SCHOOL HEALTH SERVICES PROGRAM
PROGRAM MANUAL

Section 9

Comprehensive Review
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Section 9: Comprehensive Review
Participation in the Colorado SHS program requires districts be subject to a periodic comprehensive review that will occur at least once every three years. This review determines whether the district is maintaining all the necessary financial records in reporting both quarterly and annual costs, validating that staff included in the direct service cost pool are qualified health care professionals with appropriate licensures and ensuring suitable billing practices.

9.1 Required Documentation
The timeline for districts to submit documentation begins with an initial request in November and ends with final review results, which are shared with districts in February. There are four main review areas which require specific program area documentation:

Random Moment Time Study (RMTS)
- Electronic copies of licensures/certification for selected providers providing direct medical services
  - Licensures/certifications must be valid during the review quarter in which the providers were listed on the staff roster

Medicaid Administrative Claiming (MAC)
- Documentation of the quarterly Salaries paid. (amount and account code)
- Documentation of quarterly Contracted Staff Costs paid. (amount and account code)
- Documentation of quarterly Employer Paid Benefits paid. (amount and account code)
- Documentation of quarterly Federal Revenues paid. (amount and account code)

In Depth Financial Annual Report
- Payroll information for a sample of direct service providers
  - Documentation must show that costs were reported according to the accrual accounting methodology
- Copies of contracts for contracted providers
- Documentation to support a sampled service type (i.e., speech language and hearing services) with reported other costs such as materials and supplies or equipment depreciation
  - Documentation must be itemized to support the lump sum reported in the cost reporting system and show a purpose direct medical in nature
- All supporting documentation for transportation costs, including:
  - Transportation payroll information
  - Transportation other costs (i.e., lease and rental, fuel and oil, etc.)
  - Transportation equipment depreciation including back up to support the cost, federal revenue, years of useful life, month and year placed into service, and if applicable, month year removed from service
• Bus logs to support the one-way trip ratio numerator count for trips submitted through the Colorado interchange System (iC System).
• Documentation to support the calculation of the one-way trip ratio denominator
• Documentation to support transportation services Individualized Education Program (IEP) ratio if the district reported costs under the “not only specialized transportation” category
• Proof that the district categorized costs accordingly as “only specialized transportation” or “not only specialized transportation”

iC System Claims Program Reviews
• IEP/Individualized Family Service Plan (IFSP), or other medical plans of care (if applicable), Effective on Date of Service
• Attendance Record for the date of service
• Service Logs and/or Clinical Notes for the date of service
• Medicaid Consent Form

### 9.2 Sample Size Selection

The standardized sampling criteria for districts has been established and will be determined by the size of the October – December (OD) Staff Pool List (SPL). The table below illustrates the sample size selection criteria for both the payroll/licensure documentation as well as the student sample size for the program are portion of the review.

<table>
<thead>
<tr>
<th>District SPL Count</th>
<th>District Category Size</th>
<th>District Provider Sample Size</th>
<th>Student Sample Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>200+</td>
<td>Large</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>51-199</td>
<td>Medium</td>
<td>8</td>
<td>8</td>
</tr>
<tr>
<td>&lt;50</td>
<td>Small</td>
<td>5</td>
<td>3</td>
</tr>
</tbody>
</table>

### 9.3 Scoring Rubric

The scoring rubric contains twelve categories with detailed performance standard descriptions, review types and required documentation. All standards have equal scoring ratings of either a ‘Pass’ or ‘Fail’ grade. If a district reports transportation, they will be measured on their collective score of all twelve standards. However, if a district does not report transportation, they will be measured on the nine relevant scoring standards. Districts that do not pass performance standards will be required to attend a Strategic Intervention Training (SIT) WebEx for each program area failed.

<table>
<thead>
<tr>
<th>Scoring Category</th>
<th>Performance Standard Description</th>
<th>Review Type</th>
<th>Required Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a</td>
<td>No variance in salaried and contracted documentation provided and annual cost report</td>
<td>In-Depth Financial</td>
<td>Salaried and Contracted Costs</td>
</tr>
<tr>
<td>Scoring Category</td>
<td>Performance Standard Description</td>
<td>Review Type</td>
<td>Required Documentation</td>
</tr>
<tr>
<td>------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>----------------------------</td>
<td>------------------------------------------------------------</td>
</tr>
<tr>
<td>1b</td>
<td>No variance in direct medical other costs documentation provided and annual cost report</td>
<td>In-Depth Financial</td>
<td>Direct Medical Other Costs</td>
</tr>
<tr>
<td>1c</td>
<td>Licensure provided covers all time periods individual was listed on staff pool list and reported costs</td>
<td>In-Depth Provider Qualification</td>
<td>Licensure</td>
</tr>
<tr>
<td>1d</td>
<td>No variance in salaried documentation provided and annual cost report</td>
<td>In-Depth Financial</td>
<td>Transportation Payroll Costs</td>
</tr>
<tr>
<td>1e</td>
<td>No variance in transportation documentation provided and annual cost report</td>
<td>In-Depth Financial</td>
<td>Transportation Other Costs</td>
</tr>
<tr>
<td>1f</td>
<td>No variance in transportation documentation provided and annual cost report</td>
<td>In-Depth Financial</td>
<td>Transportation Equipment Depreciation Costs</td>
</tr>
<tr>
<td>1g</td>
<td>Documentation provided supports one-way trip ratio denominator and transportation services IEP student’s ratio</td>
<td>In-Depth Financial</td>
<td>General and Statistical Information</td>
</tr>
<tr>
<td>2a</td>
<td>Documentation provide support claims billed. This includes service logs</td>
<td>Program</td>
<td>Service Logs</td>
</tr>
<tr>
<td>2b</td>
<td>Documentation provided support claims billed. This includes attendance logs</td>
<td>Program</td>
<td>Attendance Logs</td>
</tr>
<tr>
<td>2c</td>
<td>Documentation provided support claims billed. This includes IEPs and other medical plans of care (if applicable)</td>
<td>Program</td>
<td>IEP</td>
</tr>
<tr>
<td>3</td>
<td>Contracted/salaried employee costs provided by the district show no variance in the quarterly cost report</td>
<td>MAC/Quarterly Financials</td>
<td>Direct Service &amp; Admin. Payroll/Salaried and Contract</td>
</tr>
<tr>
<td>4</td>
<td>District met the timeline in which documentation was due</td>
<td>All</td>
<td>N/A</td>
</tr>
</tbody>
</table>
9.4 Corrective Action Plan (CAP)
Districts will be issued a CAP should they receive a score of 8/12 or lower for districts who report transportation and 5/9 or lower for districts who do not report transportation. The CAP will include a SIT for each failed standard in addition to a cursory district self-review that will be submitted to the Department with self-validated scoring. This process will begin in February after the conclusion of the comprehensive review results have been shared with the district.

9.5 Review Checklist

Program Area: Provider Qualification Review Checklist
PCG requests the following documentation with respect to the direct service cost pool for the quarter being reviewed:
1. Provider Licensure
   a. Requested electronic copies of licensures/certification for selected providers providing direct medical services
   b. Licensures/certifications must be valid during the review quarter in which the providers were listed on the staff roster

Program Area: MAC Quarterly Compliance Review Checklist
PCG requests the following financial documentation (MUST be cash based) for the selected participants on the staff roster for the quarter being reviewed:
1. Documentation of the quarterly salaries paid. (amount and account code)
2. Documentation of quarterly contracted staff costs paid. (amount and account code)
3. Documentation of quarterly employer Paid benefits paid (amount and account code) including:
   - FICA (Medicare & Social Security)
   - Worker’s Compensation
   - Teacher Retirement
   - Teacher Retirement Long Term Disability (LTD)
   - Health Insurance
   - Dental Insurance
   - Vision Insurance
   - Life Insurance
   - Any other employer paid benefits
4. Documentation of quarterly Federal revenues paid. (amount and account code)
5. Copy of the latest financial audit from a Certified Public Accounting (CPA) firm

Any variance in the documentation provided and the amount shown on the cost data reported to PCG should be explained.

Public Consulting Group (PCG) requests the following documentation. Samples are defined based on the size of the district.

1. Sample of direct service providers’ annual payroll information
2. Sample of providers who are partially federally funded annual payroll information
3. Sample of contractors’ annual payroll information
4. Sample by service type direct service other costs (materials, supplies, equipment)
5. All back-up transportation information supporting costs, including:
   a. Transportation payroll for transportation personnel reported
   b. Transportation other costs
   c. Transportation equipment depreciation (purchase price, when the asset was placed into/out of service, years of useful life)
6. All back-up transportation information supporting ratios
   a. Bus logs for one-way trips ratio denominator count
   b. Student count information for transportation services IEP ratio
7. Documentation must support the category the costs were reported under “Not Only Specialized Transportation” or “Only Specialized Transportation”

**Program Area: iC System Program Review Checklist**

PCG selects a sample of between 3-10 students, dependent on district size, who had iC System claims submitted for the review period. For these 10 students, the district must provide:

1. IEP
2. Attendance Records
3. Medicaid Consent Form
4. Service Log Notes
5. Evaluation Notes (if applicable)
6. Health Care Plan (if applicable)