Agenda

- Medicaid in Schools charter workgroup status

- Review of program assessment findings

- Discussion of preliminary recommendations impacting Occupational Therapy, Physical Therapy, Audiology, Speech-Language Pathology and School Psychology and Board-Certified Behavior Analysts services

- Next steps

Medicaid in Schools Charter Status

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Jun 2023
Medicaid in Schools Charter Workgroup established

Dec 2023–Jun 2025
SBS Guidance Scan & SBS Program Assessment Completed

Sep–Dec 2024
Leadership Review and Community Engagement Preparation

Apr–Jun 2025
Recommendations Finalized

Jul 2025–Jun 2026
Implementation Preparation

2023 — 2025 — 2025 — 2026

May 2023
New SBS Guidance released

Nov 2023
ForHealth Hired

Jun–Aug 2024
Preliminary Recommendations Provided

Jan–Mar 2025
Community Engagement

Jun 2025–TBD
Legislative and CMS Approval

July 2026
Implementation

CMS Compliance Deadline – July 1, 2026

Assessment Findings

## SPED Related services billed (2022-2023):

- 115 LEAs/ESDs billed Medicaid for Occupational Therapy services provided to 7,783 students

- 86 LEA/ESDs billed Medicaid for Physical Therapy services provided to 2,559 students

- 110 LEA/ESDs billed Medicaid for Speech Therapy/Audiology services provided to 19,142 students

- 4 LEAs billed Medicaid for Behavioral Health services provided to 41 students

The most frequent barriers to participation by school district survey:

- Lack of training (53%)

- Administrative paperwork is unmanageable (46%)

- Difficult to understand and complete billing requirements(46%)

Assessment Findings (2)

The three-pronged reimbursement program discourages LEA participation.

Does Medicaid cover the services & supports that I provide?
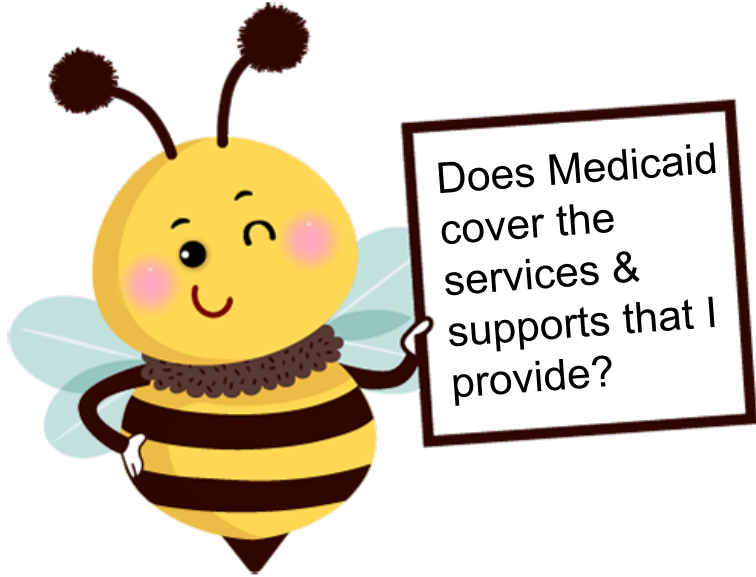
School-based related service providers

Type of Service/ Support	Reimbursement Option	Requirements
Covered service per student's IEP	School Based Health Services Program	• Provider One enrollment • Billing codes & process • Documentation requirements
Screenings & Evaluations that do not result in an IEP, 504 plan services, and other non-IEP services & supports	Managed Care Plans	• Managed Care Organization enrollment (5 plans) • Multiple Billing and Payer Requirements • Various Documentation and service authorization requirements
Case management, care coordination, health-related planning	Medicaid Administrative Claiming Program	• Medicaid Administrative Claiming enrollment • Random Moment Time Study Participation

Assessment Findings (3)

at UMass Chan Medical School

- Medicaid Administrative Claiming is the **easiest program to participate in.**
  - **73%** of survey respondents indicated the random moment time study is **"somewhat" or "extremely" easy**.
- School-based health professionals, including OTs, PTs, SLPs, Audiologists, school behavioral analysts and psychologists address many essential health conditions for their students with or without IEPs, including:
  - coordination of care/case management and services with community providers, parents/guardians, and school staff.
  - early identification of health/developmental issues through screenings and monitoring student behavioral health.
  - Skilled interventions designed to support students with developmental and/or mental/behavioral issues

Preliminary Recommendations

Focus Areas of Preliminary Recommendations

1. Expansion of Medicaid-coverage for school-based health-related services.

2. Expansion/simplification of requirements for healthcare staff to be considered Medicaid-qualified providers for the school setting.

3. Overall program simplification and easing of administrative burdens.

4. Develop training, outreach and LEA resources to support program changes.

5. Plans for a gradual transition / implementation of new program.

Preliminary Recommendation

Focus Area 1: Expansion of Covered Students and Services

- Expansion of coverage for services performed by school health-related staff to any Medicaid-enrolled student, unrelated to an IEP, but within the scope of each provider's practice standards.
    - Screenings, assessments, and evaluations, including child find activities, regardless of the outcome.
    - Orientation & Mobility services .
    - Services for students on a Section 504 plan, or other care/treatment plans.
    - Short-term and prevention services, prior to evaluation or referral.
    - Medicaid administrative activity services such as care coordination/case management, referrals and monitoring of health care services.

Discussion

Focus Area 1: Expansion of Covered Students and Services

- What concerns do you have about the expansion of covered students and/or services performed by school health-related staff?

- What considerations and additional resources would be required to support this recommendation?

- What, if any, procedural, operational, and/or regulatory changes are needed to implement these recommendations (e.g., scope of practice, regulations, etc.)?

Preliminary Recommendation

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Focus Area 2: Expansion of Medicaid-Qualified Providers

- Extend Medicaid coverage to include OSPI licensed educational staff associates and master's level clinicians, such as school speech therapists and school behavioral analysts, psychologists, counselors, and social workers.

- Review the range of services and supports provided by trained paraprofessionals or teachers as directed by the treatment/intervention plan prepared by licensed OT, PT or SLP.

Discussion

Focus Area 2: Expansion of Medicaid-Qualified Providers

- What concerns do you have about the extension of school providers covered under Medicaid?

- What considerations and additional resources would be required to support this recommendation?

- What, if any, procedural, operational, and/or regulatory changes are needed to implement these recommendations (e.g., scope of practice, regulations, etc.)?

Preliminary Recommendation

Focus Area 3: Simplification of Program Administration and Participation Requirements

- Create a comprehensive school-based Medicaid reimbursement program for school districts and ESDs.

- Extend the Random Moment Time Study utilized for the Medicaid Administrative Claiming program to include additional providers.

- Align documentation requirements with practice standards for each provider type.

- Develop a cost-based reimbursement program to maximize federal reimbursement allowable, based on their actual incurred costs.

One Medicaid Reimbursement Program

Simplify coverage of all services in schools into one program

Does Medicaid cover the services & supports that I provide?
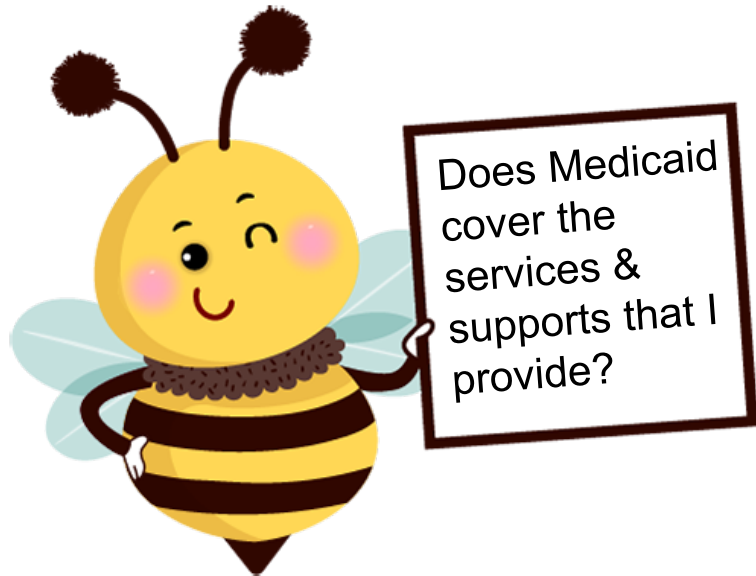
School Special Education Related Services Staff

Type of Service/ Support	Reimbursement Option	Requirements
Covered services per student's IEP	Medicaid in Schools Program	• LEA Provider One enrollment process • Single set of payer billing requirements • No service pre-authorizations • Medical Necessity requirements aligned to school setting • Comprehensive RMTS • Cost Reports
Screenings & Evaluations that do not result in an IEP, 504 plan services, and other non-IEP services & supports		
Case management, care coordination, Health-related service planning		

Random Moment Time Study

Accurately captures the time spent by school providers delivering services and supporting and ensuring access to health-related services:
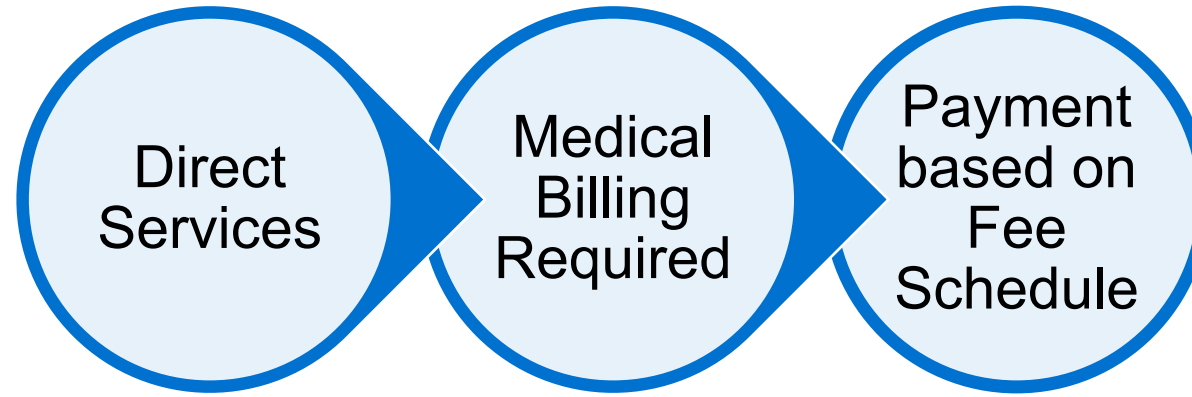
Reimbursement Models

Fee-for-Service:

Direct Services → Medical Billing Required → Payment based on Fee Schedule

- Focus & burden on billing
- Fees may not accurately reflect LEA's costs

Cost-Based Reimbursement:

Direct and Administrative Activities Integral to Services → Health-related activities captured through time study → Payment based on actual costs
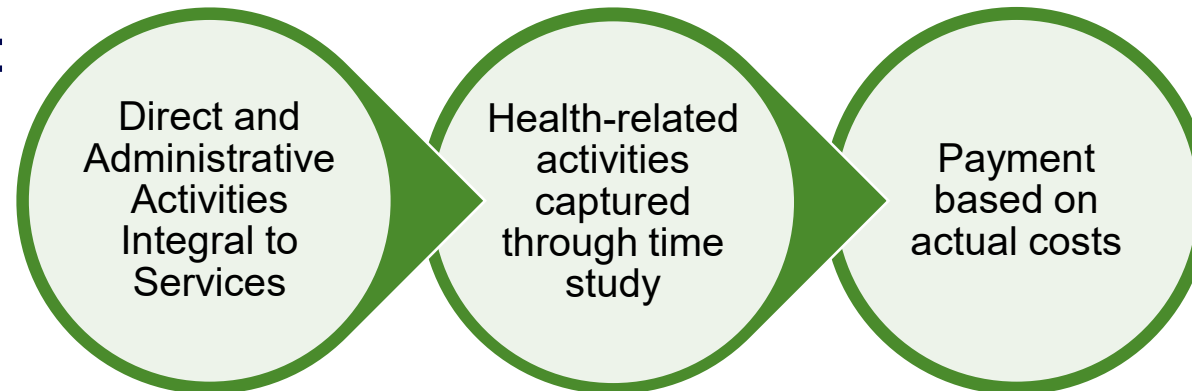
- Captures full array of health-related services & supports
- Reimbursement based on LEA's actual costs

Cost-Based Reimbursement Model

- Simplified financial reporting

- School Business/Finance staff complete cost reports

- This model takes the pressure off "billing" for every service and prioritizes:

  - Answering randomly assigned moments accurately,

  - Ensuring requirements are met for service documentation – aligned to practice standards and school policy.

  - Reimbursement for all activities staff perform to support student health, many of which do not require "billing."

Discussion

Focus Area 3: Simplification of Program Administration and Participation Requirements

- What questions or concerns do you have about the consolidation of Medicaid reimbursement processes for schools under one program?

- What concerns do you have about the carving out of school-based services from managed care?

- What specific concerns or questions do you have about participation in a Random Moment Time Study?

Preliminary Recommendation

Focus Area 4: Training, Outreach, and LEA Support

- Develop Medicaid program engagement and training strategy, which includes:

  - Active involvement from OSPI in outreach, training, and support,

  - Development of Medicaid-focused professional learning communities,

  - Alignment of Medicaid billing with existing frameworks for identifying and addressing student health needs, (e.g., Child Find, Case Management, and the Multi-Tiered Systems of Support model).

- Develop recommendations to address school health infrastructure needs that support documentation and Medicaid billing.

Discussion

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Focus Area 4: Training, Outreach, and LEA Support

- What training and outreach should be prioritized?
- What type of training forum(s) would have the most meaningful impact to support school healthcare staff and school districts in general?
- What are some immediate questions or concerns that should be considered in infrastructure support/recommendations?

Preliminary Recommendations

Focus Area 5: Gradual transition/implementation of new program

- LEAs can participate in the current Medicaid Administrative Claiming program.
  - Training and onboarding in Random Moment Time Study process.
  - Familiarity with financial reporting requirements.
  - Realization of incremental revenue for administrative activities performed.
- Assess financial impact on potential program changes.
- Provide additional feedback and considerations for new program.

Discussion

Focus Area 5: Phased Approach to New SBS Program Design

- How do school staff prefer to engage in collaboration around program requirements and implementation planning?

- Would collaboration with the following associations be an effective way to design helpful resources to support training or information sharing on Medicaid and/or clinical documentation?

  - Washington Occupational Therapy Association,

  - American Physical Therapy Association, Washington

  - Washington Speech-Language-Hearing Association

  - Washington's School Counselor Association

  - Washington State Association of School Psychologists

Next Steps

New Medicaid in Schools Program Design Requirements

- Post Engagement Session Survey
- Finalize community engagement session feedback
- Finalize program design recommendations
- Prepare requirements for state legislative and/or federal approval
- Implementation planning

For more information

On Program Recommendations, contact
HCASBS@hca.wa.gov

On Medicaid Administrative Claiming Program enrollment, contact
MAC@hca.wa.gov

Website: https://www.hca.wa.gov/billers-providers-partners/program-information-providers/school-based-services