

School-Based Health Care Services (SBHS) Program Expansion FAQ

The School-Based Health Care Services (SBHS) program provides reimbursement on a fee-for-service basis to contracted school districts for certain medically necessary health care services that are included in Title XIX Medicaid-eligible students' individualized education programs (IEP) or individualized family service plans (IFSP). In early 2020, the Centers for Medicare and Medicaid Services (CMS) approved a Medicaid State Plan Amendment (SPA) for the SBHS program. The SPA allows for some SBHS program changes which took effect August 1, 2020. This frequently asked questions (FAQ) document serves to provide clarification about the SBHS program changes. SBHS-contracted school districts should also view the recently updated [SBHS Billing Guide](#) (effective 8/1/2020) for additional information. School districts or stakeholders with additional questions about the SBHS program changes may contact the SBHS program manager at shanna.muirhead@hca.wa.gov.

Frequently Asked Questions

Q-1. How has the SBHS program changed? (Updated 8/3/2020)

- A. The Centers for Medicare and Medicaid Services (CMS) approved the following changes for the SBHS program:
- *Place of service.* Previously, school districts participating in the SBHS program could only bill for services when provided in the school setting (barring exceptions during COVID 19-related school closures as outlined in the [SBHS COVID-19 FAQ](#)). As of 8/1/2020, SBHS-contracted school districts can now bill for IEP/IFSP services when provided in the home, the natural environment, or in an alternate setting in accordance with the Individuals with Disabilities Education Act (IDEA). This includes face-to-face services as well as services provided through telemedicine.
 - *Additional provider types.* As of 8/1/2020, the SBHS program allows additional provider types:
 - Advanced registered nurse practitioners (ARNPs)
 - Speech-language pathology/audiology Department of Health (DOH) interim permit holders
 - Nonlicensed school staff (e.g. school psychologists, school counselors, school social workers, nonlicensed SLPs, paraeducators, aides, interns, etc.)
 - Services provided by interim permit holders and nonlicensed individuals must be provided under the supervision of a DOH-licensed provider



Q-2. When did the SBHS program changes take effect? (Updated 8/3/2020)

- A. The SBHS program changes took effect 8/1/2020. A link to the updated SBHS WAC 182-537 and the SBHS Billing Guide are available on the [SBHS webpage](#).

Q-3. Do advanced registered nurse practitioners (ARNPs) need a National Provider Identifier (NPI) and do they need to be enrolled in ProviderOne? (Updated 8/3/2020)

- A. Yes. ARNPs participating in the SBHS program must have an NPI and must be enrolled as a servicing provider under the school district's ProviderOne account. ARNPs may apply for an NPI through the [NPPES website](#). SBHS coordinators must enroll ARNPs in ProviderOne by following directions outlined in the [How to Enroll Servicing Providers](#) training available on the [SBHS webpage](#).

Q-4. How do ARNPs document and bill for services they provide?

- A. ARNPs must keep treatment notes as outlined in the "Documentation Section" of the current version of the [SBHS Billing Guide](#). Services provided by the ARNP are entered as claims under the ARNP's NPI in ProviderOne. If the school district contracts with a billing agent, the ARNP must also be enrolled in the billing agent's IEP/IFSP documentation software. ARNPs who want to participate in the SBHS program may contact their school district's SBHS coordinator for more information.

Q-5. Do audiology and speech-language pathology DOH interim permit holders need a National Provider Identifier (NPI) and do they need to be enrolled in ProviderOne? (Updated 8/3/2020)

- A. Yes. Interim permit holders participating in the SBHS program must have an NPI and must be enrolled as a servicing provider under the school district's ProviderOne account. Interim permit holders may apply for an NPI through the [NPPES website](#). SBHS coordinators must enroll interim permit holders in ProviderOne by following directions outlined in the [How to Enroll Servicing Providers](#) training available on the [SBHS webpage](#).



Q-6. How do interim permit holders document and bill for services they provide?

- A. Interim permit holders must keep treatment notes as outlined in the “Documentation Section” of the current version of the [SBHS Billing Guide](#). Per Department of Health (DOH) scope of practice requirements, interim permit holders must provide services under the supervision of a DOH-licensed SLP or audiologist. The supervising provider must review and sign treatment notes maintained by interim permit holders. Services provided by the interim permit holder are entered as claims under the interim permit holder’s NPI in ProviderOne. If the school district contracts with a billing agent, the interim permit holder must also be enrolled in the billing agent’s IEP/IFSP documentation software.

Q-7. Do nonlicensed individuals (e.g. school psychologists, school counselors, school social workers, nonlicensed SLPs, paraeducators, etc.) need a National Provider Identifier (NPI) and do they need to be enrolled in ProviderOne?


- A. Nonlicensed individuals do not need an NPI and are not enrolled in ProviderOne. Services provided by nonlicensed individuals must be prescribed or referred by a DOH-licensed provider, must be included in the student’s IEP or IFSP, and must be billed under the supervising provider’s NPI in ProviderOne. If the school district contracts with a billing agent, nonlicensed individuals may need to be enrolled in the billing agent’s IEP/IFSP documentation software.

Q-8. How do nonlicensed individuals document and bill for services they provide?

- A. Nonlicensed individuals must document services provided per the “Documentation Section” of the current version of the [SBHS Billing Guide](#). The supervising provider must review and sign treatment notes kept by the nonlicensed individual. All services provided by nonlicensed individuals are submitted as claims under the supervising provider’s NPI in ProviderOne. If the school district contracts with a billing agent, nonlicensed individuals may need to be enrolled in the billing agent’s IEP/IFSP documentation software.

Q-9. What trainings and resources are available for ARNPs, interim permit holders, and nonlicensed individuals who want to participate in the SBHS program? (Updated 8/3/2020)

- A. ARNPs, interim permit holders, and nonlicensed individuals should review the current version of the [SBHS Billing Guide](#). The SBHS Billing Guide provides information on covered services, billable codes, documentation requirements, and more. It is recommended that ARNPs, interim permit holders and nonlicensed individuals also review the SBHS 101 training and the SBHS provider trainings specific to



their provider type. Links to the SBHS Billing Guide, the SBHS 101 training and the provider trainings are available on the [SBHS webpage](#) under “Resources/Service Providers”.

Q-10. Can ARNPs prescribe or recommend IEP/IFSP related services? (Updated 8/3/2020)


- A. Medicaid requires services be prescribed or recommended by a physician or other licensed provider. ARNP scope of practice requirements at [WAC 246-840-300](#) state that if it is within an ARNP's knowledge, experience and practice, ARNPs may establish diagnoses, prescribe medications and therapies, and manage health care. It is recommended that ARNPs participating in the SBHS program review their scope of practice with DOH to determine if they can prescribe or recommend services without a physician's prescription.

Q-11. Can interim permit holders and nonlicensed individuals prescribe IEP/IFSP services?

- A. No. Medicaid requires services be prescribed or recommended by a physician or other licensed provider. In order for SBHS-contracted school districts to receive reimbursement for IEP/IFSP health care related services, the services must be prescribed or referred by either DOH-licensed school district staff (if it is within their scope of practice) or another DOH-licensed physician or provider within their scope of practice. The prescription or referral must be in the student's file and must be accessible during program monitoring activities.

Q-12. What does “under the supervision of a licensed provider” mean? (Updated 8/3/2020)

- A. Services provided by nonlicensed individuals, assistants (SLPAs, OTAs, PTAs, LMHCAs), and interim permit holders must be provided under the supervision of a DOH-licensed provider per the provider's scope of practice as outlined by the Department of Health. It is recommended that licensed providers participating in the SBHS program review their scope of practice to ensure they are providing the necessary supervision for services provided by assistants, interim permit holders, and nonlicensed individuals. In addition, the SBHS program requires that all treatment notes maintained by nonlicensed individuals, assistants, and interim permit holders be reviewed and signed by the DOH-supervising provider before submitting claims to the Health Care Authority (HCA).



Q-13. Will districts be able to bill for additional services (e.g. ABA services, EPSDT screenings, SUD services) as part of the SBHS program expansion?

- A. At this time, the SBHS program is not expanding the types of services that are reimbursable. Schools will continue to bill for the same services that are currently billable as outlined in the “Covered Services” section of the current version of the [SBHS Billing Guide](#). Although no new reimbursable services are being added to the SBHS program, school districts may see an increase in Medicaid reimbursement due to the expansion of provider types and place of service.

School districts who are interested in receiving Medicaid reimbursement for ABA services, SUD services, and other non-IEP/IFSP services may contract with and receive payment from the Medicaid Managed Care Organizations (MCOs) in their region. More information about the Medicaid MCOs can be found on HCA’s [MCO webpage](#).

Q-14. How do providers document where services are provided (place of service)? (Updated 8/3/2020)

- A. Effective 8/1/2010, the following place of service (POS) codes must be entered on each claim in ProviderOne to indicate where the student was located when services were provided:

Location of Student	Action in ProviderOne
School	Enter POS 03 (school)
Home	Enter POS 12 (home)
Alternate setting (e.g. school bus, childcare, hospital, field trip, hospital, etc.)	Enter POS 99 (other)
Telemedicine	See Telemedicine section of the SBHS Billing Guide

Q-15. When will an updated SBHS Billing Guide be available? (Updated 8/3/2020)

- A. An updated [SBHS Billing Guide](#) (effective 8/1/2020) is available now on the [SBHS webpage](#).



Q-16. Will there be any trainings/webinars about the SBHS program expansion? (Updated 8/3/2020)

- A. A pre-recorded training entitled “SBHS Annual Training for Returning School Districts” will be available on the [SBHS webpage](#) later this month. The training is intended for SBHS coordinators and will explain the program changes and will also review annual SBHS requirements. It is recommended that all SBHS coordinators view this training. The SBHS program manager will notify school districts via GovDelivery when the training is available. Provider specific trainings will also be updated later this month to reflect the SBHS program changes. SBHS coordinators and providers may [sign up here](#) to receive SBHS GovDelivery notifications.

Q-17. Will ARNPs, interim permit holders and nonlicensed individuals be able to provide IEP/IFSP services through telemedicine if schools are still closed due to COVID-19 during the 2020-21 school year? (Updated 8/3/2020)

- A. IEP/IFSP services provided via telemedicine by ARNPs, interim permit holders and nonlicensed individuals is reimbursable. More information is available in the updated [SBHS Billing Guide](#) and in the [SBHS COVID-19 FAQ](#) available on the [SBHS webpage](#).

Questions?

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SBHS webpage: <https://www.hca.wa.gov/sbhs>