



Changes to Medicaid School-Based Health Services (SBHS)

September 15, 2025

2025 Oregon Administrative Rule (OAR) Updates

Webinar Team

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Session Objectives

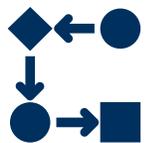
By the end of the session, participants will be able to



Understand the latest OAR updates.



Assess the implications of these updates.



Identify specific implementation steps.

Webinar Agenda

- Welcome and Introduction
- SBHS Program Overview
- Documentation Clarification
- Four Main OAR Updates
- Next Steps
- Questions and Answers
- Closing and Resources



SBHS Program Overview



School-Based Health Services



Medicaid reimburses education agencies (EAs) for medically necessary and appropriate Medicaid-covered services provided to Medicaid-eligible children and young adults (birth to 21).

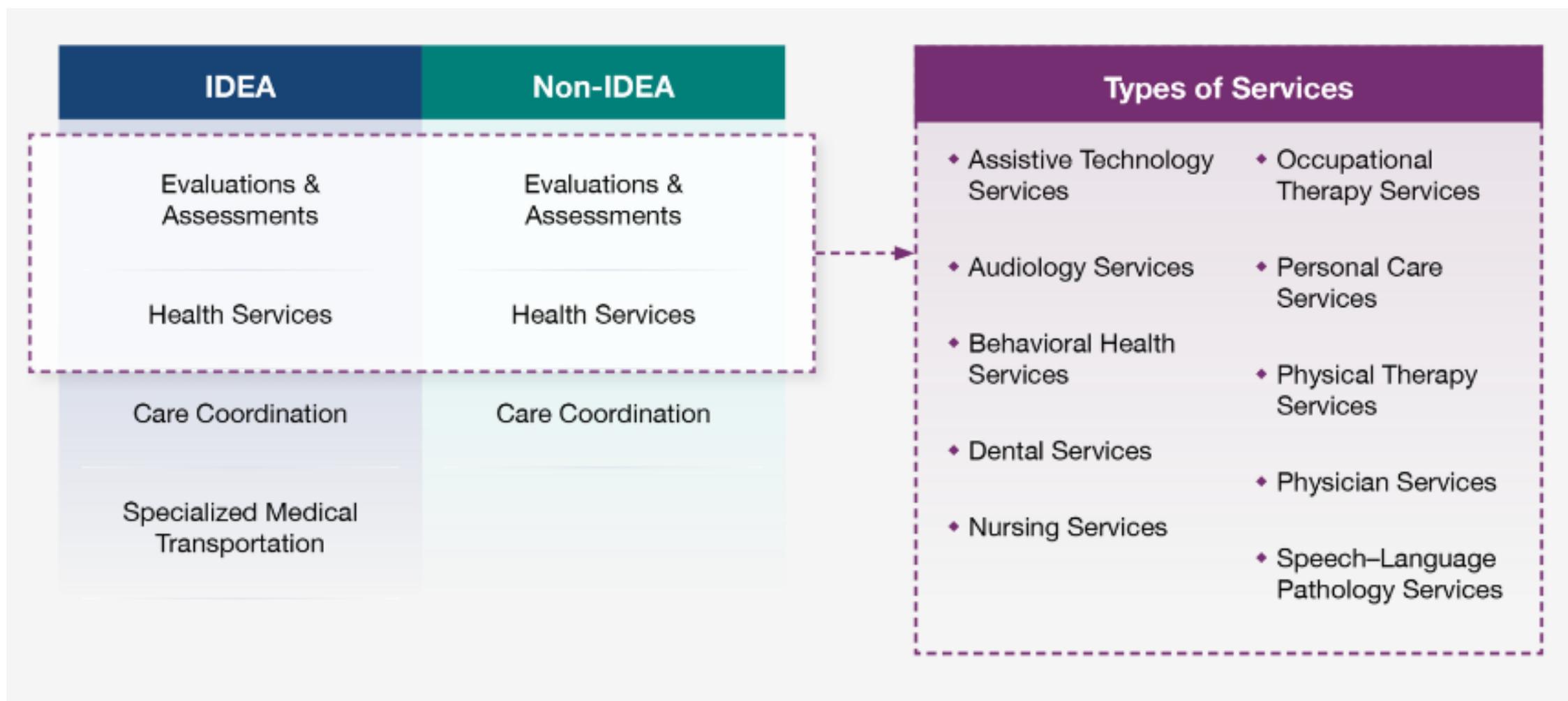


SBHS Medicaid is a flexible funding stream that may be used to increase access to comprehensive school health and behavioral health services.



SBHS services can cover Individualized Educational Program (IEP) and non-IEP related services, as long as those services are provided by SBHS-recognized providers.

Covered Services



SBHS Recognized Providers

Behavioral Health Services

- Licensed psychiatrist
- Licensed psychologist
- Psychologist associate
- Psychology technician
- Licensed clinical social worker
- Clinical social work associate
- Licensed professional counselor (LPC)
- LPC Associate
- Licensed marriage & family therapist (LMFT)
- LMFT Associate
- Teacher Standards Practice Commission (TSPC)-licensed School Social Worker
- TSPC-licensed School Counselor
- TSPC-licensed School Psychologist

Rehabilitation and Therapeutic Services

- Licensed occupational therapist (OT)
- Certified OT assistant
- Licensed physical therapist (PT)
- Licensed PT assistant
- Speech-language pathologist (SLP)
- SLP assistant
- Licensed audiologist

Dental Health

- Licensed dentist
- Expanded practice dental hygienist
- Licensed dental therapist

Nutrition Services

- Licensed dietitian

Nursing Services

- Nurse practitioner
- Registered nurse
- Licensed practical nurse
- Unregulated assistive person (UAP)

Physician Services

- Medical doctor
- Doctor of osteopathic medicine
- Doctor of podiatric medicine
- Physician assistant

Providers and Enrollment



Billing Provider

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

Three Enrollments

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



Referring Provider

Supervisory-level SBHS-recognized providers

One Enrollment

Referring providers do not need separate enrollments for IDEA, non-IDEA and EI/ECSE services



2025 OAR Updates



Four Main Changes



Why were these changes recommended?

Aligns Oregon's SBHS Medicaid program with the practitioners operating in the education setting and the services they commonly provide in schools

Reflects OHA's commitment to school health services by improving health outcomes for Oregon children and reducing learning barriers

Expands access to reimbursement for EAs

Documentation Clarification

Supporting Documentation

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



Written Notification
and Parent Consent



Individual Plans of
Care



Service
Documentation

Documentation Requirements

Required Elements

- 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
- Location and duration of service
- Nature, extent or units of service



Written Notification
and Parent Consent



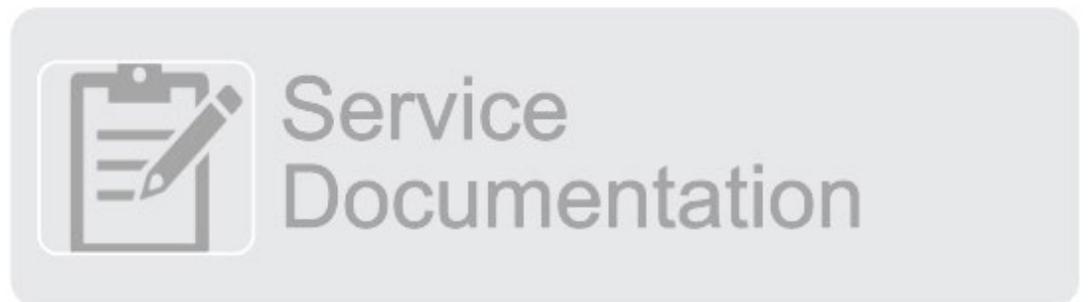
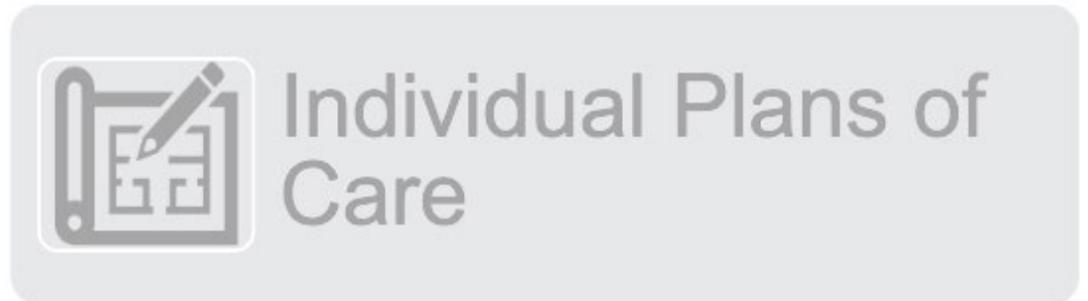
Individual Plans of
Care



Service
Documentation

Written Notification and Parental Consent

- EAs must provide written notification and obtain parent consent before disclosing information about a student to access Medicaid reimbursement.
- The effective date of the parent consent is the date it is signed. The parent consent may not be backdated.
- ODE has written notification and parent consent forms and information online.



What is an IPOC?

- A prescriptive document required for billing Medicaid for *planned* school-based health services
- Examples include IEPs, Individualized Family Support Plans (IFSPs) and nursing care plans
- **NEW:** Not needed for unplanned services or screenings



Written Notification
and Parent Consent



Individual Plans of
Care



Service
Documentation

IPOC Required Elements

- The effective dates of the IPOC
- The specific child or young adult's name
- The EAs 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
and Parent Consent



Individual Plans of
Care



Service
Documentation

Service Documentation

- Practitioners should follow the requirements for service documentation set by the scope of practice and respective board or national association rules.
- See also OAR 410-120-1360 (Requirements for Financial, Clinical and Other Records)



Written Notification
and Parent Consent



Individual Plans of
Care (IPOCs)



Service
Documentation

Reminder: Four Main Changes



Adds personal care services as billable services



Adds licensed school counselors, school psychologists and school social workers as SBHS-recognized providers



Includes the ability to bill for services outside of an IPOC



Removes written practitioner recommendation requirement

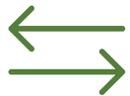


Personal Care Services as Billable Services



Technical OAR Update: Personal Care Services

- **Personal care services to include the following in school settings**



Mobility, transfers and repositioning



Basic personal hygiene



Toileting and diapering



Feeding



Some medication management

Considerations: Personal Care Services



Adding personal care services to IPOCs and establishing procedures and protocols



Identifying rendering providers



Determining how to log services

Adding Personal Care Services to IPOCs



- Personal care services provided in education settings are *planned services* provided pursuant to an IPOC (410-133-0040 (36))
- Assessments must be conducted to determine a student's need for these services, but assessments do not need to be conducted by a nurse

Identifying Rendering Providers



- Supervisory-level recognized providers must assess or evaluate the student's need for personal care services, sometimes as part of assessments for other services.
- Any SBHS-recognized provider, within scope and with appropriate training, may render personal care services.

For example...

OT or SLP assesses the need for assistance with feeding.
RN assesses the need for diapering.

Unregulated assistive person (UAP), like educational or instructional assistant renders feeding or diapering services.

Determining How to Log Services



- Frequency of service provision is a key challenge.
- Consider creating a system of service logs to quickly document service documentation requirements:
 - Location and duration of service
 - Nature, extent, or units of service
 - Rendering provider



Addition of Licensed School Counselors, School Psychologists and School Social Workers

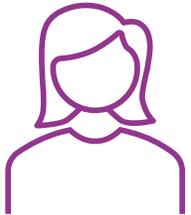


Technical OAR Update: TSPC Providers

- Added the following as SBHS-recognized providers:



TSPC-licensed school psychologist



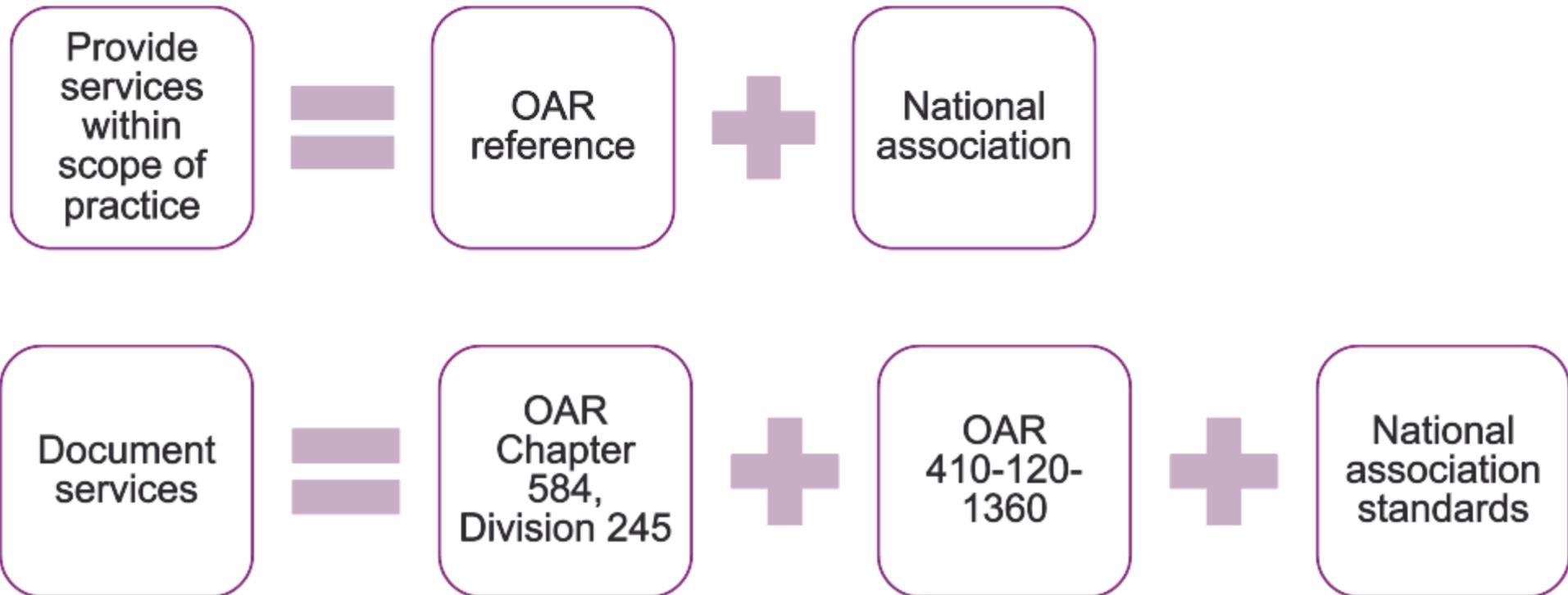
TSPC-licensed school social worker



TSPC-licensed school counselor

Technical OAR Update Continued: TSPC Providers

- For each TSPC-licensed practitioner:



Considerations: TSPC Providers



Service documentation requirements



Referring provider enrollment



Medicaid administrative claiming (MAC) overlap

Strategies to Support Documentation



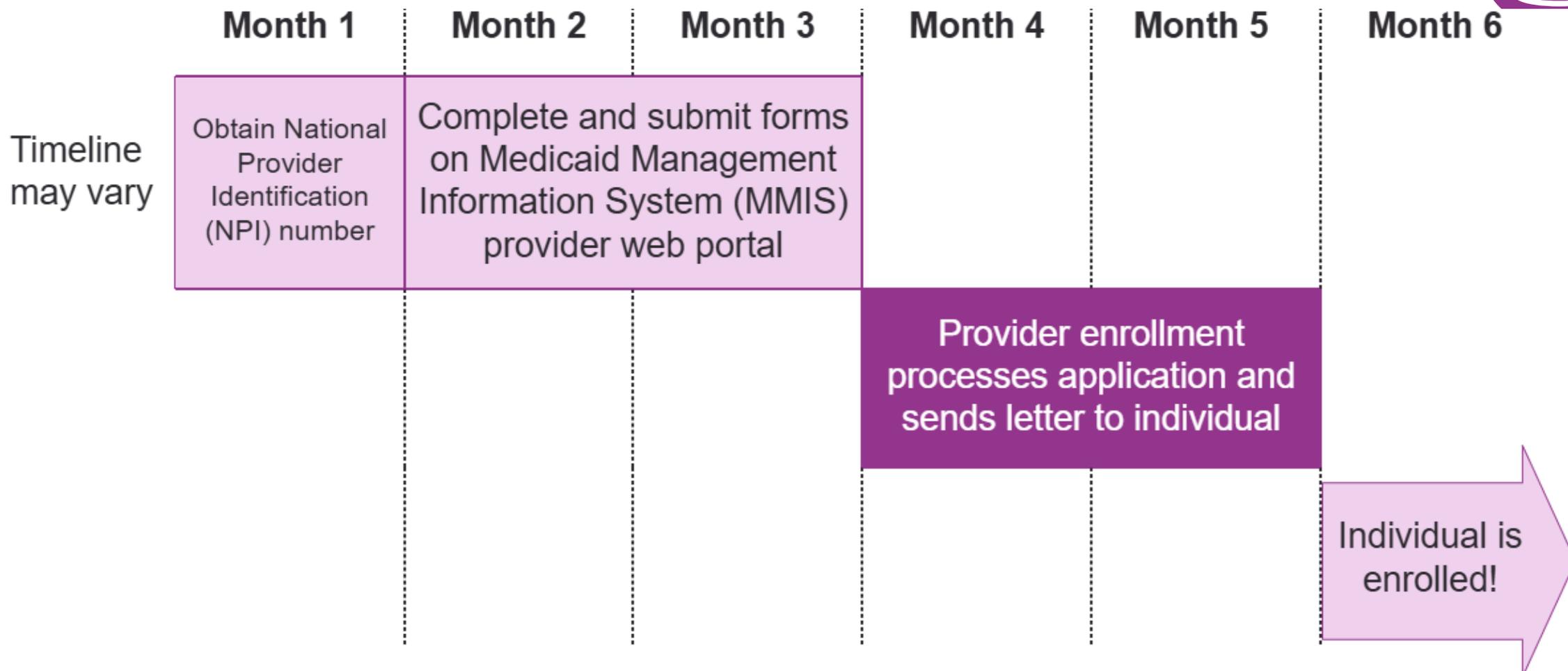
- Work with supervisors to understand existing capacities and practices already leveraged.
- Train staff on documentation requirements. Bring in peer providers to discuss best practices and workflows.
- Implement technology and electronic platforms with required fields.
- Leverage existing documentation practices and systems to the extent possible.

Referring Provider Enrollment

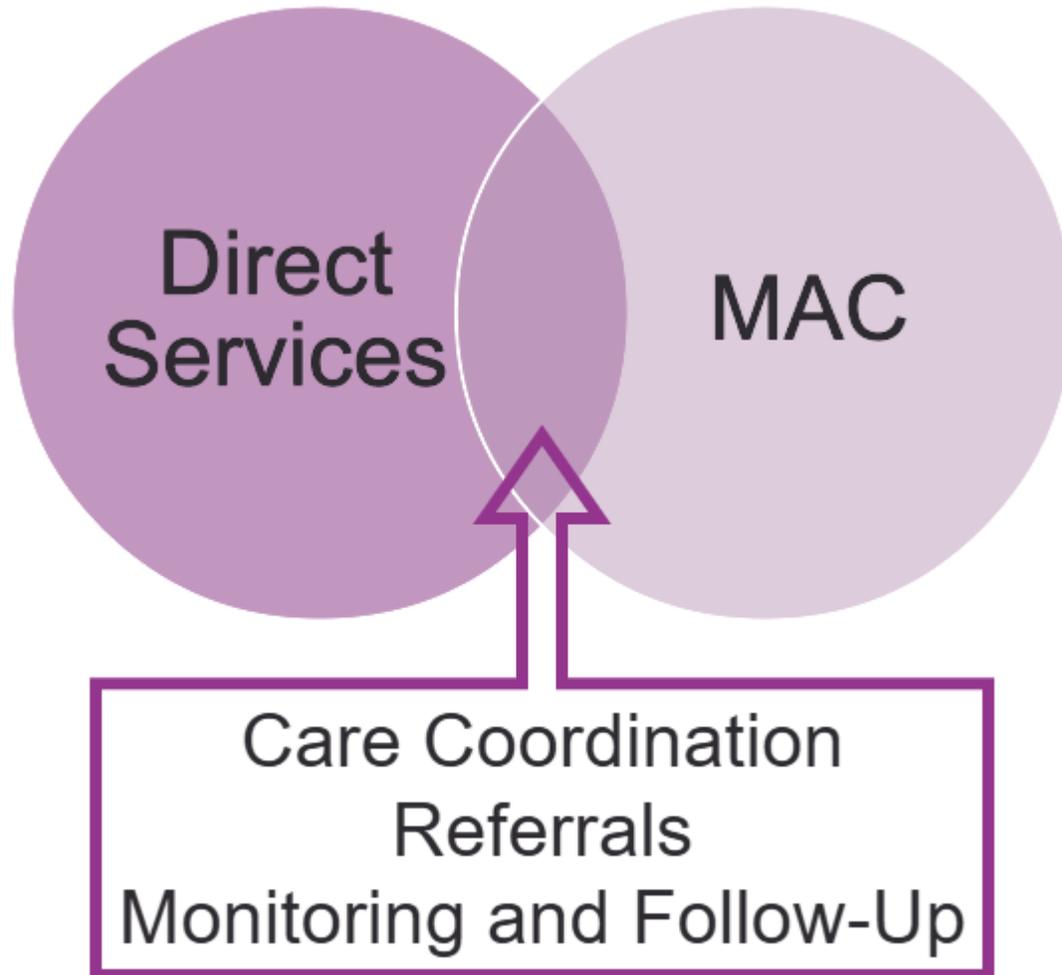


- TSPC-licensed individuals must enroll with OHA as a referring provider.
- Referring providers must be individually enrolled and have an active Medicaid provider ID.
- Unlike other SBHS-recognized providers, TSPC-licensed practitioners may be unfamiliar with the enrollment process.
 - Support and training is available and may be valuable!
- EAs may submit enrollment forms on behalf of these individuals.
- New enrollment pathway, taxonomy codes and provider type and specialty codes are available.

General Enrollment Process



MAC Overlap



- Goal: Allow EAs flexibility for dual participation in both programs while preventing duplicate payment.
- Next: More information coming through OHA trainings.



Billing Outside of Individual Plans of Care



Technical OAR Update: Billing Outside of IPOCS

- SBHS, *except unplanned services and screenings*, must be provided pursuant to, in relation to, or in the development of a Medicaid-enrolled child or young adult's IPOC.

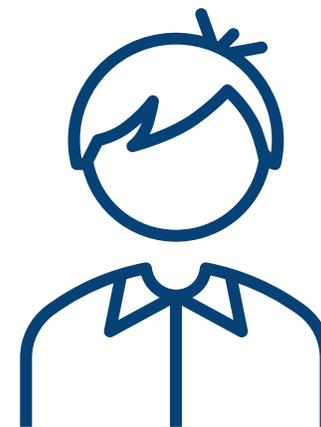


Technical OAR Update Continued

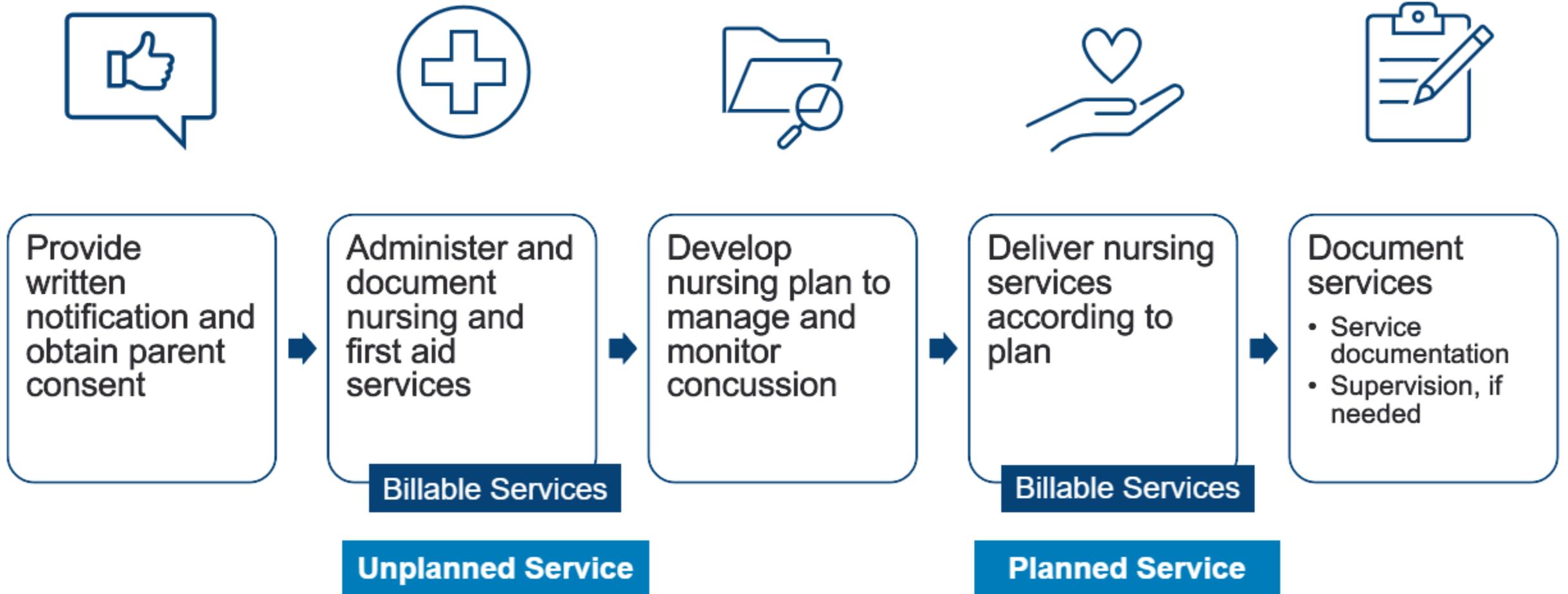
- (1) Oregon's SBHS program does not cover or reimburse for
- (b) Unplanned services in lieu of planned services when an IPOC is required by IDEA, Section 504 of the Rehabilitation Act of 1973, or the provider's scope of practice

Scenario A

Liam is a 4th grade student. While playing on the playground, he falls and hits his head on the playground structure. He goes to the school nurse, where she bandages his head wound, administers pain medication and calls his parents to pick him up. Liam's parents pick him up and take him to his doctor, where he is assessed and diagnosed with a concussion. When he returns to school, the nurse develops a nursing plan and administers follow-up care per the nursing plan and the doctor's recommendation. Liam and his family are enrolled in the Oregon Health Plan (Medicaid).



Medicaid Services: Scenario A



Considerations: Services Outside an IPOC



Billing Provider Enrollment



Parental Consent



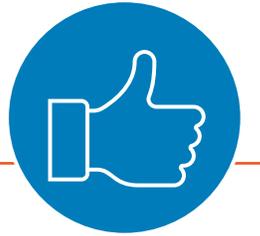
Service Documentation Requirements

Billing Provider Enrollment



- EAs must enroll as a non-IDEA health services program to bill for unplanned services and screenings.

Parental Consent



- Parental consent to share medical information with Medicaid is still required.
- EAs should consider this requirement when assessing if they intend to bill for unplanned services and/or screenings.

Service Documentation Requirements



- Service documentation is still required pursuant to requirements in OAR 410-133-0320.
- Medical necessity must be included through service documentation.

Documentation Requirements Reminder



Required Elements

- Student's full name
- Student's Medicaid ID
- ICD-10 Code
- School medical provider (the EA)
- Rendering provider
- Supervising provider, if applicable
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- Location and duration of service
- Nature, extent or units of service



Written Notification
& Parent Consent



~~Individual Plans of
Care~~



Service
Documentation



Removal of the Written Recommendation Requirement



Technical OAR Update: Written Recommendation

- OAR 410-133-0160 has been repealed:
 - **Licensed Practitioner Recommendation**
Requests for reimbursement for Medicaid-covered SBHS pursuant to a Medicaid-enrolled child or young adult's IPOC must be supported by a current, within twelve (12) months of the date-of-service, written recommendation from a licensed health care practitioner
- Repeal is effective July 1, 2025
 - Services being back billed prior to this date will still require a written recommendation

Consideration: Written Recommendation Removal

- To establish medical necessity without a written recommendation, EAs can reference the IPOC or service documentation.



Next Steps



Next Steps

1. Review documentation processes and standards to ensure your processes and systems are aligned with new OARs.

Personal Care Services

2. Conduct personal care service assessments and add these services to appropriate IPOCs.
3. Clarify and create a policy or guidance for how your EA will document and log these services for easy billing.

Addition of TSPC Providers

4. Enroll TSPC providers.
5. Train your TSPC providers on documentation requirements.

Next Steps Continued

Billing Outside of IPOCs

6. Ensure your EA is enrolled as a billing provider for non-IDEA services.
7. Consider your process for obtaining parental consent.
8. Determine which providers can provide unplanned services.

Remove Written Recommendation Requirement

9. Communicate this change across your agency and with billing vendors.
10. Update any documentation or communication regarding requirements.



Resources and Closing



Resources

- Resource list with all links can be found here:
https://docs.google.com/document/d/1kBSIFKD1bquoqfjfMG Ae8E8Yb2qDpEG_XdPbQntE0ew/edit?usp=sharing
- Oregon Administrative Rules (OARs)
- SBHS Provider Enrollment Instructions - *updated*
- SBHS Medicaid Billing Matrix - *updated*

Other Program Resources

- Oregon SBHS Medicaid Program Tipsheets
- School Medicaid Billing Manual (For School Business Offices)
- OHA SBHS monthly Medicaid discussions: medicaid.sbhs@oha.oregon.gov
- Direct technical assistance requests: Shelby Parks, School Medicaid Program Analyst, Shelby.Parks@ode.oregon.gov

Stay in Touch

- School Medicaid listserv
- OHA website
- ODE website
- Medicaid in Education website
- Questions and technical assistance requests: medicaid.sbhs@oha.oregon.gov
- **Save the Date:** October 13 at 10 a.m. SBHS office hours for OAR Updates