

**MEDICAID COMPLIANCE FOR HEALTH-RELATED SERVICES****1. Policy Statement**

The Board of Education recognizes its responsibilities to provide services for children with disabilities and to pursue funds available from federal sources for this purpose. Accordingly, the Rochester City School District (RCSD) actively seeks reimbursement from the New York State Department of Education and the New York State Department of Health for health-related services provided to Medicaid eligible children with disabilities.

**2. Purpose**

The purpose of this policy is to authorize conditions under which the RCSD may seek reimbursement for health-related services provided to Medicaid eligible children with disabilities.

**3. Definitions**

- a. Health-Related Services – Services that include audiology, nutrition, occupational therapy, physical therapy, social work, counseling, nursing, speech and language, psychological and other services approved by federal regulations.
- b. Individualized Education Program (IEP) – An instructional program designed for each child with a disability as recommended by an IEP team.
- c. Third-Party Billing – The process for billing Medicaid for reimbursement of health-related services for Medicaid eligible RCSD children with disabilities by qualified RCSD service providers.

**4. Compliance**

The RCSD Department of Special Education is responsible for directing and obtaining the necessary documentation and requirements needed for Medicaid compliance. The RCSD Department of Medicaid is assigned the overall responsibility for reviewing and reporting the necessary Medicaid compliance. The Medicaid Department also oversees the third-party billing process to seek Medicaid reimbursement for health-related services. Medicaid is also responsible for implementing an effective compliance program which includes the following attributes:

- a. Written Superintendent Regulations are required to provide guidance, reporting, attestation, certification to the state, investigations, and resolution processes associated with the Medicaid activities.
- b. A Medicaid Compliance Officer is to be designated to report directly to the senior administrator regarding this program.
- c. Regular Medicaid training for RCSD employees must exist.
- d. A confidential disclosure mechanism must exist to enable anonymous reporting.
- e. Procedures must support non-intimidation and non-retaliation for good faith reporting.

- f. A process to assure fair enforcement and ramifications for non-compliant behavior or failure to report non-compliance must exist.
- g. A process is to be defined and enacted to resolve non-compliance and assure prevention of non-compliance.
- h. Compliance risks based on regular provider types' evaluations are to be regularly assessed. Activities are to be implemented and documented to manage those risks.

**5. Delegation of Authority**

The Superintendent is authorized and responsible for developing appropriate procedures for the implementation of the policy.

**6. Monitoring**

The Medicaid Compliance Officer shall provide a report to the Board of Education at least annually.

Cross-ref:   Development of Regulations (3310)  
                  Financial Reports and Resolutions (6630)  
                  Purchasing (6700)  
                  Vendor Relations (6750)  
                  Medicaid Compliance and Integrity Program (8600-R)  
                  Whistleblower (9645)

Ref:           Medicaid Compliance Program 18 NYCRR Part 521  
                  Social Services Law Section 363-d and NYCRR Part 521

Notes:       Adopted December 17, 2009 pursuant to Resolution No. 2009-10: 490; Amended April 25, 2013 pursuant to Resolution No. 2012-13: 618; Amended March 23, 2023 pursuant to Resolution No. 2022-23: 555

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