



MEMO

Date: March 2017

To: **All Certified Oregon School-Based Health Centers**

From: **Oregon SBHC State Program Office (SPO)**

Re: **Access and Billing Policies**

This memo is intended to provide additional guidance to Certified School-Based Health Centers (SBHCs) on SPO expectations regarding who can access SBHC services, billing and payment processes, and how these processes are implemented and communicated to clients and their families. The SPO believes that having equitable and transparent access and billing policies is vitally important to serving all clients, particularly youth and other vulnerable populations.

Current SBHC Certification Standards state clearly that **“Students shall not be denied access to services based on insurance status or ability to pay.”** Standards also require that all SBHCs bill Medicaid and maximize private insurance billing where possible. The SPO understands that SBHCs may also be operating under additional rules or policies regarding billing policies and communication based on their medical sponsorship, FQHC status and contracts with insurers.

The SBHC State Program Office expects that all SBHCs:

- Have the full array of SBHC services accessible to all clients regardless of their:
 - Ability to pay
 - Insurance status
 - Assigned primary care provider (PCP)
 - Visit history (e.g., number of visits they have already received at the SBHC)
 - Account status (e.g., unpaid bills)
 - Need for confidential services

Additionally, we strongly encourage all SBHCs to have billing policies available to clients that are clear, easy to understand and include information regarding:

- How requests for confidential services are handled from a billing/payment perspective
- Fee schedules and sliding scale policies
- Whether and under what circumstances the SBHC will use a collection agency for unpaid accounts
- Who to contact with questions or concerns about billing policies and practices

While referrals are an important part of SBHC practice, SBHCs should not substitute referrals for providing on-site care because of a client’s insurance status, ability to pay or assigned primary care provider.

For questions or concerns regarding this guidance, please contact the SPO at:
SBHC.Program@state.or.us

Additional Resources:

Oregon SBHC Certification Standards:

<http://public.health.oregon.gov/HealthyPeopleFamilies/Youth/HealthSchool/SchoolBasedHealthCenters/Pages/certification.aspx>

HRSA Explanation of FQHC Sliding Fee Scale Rules:

<https://bphc.hrsa.gov/programopportunities/lookalike/pdfs/pin201402.pdf>

Oregon CCare and Title X Rules/Guidance on Billing: <http://healthoregon.org/rhmanual>

http://public.health.oregon.gov/HealthyPeopleFamilies/ReproductiveSexualHealth/Resources/Documents/Training_Presentations/RH_Program_Orientation.pdf

Oregon Vaccines for Children (VFC) Fees and Billing Policy:

<https://public.health.oregon.gov/PreventionWellness/VaccinesImmunization/ImmunizationProviderResources/Documents/NewAdminFeeepolicy.pdf>