Community Engagement Session Nurses

Medicaid in Schools: Recommendations

Presented by:

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In partnership with:
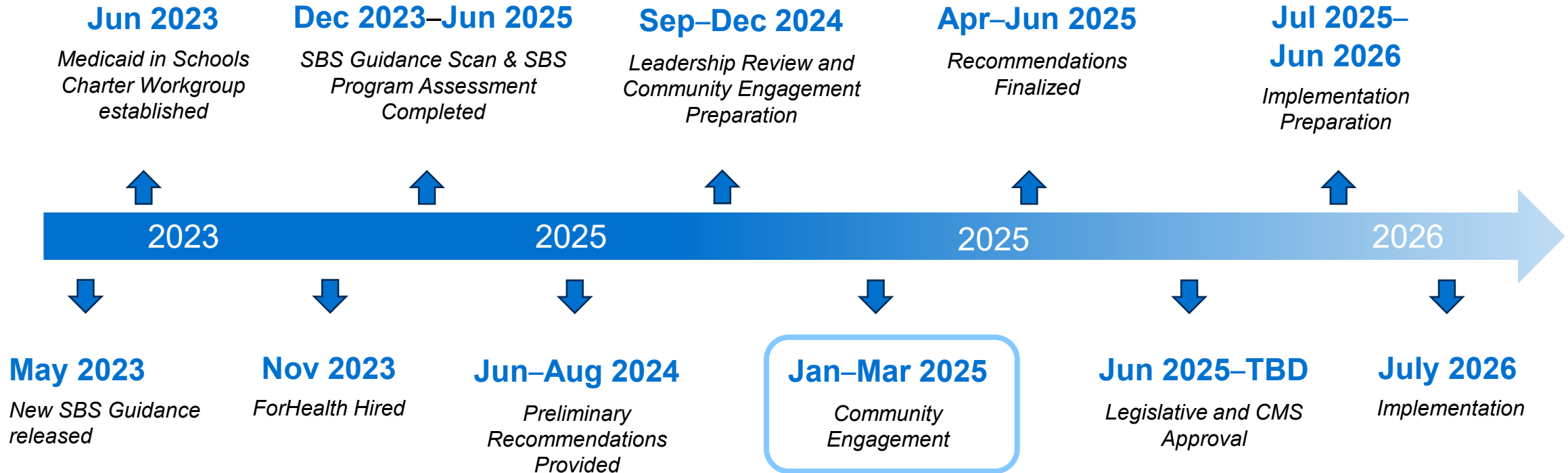
Washington State Health Care Authority

Washington Office of Superintendent of PUBLIC INSTRUCTION

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January 9, 2025

Agenda

- Medicaid in Schools charter workgroup status

- Review of program assessment findings focused on nursing services

- Discussion of preliminary recommendations impacting nursing 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 – Nursing Focus

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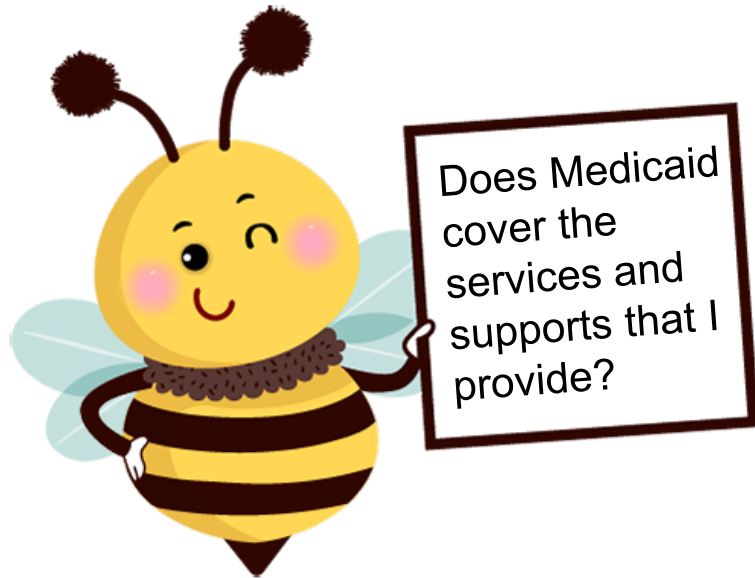## Few school districts bill for nursing services:

- 13 school districts billed Medicaid for nursing services (2022-2023 school year)
- 69 students claimed statewide

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 and supports that I provide?

Nurses

Type of Service/ Support	Reimbursement Option	Requirements
Nursing services per student's IEP	School Based Health Services Program	• Provider One enrollment • Billing codes & process • Documentation requirements
Nursing Services interventions – non-IEP	Managed Care Plans	• Managed Care Organization enrollment (5 plans) • Multiple Billing and Payer Requirements • Various Documentation and service authorization requirements
Case management, care coordination, service planning	Medicaid Administrative Claiming Program	• Medicaid Administrative Claiming enrollment • Random Moment Time Study Participation

Assessment Findings (3)

- 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 nurse services extend beyond students with IEPs, including:
  - Anxiety, depression, and/or other mental health issues.
  - Asthma, diabetes, and other chronic conditions.
  - Coordination of care/case management and services with community and school providers.
  - Early identification of health issues through routine screenings and/or monitoring of student health.

Preliminary Recommendations

Focus Areas of Preliminary Recommendations Pertinent to Nurses

1. Expansion of Medicaid coverage for school-based nursing services.

2. Overall program simplification and easing of administrative burdens.

3. Development of training, outreach, and LEA resources.

4. Gradual transition/implementation of new program.

Preliminary Recommendation

Focus Area 1: Expansion of Covered Students and Services

- All services performed by RNs and LPNs to any Medicaid-enrolled, unrelated to an IEP, and within the scope of school nursing practice standards.

- Examples include:

  - Prevention services, health screenings (e.g., vision, hearing)

  - Early Periodic Screening, Diagnostic and Treatment services.

  - Chronic disease management, e.g., diabetes and asthma.

  - Urgent/crisis care and unplanned medical interventions.

  - Care coordination/case management, referrals, and monitoring of health care services (eligible Medicaid administrative activity).

Discussion

Focus Area 1: Expansion of Covered Students and Services

- Are there any issues or concerns associated with the expansion of covered students and/or services performed by RNs and LPNs?

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

- Are there any procedural, operational, and/or regulatory changes needed to implement these recommendations, e.g., scope of practice, standing orders, regulations, etc.?
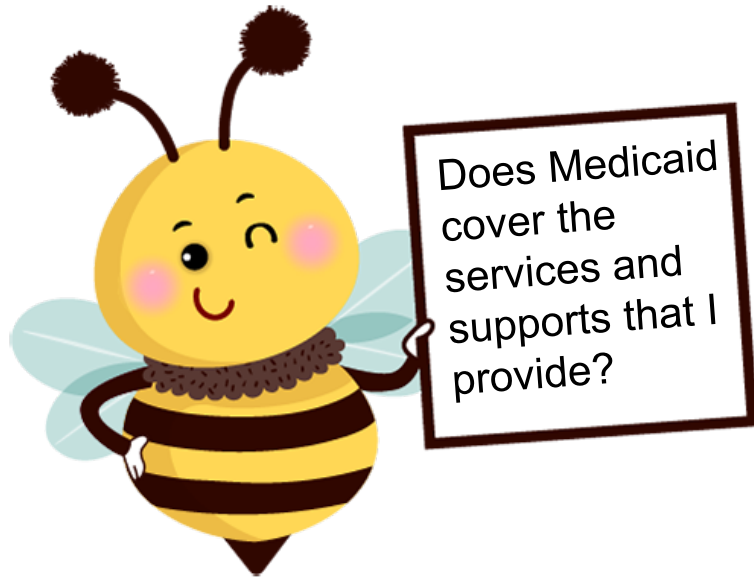
Preliminary Recommendation

Focus Area 2: Simplification of Program Administration and Participation Requirements

- Create a comprehensive school-based Medicaid reimbursement program for school districts and ESDs, carved out of managed care contracts.
- Extend the Random Moment Time Study utilized for the Medicaid Administrative Claiming program to include additional providers.
- Align documentation requirements with standard nursing practices.
- 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 and supports that I provide?

Nurses

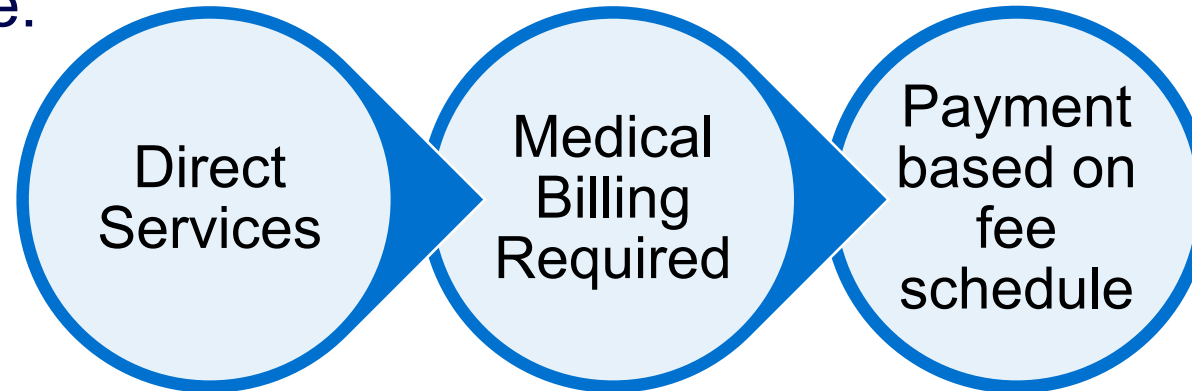| Type of Service/ Support	Reimbursement Option	Requirements
Nursing Services per student's IEP	Medicaid in Schools Program	• Provider One enrollment process • Single set of payer billing requirements • No service pre-authorizations • Medical necessity requirements aligned to a school setting • Comprehensive Random Moment Time Study • Cost reports
Nursing Interventions – non-IEP		
Case management, care coordination, service planning		

Random Moment Time Study

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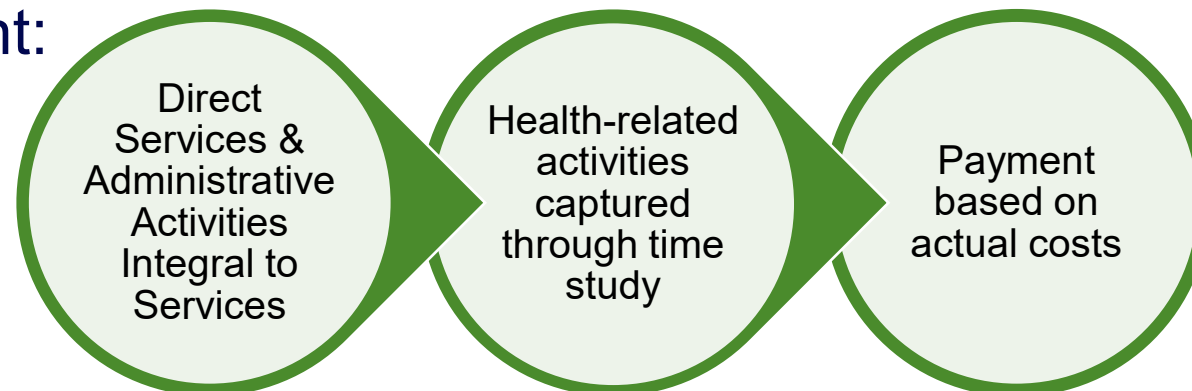
Reimbursement Models

Fee-for-Service:

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Direct Services  →  Medical Billing Required  →  Payment based on fee schedule
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- Focus and burden on billing
- Fees may not accurately reflect LEA's costs

Cost-Based Reimbursement:

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Direct Services & Administrative Activities Integral to Services  →  Health-related activities captured through time study  →  Payment based on actual costs
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- Captures full array of health-related services and 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 2: Simplification of Program Administration and Participation Requirements

- What is the best approach to align billing requirements into one program to cover all services provided on the continuum of care?

- Are there any issues or concerns associated with the carving out school-based services from managed care?

- Are there specific concerns or questions about participating in a Random Moment Time Study?

- Are there other questions or concerns about streamlining Medicaid reimbursement processes for schools?

Preliminary Recommendation

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Focus Area 3: 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, such as Child Find, Case Management, and the Multi-Tiered Systems of Support model.

- Develop recommendations to address school infrastructure needs around health service delivery documentation systems and Medicaid billing.

Discussion

Focus Area 3: Training, Outreach, and LEA Support

- What recommendations for training and outreach should be prioritized?

- What type of training forum(s) would have the most meaningful impact to support school nurses and school districts in general?

- What are some immediate questions or concerns that come to mind that should be considered in infrastructure support/recommendations?

Preliminary Recommendations

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Focus Area 4: Gradual transition/implementation of new program

Increase familiarity with current Cost Reimbursement model by participating in the Medicaid Administrative Claiming program.

- School staff can be trained in Random Moment Time Study process.

- Business administrators can become familiar with financial reporting requirements.

- Earn incremental revenue for administrative activities performed.

- Assess financial impact on potential program changes.

- Provide additional feedback and considerations for new program.

Discussion

Focus Area 4: Gradual transition/implementation of new program

- How do school nurses 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 for school nurse staff to support training or information sharing on Medicaid reimbursement and/or clinical documentation?

  - School Nurse Organization of Washington

  - Office of Superintendent of Public Instruction

  - School Nurse Corps

- Any concerns related to proposed next steps?

Next Steps

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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