

Overview of the PPA for the CYBHI Fee Schedule Program

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Signing the CYBHI Fee Schedule Provider Participation Agreement (PPA) is a significant commitment that comes with a range of operational, financial, and compliance obligations. The PPA is a defining document that must be signed as part of the enrollment process to participate in the CYBHI Fee Schedule Program. It clearly outlines the responsibilities and requirements that each LEA must adhere to while participating in the program.

- [Download the PPA](#)
- [Download Consortium Addendum A \(Lead LEA\)](#)
- [Download Consortium Member Modified PPA](#)

Paradigm has compiled this overview as an introduction to the CYBHI Fee Schedule PPA, assisting LEAs with understanding the key terms, conditions, and obligations involved. This analysis aims to highlight critical areas that need thorough consideration, such as mandatory billing transitions, compliance with state and federal laws, financial impacts, and the operational readiness required to successfully participate in the program.

1. Mandatory Billing Shift for General Education Mental Health Services

- **Key Requirement:** By signing the PPA, an LEA commits to billing all general education mental health services under the CYBHI Fee Schedule, which inherently limits the use of the LEA Billing Option Program (LEA BOP) for these services. LEAs cannot simultaneously bill the same services under both the CYBHI Fee Schedule and LEA BOP—even for different practitioners—which necessitates a strategic choice. Once the PPA is signed, claims submitted to LEA BOP for general education mental health services will be denied.
- **Implications:** LEAs need to evaluate the impact of this change on their current billing processes and cash flow. While the CYBHI Fee Schedule presents opportunities to bill for some new services and new practitioner types not currently eligible under LEA BOP in addition to billing commercial health plans, your local demographics, service delivery structure, and community engagement are significant to the success of the CYBHI Fee Schedule. We recommend [reviewing these key strategic areas as you consider your readiness to sign the PPA](#).

2. Compliance with Federal and State Laws

- **Key Requirement:** The PPA mandates that all participating LEAs comply with all applicable federal and state laws, including HIPAA, FERPA, Medi-Cal program requirements, and various sections of the Welfare and Institutions Code.
- **Implications:** LEAs must ensure they have the necessary policies, procedures, and training in place to meet these compliance requirements. This includes safeguarding student data, managing privacy, and maintaining clear records to avoid penalties or claims denials.

3. Consortium Billing Requirements

- **Key Requirement:** For LEAs participating as part of a consortium, the lead LEA must handle all billing and claims submission for the consortium members. This arrangement requires a Consortium Billing

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Addendum to the PPA, specifying roles, responsibilities, and compliance commitments for each participating member.

- **Implications:** LEAs must carefully consider their capacity to act as a lead LEA or their willingness to be a member LEA. Being a lead LEA entails significant administrative overhead, including ensuring compliance for all members, managing submissions, and possibly handling disputes or audits. Being a member LEA means adhering the processes, systems, and costs as arranged by the Lead LEA. Consortia offer great opportunities for LEAs to save time and reduce costs through shared resources and streamlined processes. However, they can also introduce redundancies, increase complexity, and potentially expand costs if not carefully managed. The effectiveness of a consortium largely depends on the alignment of member LEAs' goals, existing systems, and the clarity of roles and responsibilities within the group.

4. National Provider Identifier (NPI) Requirements

- **Key Requirement:** All participating practitioners for the LEA must have a Type 1 National Provider Identifier (NPI), which will be submitted along with the LEA's Type 2 NPI on all claims under the CYBHI Fee Schedule. Additionally, licensed practitioners performing billable services must also enroll as a Medi-Cal Provider. Medi-Cal Enrollment as a Fee-For-Service, Rendering, or Ordering, Referring, Prescribing Provider are all currently acceptable.
- **Implications:** LEAs need to ensure that all their practitioners, including contracted practitioners, obtain NPIs and that these NPIs are correctly registered and maintained in compliance with CMS standards. Failure to do so may result in denied claims and lost revenue.

5. Financial Considerations and Risk Management

- **Key Requirement:** The shift to the CYBHI Fee Schedule affects how LEAs generate revenue from mental health services. The PPA outlines specific rates and reimbursement policies, which may differ from those currently received under LEA BOP or other billing arrangements.
- **Implications:** LEAs need to conduct a thorough financial analysis to understand the potential revenue changes. They should consider their current Medi-Cal population and the rates at which they could bill commercial insurance versus Medi-Cal under the new Fee Schedule. For LEAs with a high Medi-Cal population, for example, sticking with LEA BOP might be more viable. Conversely, LEAs with a low Medi-Cal population might benefit from the flexibility to bill commercial insurance.

6. Data Sharing and Privacy Considerations

- **Key Requirement:** Practitioners are required to share data, including student health records, as needed for care coordination while adhering to FERPA, HIPAA, and other privacy regulations.

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- **Implications:** LEAs must establish robust data-sharing agreements, policies, and consent procedures to comply with these requirements. This includes obtaining the necessary consents for data sharing and ensuring that privacy and confidentiality standards are met.

7. Coordination with Managed Care Plans (MCPs)

- **Key Requirement:** LEAs participating in both the CYBHI Fee Schedule and LEA BOP must avoid duplication of claims and coordinate billing accordingly.
- **Implications:** This requirement introduces additional administrative tasks to ensure that claims are not duplicated and that services provided under one program are not billed again under another. LEAs must maintain detailed records and processes to manage this effectively.

8. Ongoing Compliance Monitoring and Reporting

- **Key Requirement:** The PPA includes terms for ongoing compliance monitoring, audits, and potential penalties for non-compliance, including fraud and abuse prevention.
- **Implications:** LEAs must be prepared for audits and provide documentation to prove compliance. This includes maintaining accurate and comprehensive records for billing, service delivery, and compliance with all program requirements.

Signing the CYBHI Fee Schedule PPA is a critical decision for any LEA, carrying significant operational, financial, and compliance commitments. From mandatory billing shifts and compliance with federal and state laws to the complexities of consortium participation and data-sharing protocols, the PPA sets clear expectations for participating LEAs. We strongly encourage each LEA to conduct a comprehensive review of their readiness, considering their local demographics, existing infrastructure, and strategic goals to determine the best path forward. Paradigm is here to support you with consultation and resources to ensure a smooth transition to the CYBHI Fee Schedule Program.

**To discuss this further, contact your account manager,
or feel free to contact us directly at (888) 536-0920.**