

# Oregon's Medicaid State Plan Amendment School Based Health Services

Presenter: Rusha Grinstead, MS, MPH  
Interim Medicaid Policy & Program Manager  
Children & Families Programs

Oregon  
**Health**  
Authority

Health Systems Division



# What are School Based Health Services (SBHS)

School Based Health Services are special education and health related services that are also considered as a Medicaid covered service. School districts and Oregon Department of Education contractors for Early Intervention/Early childhood in Special Education may utilize three Medicaid billing programs to optimize Medicaid billing:

- **SBHS Medicaid Billing Fee for Service:** a cost-sharing program that allows school districts to seek reimbursement for eligible health-related services provided by medically qualified staff employed or contracted by a school district providing services to a Medicaid enrolled student.
  - It is required by the Individuals with Disabilities Education Act (IDEA) pursuant to an Individualized Education Program (IEP)/Individualized Family Service Plan (IFSP) or a Section 504 plan.
- **Medicaid Administrative Claiming (MAC):** provides reimbursement to school districts for activities related to the administration of Medicaid.
- **Direct Services Early Intervention/Early Childhood Special Education (EI/ECSE) Programs Billing (Birth-5 Pre-K)**
- In 2023, 50 School Districts have billed Medicaid as of June 1.

On May 18, 2023, CMS approved Oregon's Medicaid State Plan Amendment (SPA) which increased types of services provided and types of medically licensed staff who can provide billable services within the scope of practice of their license for School Based Health Services

# Key updates from new approved SPA

- Increases the types of billable services
- Increases the number of medically licensed staff that can provide billable services
- Adds Section 504 plans, other documented individualized health or behavioral health plans, and other plans determined medically necessary for services provided in school programs and settings
- Adds potential for “free care”
- OHA, in partnership with ODE and the School Medicaid Core team, will work to amend OARs to align with approved SPA

# Oregon's newly approved State Plan Amendment

## Previous State Plan

- Audiology Services
- Behavioral Health Services
- Nursing Services
- Nurse Practitioner Services
- Occupational Therapy Services
- Personal Care Services
- Physical Therapy Services
- Physician Services
- Specialized Transportation Services
- Speech-Language pathology Services

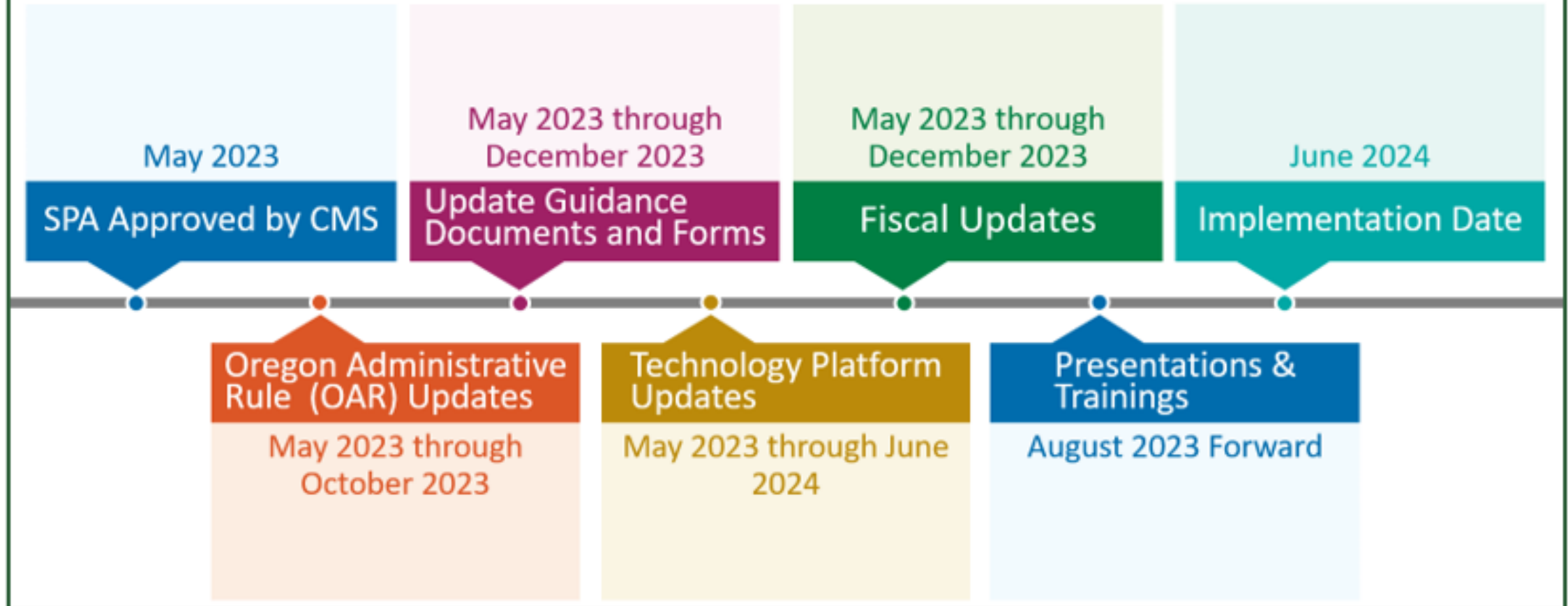
## New State Plan Amendment

- Dental Health Services
- Diagnostic, screening, preventive, developmental and rehabilitative services
- Nutritional Services
- Personal Care Services
- Respiratory Therapy Services

# Key Updates from New Federal Guidance

- Clarified the reversal of the “free care” policy and provided states with guidance on how to add billing for eligible non-IDEA health services
- Proposed Written Notification and Parent Consent Final Rule
- Third Party Liability
- Provider Enrollment

# State Level Implementation Timeline



# Some identified opportunities

- A statewide Electronic Education Health record (EEHR) would be the most streamlined way to encourage schools to bill Medicaid. Opportunity for OHA and ODE to assess interest in participation from School Districts.
- MAC match funds can be reinvested by SDs to increase access to Medicaid. Opportunity for OHA to partner with ODE and learn from school staff their administrative need to leverage Medicaid.
- School Nurses employed by SDs can enroll as referring providers to ensure appropriate Medicaid billing.
- OHA and ODE can work in partnership with each other, and with SDs and Licensing Boards to identify potential solutions to address lack of adequate licensed providers to serve in school settings.
- OHA and ODE are working together to identify pathways to streamline access to behavioral health services without compromising privacy and quality of service.
- Regular and frequent Interagency collaboration in action between Medicaid: Behavioral Health: ODE: Public Health: ODHS to explore and analyze existing programs, evaluations, and data sources such as
  - School based Mental Health assessments
  - Student Health Survey.



# Thank you!

Link to references:

[School Based Health Services: A Medicaid Program](#)

For questions: Please contact John English, Policy Advisor-Government Relations Unit  
[john.a.english@oha.oregon.gov](mailto:john.a.english@oha.oregon.gov)

COMMENTS/QUESTIONS?