

Submitter :

Date: 10/03/2007

Organization :

Category : Other Health Care Provider

Issue Areas/Comments

GENERAL

GENERAL

See attachment

#178

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DEPARTMENT OF HEALTH AND HUMAN SERVICES
CENTERS FOR MEDICARE AND MEDICAID SERVICES
OFFICE OF STRATEGIC OPERATIONS & REGULATORY AFFAIRS

Please note: We did not receive the attachment that was cited in this comment. We are not able to receive attachments that have been prepared in excel or zip files. Also, the commenter must click the yellow "Attach File" button to forward the attachment.

Please direct your questions or comments to 1 800 743-3951..

Submitter : Mrs. Marsha Nagel

Date: 10/03/2007

Organization : Colton Joint Unified School District

Category : Nurse

Issue Areas/Comments

GENERAL

GENERAL

I hope that the Administration does more homework to see the sad ramifications of CMS 2287-P's proposal. Medically indigent children are a huge part of school programs and have medical needs which need to be taken care of at school-not just to be bussed to school and then 'forgotten' by the government.

School Nurses see the great need for this proposal NOT to pass--

PL 94-142 says that 'Every child has the right to a free and appropriate education' and this includes medical help and states shouldn't have to bear that burden alone--as some states have more more medically indigent/fragile children than others.

Please reconsider the ramifications of this proposal more carefully.

Thank you.

Submitter : Ms. catherine forster

Date: 10/03/2007

Organization : Ms. catherine forster

Category : Speech-Language Therapist

Issue Areas/Comments

GENERAL

GENERAL

I am a provider of speech/language services in the public schools and have felt that these services should be paid for with educational monies. The dept of education wants us to write 'educational' goals, while medicaid requires 'medical' goals. Although there has been much legal double-talk to explain how our educational goals can be medical, I find it very frustrating and would prefer medicaid pulled out of the schools all together. This is not a popular point of view from a funding perspective given all the other cuts education faces...but I am glad that someone is starting to look closer at what I consider to be 'double dipping'. I would also like to add that the amount of time spent on completing and generating the paperwork for these reimbursements is absurd and actually reduces the time available to effectively work with students. I also do not like that ALL students found eligible for special education have their names automatically run through the medicaid system, just in case they may be eligible. This means that many names go floating out there that are not medicaid recipients and this could be a Hippa privacy issue.

Submitter : Ms. Nicole Plamondn

Date: 10/03/2007

Organization : Ms. Nicole Plamondn

Category : Congressional

Issue Areas/Comments

GENERAL

GENERAL

This is in response to the proposal for the elimination of FAN reimbursements in schools. As a health care professional, I have had the opportunity to work with the local FAN network people in order to fill medical, dental, and other needs I see here at work. I have personally watched the difference the LaPine Middle School FAN network has made in our underprivileged community. Cutting back on such a critical network is not only a mistake- it is a disservice to those people out there that need help. Many times the people in the schools are the only ones aware of problems that the state is too often too busy to see.

Submitter : Mrs. Kathy Casey
Organization : Siskiyou County Office of Education
Category : Nurse

Date: 10/03/2007

Issue Areas/Comments

GENERAL

GENERAL

see attachment

CMS-2287-P-182-Attach-1.DOC

**The Importance of Medi-Cal Administrative Activities Funding
Siskiyou County Office of Education**

Medi-Cal Administrative Activities (MAA) Funding is a critical source of revenue for school health related services in our rural and geographically large county. Until MAA Funding was available, school's had very little monetary resources for health related activities/services that are so important for academic success and are often required for the school to provide under the Individuals with Disabilities Education Act.

Our district schools and the Siskiyou County Office of Education (SCOE) are using MAA funds to help pay for school nurses and counselors. Through LEA Medi-Cal Billing and the MAA program, nurses and counselors provide medical and psychological services for our students at the school sites. We also refer students and their families to other medical providers and services.

The SCOE has also used the funding to maintain our highly effective and state of the art HIV program that provides classroom presentations by school nurses, HIV positive presenters, and peer presenters that are trained by our HIV Coordinator. We use the funds for much needed school health related trainings and resources such as books and curriculum. This year, some school districts are planning on using MAA money to help finance a mobile dental van that will provide dental care to students with severe dental problems who have not been able to access dental care.

Money from LEA Medi-Cal Billing has been used to hire a speech therapist for our remote schools on the Klamath River so that the preschool and school age students can receive speech therapy services that are an important part of their achieving academic success.

Please consider the negative impact the loss of MAA and LEA Billing Programs would have on the health and educational success of the children of Siskiyou County.

Sincerely,

Kathy Casey, RN, MSN
Health Services Director
Siskiyou County Office of Education
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Yreka, CA. 96097
(530)842-8425
kcasey@sisnet.ssku.k12.ca.us

Submitter : Ms. Kathy Drew

Date: 10/03/2007

Organization : Deschutes County Mental Health

Category : Social Worker

Issue Areas/Comments

GENERAL

GENERAL

This funding helps to provide the most cost effective program I am aware of for children and their families. This program connects families in need with the services that help them provide a stable homelife to the children who are then able to benefit from school services. The program breaks down the barriers that prevent children from accessing the health, dental and mental health services they need to be successful in school and life. We spend a lot of money on making services available but it can be wasted if there isn't a mechanism for making sure those who need the services the most can know about them and be supported in accessing them and making good use of the services. It would be like building a beautiful neighborhood for people to live in, but building it on an island and not building the bridge to allow people to get there. This program provides a valuable service at a very modest cost. It adds value to the other services and helps people to make the most of those services. Please find another solution rather than eliminating this funding.

Submitter :

Date: 10/04/2007

Organization :

Category : Individual

Issue Areas/Comments

GENERAL

GENERAL

Please do not eliminate this program. Schools are a source of health-related costs. Why would you penalize them?

Submitter : Mike Schofield

Date: 10/04/2007

Organization : High Desert Education Service District

Category : Local Government

Issue Areas/Comments

GENERAL

GENERAL

Fraud, waste and abuse are conditions that may have been uncovered in certain program areas. However, in Dechutes and Crook Counties in Central Oregon, the MAC monies have provided a vital referral link for needy families. Without the outreach efforts of our 'FAN' advocates, many of our young children will not receive the services and education that is so vital to a good start in life. We are saddened by the funding elimination for this vital program in Central Oregon.

Please, please isolate the fraud, waste and abuse and remove the participants from the program, but please allow organized programs with good track records to continue. Do not allow the neglect of a few, cause the disintegration of the program for those who are in compliance with the objective of the grants.

Thanks for your consideration.

Mike Schofield
High Desert Education Service District

Submitter :

Date: 10/04/2007

Organization :

Category : Academic

Issue Areas/Comments

GENERAL

GENERAL

Medicaid dollars support our Family Access Network (FAN) which helps meet basic health care, food, and housing needs of low income students and families in our area. FAN advocates are a vital part of our community services for children in need. I would urge you not to eliminate funding for a program which positively affects the living conditions of impoverished families in this community. Thank you.

Submitter : Dr. Sheri Coburn
Organization : Dr. Sheri Coburn
Category : Nurse

Date: 10/04/2007

Issue Areas/Comments

GENERAL

GENERAL

Eliminating this reimbursement program will have significant impact on impoverished children who need access to care. Funding from this program has supported school health services, 25% of all parents in our district reported receiving necessary health information and services from our schools. Outreach activities support the acquisition of insurance for needy children to minimize barriers to learning. Eliminating this funding will again widen the gap between the haves and the have nots. It is critical that this funding be continued.
Thank you.

Submitter : Bonnie Winther

Date: 10/04/2007

Organization : Bonnie Winther

Category : Individual

Issue Areas/Comments

GENERAL

GENERAL

I oppose this rule. Once again our government is turning its back on children. Funding from this program provides access to medicaid system so that children can receive the health services they need.

Submitter : Ms. Cheryl Rollins-Allen

Date: 10/04/2007

Organization : Chino Valley Unified School District

Category : Individual

Issue Areas/Comments

GENERAL

GENERAL

I am opposed to the proposed regulation from the Centers for Medicare & Medicaid Services CMS-2287-P. Federal reimbursement for the costs of school staff that performs MAA administrative activities, outreach, monitoring of medical services, is critically important to children who need medical services. The proposed change will greatly impact Chino Valley Unified School District's financial resources that are used to provide staff support for the health and mental health services for our students.

Thank you for allowing me to comment on this very important issue.

Cheryl Rollins-Allen