

# Revisions to Medicaid School-Based Services (SBS)

**Peter Gilles:** Public Consulting Group

**Steve Milioto:** Department of Health Services

## Commonly Used Acronyms

- **CAP:** Corrective action plan
- **CMS:** Centers for Medicare & Medicaid Services
- **DHS:** Wisconsin Department of Health Services
- **DPI:** Wisconsin Department of Public Instruction
- **IEP:** Individualized education program
- **IFSP:** Individualized family service plan
- **LEA:** Local educational agency (such as school districts and independent charter schools)
- **NPI:** National provider identifier
- **PCG:** Public consulting group
- **PERM:** Payment Error Rate Measurement (audit)
- **PRO:** Prescribing, referring, or ordering
- **RMTS:** Random moment time sample
- **SBS:** School based services
- **SPA:** State plan amendment

# Agenda

1. High Level Overview of SBS Projects
2. SBS Expansion Update
3. CMS Required Compliance Changes
4. Resources and Contact Information

# High Level Overview



# Wisconsin's SBS Projects

## State-Initiated

### SBS Expansion

Expands SBS to Medicaid-enrolled students without an IEP

## Federally Mandated

### Compliance with CMS Guidance

Specialized transportation and random moment in time study requirements

### Corrective Action Plan

Requires a Type 1 NPI on certain Medicaid claims

# SBS Expansion



# School-Based Services Expansion

The school-based services expansion will affect Medicaid-enrolled students who are between 3 and 21 years old during the school term.

Changes include:



Expanding  
member  
eligibility



Expanding  
allowable  
provider types



Adding and  
expanding  
allowable  
services



# Expanded Member Eligibility



Expanded member eligibility allows eligible Medicaid-enrolled students with general healthcare service needs to receive SBS, as long as there is a plan.



**No longer required**

Previously, all SBS had to be tied to an "educational need" in the IEP. With this change any Medicaid covered medically necessary services no longer requires they be tied to an "educational need" in the IEP.

# Expanded Member Eligibility

Examples of plans eligible for school-based services:

IEP

IFSP

504 Plan

Individualized health plan

Behavioral health plan

Other plan type

Documentation is required for eligible plans and must include:



Justification of medical need or a disability condition statement.



A list of services being provided.



Start/end dates.



Scope, frequency, and duration.

*Reminder!*

Medicaid-covered medical needs do not have to directly tie to an educational need.

# Required Plan Documentation

# New Allowable Provider Types

Includes:

## Clinically trained mental health professionals

Operating within their scope of practice as defined under state law.

## Physicians and nurse practitioners

- Operating within their scope of practice under Wis. Admin. Code § N 8.02(1) with prescribing authority granted under Wis. Stat. § 441.16(2).
- Providing services identified in the member's treatment plan as defined in Wis. Admin. Code § DHS 105.53(3)(a)3.

## Dentists and dental hygienists

Operating within their scope of practice as described in Wis. Admin. Code §§ DHS 105.06(1) and 105.06(2).

# New Allowable Provider Types

## **Provider requirements:**

All SBS providers must be employed by or contracted with a local education agency, such as a school district, Cooperative Educational Service Agency (CESA), County Children with Disabilities Education Board, or charter school.

# New Services



## Physician services:

- Performing evaluation and management services
- Screening and referring for treatment of health needs
- Providing treatment
- Performing medication management
- Explaining treatments, therapies, and physical or mental conditions to family members, school districts, or CESA



## Dental services:

- Performing oral evaluations
- Performing oral assessments
- Applying fluoride and dental sealants (when provided by a dentist or dental hygienist)

# Included Services



## Attendant care:

- Preparing food, assisting with and monitoring eating, feeding, and swallowing.
- Performing routine personal hygiene dressing, toileting, diapering, transferring.
- Performing routine care of personal assistive devices.
- Supervising and cuing of activities.

# Included Services



## Attendant care:

- Preparing food, assisting with and monitoring eating, feeding, and swallowing
- Performing routine personal hygiene dressing, toileting, diapering, transferring
- Performing routine care of personal assistive devices
- Supervising and cuing of activities



Additional medically necessary nursing services and medical services added within the provider's scope of practice

# Included Services



Additional medically necessary nursing services and medical services added within the provider's scope of practice



Coaching added as an allowable occupational therapy, physical therapy, and speech-language pathology service

# Included Services



Coaching added as an allowable occupational therapy, physical therapy, and speech-language pathology service



Psychological, counseling, social work, and mental and behavioral services:

- Performing marriage and family therapy
- Providing substance use disorder services

# Included Services



Coaching added as an allowable occupational therapy, physical therapy, and speech-language pathology service



Psychological, counseling, social work, and mental and behavioral services:

- Performing marriage and family therapy
- Providing substance use disorder services



**All services that are currently covered continue to be covered.**

# CMS Mandated Changes



# Required CMS Changes

Specialized  
transportation

Change in types of transportation allowable for reimbursement

Random moment time  
study

Changes in notice and response window

National provider  
identifier

Type 1 (individual) NPI of a prescribing referring or ordering provider on required claims

# Specialized Transportation Changes

## Definition

CMS narrowed the definition of specialized transportation to mean that a child must be transported on a physically modified vehicle.

Examples: wheelchair lift, ramp, or a special harness

## Qualifications

The current state plan allows Medicaid SBS to pay for transportation in any vehicle where an aide is required to assist the child.

Vehicles will no longer qualify as specialized transport vehicles with the presence of an aide as the only qualifier.

# Specialized Transportation Changes



Prior to implementing new transportation requirements, schools should review the impact of claiming Medicaid SBS transportation for vehicles that do **not** comply with the new requirements (such as a physically modified vehicle).



Schools may need to identify other funding sources (such as IDEA) to ensure students are receiving a free and appropriate public education (FAPE) when transportation is listed in the student's IEP but do not utilize a physically modified vehicle.

# Random Moment Time Study

Random Movement Time Study (RMTS) is a required reporting tool used to quantify how much time school staff spend doing certain work activities.

## **The RMTS requirements:**

- Including all regular school days (formerly the summer quarter).
- Adjusting to a two-day notification policy (currently there is a five-day prior notification window).
- Updating response time limit to two school days from the moment (currently, Wisconsin has five days).

# Random Moment Time Study

CMS provides options for how states will report the summer quarter (such as merging summer dates into another time period).

- CMS is working with the Technical Assistance Center (TAC) to provide additional guidance around requirements for service documentation and maintenance of those records.
- Prior to implementing the new RMTS reporting window, schools should review their procedures for ensuring all personnel are responding to the RMTS moments.

# National Provider Identifier: Corrective Action Plan

NPI of the prescribing, referring, or ordering provider will be required on Medicaid SBS claims that require a prescription, referral, or order for the service.

- In Wisconsin, schools previously allowed for a district-wide (Type 2) NPI number when billing Medicaid SBS. DHS received a corrective action on Medicaid SBS claims as a result of findings from a CMS PERM audit.

DHS needs to become compliant with this **by July 2026**.

# National Provider Identifier: Corrective Action Plan

- Prior to implementing new NPI number requirements, DHS and DPI are identifying how to best ensure compliance and efficiency with enrollment of school personnel or other options CMS provides to minimize impact and burden on schools.
- DHS and DPI are working on an implementation timeline and will send out information well in advance of implementation.

# Resources

[ForwardHealth Handbook](#)

[SBS Provider Resources page](#)

SBS Email: [DHSDMSSBS@dhs.wisconsin.gov](mailto:DHSDMSSBS@dhs.wisconsin.gov)

# Questions?