LME-MCO Communication Bulletin #J319

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To: Local Management Entities/Managed Care Organizations (LME-MCOs)

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Subject: Verification of Education

The purpose of this bulletin is to provide clarifying information to the LME-MCOs and providers regarding the education verification process, specifically with respect to assessing the validity and/or acceptability of high school diplomas and GEDs. Prior communications indicated that education verification referred to the receipt of sufficient evidence that a person received a high school diploma or GED. While this remains true, the prior communication was not intended to eliminate the need for the diploma or GED to be issued by an entity qualified to make such an award. DHHS is aware of concerns raised about “diploma mills” that may be awarding diplomas while not offering an education that is sufficiently rigorous.

Whether a high school diploma constitutes acceptable evidence of education may require an analysis by LME-MCOs and providers of the history of the entity awarding the diploma. DHHS has not established rules that the LME-MCOs and providers must follow in making such an analysis. An example of a potential analysis has been published by the DHHS Division of Child Development and Early Education (DCDEE) within the context of that Division’s scope of work. DCDEE requires that high school diplomas be issued by nationally recognized regional accrediting bodies but makes an exception for high schools listed with the North Carolina Division of Non-Public Education, which is a Division of the North Carolina Department of Administration. The schools listed with the Division of Non-Public Education change over time and, therefore, diplomas issued at different times may not have the same weight in the analysis done by DCDEE.

Ultimately, LME-MCOs and providers that verify the education and training of individuals interacting with Medicaid beneficiaries must be able to reject certain evidence of education when there is sufficient reason to doubt the legitimacy or authenticity of the information and evidence presented. When a diploma is not awarded by an accredited body, or the accrediting body is not...
widely recognized, LME-MCOs and providers may choose to investigate further or may choose to
find that the diploma is insufficient evidence of education. Given the complexity of the variations
that are present between public schools, private schools, home schools, and accrediting bodies,
as well as the regular change in the schools listed with the Division of Non-Public Education, DHHS
believes LME-MCOs and providers are in the best position to make factual determinations about
the acceptability and authenticity of high school diplomas.

If you have any questions, please call Kenneth Bausell at 919-527-7643 or e-mail at
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Previous bulletins can be accessed at:
www.ncdhhs.gov/divisions/mhddsas/joint-communication-bulletins

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