



# Medicaid School Based Claiming (MSBC) Transformation

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# State Efforts to Transform the School Based Claiming Program

- AHCCCS is pursuing changes to the MSBC program recognizing the growing need to provide health services and support to children where they spend the majority of their time - in school.
- Historically, the Centers for Medicare & Medicaid Services (CMS) guidance on “free care” was that Medicaid payment was generally not allowable for services that were available without charge to the beneficiary.
- In 2014, CMS issued a State Medicaid director letter reversing the long standing free care policy. This change allows states more flexibility in their school-based Medicaid programs by allowing school districts to bill Medicaid for health services delivered to all Medicaid-enrolled children, not just those with a special education plan documented by an Individualized Education Program (IEP)

# State Efforts to Transform the School Based Claiming Program (cont...)

- Implementing the free care policy reversal is one pathway to increasing children's access to Medicaid services.
- In order to implement this change, Arizona needs to submit a state plan amendment (SPA) to CMS.
- A SPA is a contract with CMS on how we administer Medicaid and the school based claiming program.
- We are soliciting input from ADE, Districts and Charters at this time, no decisions have been made and even if we ask CMS, we may or may not gain authority to implement changes.

# Transformation Opportunities, expand allowable provider types

Program Area	Current AHCCCS School Based Claiming Services	Transformation Opportunities
<b>Providers</b>	<p>The following providers with appropriate licensure and supervision:</p> <ul style="list-style-type: none"> <li>♣ Audiologists</li> <li>♣ Licensed clinical Social Workers (LCSW),</li> <li>♣ Licensed Professional Counselors (LPC)</li> <li>♣ Licensed Marriage and Family Therapists (LMFT)</li> <li>♣ Nurses (LPN, RN)</li> <li>♣ Occupational Therapists / Assistant OT</li> <li>♣ Personal Care Services Providers / Health Aids</li> <li>♣ Physical Therapists / Assistant PT</li> <li>♣ Psychiatrists</li> <li>♣ Psychologist</li> <li>♣ Speech/Language Therapists Speech-Language Pathology Assistants</li> <li>♣ Specialized Transportation</li> </ul>	<p>Currently allowed providers and the following additional providers with appropriate licensure and supervision:</p> <ul style="list-style-type: none"> <li>♣ Board Certified Behavior Analysts (BCBAs) – BC provider type</li> <li>♣ Nurse Practitioners (NP)</li> <li>♣ Physicians MD or DO (EPSDT services)</li> <li>♣ Certified Orientation and mobility specialists (COMS)</li> <li>♣ School Psychologist licensed by Department of Elementary and Secondary Education</li> <li>♣ Licensed Independent Substance Abuse Counselor (LISAC)</li> </ul>

# Transformation Opportunities beyond Individualized Education Program (IEP's)

Program Area	Current AHCCCS School Based Claiming Services	Transformation Opportunities
Reimbursable Services	Medically necessary IEP services only	<p>Medically necessary covered services provided pursuant to an IEP or below</p> <ul style="list-style-type: none"> <li>♣ IHCP – Individual Health Care Plan</li> <li>♣ IFSP – Individualized Family Service Plan</li> <li>♣ Section 504 plan – plan developed to ensure that a child who has a disability identified under the law and is attending an elementary or secondary educational institution receives accommodations that will ensure their academic success and access to the learning environment.</li> <li>♣ Chronic Illness Plan</li> <li>♣ Chronic Health Plan</li> <li>♣ Or are otherwise medically necessary, to be determined</li> </ul>

# Transformation Opportunities, Telehealth

Program Area	Current AHCCCS School Based Claiming Services	Transformation Opportunities
Reimbursable Services	Telehealth; not eligible	Implement Telehealth as a modality for the provision of existing Local Education Agency (LEA) Program reimbursable services <ul style="list-style-type: none"><li>♣ Behavioral Health</li><li>♣ Speech assessment and treatment services</li></ul>

# Transformation Timeline

Jul – Dec  
2019

- Conduct work groups to identify transformation opportunities and outline changes

Dec – Jan  
2019

- Meet with stake holders to discuss proposed changes.
- Submit a survey to stake holders for feedback on proposed changes.

Jan – Feb  
2020

- Draft SPA Language and prepare program transformation documentation

## Transformation Timeline (cont...)

March 2020

- Present SPA at Tribal Consultation
- Begin 45 day public comment period
- Ensure LEAs are engaged during public comment period

Apr – Sept  
2020

- Submit SPA to CMS
- Update systems with changes
- Community engagement and LEA training

Oct 2020

- Effective date = October 1, 2020 following CMS approval.



We will be sending a link to a survey requesting to your input on the proposed changes. Please complete the survey before the winter break starts on Dec 20<sup>th</sup>.

Thank you,



# Contact Information:

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Program Information:

<https://www.azahcccs.gov/PlansProviders/FeeForServiceHealthPlans/ProgramsAndPopulations/thirdpartyaccounts/SBC.html>

