School Health and Related Services (SHARS)
Common Audit/Review Findings

General

a. Documentation does not support service rendered
b. Documentation does not include billable time.
c. Documentation does not include session notes, start and stop times, total minutes, activity performed, student observation, or related IEP objective.
d. Quantity of time units billed does not match quantity of time documented.
e. Student was absent on the date of service billed.
f. Medical records requested were not submitted.
Common Audit/Review Findings

Date of Service I

1) Student is absent on the day a service is claimed and paid.
   a. Prior to submitting claims, verify student was not absent on the date of service.
   b. If a student arrives late to a service, document it in the comments section of the service ticket. Attendance may have already been collected for the period and an attendance report may show the student as absent.
   c. If a student is offsite, document in the comments section of the service ticket.

Example—specialized transportation was provided by the district; Personal Care Services were provided to student while being transported to another campus.
Common Audit/Review Findings

Date of Service II

2) Service is billed on a holiday or weekend.
   - Prior to submitting claims, verify the date of service with the school calendar.

3) Service is not documented correctly or at all in the Admission, Review, and Dismissal (ARD).
   - Review ARD documents to ensure proper documentation is included for services provided.
Common Audit/Review Findings
Nursing Services

1) The need for Nursing Services (NS) is not linked to medical necessity (diagnosis) or why service is needed.
   - Example of good documentation--Joey has cerebral palsy and requires suctioning, specialized medication administration, and continuous monitoring for seizures daily. Joey is a medically fragile student and requires individual Nursing services throughout the day.

2) The number of Nursing Service minutes provided is insufficient to submit for reimbursement.
   - Document Nursing Services that are under 7 minutes if an additional NS service is to be provided later in the day.
   - Totals should be added for the day and then submitted for payment.
Common Audit/Review Findings
Nursing Services

3) The documentation for nursing services does not include the type of Nursing service performed. Medication Administration cannot be claimed unless it is documented in the ARD.

- Example of good documentation--Mabel receives routine oral medication as prescribed for her bipolar disorder. The medication is needed to control her behavior and limit her anger and frustration during school hours.

- Recommend NS Supplement Form to clearly document the need and type of service that will be provided to student.

- Include Nurses in ARD meeting or pre-ARD discussions.
Common Audit/Review Findings
Personal Care Services I

1) The need for Personal Care Services (PCS) is not linked to medical necessity (diagnosis) or why service is needed.
   - Example of good documentation--PCS assistance is required for Timmy throughout the day on a one-on-one basis. Timmy has mental retardation and needs periodic PCS to assist him in moving from class to class. Without PCS assistance, Timmy would wander off.

2) PCS are not mentioned in Individual Education Plan (IEP) or are not specified (only reference to Life Skills).
   - Life Skills is not a medical term.
   - PCS & Life Skills are not interchangeable terms.
Common Audit/Review Findings
Personal Care Services II

3) Documentation does not include billable start time, billable stop time, total billable minutes, and the type of PCS performed.

4) Documentation lacks required signatures.

5) Group services were inappropriately billed for the entire day, rather than for an amount of time actually required to perform the activities.

6) The quantity of time units billed exceeds the quantity required to perform the services.

7) The services documented on the PCS log exceed the personal care needs listed in the IEP. In numerous instances, the IEP states the client is independent in personal care, yet an entire day of various PCS was billed.
Common Audit/Review Findings

PCS Documentation Recommendation

Recommend PCS Supplement Form; documentation must include:

a. Statement linking service to medical necessity (diagnosis).

b. Service to be provided along with detailed activities.
   - Diapering alone does not justify billing for the entire day.

c. Group, Individual, Both/Episodic or Continual.
   - Redirection, Monitoring, Observation, Queuing, and Prompting.
   - Duration listed for these – “daily,” “throughout the school day,” “continual.”

d. Service provided on the bus (indicate if transportation aide is required).
Personal Care Services
ARD/IEP Documentation Requirements

PCS documentation must answer 4 questions.

1) Why are PCS needed (link to medical necessity)?
2) What PCS activities are needed?
3) When/where are the PCS to be provided?
4) Why can't the student perform the age appropriate task?

NOTE: Districts may choose not to seek reimbursement for episodes of one-on-one PCS time and may bill all of the student’s PCS under the group PCS code.

Services provided should be billed with appropriate individual or group procedure codes.
Common Audit/Review Findings
Specialized Transportation I

1) Specialized Transportation (Sp. TR) services are not listed in the IEP or justification for the services is not documented.

- Example of good documentation--Autistic student enrolled for SP, OT, PCS, and Sp. TR in ARD.

Winnie has Autism and cannot ride the regular school bus. She needs to have a restraint/harness to prevent harm to herself and others. In addition, she needs constant monitoring and supervision at all times including on the school bus.
Common Audit/Review Findings
Specialized Transportation II

2) Justification for Specialized Transportation service not adequately documented.
   - Must link the adaptation to the medical need (diagnosis).
     Example of good documentation--The student suffers from spina bifida. Wheelchair lift is needed because the student is in a wheelchair and is unable to transfer himself.

Recommend Specialized Transportation ARD/IEP Supplement form to clearly document the need and type of service to be provided to student.
Audit/Review Documentation
ARD/IEP & IEP Supplement Forms

For SHARS purposes, ARD/IEP’s and ARD/IEP Supplement forms should include the following information:

1) Type (name) of service
2) Frequency and duration of services
3) Medical condition related to service
4) Rationale/reason for service
5) Description/list of activities to be provided
Audit/Review
Documentation Best Practices I

1) Include student’s Medicaid ID # on all documentation (required).
2) Document for ALL students receiving SHARS services--Medicaid eligible or not.
3) Document all services in the ARD in a consistent manner to minimize the need to go back to ARD to add a service.
   - Student can become Medicaid eligible at anytime.
4) “See IEP goals” is not sufficient documentation.
   - Providers can reference related service goal and objective numbers if numbered in the ARD.
5) All service tickets must include provider signature and initials for separate sessions.

6) Occupational Therapy (OT) & Physical Therapy (PT) prescriptions and referrals must include:
   - the type of service the prescription or referral is for, and
   - legible name and address for the referring physician.
Audit/Review
Documentation Best Practices III

7) “Psychological/Counseling Services” can be documented on the Related Services page if the district has both provider types.

- ARD committee will not know which provider will work with student.

- Licensed specialist in school psychology (LSSP); licensed psychologist; or licensed psychiatrist--file under Psychological Services.

- Licensed professional counselor (LPC); licensed clinical social worker (LCSW, formerly LMSW-ACP); or a licensed marriage and family therapist (LMFT)--file under Counseling Services.
Electronic Signatures

- Original signatures are required on the service logs and session notes which are required documentation for Medicaid services. The service log/session notes can be a printed copy from an “electronic documentation system” that lists the services delivered – this printed copy would need the signature/initiais of the provider of the service.

- If the documentation is kept on paper then “summarized” on a separate “billing ticket” to accumulate and total the services to expedite and simplify the billing process, then a signature would not be needed on the separate “billing ticket.” A “billing ticket” is not Medicaid documentation that the SHARS service was provided, but, if the “billing ticket” also serves the purpose of the service log and/or session notes, then original signatures are required because they are considered required documentation for Medicaid services.
If request for documentation states “all medical records,” include all documents required to support payment for the claim.

- ARD/IEP/IEP Supplement forms, Full and Individual Evaluation (FIE), prescriptions/referrals, Speech Language Pathologist evaluations, provider licenses, supervisor logs, service tickets, session notes, bus logs, attendance records, etc.

Highlight or tab items pertinent to SHARS services to aid auditor/reviewer for documentation review.
SHARS Program Contact

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