

# Webinar 2 FAQ: Oct. 21, 2024 | Medicaid Expansion: Enrolling in Oregon's School-Based Health Services (SBHS) Medicaid Program

## Background: Billing and referring provider enrollment is integral to participation in SBHS Medicaid

Medicaid reimbursement for claims is not possible without active enrollment. The enrollment effective date determines when a school medical provider may begin billing Medicaid.

The SBHS Medicaid program now allows additional education agencies (EAs), including Education Service Districts (ESDs), to bill SBHS Medicaid for K-12 health services (see [Oregon Administrative Rule \(OAR\) 410-133-0040](#)). Step-by-step instructions on how to enroll as an Oregon Health Plan (OHP) billing or referring provider are in the [SBHS Provider Enrollment Instructions](#).

### Provider enrollment categories

**Billing providers:** School Districts, ESDs, or state institutions

**Referring providers:** As of June 1, 2024, all medically qualified practitioners must be enrolled as referring (non-payable) providers.

### Enrollment program types

- K-12 Individuals with Disabilities Education Act (IDEA) services
  - K-12 non-IDEA services
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- Early Intervention/Early Childhood Special Education (EI/ECSE)

## Other enrollment activities

**Re-enrollments:** If a billing provider has not submitted claims for 12 months, their enrollment status becomes inactive. A billing provider can re-enroll when they are ready to begin billing. They may also request a retroactive effective date of up to 12 months.

**Revalidation:** Federal Medicaid regulations require states to revalidate enrolled providers at least every five (5) years. Oregon Health Authority (OHA) sends revalidation forms to enrolled providers. To remain actively enrolled, providers must complete and return the forms to OHA.

**Information updates:** If information changes from what is submitted during enrollment, re-enrollment or revalidation (such as address or contact people), providers must report the changes within 30 days of the change.

### Provider enrollment requires:

- Billing providers to obtain a National Provider Identifier (NPI) for each SBHS program (IDEA, Non-IDEA, EI/ECSE).
- Complete an Oregon Medicaid provider enrollment form for each enrollment type.

## Enrollment considerations

- Impact vs. effort: Focus your effort on what will bring the highest reimbursement while balancing administrative effort.
- OHA and Oregon Department of Education (ODE) recommend that EAs start small and establish solid systems in order to expand their program in the next school year.

## Provider enrollment questions

**Our EA doesn't employ medically qualified practitioners to provide services to students. Instead, the EA contracts with another agency to provide them. Can we enroll and participate in the SBHS program?**

Yes, if the contract agency agrees to enroll their medically licensed practitioners as SBHS referring providers and to avoid duplication of billing the EA and contract agency engage in an agreement that clearly establishes the EA will bill Medicaid for the contracted services.

**Are charter schools eligible to enroll and participate?**

OHA's definition of EA in [OAR 410-133-0040 \(16\)](#) indicates an EA must be considered a local unit of government. OHA recently sought an Oregon Department of Justice (DOJ) opinion on whether public charter schools meet the criteria. Oregon DOJ confirmed public charter schools are considered a local unit of government for the purposes of SBHS Medicaid billing. Therefore, public charter schools can enroll and participate in SBHS Medicaid billing as long as they meet all other requirements.

**How do I find out if my EA is already enrolled?**

The EA can use the [NPI Validator](#) to determine if a provider is already enrolled. Go to Home>Validate NPI. (See [SBHS Provider Enrollment Instructions](#).)

You can also contact OHA Provider Enrollment at 1-800-336-6016.

**Are K-12 non-IDEA enrollment options available now?**

Yes, an EA may now enroll as a K-12 non-IDEA billing provider. (See [SBHS Provider Enrollment Instructions](#).)

## **Are certain medically qualified practitioners considered IDEA vs. non-IDEA? For example, are school nurses considered “non-IDEA” only?**

The answer depends on the services being provided. If a practitioner provides Medicaid-covered services identified in a child or student’s Individual Education Program (IEP) or Individualized Family Service Plan (IFSP), those services are considered IDEA. This includes assessments and evaluations performed to determine IDEA eligibility whether the child or young adult is found eligible or not.

Services found on other Individual Plans of Care (IPOCs) are non-IDEA.

## **Do licensed medically qualified practitioners who supervise licensed assistants or associates need both an Oregon Medicaid ID and NPI?**

Yes. (See [SBHS Provider Enrollment Instructions](#).)

## **Could medically licensed practitioners need three enrollments if they are working in IDEA, non-IDEA and EI/ECSE?**

No. IDEA, non-IDEA and EI/ECSE program types apply only to billing providers. A referring provider (the practitioner providing the service) requires only one Oregon Medicaid enrollment.

## **Who is liable if a claim is submitted in error? The billing provider, billing vendor or referring provider?**

The federal tax identification number associated with the EA who enrolled as a billing provider would be liable. For claims submitted in error, the billing provider is responsible for making claims data corrections and any associated fraud or financial reconciliation. See page 4 of the [Referring Provider Enrollment FAQ](#).

## **What is an example of a referring provider?**

The medically qualified practitioner rendering Medicaid covered services to a child or young adult in the school setting is an example of a referring provider for the purpose of billing Medicaid (e.g., RN, SLP, OT, PT, Audiologist, LCSW).

**Is it necessary for an EA to provide a social security number (SSN) and date of birth (DOB) on the provider disclosure statement form?**

Yes. This does not, however, make the individual whose SSN and DOB were used to complete the enrollment paperwork financially liable for financial reconciliation or fraud. The EA is liable.

**Will TSPC-licensed School Psychologists, School Counselors and School Social Workers be added as medically qualified practitioners in upcoming OAR updates?**

Yes, OHA plans to add these provider types as Medicaid recognized for SBHS in 2025.

**Will School Psychologists, School Counselors and School Social Workers need to enroll as non-IDEA providers?**

No. IDEA, non-IDEA and EI/ECSE specialties apply only to an EA's enrollment. TSPC-licensed School Psychologists, School Counselors and School Social Workers will enroll as referring providers.

**For an EA enrolling as a billing provider for non-IDEA services, will the taxonomy code and provider type be the same as for IDEA services? Is the specialty identification the only difference?**

The taxonomy code and provider type will remain the same, however, the specialty code will vary depending on services being billed (see page 4 of the [Provider Enrollment Instructions](#)).

**Does the NPI information need to be updated when there is a change in the address or contact person?**

Yes. Updates to NPI information must be made through the [National Plan & Provider Enumeration System](#) (NPPES).

**As an ESD nurse employee contracted to work in multiple school districts, I sometimes change my school district assignment from year to year. Will this affect my referring provider enrollment? Will I need to update each time I change?**

No. Referring providers working within more than one education agency do not need to update the location of service for each school district they are contracted to work for.

**Can school districts bill Medicaid for school health services provided via telehealth? If so, do medically licensed practitioners providing telehealth services need to apply for an NPI and enroll with Oregon Medicaid as a referring provider?**

Yes. An education agency may bill SBHS Medicaid for covered telehealth services provided and documented by a medically qualified practitioner to a Medicaid-enrolled child or young adult pursuant to an IPOC. The SBHS Medicaid rules for telehealth are found under [OAR 410-133-0070](#). Telehealth practitioners must be licensed in the state where they are located per [OAR 410-120-1260](#) and must apply for an NPI and enroll with Oregon Medicaid as a referring provider.

## **Medicaid billing vendor/systems questions**

**How do school districts process and submit claims?**

Education agencies may use either the free Medicaid Management Information System (MMIS) Provider Web Portal to submit claims data manually or a billing vendor. There may be advantages to using a billing vendor, including maintenance of data, validation of supporting documentation, claims batch file submission, and claims reconciliation.

## **Medicaid billing agreement questions**

## **Is there a Memorandum of Understanding (MOU) template that ESDs and school districts can use to develop Medicaid billing agreements?**

OHA and ODE do not have MOU example language or templates for Medicaid agreements made between ESDs and school districts to partner for Medicaid billing. We recommend engaging legal counsel to establish such an agreement as it is a legal document that may vary depending on the specific Medicaid billing relationships established with school districts. For examples of the elements to consider in such an agreement, please see [Webinar 1: Medicaid Expansion - Provider Guidance FAQ](#).

## **Could you provide an example scenario in which an ESD would be both a billing provider and a referring provider?**

No. An ESD can only be a billing provider. The medically qualified individuals employed or contracted to work for the ESD to provide SBHS to children and young adults are considered referring providers, such as a speech language pathologists (SLPs), Licensed Clinical Social Workers (LCSWs) or Occupational Therapists (OTs).

If our EA superintendent obtained an NPI for our EI/ECSE program, and we now want to bill for K-12 IDEA Medicaid covered services does our EA need to obtain a new NPI for K-12 IDEA services?

Yes. Each billing provider program type (e.g. EI/ECSE, K-12 IDEA, K-12 non-IDEA) requires its own unique NPI.

**If our ESD applied for an NPI for our K-12 IDEA program several years ago when ESDs were allowed to bill K-12 IDEA services, but haven't billed the past 7 years, would the ESD need to reapply for a new NPI for that program type?**

If the ESD already has an existing NPI for K-12 IDEA (used in the past), there is no need to re-apply for a new NPI for that program type. However, there is a need to ensure that the information under that NPI is up to date. The ESD will need to complete the re-enrollment process for their Medicaid provider number.

## **SBHS Medicaid cost setting**

**Will Medicaid costs need to be submitted separately for each program type?**

SBHS Medicaid providers will need to establish costs for each NPI and associated Oregon Medicaid provider number. However, in some instances, if the same medically licensed individuals provide services for more than one program, costs submitted for each program may be the same. For example, when the same medically qualified individuals provide services to K-12 students regardless of whether they are IDEA or non-IDEA there is no need to submit separate costs. In this instance, the EA will identify all applicable program type NPIs and Oregon Medicaid provider numbers on the cost summary page of the SBHS cost calculation worksheet submitted to OHA.