



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

ROY COOPER • Governor

MANDY COHEN, MD, MPH • Secretary

DAVE RICHARD • Deputy Secretary for NC Medicaid

KODY H. KINSLEY • Deputy Secretary for Behavioral Health and
Intellectual/Developmental Disabilities

LME-MCO Communication Bulletin #J319

Date: March 06, 2019

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

From: Deb Goda, Behavioral Health Unit Manager, NC Medicaid,
Lisa Haire, Assistant Director, Quality Management and Operations,
DMH/DD/SAS

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

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES

NC MEDICAID • DIVISION OF HEALTH BENEFITS

LOCATION: 1985 Umstead Drive, Kirby Building, Raleigh, NC 27603
MAILING ADDRESS: 2501 Mail Service Center, Raleigh, NC 27699-2001
www.ncdhhs.gov • TEL: 919-855-4100 • FAX: 919-715-9451

**DIVISION OF MENTAL HEALTH, DEVELOPMENTAL
DISABILITIES AND SUBSTANCE ABUSE SERVICES**

MAILING ADDRESS: 3001 Mail Service Center, Raleigh, NC 27699-3001
www.ncdhhs.gov • TEL: 919-733-7011 • FAX: 919-508-0951

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 Kenneth.Bausell@dhhs.nc.gov.

Previous bulletins can be accessed at:
www.ncdhhs.gov/divisions/mhddsas/joint-communication-bulletins

cc: Dave Richard, NC Medicaid
Kody Kinsley, Behavioral Health & I/DD
Helen Wolstenholme, DSOHF
NC Medicaid Leadership Team
DMH/DD/SAS Leadership Team
Mary Hooper, i2i Center for Integrative Health