January 25, 2022

The following packet is being provided by the Office of Public Instruction (OPI) to the Education Interim Committee. In the packet you will find handouts which provide information for the committee’s consideration regarding the Comprehensive School & Community Treatment (CSCT) program. The packet includes the following:

- CSCT Timeline
- Intergovernmental Transfer Process Overview
- CSCT Monthly IGT Timeline by Month
- CSCT Accounting Guidance
- CSCT Statistics

In the event the committee requires additional information, or any clarification please contact Jay Phillips, Chief Financial Officer, at (406) 444-4523 or jphillips3@mt.gov.
Comprehensive & School Community Treatment Timeline

July 1, 2021 - January 25, 2022

**HB 671**
Effective 7-1-21
Moved Administration of School-Based Medicaid-Medicare Services & CHIP to the OPI

**GUIDANCE**
To Districts OPI-DPHHS
July 9, 2021
August 25, 2021
September 9, 2021
October 25, 2021
November 19, 2021
January 21, 2022

**INPUT**
INPUT
October - November
MTSBA, Dallum Law
OPI Legal, DPHHS Legal
Released to Districts
November 19, 2021
Revision Request 12.29.21
Release - 1.18.2022

**SPA**
STATE PLAN AMENDMENT
Submitted by DPHHS - Approval December 22, 2021
Retroactive - October 1, 2021

**MATCH**
State Match 65% FED - 35% State
- Bridge Funding $2.2 million exhausted 12.28.2021
- District Dollar Match Effective January 1, 2022
- January payment due February 11, 2022
CSCT | COMPREHENSIVE SCHOOL AND COMMUNITY TREATMENT
Montana Medicaid School-Based Intergovernmental Transfer Process

The School Provider submits a CSCT Medicaid claim to MMIS.

CSCT Services Provided by Contracted Mental Health Information Services (MMIS)

- Claim assigned a unique Internal Control Number (ICN)
- MMIS calculates the state and local match funds required for claim.
- If claim passes all criteria, suspended until state match received.
- MMIS generates monthly State Match Report of all suspended, payable CSCT claims.

Claims submitted first of the month through second to last Tuesday of the month.

DPHHS generates CSCT State Match Report on the last Friday of the month that is followed by a Monday.

The Children’s Mental Health Bureau runs State Match Report and reviews.

School District Notifies of State Match Amount Due

- DPHHS sends report to OPI on the first of the month.
- OPI notifies LEAs starting on first of month.
- Check submitted to OPI within window of 10 business days from receipt of match amount due.
- Funds reconciled within window of 10 business days from receipt of match amount due.

School Provider submits state match portion to the OPI CSCT account via IGT.

State Match Amount Transferred to the OPI

- The OPI reviews the State Match Report and notifies school districts of their state match amount due.
- School Provider submits state match amount due.

St at e M a tc h R e ceived f r om School Districts

- The OPI reconciles the state match submitted by each school district to the amount on the MMIS State Match Report.
- OPI notifies DPHHS, based on NPI, which LEA state matches have been received and reconciled and which have not.
- OPI sends match funds received and reconciled to DPHHS

St at e M a tc h F u nds Transferred to DPHHS

- DPHHS Program staff review payment information and notifies MMIS claims processor to release suspended CSCT claims.

CSCT Reimbursement Received

- School district receives both Federal and State match payment from MMIS.
- School district pays Mental Health Center per contract terms.

Questions?

DPHHS, Children’s Mental Health Bureau, CSCT Program Officer | Christine White 406.444.5916/chwhite@mt.gov
Montana Office of Public Instruction, CSD Senior Manager | Jay Phillips 406.444.4523/jphillips3@mt.gov

PUBLIC SCHOOL DISTRICT

MMIS

DPHHS

OPI

PUBLIC SCHOOL DISTRICT

OPI

OPI

DPHHS

PUBLIC SCHOOL DISTRICT
To make the transition to the CSCT IGT process easier, please refer to the SFY 2022 calendar below to determine when claims should pay based on when they are submitted.

For questions on this process, please contact
DPHHS, Children’s Mental Health Bureau, CSCT Program Officer | Christine White 406.444.5916/chwhite@mt.gov
Montana Office of Public Instruction, Chief Financial Officer | Jay Phillips 406.444.4523/jphillips3@mt.gov

<table>
<thead>
<tr>
<th>Task</th>
<th>October 2021 Claims</th>
<th>November 2021 Claims</th>
<th>December 2021 Claims</th>
<th>January 2022 Claims</th>
<th>February 2022 Claims</th>
<th>March 2022 Claims</th>
<th>April 2022 Claims</th>
<th>May 2022 Claims</th>
<th>June 2022 Claims</th>
</tr>
</thead>
<tbody>
<tr>
<td>LEA/MHC</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LEAs submit claims to MMIS</td>
<td>Fri Oct 1 through</td>
<td>Wed Oct 20 through</td>
<td>Wed Nov 24 through</td>
<td>Wed Dec 22 through</td>
<td>Wed Jan 26 through</td>
<td>Wed Feb 23 through</td>
<td>Wed Mar 23 through</td>
<td>Wed Apr 20 through</td>
<td>Wed May 25 through</td>
</tr>
<tr>
<td></td>
<td>Tue Oct 15</td>
<td>Tue Nov 23</td>
<td>Tue Dec 21</td>
<td>Tue Jan 25</td>
<td>Tue Feb 22</td>
<td>Tue Mar 22</td>
<td>Tue Apr 19</td>
<td>Tue May 24</td>
<td>Tue June 21</td>
</tr>
<tr>
<td>MMIS</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Claims set to pay, suspend in MMIS</td>
<td>Throughout reporting period</td>
<td>Throughout reporting period</td>
<td>Throughout reporting period</td>
<td>Throughout reporting period</td>
<td>Throughout reporting period</td>
<td>Throughout reporting period</td>
<td>Throughout reporting period</td>
<td>Throughout reporting period</td>
<td>Throughout reporting period</td>
</tr>
<tr>
<td>DPHHS CMHB</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CMHB communicates match amounts owed to OPI via monthly report</td>
<td>Mon Nov 1</td>
<td>Wed Dec 1</td>
<td>Thu Dec 30</td>
<td>Tue Feb 1</td>
<td>Tue Mar 1</td>
<td>Fri Apr 1</td>
<td>Mon May 2</td>
<td>Wed June 1</td>
<td>Fri July 1</td>
</tr>
<tr>
<td>OPI</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>OPI notifies LEAs what their CSCT state match amount is and when it is due.</td>
<td>Mon Nov 1</td>
<td>Wed Dec 1</td>
<td>Thu Dec 30</td>
<td>Tue Feb 1</td>
<td>Tue Mar 1</td>
<td>Fri Apr 1</td>
<td>Mon May 2</td>
<td>Wed June 1</td>
<td>Fri July 1</td>
</tr>
<tr>
<td>LEA and OPI</td>
<td>30-Day Window: Mon Nov 1 to Mon Nov 15</td>
<td>10-Day Window: Mon Nov 1 to Mon Dec 15</td>
<td>10-Day Window: Tue Dec 1 to Tue Jan 14</td>
<td>10-Day Window: Tue Feb 1 to Tue Mar 15</td>
<td>10-Day Window: Tue Feb 1 to Tue Mar 15</td>
<td>10-Day Window: Tue Mar 1 to Tue Apr 15</td>
<td>10-Day Window: Mon May 2 to Mon May 16</td>
<td>10-Day Window: Mon May 2 to Mon May 16</td>
<td>10-Day Window: Mon July 1 to Mon July 15</td>
</tr>
<tr>
<td>OPI</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>OPI sends funds to DPHHS and notifies them which LEA state matches have been received and reconciled and which have not.</td>
<td>Mon Nov. 15</td>
<td>Wed Dec 15</td>
<td>Fri Jan 14</td>
<td>Tue Feb 15</td>
<td>Tue Mar 15</td>
<td>Fri Apr 15</td>
<td>Mon May 16</td>
<td>Wed June 15</td>
<td>Fri July 15</td>
</tr>
<tr>
<td>DPHHS CMHB</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CMHB notifies Conduent which claims, by ICN, to release.</td>
<td>Tue Nov 16</td>
<td>Tue Dec 21</td>
<td>Tue Jan 18</td>
<td>Tue Feb 15</td>
<td>Tue Mar 15</td>
<td>Tue Apr 19</td>
<td>Tue May 17</td>
<td>Tue June 21</td>
<td>Tue July 19</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MMIS</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MMIS</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Claims pay to LEAs</td>
<td>Mon Nov 22</td>
<td>Mon Dec 27</td>
<td>Mon Jan 24</td>
<td>Mon Feb 21</td>
<td>Mon Mar 21</td>
<td>Mon Apr 25</td>
<td>Mon May 23</td>
<td>Mon June 27</td>
<td>Mon July 25</td>
</tr>
</tbody>
</table>
Background
The Montana Legislature (HB 671) has transferred the management of the Comprehensive School and Community Treatment (CSCT) program from the Department of Public Health and Human Services (DPHHS) to the Office of Public Instruction (OPI), effective July 1, 2021. The OPI is responsible for providing districts with the official guidance. The below accounting and process guidance provides school districts with OPI’s determined process and requirements of related to Intergovernmental Transfer (IGT). Districts should anticipate updated guidance as factors change.

Interim Match Funding
Until the IGT process was implemented the 2021 Legislature provided $2.2 million in bridge funding to pay the local state match for Medicaid claims effective July 1, 2021. As of December 2021, the bridge funding has been fully exhausted. Starting February 1, 2022, schools who choose to participate in the Comprehensive School and Community Treatment Program will be required to submit the state share of submitted CSCT program claims via the Intergovernmental Transfer process.

IGT
IGT is an intergovernmental transfer of funds from one government entity to another. In this case, it is a transfer from the school district to the OPI and from the OPI to DPHHS.

Schools are required to provide to OPI a non-federal funds match for CSCT services eligible for Medicaid Reimbursement. Schools must have an authorized representative certify match funds remitted are from a non-federal source which are then transferred to DPHHS for claims processing for the Medicaid reimbursement.

Per Diem Rate
DPHHS proposed in their State Plan Amendment a per diem rate for services. CMS approved a per diem rate of $96.00 and a Frontier Rate of $110.40 (115% of per diem rate) for eligible CSCT services. These rates were implemented by DPHHS effective October 1, 2021. The per diem rate is for a minimum of 30 minutes of services to an identified student-client.

Negotiated Rates with Providers
The negotiated rate is the agreed-upon amount districts will pay to 3rd-party providers for Medicaid eligible services to CSCT students with a serious emotional disability diagnosis (SED). The negotiated rate for all districts, at a minimum, should be set at the current FMAP percent by which CMS will reimburse claims. This federal reimbursement rate + district funds that make up the State match is what equals 100% of costs for the services.
Reimbursement
Funds reimbursed, Medicaid and Match, must be deposited into the Miscellaneous Programs Fund (15) using Medicaid CSCT reimbursement (Revenue Code 3356).

A unique project reporter code is recommended.

If actual provider costs are less than the approved per diem rate negotiated by DPHHS and the Center for Medicaid Services (CMS), provider may only bill and be reimbursed for actual costs. Receipt of reimbursement funds over actual service costs is classified as program income and is prohibited. The school district is required to return any program income to DPHHS.

Local State Matching Funds
Local state match is estimated at 35% but can fluctuate depending on the current approved CMS FMAP rate. The local state match must be paid from non-federal funds. The OPI recommends that districts track CSCT matching funds with unique project reporter codes.
**District Options for Match Funding**

The purpose of this guidance section is to provide districts with viable options that may be used to meet the match requirement for CSCT programs services that are planned for billing to Medicaid for reimbursement. There are two suggested options for the use of ESSER funds. In addition, there are three options identified in current flexibilities afforded to school district trustees in Montana Code Annotated.

<table>
<thead>
<tr>
<th>Use of ESSER Funds to pay 100% of the cost of CSCT Services. Use of these funds is not an allowable Match.</th>
<th>Social-Emotional and Student-Wellbeing are appropriate uses of ESSER funds.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Multi-District Agreements are funds from the district’s general fund, budgeted funds that could be used as an allowable Medicaid match.</td>
<td>This section intends to increase the flexibility and efficiency of school districts without an increase in local taxes. Agreements may need to be amended to include uses for CSCT. MCA 20-3-363</td>
</tr>
<tr>
<td>Use of ESSER Funds to supplant where general/non-federal funds are budgeted for the match.</td>
<td>The use of ESSER funds for current non-federal expenses, e.g., staffing, HVAC systems, IT updates, summer enrichment, etc., as it meets the need to prepare, prevent, respond to COVID.</td>
</tr>
<tr>
<td>Gifts, legacies, devises, and administration of endowment funds: Unspecified donations may be placed to any fund/use at the Trustees’ discretion. These funds would be considered non-federal funds.</td>
<td>Unless otherwise specified by the donor, devisor, or testator, when a district receives a gift, legacy, or devise, the trustees may deposit the gift, legacy, or the proceeds in any budgeted or non-budgeted fund at the discretion of the trustees and may thereafter transfer any portion of the gift, legacy, devise, or proceeds to any other fund at the discretion of the trustees. Note: For most districts, this is very limited funding. MCA 20-9-604</td>
</tr>
<tr>
<td>Transfer of Funds – Improvement of School Safety &amp; Security – may be a viable option for the match and funds transferred would be non-federal funds.</td>
<td>Programs to support the school and student safety and security, including but not limited to active shooter training, threat assessments, and restorative justice; MCA 20-9-236 (b)</td>
</tr>
<tr>
<td>Use of Tuition Funds – Permissive Levy</td>
<td>For students with an IEP that requires SED services, tuition funds could be used for the match</td>
</tr>
<tr>
<td>Tax credit scholarship program and the innovative educational program identifies that any program, service, instructional methodology, or adaptive equipment used to expand opportunity for a child with a disability as defined in MCA 20-7-401 is allowable.</td>
<td>School districts that have identified CSCT services for children with disabilities may seek tax credit scholarships to pay for the match for Medicaid-eligible students. HB 279-2021 Legislative Session</td>
</tr>
</tbody>
</table>
OPI Notifies DPHHS, Based on NPI, which LEA State Matches have been Received and Reconciled and which have not. OPI Sends Match Funds Received and Reconciled to DPHHS.

OPI Reconciles the State Match Submitted by Each School District to the Amount on the State Match Report.

The OPI Reviews the State Match Report and Notifies School Districts of Their State Match Amount Due.

State OPI Payment To School is Released (Includes Both Local & Federal Match)

Generates Monthly State Match Report of all Suspended, Payable CSCT Claims.

Monthly: If Claim Passes All Exception Criteria, Claim is Suspended until State Match is Received.

MMIS Calculates State and Local Match Funds Required for Each Claim

If Claim Passes All Exception Criteria, Claim is Suspended until State Match is Received.

The School Provider submits a CSCT Claim to MMIS

Claim is Processed and Assigned a Unique ICN


School Provider Submits to OPI Monthly (1) Match Certification Form (2) Local Match Funds

School District

Provider is Paid from MMIS (Includes Both Local & Federal Match)

Payment To School is Released (Includes Both Local & Federal Match)

Claims Processor

Monthly:

State DPHHS CMHB

Monthly:

Runs State Match Report

Submits State Match Report to OPI

DPHHS Program Staff Review Payment Information and Notifies MMIS Claims Processor to Release Suspended CSCT Claims.

District Returns Overpayments to DPHHS

Flow Chart Definitions

MMIS – The Montana Medicaid Management Information System

NPI Number - A National Provider Identifier (NPI) is a unique 10-digit identification number issued to a health care provider in the United States by the Centers for Medicare and Medicaid Services (CMS).
School District IGT Accounting Activity Example
The below example provides accounting journals completed by the school for the submission and receipt of funds in the IGT process. Each school will need to determine the appropriate accounting journals based on their individual program circumstances. Note, the provided example references the use of code "280" which can have an impact on a school’s maintenance of effort calculation.

School District Match (Per DPHHS Remittance Advice)
Debit XXX-XXX-XXXX-XXX-PRC - CSCT Match Expenditure
Credit XXX-101-PRC - Cash

School District Receives Medicaid Payment (Claim+Match)
Debit X15-101-PRC - Cash
Credit X15-3356-PRC - Medicaid Reimbursement - CSCT

Note: Per CSCT MOU, CSCT match funds can’t be recycled to meet future match requirements.

School District Pays 3rd Party Provider
Debit X15-280-2140-330-PRC - CSCT Services
Credit X15-101-PRC - Cash

School District Pays CSCT Direct Costs
Debit X15-280-XXXX-XXX-PRC - CSCT Direct Costs and Non-Direct Costs
Credit X15-101-PRC - Cash

Note: Initial expenditures coded to the GF; when match is reimbursed, school may elect to then recode expenditures from GF or other funds

Outstanding Provider Bills Medicaid Fiscal Year End
DR X15-280-2140-330-PRC - CSCT Services
CR X15-621 - Accounts Payable
DR X15-180 - Due from Other Governments
CR X15-3356-PRC - Medicaid Reimbursement – CSCT

Contact: Jay Phillips, Chief Financial Officer, jphillips3@mt.gov or 406-444-4523
1. **Bridge Funding:** The $2.2 million provided by the legislature was exhausted on December 28, 2021. The bridge funding used for the match was returned to districts as they submitted claims.

2. **IGT-MOU Revisions:**
   - effective date change from October 1, 2021, to January 1, 2022.
   - double indemnification was explicitly included.

3. **Information:** Sent to districts and 3rd party providers: Updated Accounting Guidance - New FAQs

4. **Key Issue:** The significant issue shared directly with the OPI by districts: **Sustainability** due to the funding match requirement.

5. **Number of meetings on CSCT:** 16 virtual sessions; 17 individual; 7 other; minimum of monthly with DPHHS; numerous phone calls with districts and others.