

School-Based Health Services (SBHS) Dual Participation

Background

SBHS-recognized providers, employed or contracted by an education agency, are allowed to participate in both Medicaid leveraging programs: SBHS direct services and Medicaid Administrative Claiming (MAC). Participating SBHS-recognized providers under [OAR 410-133-0120](#) and education agencies must understand the conditions, constraints, and liabilities of participating in more than one SBHS Medicaid leveraging program to ensure all provisions of guidance are met. Prior to participating in multiple leveraging programs, the participating education agency must certify they meet dual participation requirements outlined below.

Participation requirements

1. Billed and paid amount cannot exceed cost of the actual service

Costs recovered through dual participation may not exceed the actual costs associated with providing direct services or MAC activities. If participating in multiple leveraging programs, the cost billed and reimbursed may not exceed the actual cost of the individual providing the service.

2. Do not claim the same activity or service in both programs

Duplicate claiming is prohibited. The same activity or service provided by an individual for the same child or family may only be claimed once. Claiming the same service through multiple leveraging methodologies is duplication.

3. Do not report direct services and related activities performed by SBHS Recognized Providers as a reimbursable administrative activity

Administrative activities reimbursed cannot reflect any direct or indirect activities related to providing a direct medical service. Activities provided by SBHS Recognized Providers are considered integral to or as an extension of a direct medical service and may not be reimbursed under MAC. These include:

- Follow up,
- Assessment,
- Counseling,
- Consultation or
- Related direct services billing activities.

This does not apply to activities provided by TSPC licensed school psychologists, school social workers and school counselors who elect not to bill SBHS direct services.

4. Validation of claims is required when SBHS recognized providers elect to participate in both SBHS direct billing and MAC

For dual participants:

- Validate the administrative time study results against the participant's direct services claims to ensure there is no duplication of claim.
- If there is duplication, the EA must reconcile and pay back the claim.

You can get this document in other languages, large print, braille or a format you prefer free of charge. Contact the Medicaid School-Based Health Services (SBHS) team at medicaid_sbhs@oha.oregon.gov or 503-979-8905. We accept all relay calls.

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