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October 9, 2023

Ms. Michelle Baass, Director
Department of Health Care Services (DHCS)
P.O. Box 997413, MS 0000
Sacramento, CA 95899-7413

Re: Response to Request for Information (RFI) #23-014

Dear Director Baass,

On behalf of the Alameda County Office of Education (ACOE), I write to thank you for the opportunity to provide input on the Third-Party Administrator (TPA) Fee Schedule, in response to RFI 23-014.

ACOE respectfully offers the following recommendations with regard to the TPA contract and selection process, TPA requirements, the claims administration process, and the technical assistance to be provided to local educational agencies (LEAs).

The TPA Contract and Selection Process

The TPA contract could be two contracts, rather than one, with the work divided up as follows to support specific expertise in each area:

- One contract to oversee claims administration and to manage the provider network
- One contract to provide education-specific technical assistance to LEAs

County Offices of Education, especially those with districts selected for Cohort 1, should be able to participate in the DHCS's selection process for the TPA contract.

TPA Requirements

The selected TPA should be able to do the following:

- Register and manage school-linked providers and provider entities for all LEAs
- Match all students/claims to the correct insurance coverage information
- Receive service documentation for billing from all provider entities
- Facilitate technical assistance for new provider entities to understand the process, requirements, and infrastructure of the TPA billing system
- Provide quality assurance that the claim is accurate, complete, and not duplicative
- Follow up and resolve billing issues with providers and payers
- Send bills to all payers
- Send payment remittance back to all provider entities and LEAs, as relevant
- Provide a dashboard and reporting functionality for provider entities to track the status of claims

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The Claims Administration Process

The claims administrator should have experience working with schools and should understand the intersection of LEA BOP and the new Fee Schedule. LEA BOP practices that worked to increase efficiency in the claim process should be implemented in the Fee Schedule context as well. To reduce the administrative burdens and costs to LEAs, the claims submission process would ideally be the same for both LEA BOP and the new Fee Schedule.

The Technical Assistance for LEAs

Technical assistance should:

- Address implementation requirements in a way that is contextualized for education settings and understandable by implementers in those settings
- Be provided in both online and onsite forms, with general information offered online and in-person and site-specific support offered at the school locations
- Translate between IT, claims language, and LEA language to increase understanding across systems
- Ensure support not only for being a provider in the school-linked fee schedule and claims administration, but also technical assistance on the front end, including support related to provision of services, documentation, collecting insurance information, compliance with HIPAA/FERPA, and preparing for audits. The provision of such technical assistance for providers reduces audit risks.

In addition, we recommend that the provider formally partner with the Office of School-Based Health to address the need for specialized school mental health technical assistance.

We believe the above recommendations will help streamline the process for LEAs, increase the likelihood of successful claims, and also ultimately reduce the administrative burden for DHCS. Most importantly, implementation of the above recommendations will help ensure that as LEAs, we are better able to access the remarkable resources available now to provide much-needed services to our students.

Thank you for your consideration of these recommendations. If you have questions regarding our recommendations, please do not hesitate to contact me at cpowell@acoe.org or 510-458-4621.

Sincerely,

Dr. Chaunise Powell, LCSW, PPS, CWA
Chief of Student Services