

**Board of Education
Elmira Heights Central School District
2083 College Ave.
Elmira Heights, NY 14903**

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Internal Audit Services

**Medicaid
Internal Audit Report
Fiscal Year 2021-2022**

June 2022

Audit Scope, Objective, and Methodology

Scope

Per New York State Education Law, and the Regulations of the Commissioner of Education, Internal Audit is required to perform annual testing and evaluation of one or more areas of the District's internal controls, taking into account risk, control weaknesses, size, and complexity of operations.

The Medicaid audit for the Elmira Heights Central School District was conducted during June 2022.

Internal Audit is a department within Tompkins-Seneca-Tioga BOCES and is supervised by the Board of Education for the Elmira Heights Central School District under a cooperative services agreement. The findings and conclusions in this report are the responsibility of the Board and the Internal Audit Department.

Objectives

To determine whether:

- Employees providing Medicaid billable services have proper qualifications.
- Proper supporting documentation is maintained for Medicaid billing.
- Medicaid billings are submitted timely.
- Medicaid billing process is proper.

Methodology

Internal Audit complies with applicable regulations promulgated by the State Commissioner of Education and the District's policies and procedures.

Samples were selected for internal control testing, along with discussions with District staff, and walk-throughs of key processes. Testing during this audit was focused on key controls within the Medicaid area, which could or are likely to have a significant impact on the District as a whole.

Exceptions and Recommendations

Per New York Education Law, and the Regulations of the Commissioner of Education, Internal Audit is also required to recommend changes for strengthening controls, reducing identified risks, and to specify time frames for implementation of such recommendations.

1. Speech Therapy Session Notes - Session notes for speech therapy services are required for Medicaid billing. Providers need to enter and sign session notes in ClearTrack within 45 days of the date of service for Medicaid reimbursement.

Internal Audit noted speech therapy session notes were entered into ClearTrack for 3 students in December 2021. The session notes did not save in ClearTrack, and the District did not received reimbursement for 6 billable sessions. Internal Audit recommends the District contact BOCES to bill the 6 sessions, and to determine the cause of the error in order to prevent reoccurrence in the future.

2. Skilled Nursing Session Notes - Session notes for skilled nursing services are required for Medicaid billing. Providers need to enter and sign session notes in ClearTrack within 45 days of the date of service for Medicaid reimbursement.

Skilled nursing session notes were entered into Schooltool, instead of ClearTrack, in 1 of 16 student files tested. The student attends Cohen Elementary, and the session notes were entered into Schooltool for the school year. The session notes entered in Schooltool are not Medicaid compliant, and therefore, not Medicaid reimbursable. Additionally, the Medication Administration Record (MARs) was not completed, and is also required for Medicaid reimbursement.

Internal Audit recommends ClearTrack training be provided to District employed nurses, and the nurses be reminded MARs forms must be completed when medication is given to students. The opportunity to increase Medicaid reimbursement by following proper procedures is \$953 based on the services the student received during the school year.

District Response – The nurses are scheduled to complete ClearTrack training on June 28, 2022. Proper procedures will be in place for the 2022-23 school year.

Recommended Implementation Timeframe: September 2022

Conclusion

Based on the results of audit testing, Internal Audit believes controls and the related policies and procedures over Medicaid are present, but could be enhanced. The aforementioned audit exceptions indicate opportunities for improvement in the internal control system. Implementation of corrective actions should strengthen the process and reduce the risks associated with the weaknesses discovered.