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To: Vanesha Perrin, Director
Office of Medicaid Services
South Carolina Department of Education

From: Sherman L. Anderson, JD – Director /s/
State Contracts and Initiatives
South Carolina Department of Health and Human Services

Re: Advisory Statement – Quality Assurance Reviews (QARs) and Remittance Advice

Date: November 21, 2023

Please be advised that this Advisory Statement regarding Quality Assurance Reviews should assist school districts in complying with the requirements imposed by the South Carolina Department of Health and Human Services (SCDHHS) and consistent with the expectations of the South Carolina Department of Education (SDE). Best and effective practices dictate that consistency has its inherent benefits.

A Quality Assurance Review (QAR) of a subcontracted Rehabilitative Health Service (RBHS) provider must adhere to the following:

- 1) A QAR should take place at least once each fiscal year during the Contract Period. The Contract Period is defined in your Contract. Conducting a QAR in this timeframe serves as a cautionary measure to alert you to potential deficiencies so that corrections can be made as soon as they become known.
- 2) An examination of Random Sample of Records (RSR) should occur at least once each fiscal year during the Contract Period. The Contract Period is defined in your Contract. The RSR must include at least one record for each service rendered. If your RSR includes only one of the services provided, and several services were provided, this requirement shall not have been met.
- 3) Utilization of SCDE and SCDHHS approved review tool(s)/checklist(s) is the best possible strategy that you can employ to ensure that your QARs are appropriate to detect problem(s) and provide assurances that your activities are consistent with what SCDHHS and SDE will be examine in their QARs. You are encouraged not to use another tool and/or checklist as it may not adequately cover the performance measures that are required.
- 4) School Districts should share in writing their QAR findings with its subcontractor(s) within thirty (30) business days after completing the QAR. A copy of such findings shall also be shared with the SCDHHS and the SDE. This feedback is essential to inform and continuously maintain open dialogues with those entrusted to perform high quality services to the targeted population.
- 5) The subcontractor must submit to the school district, the SCDHHS and the SDE its Corrective Action Plan (CAP), titled as such, when the QAR indicates that the following minimum requirements have not been met:



- a. 100% of records reviewed contain a Consent and Release of Information form signed by the child's parent, guardian or other responsible party;
- b. 100% of the records reviewed contain an assessment with a recommendation for services;
- c. 100% of records reviewed contain a treatment plan (i.e., Individualized Plan of Care (IPOC) Individualized Education Program (IEP) or Individualized Family Service Plan (IFSP);
- d. 100% of records reviewed contain documentation (e.g., Clinical Service Notes) that accurately describes the services rendered, include all documentation components, and supports the billing of services billed to Medicaid;
- e. 100% of records contain timely Summaries of Progress; and
- f. A 90-day follow-up regarding corrective actions submitted by the subcontractor to prevent reoccurrence of any deficiencies/findings noted in the QAR Report.

This second Advisory Statement relates to Remittance Advice. It is appropriate, and it is advised that school districts request and receive a copy of any and all remittance advice that a subcontracted private Rehabilitative Behavioral Health Service (RBHS) provider may submit to the SCDHHS for professional services that are rendered to its Medicaid eligible population. This effort will further enable school districts to be informed of the type and nature of professional services that are performed by subcontracted providers and hence request payment from SCDHHS for the same.

The remittance advice should be consistent in the description of professional services that subcontracted providers state to the school district that it has performed and what the subcontracted provider has invoiced SCDHHS. This is considered additional evidence to support the quality and quantity of professional services rendered by subcontracted providers to Medicaid eligible individuals.