

## Waiver Administration Claiming

### Questions and Answers

#	Question Asked By	Date	Question	Answer
1	Eric Hammer, Cuyahoga CBMRDD via e-mail	6/7/05	Do WAC duties need to be included in the staff member's position description?	<p><u>No.</u> Prior WAC billing instructions indicated WAC duties needed to be in PD. With the new WAC Guide, the Implementation Plan would address this issue. So, now I would say, it is not necessary for the employee's PD to reflect WAC duties. There are two exceptions</p> <p>The WAC Coordinator. This individual's PD must include the title and duties.</p> <p>Employee that are considered 100% WAC. The employees must not perform any functions that would need to be stepped-down by the WER and those employees are listed in the Implementation Plan as detailed in the WAC Guide Section 2.4.3.B.</p> <p>Those employees' PDs should be modified with enough detail to be able to determine that the employees are 100% WAC with no step-down.</p>
2	Eric Hammer, Cuyahoga CBMRDD via e-mail	6/7/05	Is eligibility a Code 2 service? (The more I look at the description, I think it would be)	<p><u>No.</u> If referring to county board eligibility (OEDI and COEDI), because an individual can be placed on a Waiver without being</p>

				<p>county board eligible.</p> <p><u>Yes.</u> If referring to level of care eligibility but it would be a Code 1 activity which is 100% Waiver.</p>
3	WAC Training Class	--	<p>Is communication with an SSA ever allowable as a billable WAC service? This question relates to the Activities not allowable regarding “Initial and Ongoing Assessments and Evaluations”.</p>	<p><u>Yes.</u> Waiting list communication are allowable if done as part of an Initial and Ongoing Assessments and Evaluation – WER activity.</p>
4	WAC Training Class	--	<p>Why isn’t there a WER code for waiting list activities? (p. 36)</p>	<p>There should be and it will be in the next reiteration of the Guide.</p>
5	WAC Training Class	--	<p>Does the Waiver Agreements and Contracts for Additional and Supportive Services Required by Waiver Enrollees Code include bargaining unit contract negotiations?</p>	<p><u>No.</u> Bargaining unit contract negotiation are not allowable as Waiver Agreements and Contracts for Additional and Supportive Services Required by Waiver Enrollees activity reimbursable because those activities would be performed regardless of whether or not the agency had Waivers.</p>
6	<p>Michelle Vogelsong, NOWAC via e-mail</p> <p><a href="#">Also on TCM Q&amp;A</a></p>	6/13/05	<p>In the past our QA staff billed WAC and this was not an issue. Now the consumer specific Quality Assurance reviews need to be billed through TCM.</p>	<p><u>Yes.</u> Consumer specific QA reviews are billable through TCM.</p> <p>However, for Provider Compliance reviews and system QA reviews, those are billable through WAC using the “Monitoring of Waiver Providers, Quality Assurance and Quality Improvement” codes.</p>
7	<p>Shirley Riggs, NEON via e-mail</p>	6/13/05	<p>For a COG that assists a member county by operating their Family Support Service Program (not just</p>	<p>The calculation for the WER for a COG is located in Guide Section 6.3. There is no relationship between the WER for WAC and</p>

			<p>paying bills to the vendor, but operating the program), would those consumers be included in the denominator for WER? The consumer could be someone also served by a waiver. If so, would it be the number <u>eligible</u> to participate in the program or the actual number who have <u>participated</u>?</p>	<p>the FSS program. FSS is not a Waiver Administrative Activity. Therefore, any function or activity performed while working on a FSS project is not billable to WAC. There may be some of the consumers that a COG will work with during a FSS activity that are on a Waiver. However, the activity itself does not benefit the administration of the Waiver. Therefore, it is not billable to WAC.</p>
8	<p>Shirley Riggs NEON via e-mail</p>	6/13/05	<p>If the COG provides a service for a county, such as IA services, could NEON or the COG bill WAC just as long you know who will bill and expressed in the plan?</p>	<p><u>Yes</u>. The COG or CB may bill WAC as long as it is specified in both the COGs and CBs Implementation plans. See WAC Guide Section 2.4.3 E for requirements. The main issue here is that the COG and CB may not both bill for the exact same service.</p>
9	<p>Shirley Riggs, NEON via e-mail</p> <p><a href="#">Also on TCM Q&amp;A</a></p>	6/13/05	<p>I understand that <u>individual</u> quality assurance services provided, whether by a COG or the CB, are only billed as TCM. For the delivery of quality assessment registered nurse services required by OAC 5123:2-6-07, are they billable under WAC? Page 32 of the training manual references assessments and evaluations, however, QARN services are an assessment of the provider as their service relates to an individual including observation of the provider administering the medication, review of provider documentation, review of medication</p>	<p>Monitoring of quality or system reviews are billable under WAC using the “Monitoring of Waiver Providers, Quality Assurance and Quality Improvement” WAC Code.</p>

			errors, review of provider system, techniques and policies. It doesn't appear that QARN services would fall in this category.	
10	Beth Graham, Vinton CBMRDD via e-mail  <a href="#">Also on TCM Q&amp;A</a>	6/15/05	Scenario: Current SSA is working toward her bachelors, but does not have an associate degree. She has been working with a provisional case management certificate from ODMRDD, but due to the new rule, she would only be qualified to be a Registered Service Provisional grade. My question: If she would only bill Waiver Administration for all of our Waivers, 100%, is she allowed to have a case load? As her supervisor, I would review and sign off on everything until she finishes her bachelors degree.	This current SSA will receive an SSA registration to replace her CM registration. She can continue to assist in all the SSA activities and bill for those that are TCM reimbursable. If you decide to have her do <b>only</b> WAC, she can only bill for activities that are WAC, not for any SSA/TCM activities.
11	Beth Graham, Vinton CBMRDD via e-mail	6/15/05	Are SSA's able to have a case load of both IO and others be able to bill both TCM and WAC?	Yes, SSA may bill both TCM and WAC. However, the SSA must prepare continuous WAF forms and the activities that which WAC may be billed are limited. See WAC Guide Section 2.5.1.
12	Beth Graham, Vinton CBMRDD via e-mail	6/15/05	Is there an explanation of the penalty rate for not making the productivity rate that is required?	This is currently being evaluated and will be included as part of the TCM reconciliation.
13	Beth Graham, Vinton CBMRDD via e-mail	6/15/05	If someone is 100% WAC, how will the documentation be completed? Case noting continued as normal, just not mailed to ODMRDD for billing or	After 7/1/05, if an employee is 100% WAC and that employee does not perform any functions that would need to be stepped-down by the WER, then that employee is

			<p>should they use the WAC form and keep these for our records?</p>	<p>noted in the Implementation Plan as detailed in the WAC Guide Section 2.4.3.B.</p> <p>The employee's PD should be modified with enough detail to be able to determine that the employee is 100% WAC with no step-down.</p> <p>The employee at that point will not need to prepare a WAF and the documentation that they create while performing their assigned duties will substantiate their work. That documentation <u>does not</u> need to be mailed to ODMRDD</p>
14	Beth Graham, Vinton CBMRDD via e-mail	6/15/05	<p>If the SSA supervisor has split duties between overseeing TCM and doing WAC functions can their costs be split between both areas?</p>	<p><u>Yes.</u> It would be expected that their costs be allocated to each function based on the amount of time they spend at each separate function.</p>
15	Carey Bates	6/23/05	<p>On the implementation plan it states that the duties the COG will perform and receive reimbursement for we cannot receive reimbursement. Based on the codes there are activities that we as a county board may do but our COG may do as well. How is this to be handled?</p>	<p>A CB contracts with the COG to perform MUI investigations. The COG performs investigations in the Month of March 2005 and bills the CB \$4,000 for those costs. The CB pays the COG the \$4,000 and then sends the Department a WAI for \$4,000 under WAC. The COG then bill the Department directly for those costs and send the Department a \$4,000 WAI. At this point the Department would have paid both the CB and COG for the exact same costs. That is why we require the Implementation Plan to delineate who will bill the Department for those costs as specified in Guide Section</p>

				2.4.3 E.
	WAC Training Class	--	Can the WAC Coordinator also be the Medicaid manager?	<u>Yes.</u> The local agency WAC Coordinator may also be the Medicaid manager. Whoever is designated as the WAC Coordinator must have their position description modified to include the title and duties as required by WAC Guide Sections 2.1 and 2.2. The WAC Coordinator must report to a high enough position in order to effect change should that be necessary.
	WAC Training Class	--	Should the county board policy in reference to WAC reflect the WAC guide or the OAC rule?	The policy and procedures should use and reflect the WAC Guide as the basis for what is required.
	WAC Training Class	--	Is it possible to have a personnel description that allows 1-5% "other duties" for the 100% WAC employees	<u>Yes.</u> Miscellaneous duties are permissible in the personnel description. However, should those proposed duties entail significant responsibilities such as being a member of a committee, then those would not be considered miscellaneous.
	WAC Training Class	--	Can time study weeks change?	<u>Yes.</u> However, there must be a good reason for the change. Prior to making a change the issue should be discussed with the ODMRDD WAC Coordinator. Acceptable reasons to change are noted in WAC Guide Section 8.1 and Appendix A, Section II. G.
	WAC Training Class	--	When we submit a WAI to ODMRDD to request WAC reimbursement, do you need original signatures?	<u>Yes.</u> At the implementation phase of this new system, we will require original signatures. As we progress into the Web-based application electronic signatures will be considered.
	WAC Training Class	--	How do we document paid lunch?	Time on a paid lunch should be coded to the

				“Holidays and Leave Time” code.
	WAC Training Class	--	Can a county board bill for the time it takes to submit their bills.	<u>Yes.</u> When completing paperwork for as required by the WAC guide, the employee would use the “Waiver Implementation Activities” code.
	WAC Training Class	--	If a county board/COG performs a MUI investigation on a 0-3 age group population, can anything be billed to WAC	<u>Yes.</u> The investigator should use the Investigating Major Unusual Incidents code which is stepped-down by the WER.
	WAC Training Class	--	Can time spent doing county board determinations be billed to WAC?	I don’t know what is meant by “county board determinations.”
	WAC Training Class	--	Is communication with an SSA ever allowable billable service? This is in reference to the activities not allowable page 32	I think this is a repeated question.
	WAC Training Class	--	Can professional employees bill WAC for non-direct service?	<u>Yes.</u> All employees who perform WAC activities can bill WAC with the exception of those listed in WAC Guide Section 2.5.1.
	WAC Training Class	--	Can payroll clerks bill the a WER code?	<u>No.</u> Back office support activities such as payroll, human resources, etc. are allocated to WAC through the agency’s indirect cost plan and will be paid through the cost report reconciliation process at year end.
	WAC Training Class	--	Can SSA Supervisor and SSA Clerical Staff bill WAC for functions performed that are listed in Guide Section 2.5.1.	<u>Yes.</u> The SSA Supervisor and SSA Clerical Support Staff are NOT restricted in WAC functions for which they can perform and bill WAC. The SSA Supervisor and SSA Clerical Support Staff may prepare periodic WAFs in order to allocate their payroll/fringe costs to the cost report. Due to the “change”

				in this message, are we planning to send a special alert on this one.
	Laurel Lovely, Butler CBMRDD via e-mail	6/27/05	<p>Would the support staff to the IAs (employee that enters initial MUI into ITS, gathers pertinent information, reviews UIs for possible series MUI, files paper MUI records) bill her activities using the Investigating Major Unusual Incidents Activity Code - WER or under File Development and Maintenance - WER and Monitoring of Waiver Providers, Quality Assurance and Quality Improvement - WER? She is not a certified IA, so Waiver Implementation Activities – 100% (filing) and Monitoring of Waiver Providers, Quality Assurance and Quality Improvement - WER (UI trend review) look more accurate? But most of her work is in identifying an MUI and beginning the investigation process (seeking documentation), so I'd love to use Investigating Major Unusual Incidents for her if possible. If she can bill Investigating Major Unusual Incidents, then I have nurses and supervisors who assess and analyze trends following some MUIs would also be a Investigating Major Unusual</p>	<p><u>Yes</u>, Performing MUI/UI investigation and related support should be charged to the Investigating Major Unusual Incidents Activity Code. This can be done and claimed by staff other than certified IA's.</p>

