



Webinar Series

Oregon School-based Health Services (SBHS) Medicaid Program Expansion

November 18, 2024

Individual Plans of Care: Best Practices and New Requirements for Documenting Covered and Expanded Services

Webinar Team

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Session Objectives

By the end of the session, participants will

- Understand the basics of Individual Plans of Care (IPOCs), including the purpose and required elements
- Discuss different types of IPOCs and implications for different health service delivery contexts
- Discuss with colleagues what the implementation of IPOCs might look like in their education agency context

Webinar Agenda

- Welcome and Opening
- SBHS Pathway to Billing
- IPOC Overview
- Types of IPOCs
- Best Practices to Support Accurate and Sustainable Billing
- Breakout Discussion
- Question and Answer Session
- Resources and Survey

Program Expansion Timeline



Oregon SBHS Medicaid Program Expansion (1)

Webinar Series

- September 23

✓ ○ *New Services and Practitioners to Support More Students*

- October 21

✓ ○ *Enrolling in Oregon's School-based Health Services (SBHS) Medicaid Program*

- November 18

✓ ○ *Individual Plans of Care: Best Practices and New Requirements for Documenting Covered and Expanded Services*

- December 9

○ *School Medicaid Cost Calculations: Best Practices and Key Considerations for Setting Rates for Covered and Expanded Services*

SBHS Pathway to Billing

Pathway to Billing

- The Center for Medicare and Medicaid Services (CMS) has certain documentation requirements for an education agency to bill for services.
- OHA is implementing these requirements through two primary mechanisms:
 - **Individual Plan of Care**
 - Supporting Documentation
- These two mechanisms, and a few other elements, make up an education agency's pathway to bill.
- The process and pathway to bill for IDEA services have not changed.

Importance of Documentation of Health Services

Ensures delivery of quality healthcare services

Mitigates liability for individual practitioners and education agencies

Aligns with licensing board requirements

Ensures compliance with IDEA and Section 504

Supporting Documentation for Medicaid Billing

- Written notification and parent consent
- Written recommendation by the practitioner
- **Individual Plan of Care**
- Licensed healthcare practitioner documentation
 - Supervision requirements (if applicable)
 - Licensing board requirements



Written Notification and Parent Consent

- Federal statutes require education agencies to provide written notification and obtain parental consent before disclosing information about a student to access Medicaid reimbursement.
- ODE has written notification and parent consent forms and information on the [School Medicaid web page](#).
- The effective date of the parent consent is the date it is signed.
- Written notification must be provided prior to obtaining parent consent via electronic signature. Written notification must be provided to a parent or guardian annually thereafter.
- Develop a written notification and parent consent process. The process should include a method for tracking the annual notification.

Written Recommendation by the Practitioner

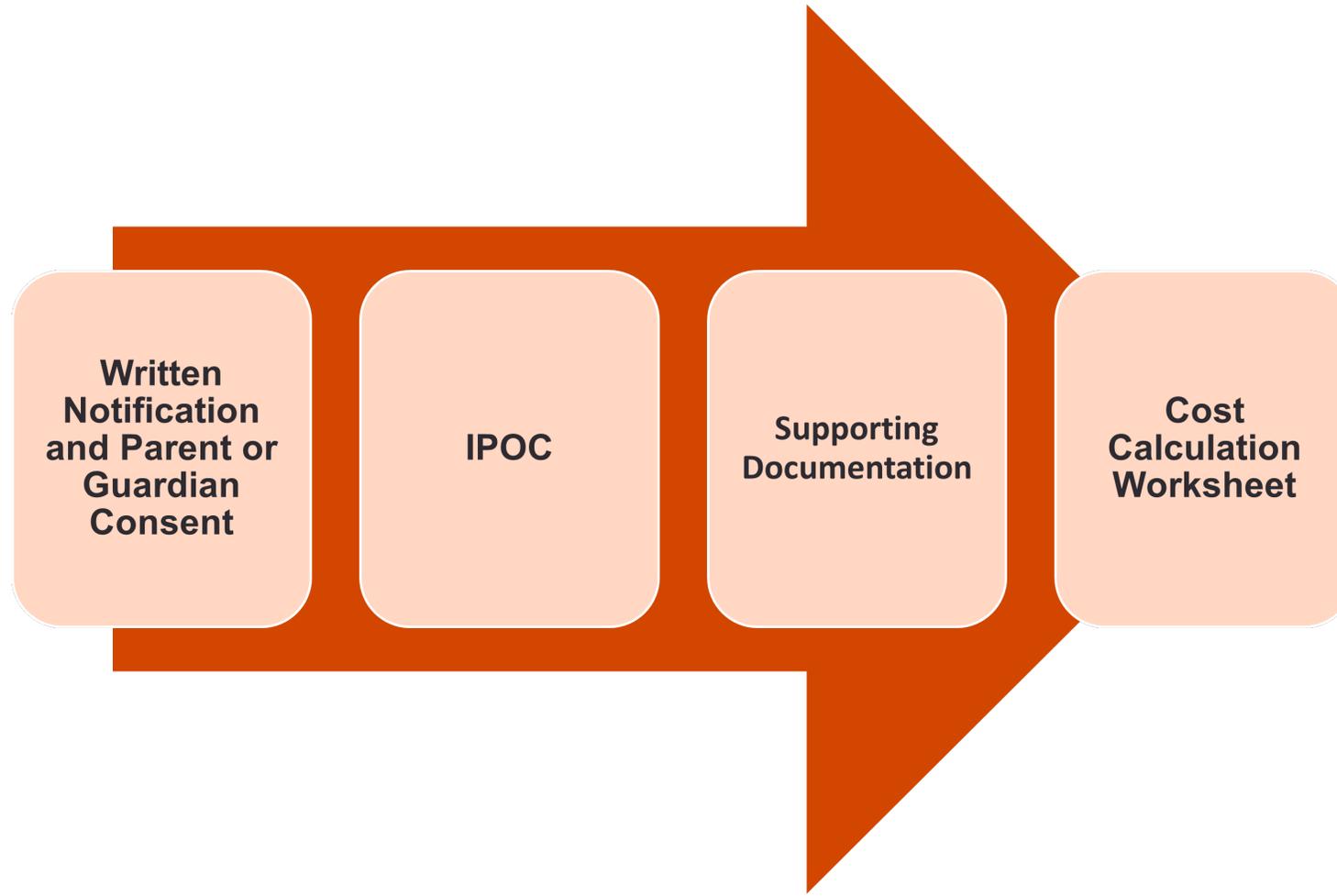
- This is sometimes referred to as “medical need for the service.”
- A written recommendation must be made by the qualified practitioner to establish medical necessity for SBHS.
- The recommendation should detail the specific services recommended for the student.
- The recommendation should be documented and may be attached to the IPOC.

Licensed Healthcare Practitioner Documentation

- Documentation must always align with the healthcare practitioners' licensing board rules and must also contain all the required elements according to SBHS Oregon Administrative Rule [410-133-0320](#).
- Documentation should include
 - Date, location, and duration of the service
 - Name of the individual providing the service
 - Name of the individual supervising the service (if applicable)
 - Child or young adult's first and last name (number in group, if applicable)
 - Child or young adult's Medicaid ID
 - Child or young adult's medical diagnosis code

IPOC Overview

Reminder: SBHS Pathway to Bill



Understanding the IPOC

- What is an IPOC?
 - A prescriptive document required for billing Medicaid for school-based health services
 - A general term that may cover a variety of plans
 - Not a stand-alone document



Licensing Board Requirements

- IPOCs must adhere to the regulations of the respective healthcare boards and can include a range of services such as behavioral health, nursing, occupational therapy, and physical therapy.
- Documentation must always align with the healthcare practitioners' licensing board rules and contain all the required elements according to SBHS Oregon Administrative Rule [410-133-0320](#).

IPOC Required Elements

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



Nature, Extent, or Units of Service, and Therapeutic Value

- The IPOC must include detailed service descriptions, including frequency and duration.
- CMS guidance uses “or” instead of “and.” OHA carried that flexibility into the Oregon Administrative Rules.
- If units of service are not listed in the IPOC, but the nature and extent are, that health service would be billable.



Health Services Without Specific Units

Services in an IPOC that are not able to document time units of service are still billable through their defined nature and scope, catering to the fluctuating needs of many chronic conditions.

- **Diabetes Management**

- IPOC specifies which school staff will provide glucose monitoring and insulin administration as needed. The plan should detail the signs of hypoglycemia or hyperglycemia and the corresponding actions to be taken, which are billable services despite not being tied to a specific number of minutes.

- **Seizure Disorder Accommodations**

- IPOC could include a seizure action plan instructing staff on immediate response procedures (i.e., maintaining airway patency and post-seizure care). The nature of seizures being unpredictable means that specific units of time cannot be assigned, yet the provision for care is clearly defined and billable.

Case Example: Nursing Care Plan (1)

IPOC Required Elements

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

Nursing Care Plan for Diabetes Management in the School Setting

Student: Oliver Twist

8/15/2024 to 8/14/2025

Condition: Type I diabetes mellitus

Care Plan:

- School nurse will ensure Oliver checks his blood glucose levels 3 times per day, 5 days per week, while he is in school.
- All protocols for . . . will be followed (protocols attached).
- [Other services as needed are documented here].

Case Example: Nursing Care Plan (2)

IPOC Required Elements

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

Nursing Care Plan for Diabetes Management in the School Setting

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Condition: Type I diabetes mellitus



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Types of IPOCs



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IPOC Examples

Remember, the IPOC is not a stand-alone document. It works in conjunction with other supporting documentation and care plans to accurately document school-based health services.

If all required elements are met, the following plans may serve as an IPOC:

- Individualized Education Program (IEP)
- Individualized Family Service Plan (IFSP)
- Individualized Healthcare Plan (IHP)
- Any individualized health or behavioral health plan with the required prescriptive elements

Section 504 Plan Consideration

- The Section 504 plan may be a component of supporting documentation.
- As with the IPOC, the Section 504 plan is not a stand-alone document.
- Best practice would be to link an IPOC as a separate attachment to the Section 504 plan.

Example: Student with a Section 504 plan for diabetes management

The Section 504 plan would be in place, but the additional “prescriptive” elements for the IPOC would be contained in the nursing plan of care for the student and supporting documentation (e.g., log notes, evaluations and assessments, written recommendations).



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Best Practices to Support Accurate and Sustainable Billing



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Best Practices

- Operational infrastructure should be developed to support accurate and sustainable billing while balancing administrative effort.
- This includes the development of policies and procedures for SBHS administration.
- Continuous improvement mechanisms should be put into place. This may include
 - Review regularly to ensure you follow Medicaid and licensing board requirements for IPOCs and have supporting documentation. The reviews should evaluate the completeness and accuracy of IPOCs.
 - Based on the results of those reviews, refine policies and procedures to remedy any issues and enhance overall documentation quality and compliance.



Question and Answer Session





Closing



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Documentation Resources

- [Oregon Administrative Rules](#)
- [Parent Consent Written Notification Forms](#)
- Coming later this month: IPOC Guidance
- Refer to your licensing board for specific resources on documentation requirements for your field of practice.

IPOC Questions:

- Contact medicaid.sbhs@oha.oregon.gov

Other SBHS Tools and Resources

- [Webinar Recordings](#)
- [Oregon SBHS Medicaid Program Tipsheets](#)
- [School Medicaid Billing Manual \(For School Business Offices\)](#)
- [School Medicaid Startup Checklist](#)
- SBHS Office Hours: [December 10 from 10–11 am on Zoom](#)
- OHA SBHS Monthly Medicaid Discussions
- Direct Technical Assistance Requests

If you are interested in monthly Medicaid discussions or would like to send a direct technical assistance request, please email medicaid.sbhs@oha.oregon.gov

Tools and Resources Being Updated

November 2024

- Cost Benefit Analysis and Readiness Assessment Documents

November–December 2024

- SBHS Medicaid Cost Worksheet

Beginning of 2026

- School Medicaid Program Manual

Stay in Touch

- [School Medicaid listserv](#)
- [OHA website](#)
- [ODE website](#)
- [Medicaid in Education website](#)
- For questions about the Medicaid School-based Health Services Program, email: medicaid.sbhs@oha.oregon.gov