



# School Based Claiming Update

Markay Adams

# 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 much 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).

# Efforts to Transform the School Based Claiming Program

- Implementing the "free care" policy reversal is one pathway to increasing children's access to Medicaid services. Coordinate with the Arizona Department of Education (ADE), our Third Party Administrator, Public Consulting Group (PCG), and Local Education Agencies (LEAs).
- In order to implement this change, Arizona needed to submit a state plan amendment (SPA) to CMS. It was submitted on April 26, 2021.
- Go live is October 21, 2021, the services provided to other plans of care will be known as **Open Care**.

# Transformation - Population and services

	Current AHCCCS School Based Claiming Services	Open Care - October 1, 2021
Providers	<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>Expanding to the following providers with appropriate licensure and supervision:</p> <ul style="list-style-type: none"> <li>• Board Certified Behavior Analysts (BCBAs)</li> <li>• Nurse Practitioners (NP)</li> <li>• Physicians MD or DO (EPSDT services)</li> <li>• Licensed Independent Substance Abuse Counselor (LISAC)</li> <li>• Bus Aides (same requirements as Personal Care Services Providers / Health Aids)</li> </ul>

# Transformation Opportunities

	Current AHCCCS School Based Claiming Services	October 1, 2021 Expansion
Reimbursable Services	Medically necessary IEP services only	<p>Medically necessary covered services provided pursuant to an IEP or as outlined 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>

# Additional Transformation Opportunities

	Current AHCCCS School Based Claiming Services	Expedited telehealth due to Covid-19 public health emergency
Reimbursable Services	Telehealth	<p>Implemented telehealth as a modality for the provision of existing Local Education Agency (LEA) Program reimbursable services</p> <ul style="list-style-type: none"><li>• Effective dates of service March 30, 2020</li><li>• Updated code set to reflect Open Care implementation, dates of service starting October 1, 2021.</li></ul>

# Implementation Timeline

Jul – Dec  
2019

- Conduct work groups to identify transformation opportunities and outline changes

Dec – Jan  
2019

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

Jan – Feb  
2020

- Draft SPA Language and prepare program transformation documentation
- Delayed due to Covid 19 public health emergency

# Implementation Timeline

April -May  
2021

- Submitted SPA to CMS 4/26/21
- Present SPA at Tribal Consultation
- Begin 45 day public comment period

June – Sept  
2021

- Update systems with changes
- Community engagement and LEA training

Oct 2021

- Effective date = October 1, 2021 following CMS approval.