

Getting Started with Medicaid School-**Based Services**

Thursday, September 28, 2023

3 p.m. to 4 p.m. ET | 2 p.m. to 3 p.m. CT | 12 p.m. to 1 p.m. PT



CMS Financial Management Group (FMG) 7500 Security Boulevard Baltimore, MD 21244







Econometrica. Inc.

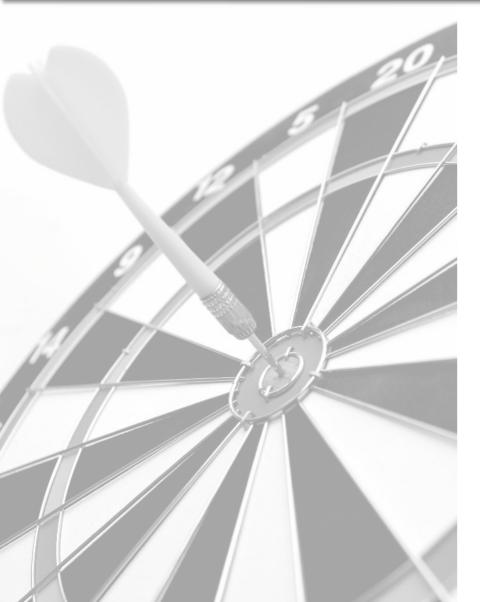
7475 Wisconsin Avenue, Suite 1000 Bethesda, MD 20814





- > Welcome
- > Objectives
- Comprehensive Review and Analysis
- > Opportunities for Information Dissemination
- > Building the Coalition
- > Questions, Conclusion, and Adjournment

Objectives



This webinar is intended to inform State Medicaid agencies (SMAs) and State educational agencies (SEAs) on how to get started with enhancing Medicaid school-based services (SBS) in their State.

By the end of this webinar, you should be able to:

- Reaffirm that your State policies regarding special education students and Medicaid SBS are consistent with existing Federal laws.
- Identify the changes made in 2014 from the issuance of CMS' State Medicaid Director Letter on Free Care.
- Describe the roles that SMAs, SEAs, and local educational agencies (LEAs) should have in order to start Medicaid SBS enhancement.
- Define what education and resources SMAs and SEAs should provide to promote implementation or enhancement of Medicaid SBS.
- Outline the considerations and action steps to build a coalition to address Medicaid SBS.

The Bipartisan Safer Communities Act



- On June 25, 2022, President Joe Biden signed into law the Bipartisan Safer Communities Act (BSCA).
- Title 34, Subtitle B, Chapter 3 includes a directive to CMS to provide additional guidance to States on Medicaid SBS to:
 - Increase access to Medicaid funded school-based health services, including mental health services.
 - Reduce administrative burden.
 - Support Federal compliance with billing and payment.

The Bipartisan Safer Communities Act (cont.)



- For Medicaid SBS, BSCA specifically addresses:
 - Establishing responsibility for interagency coordination between State agencies.
 - Providing SMAs and SEAs with technical assistance necessary for them to access Medicaid to provide SBS.
 - A special rule that identifies that the requirements may be met through State statute or regulation, signed agreements, or other appropriate written methods.

Considerations for Implementation or Enhancement of Medicaid SBS

The 2014 Policy Change: Reversal of Free Care Policy

Prior to 2014 (Pre-Free Care)

- Medicaid SBS could only be provided to students with disabilities under the Individuals with Disabilities Education Act (IDEA) in accordance with the child's Individualized Education Program (IEP).
- SEAs must ensure that the provision of such services are at no cost to parents.

Since 2014 (Free Care)

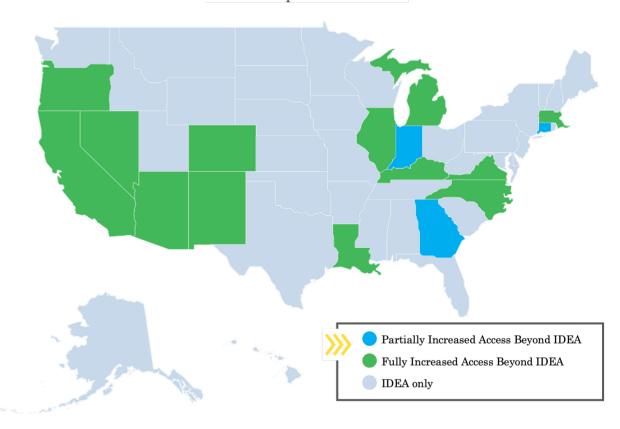
- Medicaid SBS can be covered for any student enrolled in Medicaid for any health services covered according to Early and Periodic Screening, Diagnostic and Treatment rules.
 - This includes but is not limited to routine preventive care, behavioral health, and ongoing primary care and treatment, regardless of whether students generally are charged for such services when furnished as SBS.
- LEAs may obtain financial support for services that they may already provide.

U.S. Landscape of Medicaid SBS Services

- As of September 2023, 15 States have fully or partially expanded their Medicaid SBS programs.
 - With a State Plan Amendment (SPA).
 - For the purposes of:
 - Bringing in additional resources to expand access to health services for vulnerable students.
 - Addressing the increased demand for mental health services in schools.
 - There are 13 States identified as fully increasing access beyond IDEA.
- As of September 2023, many States have not taken formal action to implement or align their State Medicaid plans (if necessary) with the 2014 Free Care rule.
 - Note: States may or may not have to update their State Medicaid plan to achieve this.

Medicaid School-Based Services Expansion by State

as of September 2023



Goal: Fully Increasing Access Beyond IDEA

To align with the statutory components of the BSCA:

- > States can establish polices to allow **all** Medicaid-enrolled students to receive healthcare through schools.
 - Does not have to be limited to only services included in a student's IEP.
 - Can include preventative care; mental health; substance abuse disorder services; nursing services, such as medication monitoring and counseling; or any other services in the Medicaid State plan.
- > Schools may seek payment for all Medicaid-covered services provided to children enrolled in Medicaid, regardless of whether the services are provided at no cost to other students.
 - Increases schools' abilities to draw down Federal Medicaid funds for health services.
 - Increases access and improves health equity among low-income children.



Categories of Medicaid SBS Adoption

IDEA States

- These States have not implemented Medicaid SBS beyond what is required by IDEA.
- Opportunities to implement.

States Partially Increasing Access Beyond IDEA

- These States have only implemented 1–2 Medicaid SBS/populations beyond what is required by IDEA, such as nursing services or Section 504 children.
- Opportunities to evolve.

States Fully Increasing Access Beyond IDEA

- These States have implemented Medicaid SBS for all Medicaid-eligible children for a variety of services.
- Opportunities to adopt new flexibilities.

Opportunities to Promote Student Health and Well-Being

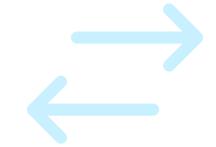
> CMS and U.S. Department of Education:

- Increase access to Medicaid/Children's Health Insurance Program (CHIP)-covered services.
- Provide options to ease administrative burden for existing and new services.
- Provide best practice examples of methods that SMAs and LEAs use to provide and pay for Medicaid SBS.



> SMAs, SEAs, and LEAs:

- Begin by engaging in a systematic review of the current state of the Medicaid/CHIP services provided in their State.
- Identify knowledge gaps among stakeholders and provide education to inform the efforts to increase access to Medicaid SBS.
- Build a coalition to do the work to implement or enhance Medicaid SBS in their State.









Comprehensive Review and Analysis

Information Dissemination

Build a Coalition

Roles and Responsibilities

	Agency Roles		
Steps	SMAs	SEAs	LEAs
Comprehensive Review and Analysis	Leading	Leading	Supporting/Informing
Current Medicaid State Plan	Leading	Recipient	Recipient
Understanding Your State's Medicaid SBS Provision	Recipient	Leading	Supporting/Informing
Opportunities for the Initiation or Evolution of Medicaid SBS	Recipient	Supporting/Informing	Leading
Addressing Health Equity in Schools	Leading	Leading	Supporting/Informing
Medicaid Managed Care Plans	Leading	Supporting/Informing	Supporting/Informing
Building the Coalition	Leading	Supporting/Informing	Supporting/Informing

Gathering Data and Information: Review of Current State

Conduct a comprehensive review and analysis to help all stakeholders understand the Medicaid SBS landscape in your State.



Comprehensive review and analysis of Medicaid SBS.

- Create a resource for understanding the school health landscape and Medicaid billing of SBS for your State.
 - Joint effort: SMA and SEA
 - Prepared for SMAs, SEAs, LEAs, and other key stakeholders (legislative and financial).
 - Resources that inform include:
 - State Medicaid Plan, State guidance, time studies, direct service billing, revenue/cost reports, community mental health plans, prior community health needs assessments, audits, etc.



Purpose: To provide a resource that outlines the current state of Medicaid billing of SBS and rationale for identifying changes or implementing Medicaid SBS.

Comprehensive Review and Analysis of Current Medicaid SBS



- Intent: Bring together information regarding the current state of Medicaid SBS in your State.
- Informs current policy and service provision for Medicaid SBS.
 - Identifies any issues with implementation of current policies.
 - Identifies gaps in addressing student health needs.
- Should provide an opportunity to involve interested LEAs.
 - Aim for LEA sample representatives: Inner city, rural, Tribal, charter, etc.
- Share with all stakeholders at school district level and up.
- May include a Community Health Needs Assessment.
 - CDC Assessment and Plans Community Health Assessment STLT Gateway

Considerations for the Comprehensive Review and Analysis



Determining health services that students have access to in schools and provision methods.

Identifying the health services covered by Medicaid in a school-based setting.

Understanding restrictions on the types of providers that can be reimbursed for delivering Medicaid-eligible services.

Defining the systems that are in place to support your State's school health services program.

17

Making It Work: Comprehensive Review and Analysis Example

The North Carolina Department of Health and Human Services' Division of Medical Assistance, in collaboration with the Department of Public Instruction (DPI), collected information and data to identify SBS eligible for Medicaid Federal match that were not being reimbursed under NC's State Medicaid Plan.

The analysis described the fiscal impact of covering proposed services and conducted research on SBS services that could be added to NC's State Medicaid Plan.

Medicaid Coverage for School-Based Health Services

Session Law 2016-94, Section 12H.9.



Legislative Report to the
Joint Legislative Oversight Committee on Medicaid and NC Health Choice
and
Fiscal Research Division

North Carolina Department of Health and Human Services

Making It Work: Comprehensive Review and Analysis Example (cont.)

Examples of data included:

- Service utilization data provided by DPI.
- Current Procedural Terminology Codes, current NC rates for services, and rate research from select States, used to inform fiscal impact projections.
- Historical data from State Fiscal Years 2014, 2015, and 2016 were used to identify submitted LEA provider claims for services.
- The number of Medicaid beneficiaries who have historically received services as stipulated on an IEP, Individualized Family Service Plan (IFSP), 504 Plan, or Individual Health Plans.
- With this review and analysis, NC provided a legislative report to the Joint Legislative Oversight Committee on Medicaid and NC Health Choice and the Fiscal Research Division that recommended additional services and enhancements of the current Medicaid SBS program.





Doing the Work: Comprehensive Review and Analysis

IDEA-Only States

Data gathering to inform the healthcare needs of students and determine best billing methodology to implement:

- State Medicaid Plan
- Community Health Needs Assessment
- Public Health Plans
- Medicaid budget
- Social Service Program Data
 - Free/reduced lunch program
- District-wide IEP service data
 - Special education policies
 - Provider rosters
- Service logs
- Medicaid Managed Care contracts
- MMIS claims data
- Parent–Teachers Association and Board of Education input

States with Partial or Full Increased Access Beyond IDEA

Data-gathering to inform how the healthcare needs of students have evolved and determine the best billing methodology to implement:

- State Medicaid Plan
- Medicaid budget
- Medicaid Managed Care contracts
- Advisory boards
- School-based provider surveys
 - Student record review
 - Focus groups
- Audits

Roles and Responsibilities: Comprehensive Review and Analysis



Comprehensive Review and Analysis

Current Medicaid State Plan

Understanding Your State's Medicaid SBS Provision

Opportunities for the Initiation or Evolution of Medicaid SBS

Addressing Health Equity in Schools

Medicaid Managed Care Plans

Building the Coalition

SEAs - Leading Role

SEAs lead this data collection to describe the State's landscape of current Medicaid SBS.

SMAs – Leading Role

SMAs use this information to inform possible enhancements.

LEAs – Supporting/Informing Role

LEAs assist the SEAs by providing information and cooperating with study/evaluative activities.

Opportunities for Information Dissemination to Promote Medicaid SBS Enhancement

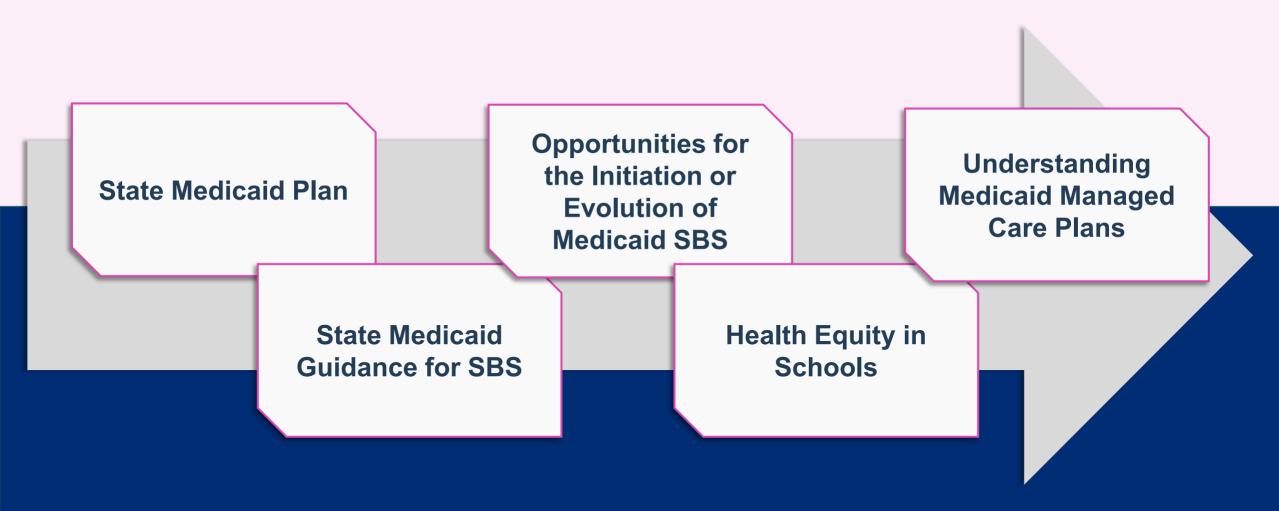
Importance of Dissemination

Information dissemination is the action of distributing or broadcasting information.

- > The data from the comprehensive review and analysis will serve as a keystone to understanding the work of the coalition.
- > The dissemination of those findings may:
 - Promote understanding of initiatives.
 - Determining provider service gaps.
 - Provide context for decision-making.
 - Identifying the best payment methodology.

- Encourage informed discourse.
 - Determining the service needs of students.
- Promote understanding of current state.
 - Ensuring appropriate implementation of requirements.

Areas to Promote Information Dissemination



Information Dissemination: Medicaid Funding for SBS

Service reimbursement and eligibility levels are outlined in each State's Medicaid State Plan. This agreement between a State and the Federal Government describes how the State administers its Medicaid program.



Provide resource/information to all stakeholders about your State's Medicaid State Plan.

- Responsibility: SMAs Recipients: SEAs and LEAs.
- Starting point for your discussion regarding how your State can implement and enhance Medicaid SBS.
- May identify policies that should be marked for revision.
- SEAs may start identifying gaps in provision or payment and/or rationales for these gaps.



Purpose: To ensure that all key stakeholders understand the current Medicaid State plan and inform them about what changes need to be made.

25

Roles and Responsibilities: Current Medicaid State Plan

Comprehensive Review and Analysis

Current Medicaid State Plan

Understanding Your State's Medicaid SBS Provisions

Opportunities for the Initiation or Evolution of Medicaid SBS

Addressing Health Equity in Schools

Medicaid Managed Care Plans

Building the Coalition

SMAs – Leading Role

SMAs are responsible for the State Medicaid Plan and amendments to that plan.

SEAs and LEAs – Recipients

SEAs and LEAs utilize that information to understand the scope of reimbursement for Medicaid SBS.

Information Dissemination: Understanding Your State's Medicaid SBS Provision





Review the analysis of the current provision and payment of Medicaid SBS, comparing it to what is allowed in your State's guidance.

- Responsibility: SEAs share what is happening at the LEA level.
 LEAs validate and inform.

 Recipient: SMAs, to identify gaps in service provision/reimbursement.
- > Use the comprehensive review and analysis to glean information regarding implementation of State guidance and related policies.
- Should ultimately inform considerations when looking at Medicaid SBS enhancements.



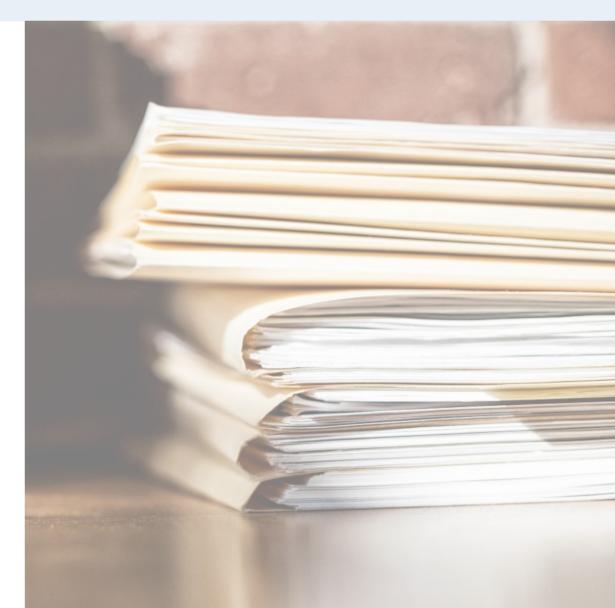
Understanding your State's implementation of current SBS policies is critical to expanding and streamlining Medicaid reimbursement.

Purpose: To foster understanding of the delivery of current Medicaid SBS.

Sharing Knowledge: Understanding Your State's Medicaid SBS Provision

27

- Intent: Inform stakeholders of the details regarding implementation of current guidance.
- Information may:
 - Help identify misunderstandings, challenges, and barriers to implementing State guidance.
 - Determine need for additional training, resources, and supports.
 - Inform service provision solutions that could help other LEAs in the State.



Roles and Responsibilities: Understanding Your State's Medicaid SBS Provision

Comprehensive Review and Analysis

Current Medicaid State Plan

Understanding Your State's Medicaid SBS Provision

Opportunities for the Initiation or Evolution of Medicaid SBS

Addressing Health Equity in Schools

Medicaid Managed Care Plans

Building the Coalition

SEAs – Leading Role

SEAs provide information regarding how Medicaid SBS is provided and how that aligns with current Medicaid SBS policy.

SMAs - Recipient

SMAs utilize this information to help provide context and consideration for enhancing Medicaid SBS.

LEAs – Supporting/Informing Role

LEAs help inform on current guidance specific to their State.

Information Dissemination: Opportunities for the Initiation or Evolution of Medicaid SBS





Outline opportunities for providing and billing direct care and administrative services that currently do not exist or do not meet current needs.

- Create resources that define the service needs, billing solutions, and provider options for meeting those needs.
- These resources should outline the service needs specifically for those students with IDEA-required services and those that do not have IDEA-required services.
 - Joint effort: SEAs and LEAs Recipients: SMAs
 - Meant to inform next steps.

Identifying opportunities to implement or evolve current Medicaid SBS requires input from all, but starts at the LEA/school level.



Purpose: Identifies problems, concerns and issues at the LEA and school level to inform next steps.

30

Sharing Knowledge: Opportunities for the Initiation or Evolution of Medicaid SBS

- Intent: Inform the work of the coalition by identifying healthcare needs of students from the school/school-based provider level.
- This information should be categorized by those students covered under IDEA requirements and those who are not.
- Information should include:
 - Healthcare services that currently meet the needs.
 - Healthcare services needed that are not currently provided and related benefits.
 - Services that are currently billed/not billed identifying the gap.
- Critical information necessary to help inform coalition work.



Roles and Responsibilities: Opportunities for the Initiation or Evolution of Medicaid SBS



Comprehensive Review and Analysis

Current Medicaid State Plan

Understanding Your State's Medicaid SBS Provisions

Opportunities for the Initiation or Evolution of Medicaid SBS

Addressing Health Equity in Schools

Medicaid Managed Care Plans

Building the Coalition

LEAs – Leading Role

LEAs pull together information and metrics regarding student health needs and opportunities to expand services.

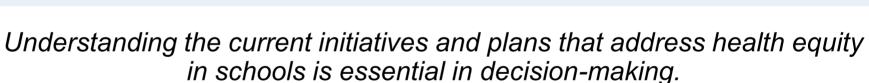
SEAs – Supporting/Informing Role

SEAs provide support and supplemental data.

SMAs – Recipient

SMAs utilize information in determining the approach to implementing or enhancing Medicaid SBS.

Information Dissemination: Addressing Health Equity in Schools





Provide stakeholders with resources that outline and inform how health equity is addressed in schools.

- Responsibility: Joint effort between SEAs and SMAs, further informed by LEAs.
- > Resources should align with the State's Health Equity Strategy.
 - Includes Health Department and SMA quality improvement plans.
 - Includes initiatives to promote Medicaid eligibility and enrollment.
- Resources should be reflective of the 2024 Mandatory Core Set of Children's Health Care Quality Measures for Medicaid and CHIP.



Purpose: Identifies potential priorities to address and align with a State's health equity plan within LEAs.

Sharing Knowledge: Addressing Health Equity in Schools

- Intent: Inform the work of the Coalition by identifying how the State's Health Equity Strategy is currently addressed in schools.
- Resources can inform:
 - Alignment with the State's Health Equity Strategy.
 - Status of health equity in schools and current initiatives.
 - Opportunities on how increasing access to Medicaid SBS can promote health equity in schools.



Roles and Responsibilities: Addressing Health Equity in Schools

Comprehensive Review and Analysis

Current Medicaid State Plan

Understanding Your State's Medicaid SBS Provisions

Opportunities for the Initiation or Evolution of Medicaid SBS

Addressing Health Equity in Schools

SMAs and SEAs – Leading Roles

SEAs and SMAs work together to understand how the State's Health Equity Strategy is reflected in the current Medicaid State Plan and SEA policies related to Medicaid SBS.

LEAs – Supporting/Informing Role

LEAs help inform by providing details about how current Medicaid SBS is addressing health equity in the schools.

Medicaid Managed Care Plans

Building the Coalition

Information Dissemination: Understanding Medicaid Managed Care Plans and SBS



Provide resources and/or training that details how the State approaches Medicaid SBS in accordance with Medicaid Managed Care Plans.

- Responsibility: SMA Recipient: SEAS and LEAs
- SBS may be included ("carved in") with the Managed Care Organization (MCO) contract or "carved out" under Fee-For-Service.
- If included, this resource should inform which services and provider types are included within the capitation rate.
 - Note: There cannot be a limit on the services against the capitation rate for IDEA children.

Each Medicaid MCO has a State contract to provide a specific bundle of services and manage care for its members.



Purpose: Identifies the approach and types of services that could be considered for Medicaid SBS implementation or enhancement.

36

Sharing Knowledge: Understanding Medicaid Managed Care Plans and SBS

- Intent: Inform stakeholders on how MCOs may impact the provision, delivery, and/or billing of Medicaid SBS.
- Information should include:
 - Services that can be provided.
 - Types of providers who may participate in the plan's network.
 - Be clear that there cannot be any reduction of benefits to students who receive IDEA services.
- Should lead to a larger discussion with the MCOs.
- Key understanding for stakeholders for States with services carved into the MCO plan.



Roles and Responsibilities: Understanding Medicaid Managed Care Plans and SBS



Comprehensive Review and Analysis

Current Medicaid State Plan

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Medicaid Managed Care Plans

SMAs – Leading Role

SMAs share information regarding the MCO plan(s). They identify whether SBS is carved out of their State's managed care programs

SEAs and LEAs – Supporting/Informing Role

SEAs and LEAs identify how this information could impact plans for changing Medicaid SBS provision and billing.

In States where SBS is included in the managed Medicaid program, SEAs and LEAs should provide information on costs to inform managed care payment rates.

Information Dissemination Example



Massachusetts' Medicaid Program, MassHealth, works with the University of Massachusetts Medical School to administer the School-Based Medicaid Program (SBMP).

MassHealth offers a <u>SBMP Resource Center</u> where guidance documents, forms, and other resources are available to individuals for successful SBMP participation.

Resources include:

- General program information.
 - Example: <u>SBMP Program Guide for Local Education Agencies</u>.
- Random Moment Time Study guides.
- Administrative Activities Claiming guides.
- Direct Service Claiming resources.

MassHealth also offers <u>SBMP Trainings</u>, including a 101 series providing appropriate introductory information about the Medicaid program that is most pertinent to varying LEA roles.

Building the Coalition

Steps to Building the Coalition

Identifying Key Stakeholders

Establishing Coalition Expectations

Promoting Coalition Understanding

Gathering Data and Information: Identifying Key Stakeholders





Identify key stakeholders for Medicaid SBS implementation/evolution coalition.

- Outreach to those who inform or are impacted by Medicaid SBS.
 - Joint effort: SMAs and SEAs
 - Should include State, local health and education decisionmakers, parents, advocates, and those who determine funding.

Identify key stakeholders to bring the right people to the table to inform critical decisions.



Purpose: To establish a coalition that brings the right people to the table to inform and decide on implementation/evolution plans.

42

Gathering Data and Information: Establishing Coalition Expectations

Determine the approach to the work to increase student access to Medicaid SBS.

- Define meeting expectation, roles related to shared workplans, and efforts to improve processes.
 - Joint effort: SMAs and SEAs
 - Establish meeting participation expectations for coalition.
 - Determine coalition meeting structures.
 - Identify the metrics by which success is measured.

Set clear goals for each coalition meeting and concrete next steps. All deliverables should have owners and target dates attached to them.





Purpose: To create an agreement for all stakeholders that establishes the approach to implementing or enhancing Medicaid SBS.

43

Gathering Data and Information: Promoting Coalition Understanding



Determine the work and common goals for the coalition and disseminate.

- Define goals/objectives, common language, key actions, and evaluative metrics.
 - Joint effort: SMAs and SEAs
 - Identify common language: healthcare vs. education terminology.
 - Informed by the comprehensive review and analysis.
 - Should be provided prior to first official coalition meeting.

Promote understanding by determining the work of the coalition to implement or evolve Medicaid SBS programs and policies.



Purpose: To ensure that all stakeholders understand the work of the coalition.

Promoting Coalition Collaboration



Roles and Responsibilities: Building the Coalition

Comprehensive Review and Analysis

Current Medicaid State Plan

Understanding Your State's Medicaid SBS Provisions

Opportunities for the Initiation or Evolution of Medicaid SBS

Addressing Health Equity in Schools

Managed Medicaid Care Plans

Building the Coalition

SMAs - Leading Roles

SMAs determine the participation, structure, and expectations of the coalition.

SEAs and LEAs- Supporting/Informing Role

SEAs and LEAs help identify key stakeholders and promote coalition understanding.

Roles and Responsibilities

	Agency Roles		
Steps	SMAs	SEAs	LEAs
Comprehensive Review and Analysis	Leading	Leading	Supporting/Informing
Current Medicaid State Plan	Leading	Recipient	Recipient
Understanding Your State's Medicaid SBS Provision	Recipient	Leading	Supporting/Informing
Opportunities for the Initiation or Evolution of Medicaid SBS	Recipient	Supporting/Informing	Leading
Addressing Health Equity in Schools	Leading	Leading	Supporting/Informing
Medicaid Managed Care Plans	Leading	Supporting/Informing	Supporting/Informing
Building the Coalition	Leading	Supporting/Informing	Supporting/Informing

Overview

With the goal of increasing access to Medicaid SBS, Delivering Services in School-Base Setting: A Comprehensive Guide to Medicaid Services and Administrative Claiming was released in May 2023.

- Many States have not started the work to implement Medicaid SBS.
- > In this training, we provided steps to getting started, including:
 - 1. Gathering data and information.
 - 2. Disseminating Information.
 - 3. Building a coalition.
- We discussed:
 - Action steps.
 - Responsibilities.
 - Intended purpose.

The Centers for Medicare and Medicaid Services (CMS)

Delivering Services in School-Based Settings: A Comprehensive Guide to Medicaid Services and Administrative Claiming



Questions?

Email: SchoolBasedServices@cms.hhs.gov



Resources

- Bipartisan Safer Communities Act:
 - eCFR :: 34 CFR Chapter III -- Office of Special Education and Rehabilitative Services, Department of Education
- Community Health Needs Assessment:
 - CDC Health Needs Assessment
- Health Promotion Model Precede/Proceed:
 - Chapter 2. Other Models for Promoting Community Health and Development | Section 2. PRECEDE/PROCEED | Main Section | Community Tool Box (ku.edu)
- North Carolina Example:
 - North Carolina Department of Health and Human Services Legislative Report
- Mandatory Core Set of Children's Health Care Quality Measures for Medicaid and CHIP:
 - 2024 Core Set of Children's Health Care Quality Measure for Medicaid and CHIP (Child Core Set)
- Massachusetts School Based Medicaid Program (SBMP) Example:
 - Mass SBMP Resource Center
- Health Students Promising Futures:
 - A Guide to Expanding Medicaid Funded School Health Services 2022 Update [PDF] (healthystudentspromisingfutures.org)