A file is maintained to track weekly Medicaid billings. Each week the BCPS Medicaid billing program produces a report of paid claims. This report is compared to the weekly report of paid claims sent by Medicaid. At the end of each month, the weekly reports for the month are added and compared to the monthly billing report available on the MSDE website. The accountant in the Office of Third Party Billing makes sure that the correct amount is received each month. Third Party Billing funds are kept in their own organization code in the special revenue fund. After each monthly deposit, the Third Party Billing revenue account is checked on the financial system to make sure that the funds were deposited into the correct account.

**Board of Education of Baltimore County  
Office of Internal Audit  
April 2003**

**Review of the Baltimore County Public Schools Office of Third Party Billing  
Self-Monitoring Program For Reimbursement From  
Medicaid For Health-Related Services**

**Introduction:**

The Office of the Inspector General, Office of Audit Services (OIG) conducted an audit of Medicaid costs claimed by the Maryland Department of Health and Mental Hygiene (DHMH) for school-based health services during State fiscal year 2000. As a result of the OIG audit, the Maryland State Department of Education (MSDE) Interagency Medicaid Monitoring Team required that Baltimore County Public Schools Office of Third Party Billing develop and implement a self-monitoring program to assure the appropriate use of federal funds and compliance with COMAR 10.09.36, COMAR 10.09.52 and COMAR 10.09.25.

**Background:**

The Centers for Medicare & Medicaid Services permits Baltimore County Public Schools (BCPS) to request reimbursements from Medicaid for health-related services provided in school settings pursuant to the Individuals with Disabilities Act (IDEA). The Medicaid program will pay for some of the health-related services included in the Individualized Education Plan (IEP) if they are among the services specified in Medicaid law and included in the state's Medicaid plan. In Maryland, the Department of Health and Mental Hygiene (DHMH) administers the Medicaid program.

**Objective:**

The objective of the Office of Internal Audit's review was to assess the status of the BCPS Office of Third Party Billing's self-monitoring program.

**Disclosure:**

The Office of Internal Audit (IA) conducted this review based on databases and copies or original documentation received from the Offices of Information Technology, Third Party Billing, Human Resources, Transportation, and various schools.

**Scope and Methodology:**

The Office of Internal Audit (IA) selected a random sample of 15 recipients representing 77 Medicaid claims for the month of March 2002. This sample was selected using an extraction from the Office of Third Party Billing's database that contained 4,392 students and 20,876 transactions for March 2002.

The Office of Internal Audit conducted the following:

- Reviewed federal and state laws, regulations, guidelines and state Medicaid plan pertaining to the Medicaid program and school-based health services

- Discussed processes and procedures with personnel for the Offices of Third Party Billing and Information Technology
- Discussed the procedure for providing transportation as a related service with the BCPS Transportation Office.
- Obtained and analyzed supporting documentation for the sampled claims for Medicaid reimbursement to demonstrate that:
  1. Medicaid health providers deliver prescribed services according to the student's IEP;
  2. Medicaid reimbursable services are delivered by providers who are qualified to bill Medicaid;
  3. Each special education health-related service provided is documented;
  4. Medicaid reimbursable services are assessed and billed correctly;
  5. Attendance records are maintained, and
  6. Medicaid documentation is maintained for 6 years and is retrievable.

**Review Results:**

The Office of Internal Audit's review indicates the following:

- Attendance records were maintained for all of the 15 recipients sampled;
- Recipients were in attendance on the dates that all of the 77 health-related services were provided;
- Records described the service for the 15 recipients sampled and the 77 health-related services provided;
- All 77 health-related services were delivered by providers who are qualified to bill Medicaid;
- Signed parental consents were not available for 2 of the 15 recipients sampled;
- Route sheets, and the quarterly time and mileage documentation are maintained in the Office of Transportation. However, the comprehensive schools do not maintain daily transportations logs;
- Services were billed for 5 of the 15 recipients when there was a lapse between the end date of one IEP and the begin date of the next IEP.
- Four services for case management were billed for related transportation services.
- Services were not billed for 1 recipient and 3 of the 77 health-related services

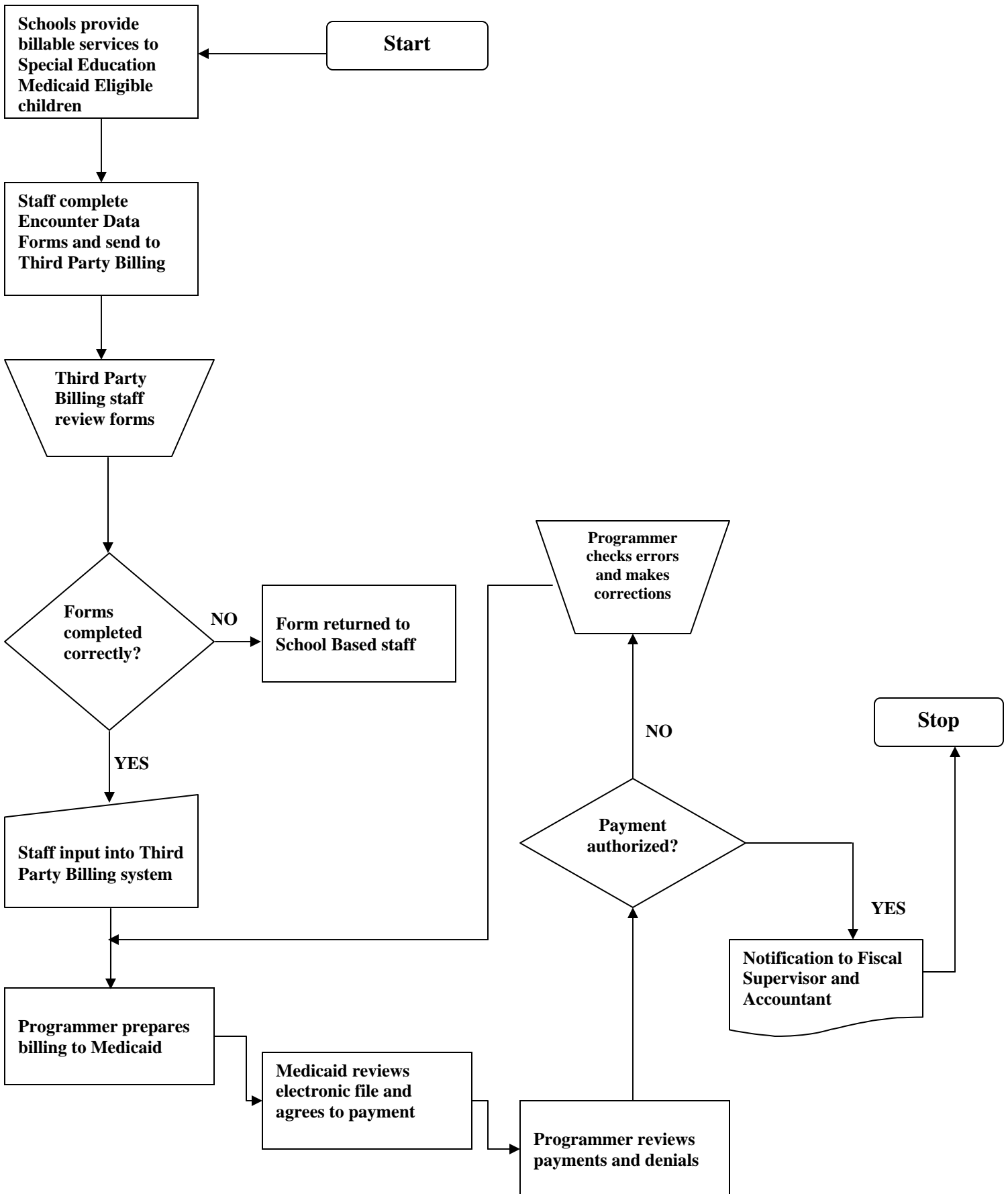
**Recommendation:**

The Office of Third Party Billing needs to work collaboratively with the Offices of Special Education, Transportation, and Information Technology in order to increase the effectiveness of its self-monitoring program.

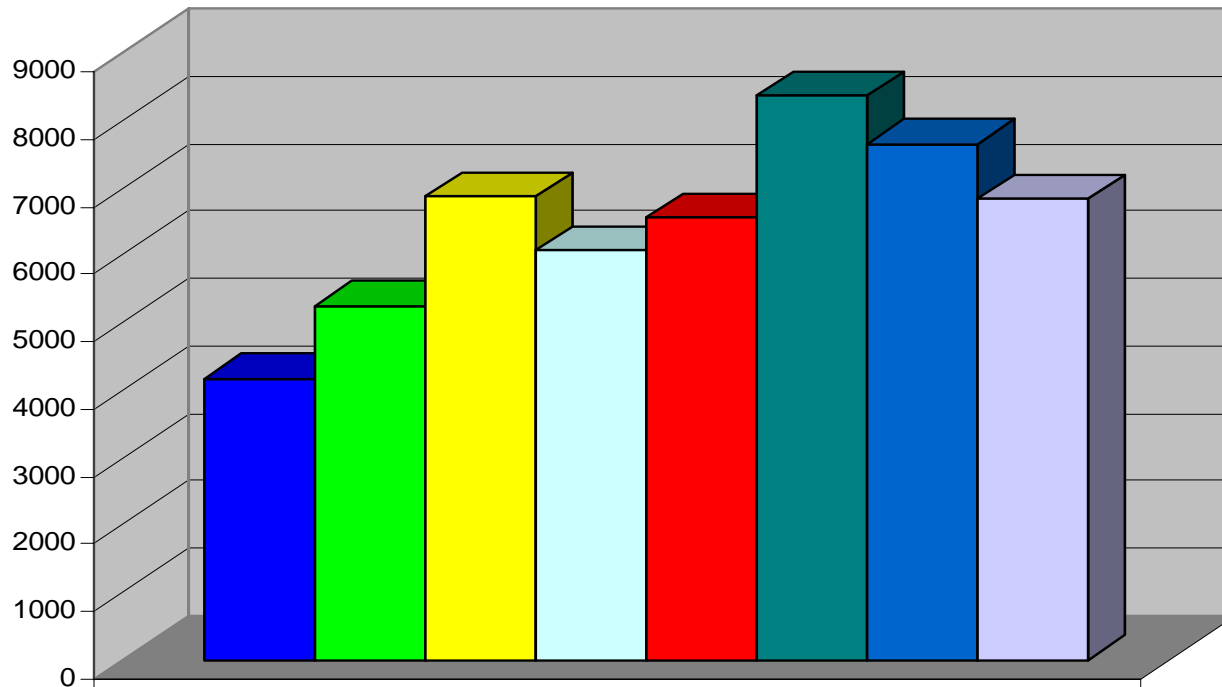
**Conclusion:**

The Office of Internal Audit determined that the Office of Third Party Billing needs to increase the effectiveness of its self-monitoring program that was implemented to further assure the appropriate use of federal funds and compliance with COMAR 10.09.36, COMAR 10.09.52 and COMAR 10.09.25.

# Baltimore County Public Schools Billing Process For An Encounter Data Form

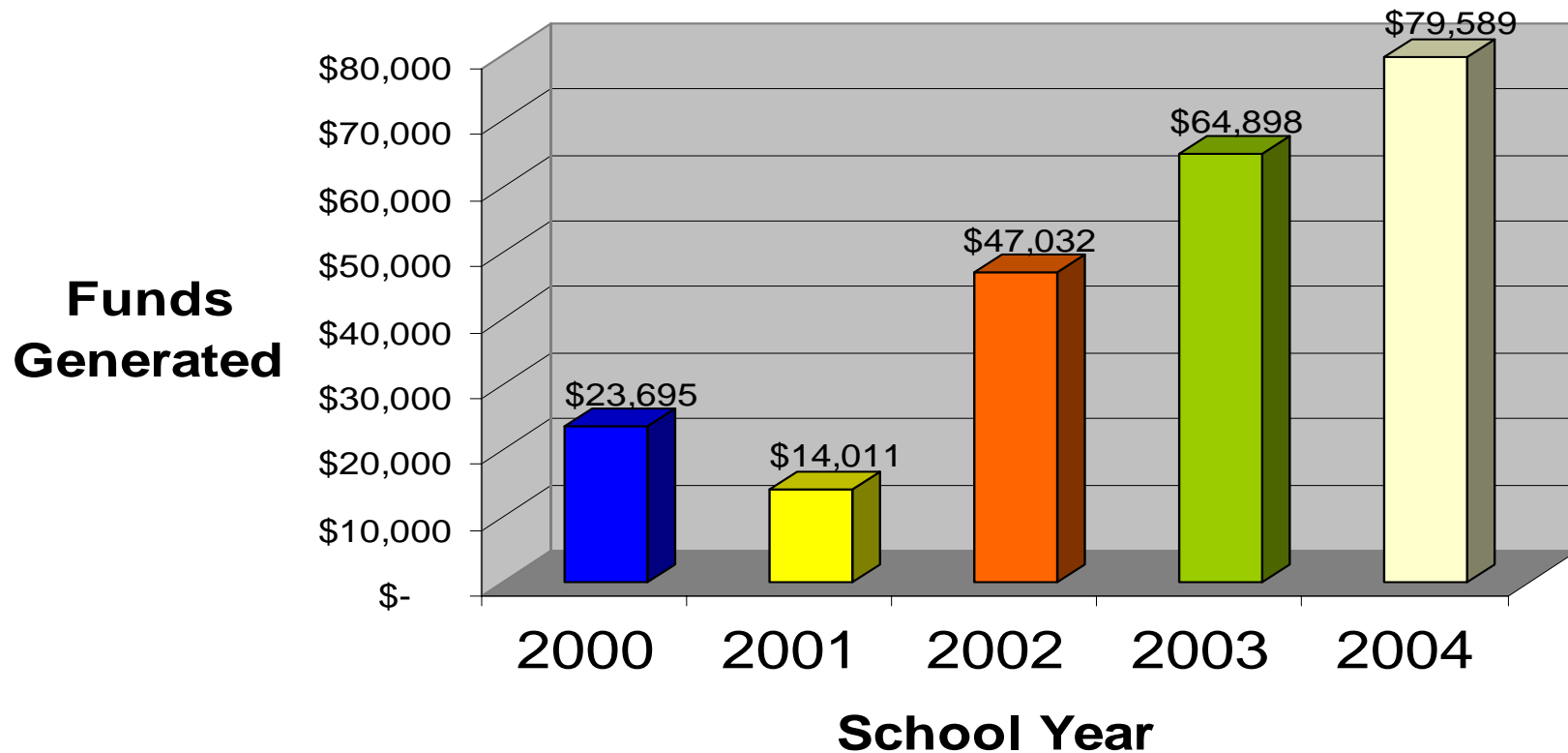


**Comparison of Baltimore County Public Schools and Baltimore County Department of Health  
School-Based Health Center Visits - Eight year trend analysis**



	1
■ Visits 1996-1997	4180
■ Visits 1997-1998	5260
■ Visits 1998-1999	6866
■ Visits 1999-2000	6064
■ Visits 2000-2001	6551
■ Visits 2001-2002	8361
■ Visits 2002-2003	7647
■ Visits 2003-2004	6831

# Baltimore County Public Schools School-Based Health Center Reimbursement



Billing of these services prior to 2000 was not consistent  
Centralized billing process began in 2001

Exhibit J