

**DETERMINATION AND FINDING  
FOR A SOURCE PROCUREMENT**

**AGENCY, OFFICE:** Office of School Improvement and Supports  
**CAPTION:** Management Tool Software (Medicaid Billing)  
**PROPOSED CONTRACTOR:** **Frontline Education**  
**CONTRACT NO.:** TBD

**FINDINGS**

**1. AUTHORIZATION:**

D.C. Code 2-354.04 and 27 DCMR, Section 1304 and 1700.

**2. MINIMUM NEED:**

The District of Columbia Public Schools (DCPS), Office of Contracts and Acquisitions (OCA) on behalf of the Office of School Improvement and Supports has a need for implementation of the Plan Management (formerly AcceliPLAN), Service Management, (formerly AcceliTRACK) and Medicaid Billing Management (formerly AcceliCLAIM) software modules to enhance the use of the data generated from AcceliCLAIM module currently being used by DCPS for special education planning, service management, and billing systems.

**3. ESTIMATED COST:**

DCPS' estimated cost is \$84,700.00 for July 1, 2021 to September 30, 2021.

**4. FACTS WHICH JUSTIFY A SOLE SOURCE PROCUREMENT:**

Frontline Education is the sole provider of the following special education planning, service management, and billing systems, including but not limited to, Plan Management (formerly AcceliPLAN), Service Management, (formerly AcceliTRACK) and Medicaid Billing Management (formerly AcceliCLAIM). Medicaid Billing Management (formerly AcceliCLAIM) is currently under contract with OSSE. These proprietary software products and the associated databases are developed and distributed exclusively by Frontline Education. Frontline maintains all copyright privileges for their products and these products must be purchased directly from the company. There are no agents or dealers authorized to represent these products.

**5. BACKGROUND AND HISTORY:**

Medicaid is a federal-state matching entitlement program designed to help fund health and medical services for low-income individuals. In January of 1988, an amendment was made to the federal Medicaid law allowing Medicaid claims to be made for the special education services provided by schools if they qualify as medical services. This allowed school districts to submit Medicaid claims for services provided to students who require special education services.

The District of Columbia’s Medicaid program allows for Medicaid reimbursement for medically necessary school-based health services (SBHS) provided to Medicaid-eligible students who are between three and twenty-two years of age that are delineated in the District of Columbia’s Medicaid State Plan Amendment (SPA). Medicaid reimbursement is only available if all applicable Federal and State Medicaid requirements are met. The federal government will ensure needed funds are available for Medicaid eligible health services and the District of Columbia educational agencies ensures needed funds are available for IDEA services. The Office of the State Superintendent for Education (OSSE) currently allows DCPS to use Medicaid Billing Management, created and customized by the vendor, Accelify, under contract CW54057. Under the contract, Frontline Education creates electronic healthcare claim files to meet the requirements for federal Medicaid reimbursement using the Special Education Database (SEDs) for all the District of Columbia. The Medicaid program permits federal Medicaid reimbursement for medically necessary school-based health services. DCPS uses OSSE’s current contract with Frontline Education to enter and generate Medicaid reimbursement claims at no cost to DCPS. All services documented are validated for Medicaid billing using Medicaid Billing Management.

DCPS seeks to continue this current partnership and data-sharing mechanism to procure and maintain functionality of customized off-the-shelf software products that Frontline Education provides. Data generated from the Medicaid Billing Management module will feed into the following two tools:

1. Service Management (formerly AcceliTRACK) is used to track and document the delivery of services. For program managers, allows visibility into service compliance, use of provider time, program costs, and other data that directly impact service delivery for students.
2. Plan Management (formerly AcceliPLAN) is a customizable and workflow driven tool to manage the referral, determination, and plan development process. The system automates special education case management, guiding Related Service Providers through each event, while ensuring timelines are met and compliance is maintained. Additionally, the module was customized in the previous contract (GAGA-2016-C-0064) to track implementation and outcomes of evidence-based mental health interventions and Behavior Intervention Plans and to manage deployment of school crisis teams to generate custom reports.

5. **CERTIFICATION BY THE OFFICE OF SCHOOL IMPROVEMENTS AND SUPPORTS:**

I hereby certify that the above findings are correct and the anticipated cost to DCPS is fair and reasonable.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Brenda Elliott  
Chief, Office of School Improvement and Supports

6. **CERTIFICATION AND DETERMINATION**

Based on the above certified findings in accordance cited authority, I hereby determine that it is not feasible or practical to invoke the competitive bidding process under Section 402 or 403 of the District of Columbia Procurement Practices Reform Act of 2010 (D.C. Law 18-371; DC Code 2-354.04 and 27 DCMR 1304 and 1702.

\_\_\_\_\_  
Date

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Candace Butler  
Contracting Officer