

Children and Youth Behavioral Health Work Group – Workforce & Rates (W&R) Subgroup

May 15, 2024

Glossary of Terms

ACH: Accountable Communities of Health

BHA: Behavioral Health Agency

CCBHC: Certified Community Behavioral Health Clinic CMS: Centers for Medicare and Medicaid Expenses DOH: Washington State Department of Health HCA: Washington State Health Care Authority

IECMH: Infant and Early Childhood Mental Health

IEP: Individualized Education Plan
IFSP: Individualized Family Service Plan

OSPI: Office of Superintendent of Public Instruction PACT: Program for Assertive Community Treatment

SAMHSA: Substance Abuse and Mental Health Services Administration

SBBHSP: School Based Behavioral Health and Suicide Prevention SWACH: Southwest Washington Accountable Community of Health

WSAC: Washington Student Achievement Council

Meeting Topics

School-based BH services charter and provider reimbursement

Updates on SBBHSP workforce and rates priorities

House Bill 1504 (2021) pilot implementation updates

Stipend program

Payment types for different professional groups – postponed to another meeting

Discussion Summary

School-based BH services charter and provider reimbursement

Todd Slettvet, Health Care Authority, see page 5 for slides Medicaid and School Based Services Presentation

- 1. Existing Medicaid Programs for Schools
 - a. School-Based Healthcare Services: For children with Individualized Education Plans (IEPs) or Individualized Family Service Plans (IFSPs), reimbursing services like occupational therapy, physical therapy, speech therapy, nursing, and mental health counseling.
 - b. Medicaid Administration Claiming: Allows partial reimbursement for administrative activities supporting Medicaid goals through a cost allocation plan and random moment time studies
 - c. Managed Care: Enables schools to contract with managed care agencies for covered services provided by qualified licensed staff.
- 2. Recent Developments and Resources



- a. In 2022, HCA released the Medicaid School-Based Behavioral Health Services and Billing Toolkit, providing comprehensive guidance for schools on Medicaid options.
- b. In 2023, new Centers for Medicare and Medicaid (CMS) expenses guidance was released, offering states additional opportunities to enhance school-based services and reduce administrative burdens.
- 3. Cross-Agency Workgroup and New CMS Guidance
 - a. HCA formed a cross-agency school-based Medicaid work group to ensure compliance with new CMS guidance.
 - b. A survey was disseminated to collect feedback from schools and stakeholders on Medicaid reimbursement and operational challenges.
 - c. The primary focus is to support school districts in obtaining more Medicaid reimbursement.
- 4. CMS Grant Opportunity
 - a. CMS announced a new grant opportunity in January 2024, offering up to \$2.5 million over three years to up to 20 states.
 - i. The goal is to improve school-based services and address the behavioral health crisis in schools.
 - b. If awarded, the grant will fund expanded collaboration and support for schools, including hiring dedicated staff to strengthen cross-agency coordination.
- 5. Stakeholder Engagement and Recommendations
 - a. HCA intends to gather extensive stakeholder feedback before making any permanent decisions regarding new methodologies like cost reimbursement.
 - i. Schools' participation in these new opportunities will be optional.
 - b. Initial recommendations from the survey will be developed by June 30, 2024, followed by further stakeholder engagement to finalize recommendations.
- 6. Potential New Opportunities
 - a. CMS now allows states to license school staff such as counselors and psychiatrists to bill Medicaid, potentially increasing billable activities.
 - b. Cost reimbursement, like the existing Medicaid administrative claiming program, could greatly increase Medicaid funding for schools, as seen in other states like Michigan.
- 7. Discussion and Questions
 - a. Concerns about the impact on the workforce, specifically documentation requirements and family involvement?
 - i. Intent to maintain documentation standards and stakeholder engagement.
 - b. What is the timeline for recommendations?
 - i. Initial recommendations are due by the end of June 2024, with further stakeholder engagement planned for the first year of the expected grant.

Updates on SBBHSP workforce and rates priorities

Christian Stark, Office of Superintendent of Public Instruction (OSPI), School Based Behavioral Health and Suicide Prevention (SBBHSP) co-lead

1. School-Based Behavioral Health Focus: priority on school-based behavioral health workforce issues.



- 2. Workshops: Planning a series of workshops to address workforce and rate issues, aiming to provide a detailed understanding and actionable recommendations by the end of June.
- 3. Meeting Schedule: The subgroup meets this afternoon, with another meeting scheduled for June 26. Three workshops are planned between these meetings.
- 4. Objectives: To define the scope of behavioral health supports across different tiers, identify workforce shortages, and develop strategies to address these issues.
 - Call for Participation: Invited interested parties to join the workshops to contribute to the discussions and help shape the recommendations.
 - Highlighted the shift to obtaining early input from subcommittees to ensure coordinated efforts.

HB 1504 (2021) pilot implementation updates

- 1. John Schapman, Thriving Together North Central Washington
 - a. Pilot Success: Described the success of a pilot program funded by HB 1504 (2023), emphasizing the flexibility in funding and its positive impact on workforce development.
 - b. Examples of Success: internship programs and hiring interns as full-time employees, particularly in rural areas.
- 2. Sharon Brown, Greater Health Now
 - a. Impactful Funding: Shared positive feedback from providers who benefitted from the funding, highlighting the importance of local training and hiring.
 - b. Sustainability: Stressed the need for ongoing, sustainable funding beyond the pilot phase to maintain and expand workforce initiatives.
- 3. Nichole Peppers, Southwest Washington Accountable Community of Health (SWACH)
 - Community Feedback: Recommendations from community partners included the need for longer-term projects, broader recipient eligibility, and expanded services to non-Medicaid populations.
- 4. Longevity and Sustainability: It is important to sustain programs beyond initial funding to ensure long-term benefits, especially in rural areas.
 - a. Ongoing efforts to establish a teaching clinic designation as a sustainable, reimbursable service.
- 5. Internship Program Details: Addressed questions about the screening and credentials of interns, supervision support, and the impact on local workforce development.
- 6. Plan for further discussions on the teaching clinic initiative and follow-up on the impact of the HB 1504 (2023) pilot program.

Stipend Program

Brandon Williams, Department of Health (DOH)

- 1. Overview of the Stipend Program:
 - a. HB 1724 (2023): Established a stipend program to reduce barriers in the behavioral health workforce.
 - b. HB 2247 (2024): Amended the stipend program, shifting from paying associates to capping what supervisors can charge (\$1,600/year) and reimbursing supervisors with a \$2,000 stipend.
- 2. Implementation and Participation:



- a. Participation is voluntary.
- b. Applies to supervisors in both private practice and Behavioral Health Agencies (BHAs).
- c. Supervisors must comply with charging limits and documentation requirements.
- d. Rulemaking for the stipend program began in April, with workshops planned to refine the process.

3. Funding and Unknowns:

- a. The program's funding is uncertain and will be clearer after the next legislative session.
- b. Comparison with a similar nursing commission program highlights the need for participants to obtain a vendor number from the Office of Financial Management (OFM).
- c. There are many unknowns, including total funding and the process for distributing funds to individuals.

4. Questions and Clarifications:

- a. What is the likelihood of DOH submitting a decision package for funding? Currently it's too early to tell.
- b. Discussion on DOH's role in providing guidance for legislators interested in budget requests.
- c. DOH's commitment to partnering with stakeholders and removing barriers for behavioral health
- d. Variability in supervision costs, complicating the determination of appropriate stipend amounts.

5. Stakeholders and Supervisors:

- a. The stipend program and the pool of eligible supervisors are intended to operate separately, though there may be some overlap in information provided to stakeholders.
- b. Rulemaking includes stakeholder engagement, with interested parties notified of workshops and discussions.
- c. The government delivery list confirmed to be used for reaching out to stakeholders.

Payment types for different professional groups (Presentation Postponed) – Renee Fullerton sacrificed her time slot for the sake of extended presentations from other speakers, potential to share at a later meeting.

Look Ahead: 24/25 Schedule

Other subgroups will deliver their workforce and rates priorities by the June 21 meeting.

W&R Schedule

*(April-August) All meetings will take place on the first and third Wednesdays of the month, unless otherwise indicated. (September-October) All meetings will take place on the first and third Thursday of the month, unless otherwise indicated.

- June 5 10 to 11:30
- *Friday, June 21 10 to 11:30
- July 3 10 to 11
- July 17 10 to 11
- August 7 10 to 11
- August 21 10 to 11
- *Friday, September 6 10 to 11

- September 19 10-11
- *Tuesday, October 1 10-11
- October 17 10-11
- November 7 10-11
- November 21 10-11
- December 5 10-11
- December 19 10-11

Medicaid and School Based Services

May 2024



Medicaid in Schools

Apple Health (Medicaid) pays for Medicaid-covered services provided in the school setting via multiple avenues:

SBHS Program Fee-for-service reimbursement for Individualized Education Program (IEP) / Individualized Family Service Plan (IFSP) special education healthrelated services

Reimbursable services include Occupational Therapy, Physical Therapy, Speech, Nursing, and Mental Health/Counseling

School districts contract directly with HCA to receive reimbursement through ProviderOne MMIS system

200 out of 295 districts participate

MAC Program Reimbursement for administrative activities such as outreach, care coordination, etc.

School staff participate in random moment time study (RMTS)

School districts contract directly with HCA to receive reimbursement through a Certified Public Expenditure (CPE) process

45 out of 295 districts participate

Managed Care Reimbursement for physical and behavioral health services not included in an IEP/IFSP

School districts contract with the Medicaid Managed Care Organizations (MCOs) to receive reimbursement

5 out of the 9 ESDs and 1 district are contracted (or are becoming contracted) with the MCOs

MCOs also pay for services provided in a School-Based Health Center (SBHC)



Medicaid in Schools

In 2022, the Health Care Authority (HCA) released the Medicaid School-Based Behavioral Health Services and Billing Toolkit which provides information on the three different reimbursement options available to schools.

Medicaid School-Based **Behavioral Health** Services and **Billing Toolkit** ealth Care Authority

New CMS Guidance

- In May 2023, the Centers for Medicare and Medicaid Services (CMS) released Delivering Service in School-based Settings: A Comprehensive Guide to Medicaid Services and Administrative Claiming Guide.
 - ➤ This guide supersedes and combines the CMS Medicaid and School Health-A Technical Assistance Guide (1997) and the CMS School-Based Administrative Claiming Guide (2003).
- The new guide provides additional flexibilities and opportunities which could potentially reduce administrative burden for schools and increase Medicaid reimbursement.

Cross-Agency School-Based Medicaid Workgroup

HCA has formed a chartered workgroup to explore the new flexibilities and opportunities outlined in the guide.

Goals of the workgroup:

- Evaluate the current state of school-based billing.
- Assess CMS guidance and determine required and optional changes.
 - Focused on reducing barriers and increasing funding.
- Collect feedback from schools about Medicaid reimbursement; successes, challenges, and barriers.
- Prepare recommendations for improvements to Medicaid program(s) provided in school settings.

New CMS Grant

- In January 2024, CMS released a grant for the "Implementation, Enhancement, and Expansion of Medicaid and CHIP School-Based Services".
- CMS intends to award 20 states up to \$2.5 million each over three years.
- ▶ HCA submitted the grant application in March and if awarded, funding will be available July 1.
- First-year grant funding will be used to:
 - Extend the contract with ForHealth.
 - Provide HCA with the needed infrastructure to expand outreach, assessment, and stakeholdering activities.
 - Help strengthen cross-agency collaboration and coordination between HCA, OSPI, and the LEAs.