



May 18, 2026

# Unlocking School Medicaid Billing for Non-IDEA School Health Services

# Webinar Team

---

## *Oregon Health Authority (OHA):*

- Jennifer R. Smith
- Lasa Baxter
- Judy Weaver

## *Oregon Department of Education (ODE):*

- Jennifer Dundon

## *WestEd:*

- Betsy Garcia
- Jeremy Ford
- Lisa Eisenberg
- Liza Morris

# Session Objectives

---



Describe the similarities and differences between IDEA-based and non-IDEA Medicaid billing



Identify key implementation considerations around documentation, parent consent, and coding for non-IDEA services.



Assess what internal systems and structures an education agency needs to successfully expand Medicaid billing to include non-IDEA services.

# Webinar Agenda

---

- Context Setting
- Building Your Systems
- Implementation Considerations to Support Documentation
- Examples
- Q&A
- Resources and Closing



# Context Setting



# Program Expansion Timeline

**May 2023**

State Plan  
Admendment to  
expand SBHS  
program approved by  
Center for Medicaid  
Services (CMS)

**September 2024**

Updated Oregon Adminsitrative Rules (OARs)  
adopted:

- Redefined Individual Plans of Care (IPOC)
- Expanded list SBHS-Recognized Practitioners
- Allowed Education Service Districts (ESDs) to bill for services

Ongoing implementation  
support and guidance

**September 2025**

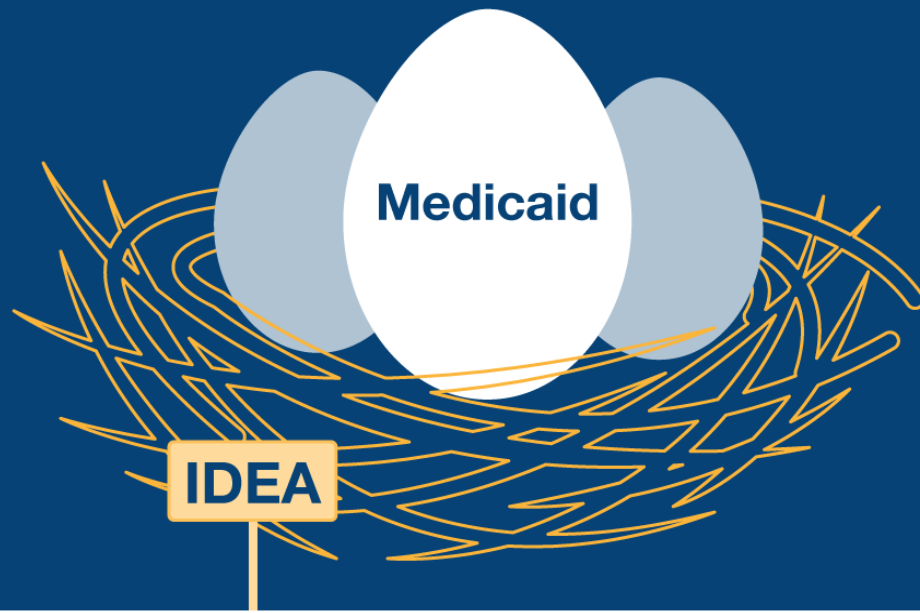
Updated OARs adopted:

- Added Teachers Standards Practice Comission (TSPC)-licensed behavioral health practitioners
- Added personal care services and services outside an IPOC (unplanned)

# Shifting Our SBHS Medicaid Mindset

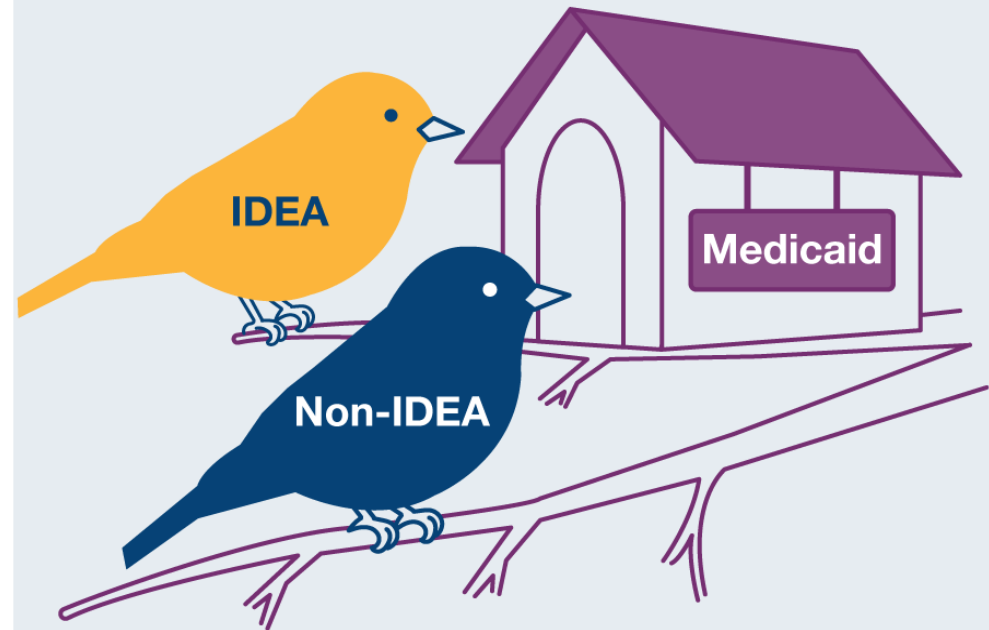
**Previous** Mindset

SBHS Medicaid is **nested** in IDEA



**New** Mindset

SBHS Medicaid **covers services** for eligible students





# Building Your Systems



# New Billing Provider Enrollment

---

## Billing Provider

- School districts
- Education service districts
- Early Intervention/Early Childhood Special Education (EI/ECSE) grantees
- State Institutions

## Three Enrollments

1. IDEA Health Services
2. EI/ECSE
3. **\*\*Non-IDEA Health Services\*\***

Separating the billing provider into three distinct enrollments is necessary to prevent unintended fiscal impacts

# Coordinating Across Departments

---

- Medicaid billing is a team process, not an individual task.
- District staff each play a role
  - They don't always work out of the same department
- Strong coordination
  - reduces errors,
  - improves documentation and service delivery, and
  - makes billing smoother.





# Implementation Considerations to Support Documentation



# Supporting Documentation

Documentation includes **all relevant records** required to document services provided to students.

Written Notification  
& Parent Consent



Evaluations &  
Assessments



Individual Plans  
of Care (IPOCs)

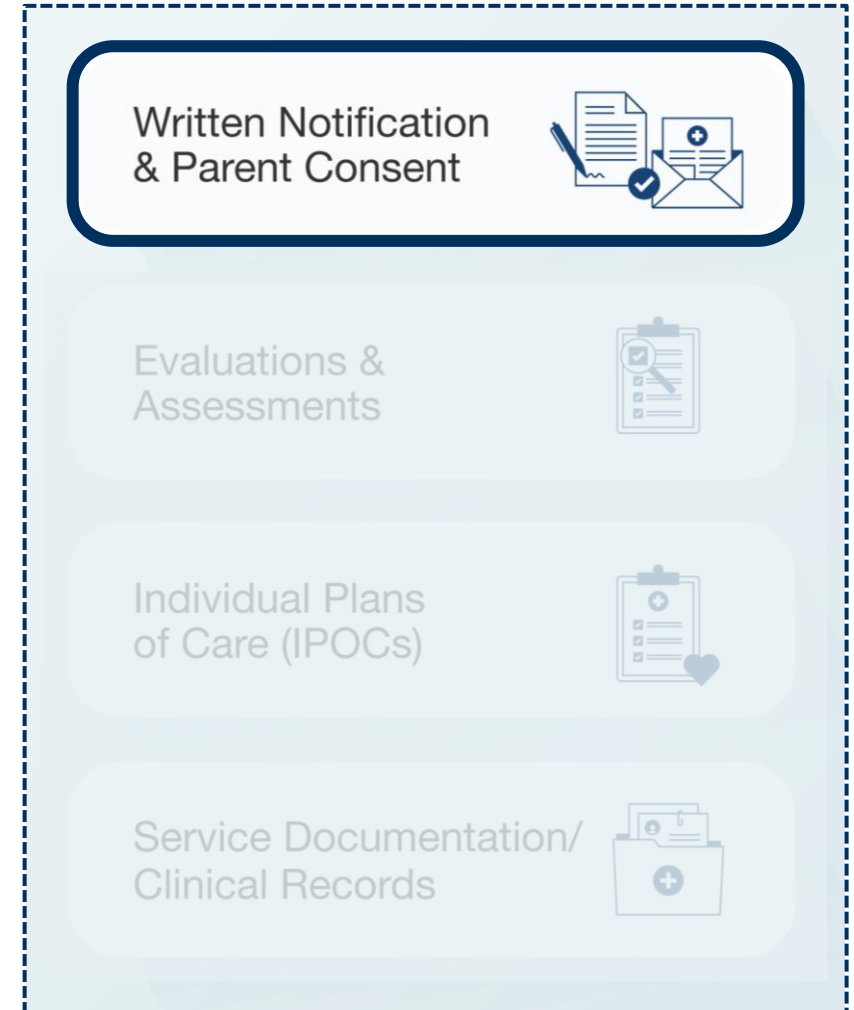


Service Documentation/  
Clinical Records



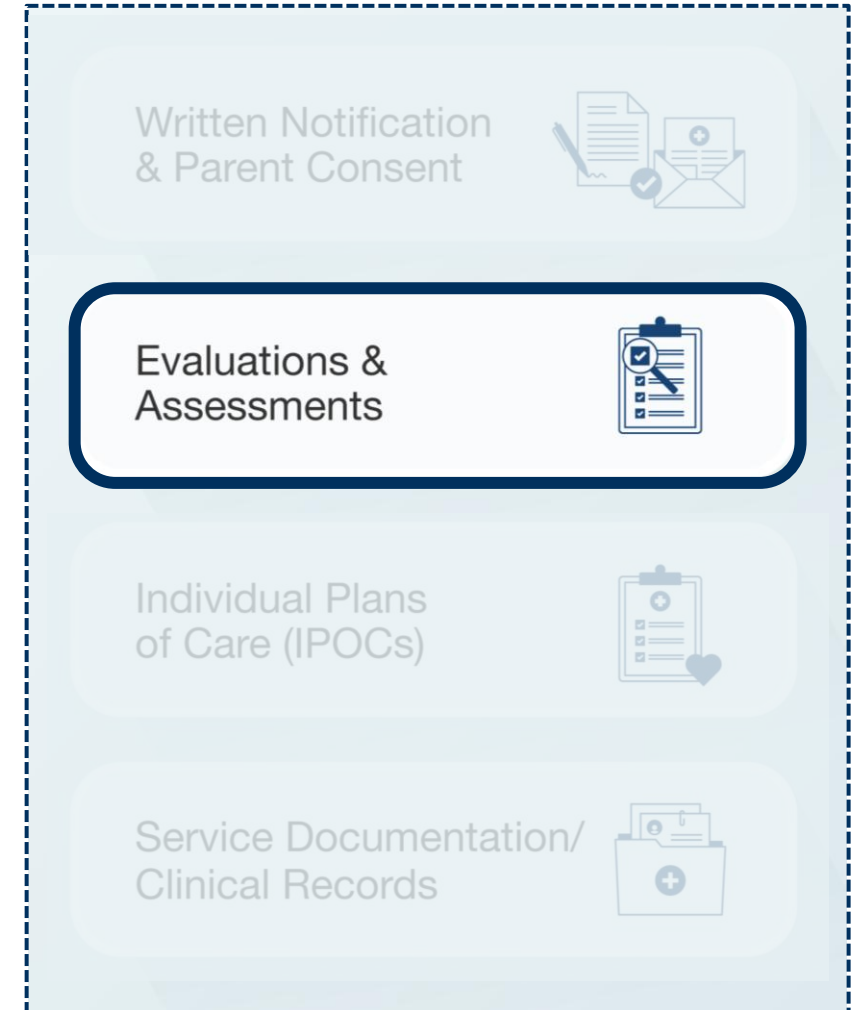
# Written Notification and Parent Consent

- All Medicaid services require written notification and parent consent
- The forms on ODE's website are intended to be used for IDEA and Non-IDEA services.
- Obtaining consent for Non-IDEA services may look different than for IDEA services but the requirements are the same:
- Written notification must be provided prior to obtaining consent and billing can only occur from the date of the consent forward.



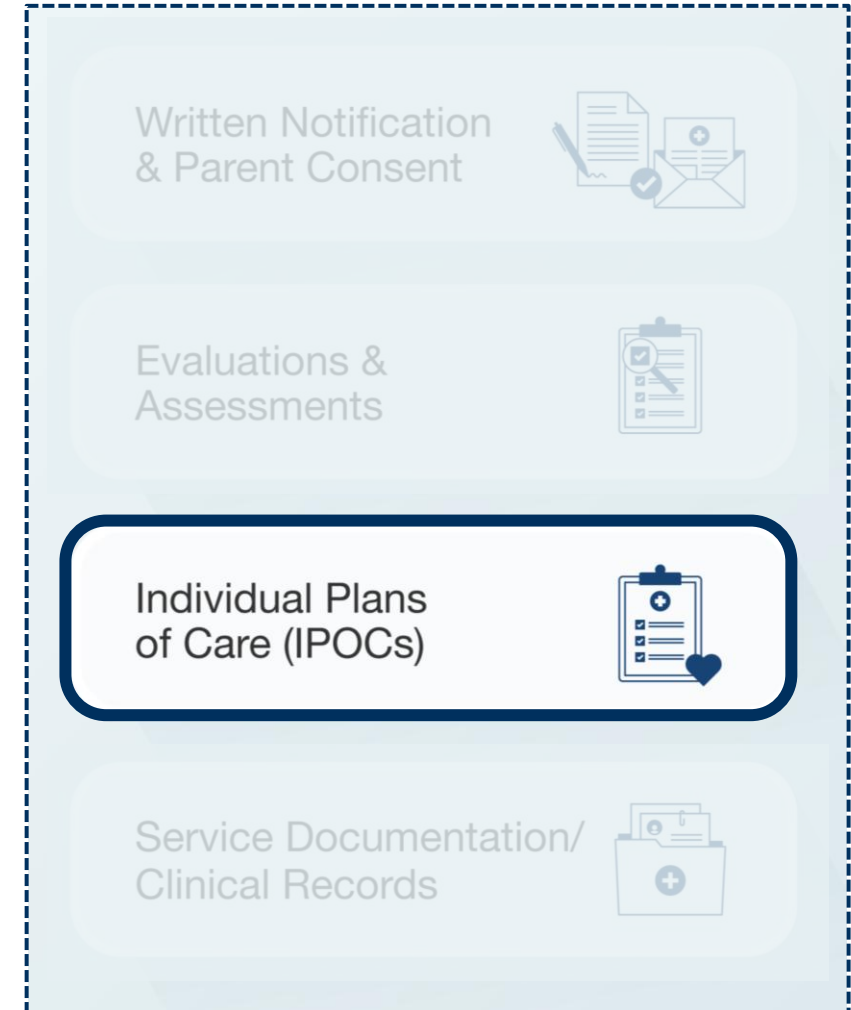
# Evaluations and Assessments

- Evaluations and assessments for non-IDEA plans of care or services may include:
  - Eligibility evaluations and assessment for 504 plans
  - Some functional behavioral assessments
  - Screenings to identify students for follow-up care and assessments to establish plans of care
  - Ongoing assessments to monitor progress
- Reminder: evaluations and assessments for establishing IEPs or IFSPs (regardless of outcome) are billed under IDEA



# What Is an Individual Plan of Care (IPOC)?

- A prescriptive document required for billing Medicaid for planned school-based health services
- A general term that may cover a variety of plans
- Not a stand-alone document
- Examples of non-IDEA IPOCs include behavior support plans and nursing plans



# IPOC Required Elements

- The effective dates of the IPOC
- The specific child or young adult's name
- The EA's name
- Each necessary and appropriate health service category, including the nature, extent **or** units of service and the therapeutic value for each service

Written Notification  
& Parent Consent



Evaluations &  
Assessments



Individual Plans  
of Care (IPOCs)



Service Documentation/  
Clinical Records



# IPOC Example

1. The **education agency's** name.
2. The **student's name**.
3. The **effective dates**.
4. Each necessary and appropriate **health service category**.

### Individualized Health Protocol

<b>Education Agency</b>	ABC School District	<b>ID Number</b>	12345	
<b>Student Name</b>	Ogden K. Toolern	<b>School</b>	XYZ Elementary	
<b>Effective Date(s)</b>	8/15/2026–8/14/2027	<b>Grade</b>	3	
<b>Student-Specific Information</b> <ul style="list-style-type: none"><li>. OK was diagnosed with Type 1 Diabetes (T1D) at age 4</li><li>. OK has CGM and glucometer for blood glucose monitoring</li><li>...</li></ul>				
<b>Health Condition Information</b> <ul style="list-style-type: none"><li>. Type 1 Diabetes</li><li>...</li></ul>				
<b>School Nursing Care</b> <p>School staff will ensure Ogden checks his blood glucose levels and follows appropriate blood sugar management protocols before meals and as needed for signs and symptoms of hyper/hypoglycemia. School staff will assist Ogden with administration of insulin as indicated per medical orders. School staff will follow protocols for emergency management of severe hyper/hypoglycemia as needed...</p>				

# Service Documentation

- Service documentation is an important part of the supporting documentation for this program.
- It includes service logs, clinical case notes, service notes, etc.
- Practitioners should follow the requirements for service documentation set by their scope of practice and respective board or national association rules.

Written Notification  
& Parent Consent



Evaluations &  
Assessments



Individual Plans  
of Care (IPOCs)



Service Documentation/  
Clinical Records



# Medicaid Service Documentation Requirements

- Student's full name
- Student's Medicaid ID
- ICD-10 Code
- School medical provider (the EA)
- Rendering provider
- Supervising provider, if applicable
- Medical necessity and appropriate need for the service, if applicable
- Location, date and duration of service
- Number of students in a group, if applicable

Written Notification  
& Parent Consent



Evaluations &  
Assessments



Individual Plans  
of Care (IPOCs)



Service Documentation/  
Clinical Records



# Medical Necessity and Appropriate Need

---

For **planned services**, medical necessity and appropriateness are established through evaluations and assessments + IPOC.

For **unplanned services**, medical necessity and appropriateness are established through

- screenings and assessments, or
- details provided in service documentation that may include the health-related reason for services, impact on learning, and how the intervention will impact the student.

# Coding for Services: ICD Codes


---

- The ICD-10 Codes are a standardized set of codes that represent a patient's health condition or diagnosis.
- Two types of ICD-10 codes are used in school settings.
  - Diagnosis of a disease or condition (**Primary**)
  - **Signs and symptoms codes**; for example: R00-R99 may be used when a definitive diagnosis has not been assigned/established
- Practitioners may not always have a primary diagnosis from the student's primary care provider, but practitioners CAN use signs and symptoms codes

# Coding for Services: Procedure Codes

---

27  
Procedure  
Codes



185  
Procedure  
Codes

- Behavioral Health Services
- Motor Therapy Services
- Medical Services (Nursing and/or Physician)
- Speech and Audiology Services
- Specialized Transportation Services
- Coordination, Consultation, Case Management Services
- Dental Services
- IEP/IFSP Evaluation and Bundled Services
- Screenings and Other

# Build Your Systems (2 of 2)

---

## Written Notification and Parent Consent

- Evaluate current systems (e.g., SIS and student registration processes) to support collecting consent.
- Work with legal counsel and IT staff to ensure that workflows meet written notification and parent consent, record retention, and FERPA requirements for digital signatures.

## IPOCs and Service Documentation

- Work with supervisors to understand existing capacities and leverage existing practices.
- Train staff on documentation requirements. Bring in peer providers to discuss best practices and workflows.
- Ensure technology and electronic platforms contain required fields and integrate with each other.

## Coding for Services

- Develop crosswalks and a short list of ICD-10 and procedure codes that reflect services and scenarios common to your EA.
- Help practitioners understand ICD-10 signs and symptoms codes.



# Examples



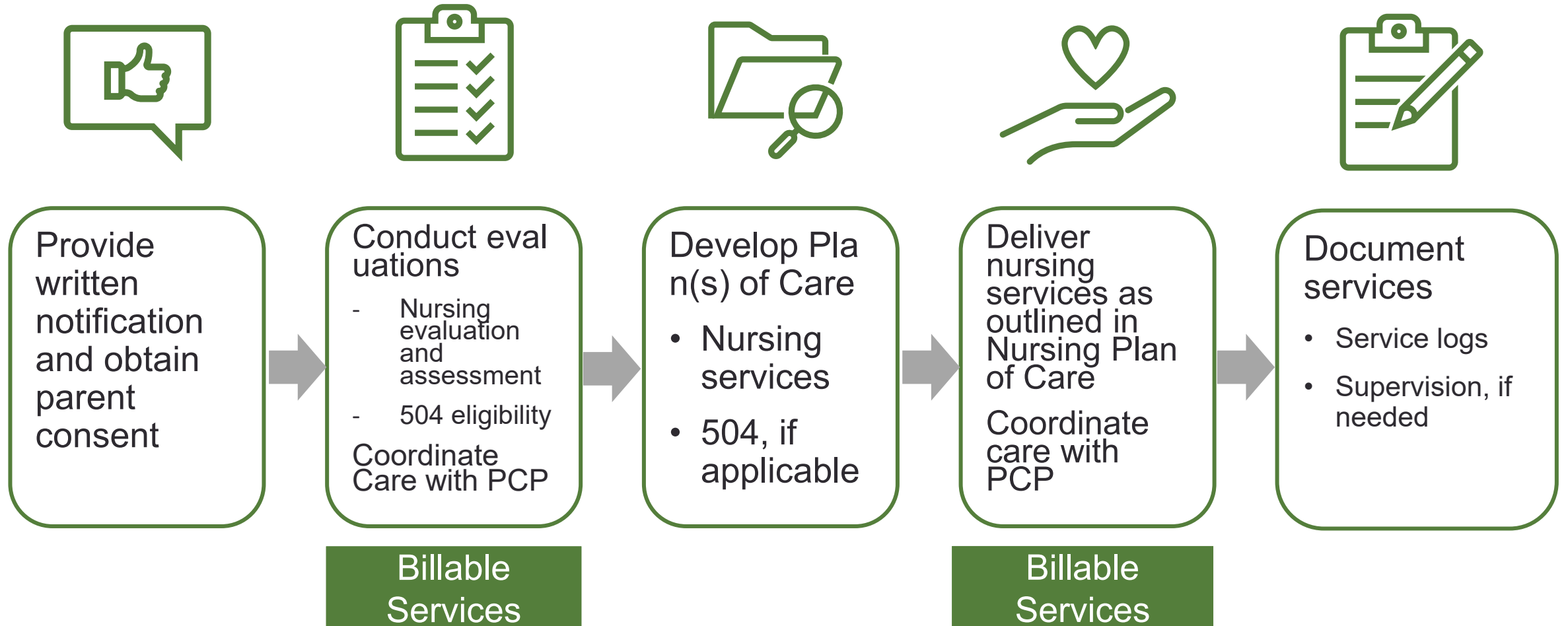
## Scenario A: Gabby

---

Gabby is a 6-year-old 1st grade student. Her parents let the school know that she was recently diagnosed with Type 1 Diabetes and requires insulin injections to manage her blood glucose levels. The registered nurse coordinates care to obtain and confirm provider orders and manage services and monitor symptoms in coordination with Gabby's pediatrician. The school refers her for a Child Find evaluation to determine eligibility under Section 504. Gabby is enrolled in the Oregon Health Plan (Medicaid).



# Medicaid Services: Gabby



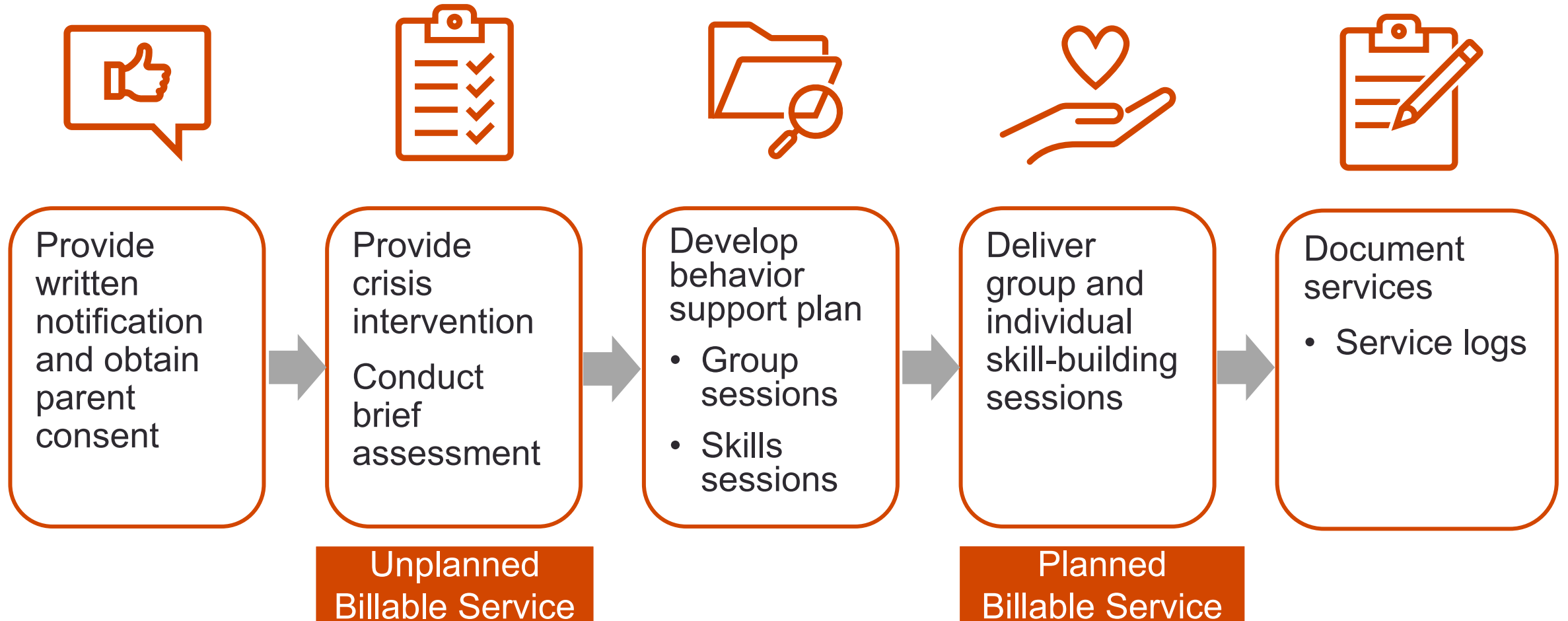
## Scenario B: Emma

---

Emma is a 10th grade student. She comes to school intoxicated. Her teacher refers Emma to the school counselor as an alternative to suspension. The school counselor meets with Emma to provide a crisis intervention and, once Emma is stabilized, conducts a brief behavioral assessment. Emma explains she's been having anxiety about her parents' immigration status. The school counselor develops a plan for Emma to attend a weekly group on anxiety facilitated by the school psychologist and weekly individual skill-building sessions on stress management with the school counselor. Emma is enrolled in the Oregon Health Plan (Medicaid).



# Medicaid Services: Emma



## Scenario C

---

Antonio is a fifth-grade student with a Section 504 plan for ADHD. His 504 plan includes accommodations to reduce distractions, improve organizational skills, and increase academic task completion. The school has developed and is implementing a behavior plan to improve his self-regulation skills that includes daily check-ins with the school counselor. Antonio and his family are enrolled in the Oregon Health Plan (Medicaid).



# Medicaid Services: Antonio



Provide written notification and obtain parent consent



Implement Behavior Plan



Deliver services according to the behavior plan

- Daily check-ins
- Weekly skills training
- Weekly social skills training

Billable Services



Document services

- Service documentation
- Service tracking log

## Scenario D – Non-Billable

---

Liam is a 3rd grade student. For the second time in one week, he goes to the health room with a sick stomach. The **health aide observes** Liam and determines that he should be picked up by his parents. The **health aide monitors** Liam until his parents could come and pick him up. Liam is enrolled in the Oregon Health Plan (Medicaid)



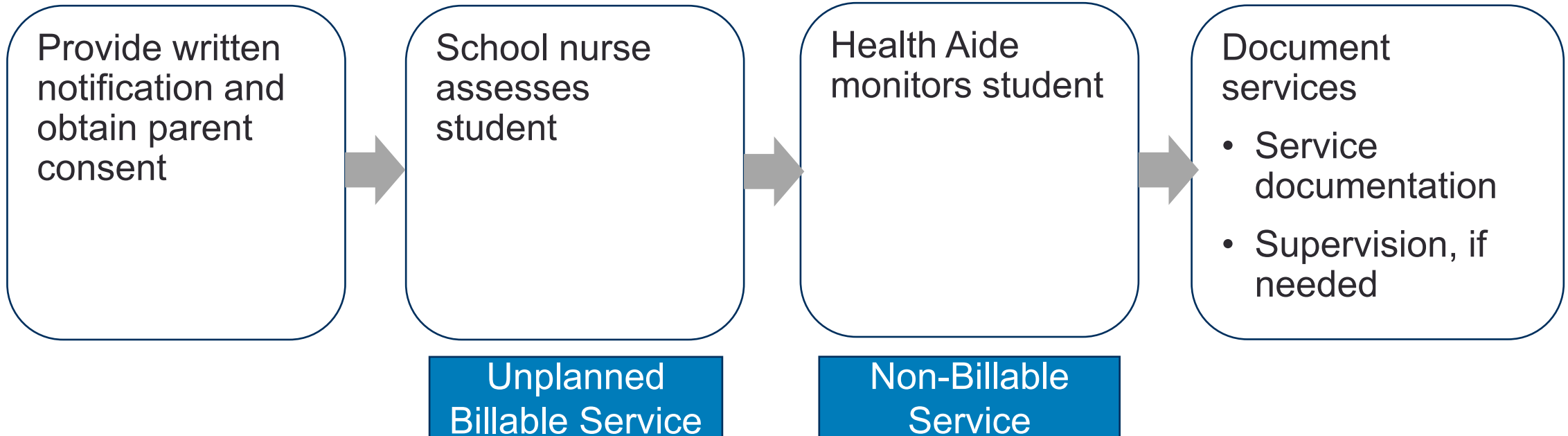
## Scenario D – Partially Billable

---

Liam is a 3rd grade student. For the second time in one week, he goes to the health room with a sick stomach. The **school nurse assesses** Liam and determines that he needs fluids and rest and should be picked up by his parents. The **health aide monitors** Liam until his parents could come and pick him up. Liam is enrolled in the Oregon Health Plan (Medicaid)



# Medicaid Services: Liam





# Questions?



# Resources

# Resources

---

- Provider Enrollment Instructions
- SBHS Billing Codes and Instructions
- Written Notification and Parent Consent webpage
- IPOC Guide

# \*NEW\* Provider Guide

Medicaid Division

School-Based Health Services



## School Medicaid Provider Guide

Medicaid School-Based Health  
Services Program



# Stay in Touch

---

- School Medicaid listserv
- OHA and ODE websites
- Questions and TA requests:
  - Jennifer Dundon [jennifer.dundon@ode.oregon.gov](mailto:jennifer.dundon@ode.oregon.gov)
  - [medicaid.sbhs@oha.oregon.gov](mailto:medicaid.sbhs@oha.oregon.gov)
- **Save the Date:** June 17 at 10 a.m. Monthly Medicaid Meeting focused on expanding to Non-IDEA services