

Medicaid and the School Based Clinic

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Presentors

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Presentation Overview

- Iowa Medicaid/Education background.
- Oklahoma Medicaid/Education background.
- Cedar Rapids CSD snapshot.
- Cedar Rapids Medicaid claiming.
- Question and Answer time.

Medicaid in Education-Iowa

- Iowa Medicaid included AEA services in 1988.
- Medicaid SPA updated to include LEA services in March of 2001.
- LEA services included primary/preventive under EPSDT umbrella of services.

Medicaid in Education-Iowa

- LEA claiming for IEP services has grown over the past two years.
- MAC claiming has declined over the past two years.
- Districts were required to use MAC funds to support nursing and health services.

Medicaid in Education-Oklahoma

- **OK added education services to SPA in 1997**
- **LEA services considered EPSDT services.**
- **Audit of EPSDT school-based health services provided in SFY2000**

OIG Audit Raised the 'Free Care' Issue

- **Review limited to SFY 2000 dates of services**
- **100 beneficiaries (97/100 billed incorrectly due to being free of charge to other students who were non-Medicaid)**
- **Sited Statutory 1902 (a) (17)(B) for “free care principle”**
- **CMS position on exception to collecting TPL was IDEA:IEP/IFSP**
- **CMS disallowance of 1.9 million FFP**
- **OK appealed to Departmental Appeals Board (DAB) (June 25, 2003)**
- **DAB decision reversed disallowance**

“Free Care Principle”

- **Set out in 1991 *Technical Assistance Guide***
- **According to Guide; Medicaid funds are unavailable for otherwise covered EPSDT services unless third-party insurers of non-Medicaid eligible students are charged for the services**
- **Not specifically authorized under Title XIX of Social Security Act**
- **CMS position: reasonable interpretation of the ACT**

Oklahoma's Position

- **Third-party reimbursement practices for school-based services follows all applicable statutory and regulatory requirements**
- **Has complied with the free care policy as it has been interpreted by the DAB**

Departmental Appeals Board Decision

- **“Pay and chase” for EPSDT services meets requirements**
- **Oklahoma’s Medicaid reimbursement for school-based health services does not violate the free care policy or the Medicaid statute’s third party liability requirements**
- **Reversal of total disallowance**

Medicaid in Cedar Rapids CSD

- Enrollment of 17,324 in K-12.
- Four high schools (one alternative), five middle schools, a 2-8 school and 23 elementary schools.
- School Health Services Program includes Metro Care Connection, School-based Health Services.
- Medicaid IEP services claimed since 2001 when Iowa first allowed.

Medicaid in Cedar Rapids CSD

- Primary and Preventive Services offered at 4 school sites and through outreach clinics
- MCC established as a school-based youth services program with funding from the DE
- Loss of funding source led to proposal to pursue Medicaid claiming for Primary and Preventive Services

Medicaid in Cedar Rapids CSD

- Already doing IEP services, so why not primary/preventive.
- Staffing considerations.
- CRCSD uses a billing service for Medicaid claiming for IEP services.
- Preparation for claiming included costing for services.

Health Care Services

- Physical examinations
- Treatment of minor illness
- Basic laboratory tests
- Prescriptions for medications
- Health education and counseling
- Referral for complex medical conditions
- Referral for counseling services

Medicaid in Cedar Rapids CSD

- Documentation on medical record
- Encounter/billing form
- Service procedure and diagnosis codes.
- Third Party Liability (TPL).
Communication with insurance companies.

Medicaid in Cedar Rapids CSD

- **Parental consent for service**
- **Communication with families regarding intent to claim**
- **Intake and eligibility determination**
- **Sliding fee scale**

Medicaid in Cedar Rapids CSD

- Good rapport with Medicaid and Education at state level.
- Initial plans to address 'free care' issue.
- Collaboration with billing service, state agencies and local district staff.
- Plans are for model to be shared with other districts around Iowa.



Questions?