

MEDICAID REHABILITATIVE SERVICES

Public Consulting Group (PCG) has successfully guided and supported state agencies to manage and maximize reimbursements for Medicaid Rehabilitative Services provided to various populations, including adults in residential and out-patient programs, children in foster care, children in juvenile justice programs, and children in school-based programs.



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Call on PCG for services including:

- Consulting on new Centers for Medicare and Medicaid Services (CMS) requirements including State Plan and Program Review and Modification
- Cost Allocation, Time Studies, and Rate Setting
- Service Documentation Reviews
- Services Identification and Billing

THE NEW CMS REQUIREMENTS

CMS has proposed *significant* changes to how Medicaid agencies reimburse rehabilitative services. These changes could limit reimbursement for services provided by your agency if the requirements are not carefully reviewed and addressed. If the proposed CMS rules are implemented, many states will need to reevaluate their rehabilitation programs and make changes to come into compliance and maintain and maximize revenue.

- PCG understands how the proposed regulations impact rat setting, service documentation, and services billing operations.
- PCG is one of the few firms in the country to have successfully assisted state Medicaid agencies and child welfare agencies with receiving approval for State Plan amendments for Medicaid Rehabilitative Services under Section 1905(a)(13) of the Social Security Act, "Other Diagnostic Screening, Preventive and Rehabilitative Services."

PCG SOLUTIONS

PCG is ready to assist state and local agencies with:

- **Cost Allocation, Time Studies, and Rate Setting**
State agencies need a comprehensive understanding of option for setting Rehabilitative Service reimbursement rates to ensure that the full cost of services is represented. Agencies providing services in residential settings require special consideration because rehabilitative services are often provided in conjunction with room and board services, which may be federally reimbursable through Title IV-E (for children in foster care), and with case management services, which may be federally reimbursable also through Medicaid or Title IV-E. **PCG has expertise in seamlessly managing these separate federal revenue streams to maximize reimbursement while maintaining compliance with federal rules.**
PCG has been a critical resource in implementing statistical allocation methodologies to apportion costs reasonably and accurately so that agencies can identify rehabilitative services costs in conjunction with other federal revenue sources. PCG knows how to identify additional reimbursable costs using the principles of OMB Circular A-87, which provides guidance on the permissibility of costs. PCG also can implement and administer CMS approved Random Moment Time Study (RMTS) methodologies, along with other time study methodologies that may be better suited to milieu staff at residential programs



- **Service Documentation Reviews**
The new proposed CMS regulations stipulate several rehabilitative service documentation requirements. 42 CFR 440.130(d) has always required a recommendation from a "licensed practitioner of the healing arts" (LPHA), but the proposed regulations further articulate the need for service documentation, including the dates, nature, content, and units of services provided, the progress made toward functional improvement and attainment of the individual's goals, and annual reviews of progress. PCG has expertise conducting case reviews and assisting agencies to assess their rehabilitative services documentation and implement new documentation protocols.
- **Services Identification and Billing**
PCG has run Medicaid Rehabilitative Services billing operations for state agencies, and we understand the complexities of documenting valid dates of service and billing Medicaid services using HIPAA formatting electronic transactions.

Ask us about PCG's work with Medicaid Rehabilitative Services or children in:

- Massachusetts
- Illinois
- Missouri