

Report in Brief

Date: September 2020

Report No. A-01-19-00003

U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES
OFFICE OF INSPECTOR GENERAL



Why **OIG** Did This Audit

As part of our oversight activities, we are conducting audits of Medicaid school-based services claimed by States. Prior **OIG** and State audits found that Connecticut did not monitor the School Based Child Health (SBCH) program to ensure that Medicaid-eligible children received services in accordance with their Individualized Education Programs (IEPs), that written parental consent forms were obtained or maintained, or that services did not exceed those authorized in a child's Individual Education Plan. We selected Hartford Public Schools (HPS) for review because it is one of the largest school districts in the State.

Our objective was to determine whether Connecticut claimed Federal Medicaid reimbursement for school-based child health services submitted by HPS in accordance with Federal and State requirements.

How **OIG** Did This Audit

We reviewed Medicaid school-based health services that were provided by HPS and claimed by the State Department of Social Services (DSS) for Federal reimbursement. We selected a random sample of 100 student-months for which DSS claimed Medicaid services during State fiscal year 2018. We reviewed IEP documentation and provider notes to determine whether prescribed services were properly delivered, documented, and billed.

Connecticut Did Not Meet Federal and State Requirements for Claiming Medicaid School-Based Child Health Services for Hartford Public Schools

What **OIG** Found

Connecticut did not claim Federal Medicaid reimbursement for school-based health services submitted by HPS in accordance with Federal and State requirements. Of the 100 student-months selected in our sample, 32 student-months were allowable. However, 68 student-months had 1 or more school-based health services, totaling \$11,928 (\$5,964 Federal share), that were not allowable. These errors occurred because Connecticut did not adequately monitor claims for school-based health services submitted by HPS. On the basis of our sample results, we estimated that Connecticut improperly claimed at least \$1,522,359 (\$761,179 Federal share) for Medicaid payments made to HPS.

What **OIG** Recommends and Connecticut Comments

We recommend that the Connecticut Department of Social Services: (1) refund \$761,179 to the Federal Government, (2) work with the Centers for Medicare & Medicaid Services to review Medicaid payments made to HPS after our audit period and refund any overpayments, and (3) strengthen its oversight of the SBCH program by working with the Connecticut Department of Administrative Services to develop a detailed review process for claims submitted by the Local Education Agencies to ensure that all claims meet Federal and State requirements.

In written comments on our draft report, DSS agreed with our finding and recommendations. In addition, DSS identified corrective actions HPS has taken or plans to take to address the conditions identified in our draft report. These actions include: (1) exploring potential changes to its billing system with the vendor, (2) researching different options to improve processes to better capture attendance records, (3) correcting the sample items in which parental consent was not obtained by reviewing submitted parental consent forms to make sure the forms contained all necessary information and obtaining new parental consent forms as necessary, and (4) providing staff training.