

Deborah S. Delisle, Superintendent of Public Instruction

Date: February 5, 2011

To: MSP Stakeholders

From: Mark Smith, MSP Program Coordinator, ODE

Re: Progress Reporting

The purpose of this communication is to clarify required documentation of progress in the Ohio School Medicaid Program, and to differentiate those requirements from the Special Education/IDEA progress monitoring requirements. MSP provider districts should evaluate their own compliance with MSP documentation requirements to insure the Medicaid Program documentation requirements are fully met.

All special education services delivered by school districts are required to follow IDEA reporting guidelines-namely, that progress reporting be used in documenting a student's progress towards IEP goals. In addition, if Medicaid reimbursements are being sought by the district to cover these services, the school must additionally adhere to progress reporting guidelines defined in the Medicaid School Program (MSP). MSP has defined its progress reporting guidelines in Ohio Administrative Code (OAC) Chapter 5101: 3-35-06 (E)(5) and OAC 5101:3-35-05 (G)(6): both rules reference the need of a description of actual progress made towards IEP goals.

MSP requires documentation to indicate progress related to the therapeutic/medical aspects of service delivery. Documentation detailing only the educational aspects of therapy services does not meet the MSP requirements for progress reporting. The original report card progress reporting for IDEA was not developed with Medicaid requirements in mind. However, many districts have modified their IDEA report card progress reporting by including therapeutic/medical aspects of progress for IEP goals as well. Districts may also choose to indicate progress in other ways, such as therapist case notes or by using an online system that tracks service delivery. While there are multiple methods of tracking progress, it must be stressed that Medicaid requires documentation indicating progress towards the therapeutic/medical aspects of services that can be accessed by Medicaid auditors at the time of an audit in order to justify reimbursements from MSP.

Other states have been cited by federal Medicaid auditors for a lack of demonstration of appropriate progress in their programs; these findings have resulted in significant paybacks by districts for services reimbursed originally by Medicaid. ODE/ODJFS stress this progress reporting compliance requirement in the hopes of avoiding similar issues with Ohio's MSP.