

Frequently asked questions from September 15, 2025 webinar “School-Based Health Services (SBHS) Oregon Administrative Rule (OAR) Updates”

Background

SBHS OARs (Chapter 410, Division 133) were adopted on September 2, 2025, with an effective date of July 1, 2025. Updated SBHS OARs include the following changes.

- Additional SBHS-recognized behavioral health providers: Licensed Professional Counselor Associates (LPCAs), Licensed Marriage and Family Therapist Associates (LMFTAs), Teacher Standards and Practices Commission (TSPC) licensed School Psychologists, School Social Workers, and School Counselors
- Additional billable services: personal care services (PCS) and unplanned services
- The written practitioner recommendation is no longer required.

SBHS Provider Enrollment Updates

The [SBHS Provider Enrollment Guide](#) has been updated to include instructions for:

- Enrolling School Psychologists, School Social Workers, and School Counselors.
- Enrolling an Education Agency (EA).

SBHS program areas include Early Intervention/Early Childhood Special Education (EI/ECSE), Individuals with Disabilities Education Act (IDEA) K12, and non-IDEA. Local Education Agencies (LEAs) must have a separate NPI and Oregon Medicaid ID to bill for multiple program areas.

Provider enrollment questions

When can LEAs begin enrolling TSPC School Psychologists, School Social Workers, and School Counselors with Oregon Health Plan (OHP)?

EAs can begin this process now. TSPC School Psychologists, School Social Workers, and School Counselors can be enrolled effective on or after July 1, 2025.

Are provider enrollment forms the same for non-IDEA as they are for IDEA?

Yes, School Medical (Education Agency) enrollment requires the following forms for each enrollment: [OHP 3120](#), [OHA 3972](#), [OHA 3974](#) and [OHA 3975](#). For questions regarding provider enrollment forms or status, contact provider.enrollment@odhsoha.oregon.gov or call 800-336-6016 (option 6).

Procedure and ICD-10 code questions

Can providers use ICD-10 codes that fall below the funding line on Oregon's Prioritized List?

Yes. Medically necessary and appropriate Medicaid-covered services provided to children and young adults ages 0-21 are not subject to Oregon's Medicaid program's HERC Prioritized List of Health Services.

What billable services can TSPC School Psychologists, School Social Workers, and School Counselors provide?

School Psychologists, School Social Workers, and School Counselors are licensed by TSPC. These TSPC-licensed individuals can provide services within their scope of practice and in compliance with TSPC OARs (Chapter 584, Division 245) and SBHS OARs (Chapter 410, Division 133).

TSPC recognized provider questions

Do TSPC School Psychologists, School Social Workers, and School Counselors only work with school-age children?

It depends on available programs and the individual's job assignment. TSPC School Psychologists, School Social Workers, and School Counselors are not limited to working only with school-age children.

If a TSPC-licensed School Psychologist, School Social Worker, or School Counselor is also a Licensed Clinical Social Worker (LCSW) or a Licensed Professional Counselor (LPC) is their service delivery and use of diagnosis codes limited?

Medicaid SBHS rules align with licensing board requirements. If a TSPC-licensed professional is an SBHS-recognized provider and is also licensed as an:

- LCSW, they must provide and document services within their scope of practice and in compliance with Board of Licensed Social Workers' OARs Chapter 877.
- LPC, they must provide and document services within their scope of practice and in compliance with Board of Licensed Professional Counselors and Therapists' OARs Chapter 833.

How is dual participation in direct services billing and Medicaid Administrative Claiming (MAC) impacted by TSPC School Psychologists, School Social Workers, and School Counselors being SBHS-recognized providers?

- **Dual Participation:** TSPC School Psychologists, School Social Workers, and School Counselors that are Medicaid-enrolled for SBHS direct service billing, must identify themselves as SBHS-recognized providers when completing their MAC random moment time study (RMTS). This will limit their access to reporting under activity codes C1.1, C1.2, and C1.3 to ensure no duplicate claiming can occur.
- **MAC-only Participation:** TSPC School Psychologists, School Social Workers, and School Counselors that are not Medicaid-enrolled for SBHS direct service billing will not

identify themselves as SBHS-recognized providers when completing their MAC RMTS and will have access to all MAC activity codes for reporting.

The Oregon Health Authority's SBHS team will validate to ensure there is no duplication of claim by comparing the time coded as claimable under MAC to direct services billed.

Did the 2025 SBHS OAR updates add educators licensed and endorsed by TSPC with a Communication Disorder endorsement (speech language pathology)?

No. Educators licensed and endorsed, prior to July 1, 2016, by the TSPC with a Communication Disorder endorsement (speech language pathology) that also meet all requirements as stated in [OAR 410-133-0120](#) were already SBHS-recognized providers.

What services are billable to Medicaid when provided by a TSPC School Psychologist, School Social Worker, or School Counselor?

Services included in the [SBHS Billing Codes and Instructions](#) are billable to Medicaid when provided and documented by SBHS-recognized providers within their scope of practice and in compliance with their respective board rules and requirements.

- TSPC School Psychologists must provide services within their scope of practice in compliance with OAR Chapter 584, Division 245 and National Association of School Psychologists (NASP) professional standards and document services in compliance with NASP professional standards and OAR Chapter 584, Division 245 and OAR 410-120-1360.
- TSPC School Social Workers must provide services within their scope of practice in compliance with OAR Chapter 584, Division 245 and National Association of Social Workers (NASW) Practice Standards for School Social Workers and document services in compliance with NASW Practice Standards for School Social Workers and OAR Chapter 584, Division 245 and OAR 410-120-1360.
- TSPC School Counselors must provide services within their scope of practice in compliance with OAR Chapter 584, Division 245 and American School Counselor Association (ASCA) standards and document services in compliance with ASCA standards and OAR Chapter 584, Division 245 and OAR 410-120-1360.

Unplanned services and screenings questions

Which services provided by SBHS-recognized providers outside of an IPOC can be billed?

Unplanned services and interventions that are urgent or immediate in nature and screenings may be billed when provided outside of services specified on an IPOC. All SBHS Medicaid billable services must be provided and documented by SBHS-recognized providers in compliance with SBHS rules. To bill Medicaid for services not listed on an IPOC, the rendering provider's documentation must include the date of service, the Medicaid-enrolled child or young adult's: full name; Medicaid ID; and diagnosis code(s), the name of the school medical provider (education agency), the name of the rendering provider performing the service, the name of the healthcare provider supervising the service (when applicable), the medically necessary and appropriate need for the service, the location and duration of the service, and the nature, extent, or units of service.

To bill for unplanned services, does the unplanned service have to result in an IPOC?

No. Unplanned services do not have to result in an IPOC to be billed to Medicaid.

If a Speech-Language Pathologist (SLP) screening for articulation disorder does not result in adding SLP services to an IPOC, can the screening be billed under SBHS Medicaid?

Yes. Screenings do not have to result in an IPOC and may be billed when provided outside of services specified on an IPOC.

Parent consent questions

Does the education agency need parent consent to bill for unplanned services and screenings?

Yes. [The Family Educational Rights and Privacy Act \(FERPA\)](#) requires education agencies to provide written notification and obtain parent/guardian consent before disclosing information about a student to access Medicaid reimbursement. Written

notification must be provided to parent/guardian annually thereafter. The effective date of the parent consent is the date that it is signed. It cannot be backdated.

If parent consent has been obtained to bill Medicaid, can the education agency bill a mental health screening that is not associated with an IPOC?

Yes. Screenings do not have to result in an IPOC and may be billed when provided outside of services specified on an IPOC.

Written recommendation questions

Does the removal of the written recommendation requirement apply to Medicaid-covered services identified in an IEP?

Yes. The written recommendation is no longer required. This applies to all SBHS Medicaid services rendered on or after July 1, 2025.