Medicaid Coverable Services and Administrative Activities for Medicaid School-Based Services (SBS)
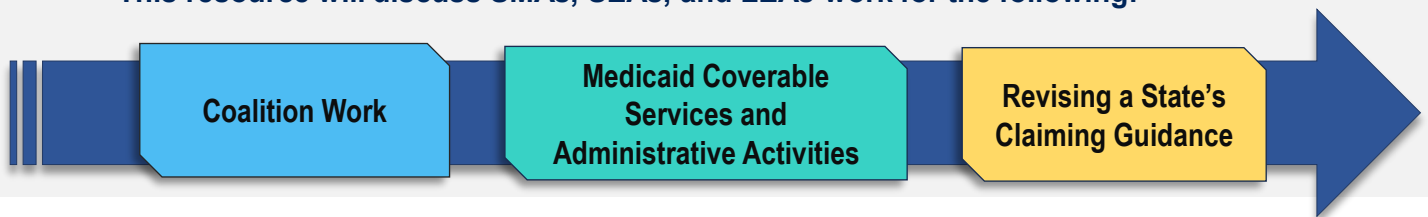## Handout

To ensure service under the Individuals with Disabilities Education Act (IDEA), the Chief Executive Officer (or designee) of a State must ensure that an interagency agreement is in effect between:

- Each noneducational public agency (other than an education agency):
  - Obligated under Federal or State law, or assigned responsibility under State policy to pay for any services that are also considered special education or related services that are necessary for ensuring Free and Appropriate Public Education (FAPE) to children with disabilities within the State; the public agency must fulfill that obligation or responsibility either directly or through contract or other arrangement.
- The State Educational Agency (SEA), to ensure that all services as described (above) that are needed to ensure FAPE are provided.

This resource will discuss SMAs, SEAs, and LEAs work for the following:

Coalition Work → **Medicaid Coverable Services and Administrative Activities** → **Revising a State's Claiming Guidance**

Coalition Work
Conduct the coalition work that informs the advancement of Medicaid SBS.

Why? The work helps define how your State will evolve Medicaid SBS, streamline Medicaid reimbursement, and understand where implementation and improvement efforts should be focused.

Action Steps

1 Establish the Primary Aim
Identify how your State will evolve Medicaid SBS to increase medical access to students in your State.
Agency Roles: Leading: SMAs and SEAs Supporting/Informative: LEAs

2 Identify Work for Policy Revision/Creation
Identify plan for policy work through a cross-agency committee
Agency Roles: SMAs, SEAs, and LEAs

▶ **Committee Roles:**
- Determine which State polices related to Medicaid SBS need to be created or revised.
- Identify priorities for State policy development/revision.
- Identify resources that should inform the work (regulations, industry standards, best practices).
- Determine best method for dissemination.

3 Identifying the Data for Collection
Identify data collection methods and approach.
Agency Roles: Leading: SMAs and SEAs

▶ **Different Types of Data Collection:**
- *Primary data collection:* Real-time data gathered via surveys, observations, questionnaires, focus groups, etc.
- *Secondary data collection:* Past data collected by someone else via publications, websites, reports, internal records, articles, etc.

▶ **Considerations for the Data Collection:**
- *Previously collected data*: time studies, cost reports, Fee-for-Service (FFS) or interim claims, etc.
- *Student/school-level data:* service frequency and duration data within Individualized Education Programs (IEPs) and Section 504 plans, treatment plans or other health care plans, provider reports/service documentation.
- *State-level data*: Community Health Needs Assessment, public health plans.
- *Data sources/subject matter experts:* School districts, special education directors, direct care providers, clinical leadership (school nursing and medical directors), Medical SBS deputy.

Medicaid Coverable Services and Administrative Activities

Action Steps

1 Determining Medicaid Coverable and Administrative Medicaid SBS
Identify how Medicaid coverable and administrative activities can be integrated into Medicaid SBS programs beyond those covered by IDEA.

▶ **Medicaid Coverable Services:**
- Though not a requirement for Medicaid payment, Medicaid coverable services can be outlined with specifics for each student who receives services:
  - For IDEA Students → needs to be outlined in an IEP.
  - For non-IDEA students → can be included in a medical care/treatment service plan
- Must be directly related to the provision of Medicaid-covered services to a student(s) enrolled in Medicaid.
- Services must be medically necessary
- Services must correspond to services outlined in the State's approved Medicaid State Plan
- Services provided by a qualified Medicaid provider

Range of Allowable Direct Care SBS:
- EPSDT Benefit
- Vision and dental care
- Physical services
- Transportation
- Personal care services
- Preventative services (immunizations, well-child care)
- Rehabilitative services
- Physical/occupational therapy and speech pathology/audiology services
- Other licensed practitioner services (e.g., license certified social worker)
- Case management and targeted case management
- Behavioral Health – including mental health and SUDS

▶ **Administrative Activities:**
- School districts must enter into interagency agreements with State Medicaid agencies to conduct Medicaid administrative activities.
- State Medicaid agencies that intend to claim for allowable administrative activities must have an approved Public Assistance Cost Allocation Plan (PACAP) as well as an SBS Claiming Time Study Implementation Plan.
- States do not reconcile to costs for administrative activity claiming

Range of Allowable Administrative Activities:
- Arranging transportation for students to Medicaid-covered services
- Arranging for and/or providing translation services to facilitate access to Medicaid-covered services
- Medical program planning, policy development, and interagency coordination
- Medical/Medicaid-related training and professional development
- Referrals, coordination, and monitoring of Medicaid services
- Outreach activities that focus on Medicaid services or eligibility requirements

2 Determine Service Provision
Understanding options for providing SBS is an essential part of your Medicaid State Plan.

- Providers furnishing the services must be enrolled in Medicaid or CHIP.
- Consider State regulations regarding provider qualifications.
- States are encouraged to identify schools as providers of Medicaid services.
- To receive payment, SBS providers must be qualified providers of those services.

3 Example Service Delivery Model: Integrating Telehealth
Identify opportunities to integrate telehealth to enhance SBS.

- Provider furnishing the services must be enrolled in Medicaid or CHIP.
- Consider State regulations regarding the use of telehealth.
- Additional overhead costs associated with delivering telehealth services may need to be considered as well.

4 Example Service Delivery Model: Building Partnerships for Care Delivery
Identify healthcare providers to engage in the provision of Medicaid SBS.

- Foster partnerships to expand access to Medicaid SBS.
- Determine specific needs and partnerships that can meet the need.
- Doing this the right way does take time.

Action Steps

1 Updating State Claiming Guidance

Identify areas for revision to the State Claiming Guidance. **Agency Roles:** Leading: SMAs.

▶ **The guide typically outlines the following information:**

- Vision, Mission, Values of the Program
- Provider Information
- Service Descriptions and Utilization Management
- Time Study Implementation Plans
- Covered Populations and Medicaid Enrollment
- Process for Billing for Direct and Administrative Services
- Program Audit and Compliance
- Managed Care Medicaid Plans
- Terminology and Definitions
- Other Requirements

▶ **Agency Roles and Responsibilities for State Claiming Guidance:**

SMAs	SEAs
- Define the direct and administrative service language to align with the Medicaid State Plan/SPAs. - Define and instruct on provider enrollment activities, qualification requirements and associated processes. - Define Medicaid eligibility requirements. - Define the Time Study Implementation Plan. - Describe audit and compliance review processes. - Provide support to SEAs and LEAs in the administration of Medicaid SBS.	- Define service provision and provider types. - Describe Time Study Implementation Plan and billing methodology. - Outline the goals and intent of a State's Medicaid SBS. - Provide support to LEAs in the administration of Medicaid SBS.
	LEAs
	- Utilize guidance in the execution of the plan. - Communicate questions and challenges in plan implementation.

Resources

Bipartisan Safer Communities Act:	eCFR 34 CFR Chapter III -- Office of Special Education and Rehabilitative Services, Department of Education eCFR 34 CFR 300.154 -- Methods of ensuring services
Theoretical stages of a team's psychological development (Tuckerman 1965):	Tuckman's Stages of Group Development - WCU of PA (wcupa.edu)
Colorado Expansion Study:	Colorado-RMTS-Case-Study-August-2020-HSPF.pdf (healthyschoolscampaign.org)
Understanding Medical Necessity:	Plans of Care Policy Brief [PDF] (healthystudentspromisingfutures.org) MassHealth School-Based Medicaid Program (mass.gov)
Medicaid Unwinding post PHE:	Coverage for Half a Million Children and Families Will Be Reinstated Thanks to HHS' Swift Action | CMS
Telehealth:	Introduction to school-based telehealth | Telehealth.HHS.gov Licensing Across State lines | Telehealth.HHS.gov
Memorandum of Understanding for Partnerships:	Microsoft Word - 3.2.a Blank MOU Template - with guidance in red.doc (embr.mobi)
New Mexico Administrative Claiming Guidance	New Mexico Medicaid Guide for SBS
South Carolina Administrative Claiming Guidance	South Carolina LEA Services Provider Manual
Commonwealth of Massachusetts Administrative Claiming Guidance	Commonwealth of Massachusetts Direct Service Claiming Program Guide