

# Webinar 2 FAQ: Oct. 21, 2024 | Medicaid Expansion: Enrolling in Oregon's School-Based Health Services (SBHS) Medicaid Program

**Background: Billing and referring provider enrollment is integral to participation in SBHS Medicaid as reimbursement for claims is not possible without active enrollment. An enrollment effective date impacts when a school medical provider may begin billing Medicaid.**

The SBHS Medicaid program now allows additional education agencies, including Education Service Districts (ESDs), to bill SBHS Medicaid for K-12 health services (see [Oregon Administrative Rule 410-133-0040](#)). Explicit instructions on how to enroll as an Oregon Health Plan (OHP) billing or rendering provider can be found in the [SBHS Provider Enrollment Instructions](#).

## **Provider Enrollment Categories:**

- **Billing Providers:** School Districts, Education Service Districts, or State Institutions
- **Referring Providers:** As of June 1, 2024, all medically qualified practitioners must be enrolled as referring (non-payable) providers.

## **Enrollment Program Types:**

- K-12 Individuals with Disabilities Education Act (IDEA) Services
  - K-12 Non-IDEA Services
  - Early Intervention (EI)/Early Childhood Special Education (EI/ECSE)
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## Enrollment Activities:

- **Re-enrollments:** If a billing provider has not submitted billing for a period of 12 months, provider becomes inactive. A billing provider can re-enroll when they are ready to begin billing and may request a retroactive effective date of up to 12 months.
- **Revalidation:** Revalidation is required by the Oregon Health Authority (OHA) no less than every five (5) years. OHA's provider enrollment unit sends required revalidation forms to enrolled providers to be completed and returned to OHA to remain actively enrolled.
- **Provider Enrollment Information Updates:** Updates to provider enrollment forms are required to be reported within 30 days of the changes taking affect (e.g. address change or contact person name change).
- Obtain a National Provider Identifier (NPI) for each enrollment type (IDEA, Non-IDEA, EI/ECSE).
- Complete Oregon Medicaid provider enrollment forms for each enrollment type.

## Enrollment Considerations:

- Impact vs. Effort: Focus your effort on what will bring the highest reimbursement while balancing administrative effort.
- OHA and the Oregon Department of Education (ODE) recommend that education agencies (EAs) start small and set up solid systems in order to expand their program in the subsequent school year.

## Provider Enrollment Questions

**Does obtaining a new billing provider number require the EA to also complete a new trading partner agreement (TPA) with their Medicaid billing vendor and OHA's Electronic Data Interchange (EDI) unit?**

Yes, obtaining a new billing provider requires the EA to complete a TPA registering the Medicaid billing vendor as their submitting agency. See [EDI and TPA Resources](#) for information on completing a TPA.

**If our education agency doesn't directly employ medically qualified practitioners providing services to students, but rather contracts with another agency to provide them, can we enroll and participate in the SBHS program?**

Yes, if the contract agency and employee agree to SBHS enrollment as a referring provider.

**Are charter schools eligible to enroll and participate?**

OHA's definition of education agency in [OAR 410-133-0040 \(16\)](#) indicates an education agency must be considered a local unit of government. OHA recently sought an Oregon Department of Justice (DOJ) opinion on whether public charter schools met this criteria and Oregon DOJ confirmed they do, allowing them to participate in SBHS Medicaid billing as long as all other requirements are met.

**How do I find out if my education agency is already enrolled?**

The EA can use the [MMIS Medicaid provider web portal](#) to perform a look-up to determine if a provider is already enrolled. You can also contact provider enrollment services unit at 1-800-336-6016.

**Are k-12 non-IDEA enrollment options available now?**

Yes, an education agency may now enroll as a k-12 non-IDEA billing provider. (See [SBHS Provider Enrollment Instructions](#))

**Are certain medically qualified practitioners considered IDEA vs. non-IDEA? For example, are school nurses considered "non-IDEA" only?**

No. If a practitioner provides Medicaid covered services to a child or young adult identified in their IEP or IFSP, those services are considered IDEA to include

assessments and evaluations performed to determine IDEA eligibility whether found eligible or not. Services found on other plans of care are considered non-IDEA.

**Do licensed medically qualified practitioners who supervise licensed assistants or associates need both an Oregon Medicaid ID and NPI?**

Yes, see instructions on referring provider enrollment ([link here](#)).

**Could medically licensed practitioners need 3 enrollments if they are working in IDEA, Non-IDEA and EI/ECSE?**

No. IDEA, non-IDEA and EI/ECSE provider enrollments program types apply only apply to billing provider enrollment. A referring provider requires only one Oregon Medicaid enrollment (e.g. the practitioner providing the service).

**Who is liable if a claim is submitted in error? The billing provider, billing vendor or rendering provider?**

The federal tax identification number associated with the education agency who enrolled as a billing provider would be liable for making claims data corrections for claims submitted in error. The billing provider is also responsible for any associated fraud or financial reconciliation. See Referring Provider Enrollment FAQ page 4 [linked here](#).

**What is an example of a referring provider?**

The medically qualified practitioner rendering Medicaid covered services to a child or young adult in the school setting. (e.g. RN, SLP, OT, PT, Audiologist, LCSW, etc.)

**Is it necessary for an EA to provide a social security number (SSN) and date of birth (DOB) on the provider disclosure statement form?**

Yes. This does not, however, make the individual whose SSN and DOB were used to complete the enrollment paperwork financially liable for financial reconciliation or fraud. The education agency is liable.

**Will TSPC school psychologist, counselors and social workers to be added as medically qualified practitioners in upcoming OAR updates, need to enroll as non-IDEA providers?**

No. IDEA, non-IDEA and EI/ECSE enrollments program types apply only apply to billing provider enrollment. TSPC school psychologist, counselors and social workers will enroll as referring providers only.

**For an EA enrolling as a billing provider for non-IDEA services, will the Taxonomy code and provider type be the same as for IDEA services? Is the Specialty Identification the only difference?**

The taxonomy code and provider type will remain the same, however, the specialty code will vary depending on provider type (see page 4 of the Provider Enrollment Instructions).

**Does the NPI information need to be update when there is a change in the address or contract person?**

Yes.

**As an ESD Nurse employee contracted to work in multiple school districts, I sometimes change my school district assignment from year to year. Will this affect my referring provider enrollment? Will I need to update each time I change?**

No. Referring providers working within more than one education agency do not need to update the location of service for each school district they are contracted to work for.

## **Medicaid Billing Vendor/Systems Questions**

**How do school districts process and submit claims?**

School districts may use either the Medicaid Management Information System (MMIS) Medicaid provider web portal to submit claims data manually at no cost or use a billing vendor (e.g. ORMED, DSCtop or PCG). There may be advantages to using a billing



vendor to include maintenance of data, validation of supporting documentation, claims batch file submission and claims reconciliation.

## Medicaid Billing Agreement Questions

### **Is there a Memorandum of Understanding (MOU) template that ESDs and school districts can use to develop Medicaid billing agreements?**

OHA and ODE don't have MOU example language or templates for Medicaid agreements made between ESDs and School Districts who are wanting to engage in Medicaid billing but encourage them to engage legal counsel to establish such an agreement as it is a legal document that may vary depending on the specific Medicaid billing relationships established with school districts. For examples of the elements to consider in such an agreement, please see [Webinar 1: Medicaid Expansion - Provider Guidance FAQ](#).

### **Could you provide an example scenario in which an ESD would be both a billing provider and a referring provider?**

No. An ESD can only be a billing provider. The medically qualified individuals employed or contracted to work for the ESD to provide Medicaid covered services to children and young adults pursuant to their individual plan of care (IPOC) are considered referring providers, such as a speech language pathologist (SLP), Licensed Clinical Social Worker (LCSW) or Occupational Therapist (OT).

### **If our EA superintendent obtained an NPI for our EI/ECSE program, and we now want to bill for k-12 IDEA Medicaid covered services does our EA need to obtain a new NPI for k-12 IDEA services?**

Yes. Each billing provider program type (e.g. EI/ECSE, k-12 IDEA, k-12 non-IDEA) all require their own unique NPI.

**If our ESD applied for an NPI for our k-12 IDEA program several years ago when ESDs were allowed to bill k-12 IDEA services, but haven't billed the past 7 years, would the ESD need to reapply for a new NPI for that program type?**

If the ESD already has an existing NPI for k-12 IDEA (used in the past), you do not need to re-apply for a new NPI for that program type. The ESD will need to complete the re-enrollment process for their Medicaid provider number.

## **SBHS Medicaid Cost Setting**

**Will Medicaid costs need to be submitted separately for each programs type?**

SBHS Medicaid providers will need to establish costs for each NPI and associated Oregon Medicaid provider number. However, in some instances, if the same medically licensed individuals provide services for more than one program, costs submitted for each program may be the same. For example, when the same medically qualified individuals provide services to k-12 students regardless of whether they are IDEA or non-IDEA the costs submitted would be the same for each medical discipline this applies to. In this instance, the EA will identify all applicable program type NPIs and Oregon Medicaid provider numbers on the cost summary page of the SBHS cost calculation worksheet submitted to OHA for review and acceptance.