

# HEALTHY SCHOOLS CAMPAIGN

EVERY CHILD DESERVES TO LEARN + THRIVE

August 1, 2022

## **School Medicaid Technical Assistance Center**

As the nation responds to significantly higher rates of mental health issues among children and youth, and communities try to connect kids with preventive services that the COVID-19 pandemic disrupted, schools are being recognized as an essential healthcare delivery site, meeting children where they are and providing access to needed services.

Medicaid, the leading insurer of children, is a significant and sustainable source of funding that schools can use to address the youth mental health crisis and support children's health and educational achievement. Increasingly, state Medicaid agencies, state education agencies and school districts are leveraging the role Medicaid can play in expanding access to physical and behavioral school-based health services. As of July 2022, 17 states are using federal Medicaid funds to cover eligible health services provided to all students enrolled in Medicaid, and more states are working to do so. But the program can be complex to administer for state educators and school officials not familiar with Medicaid.

The Biden-Harris Administration has demonstrated its strong commitment to expanding access to school health services and supporting states and school districts in expanding and strengthening their school Medicaid programs. Now the Bipartisan Safer Communities Act provides a new opportunity to invest in school Medicaid by requiring new guidance, technical assistance (TA) and grants to states to advance schools' ability to use Medicaid to cover services and improve low-income children's health. These new policies have the potential to transform the delivery of Medicaid services in schools.

The information below details how a school Medicaid TA center can play a key role in ensuring states and school districts have access to the support needed to implement, strengthen and expand their school Medicaid programs to meet the needs of children and youth.

## **How a TA Center Can Advance Access to Health Services in Schools**

*The TA center can help untangle federal policies and support school districts in providing services effectively*

The TA center should be empowered to help states implement new guidance and troubleshoot policy and operational issues. Within the next year, CMS will issue the new guidance that is required under the statute. All states will have questions about the new guidance and need to ensure their programs are strong and in compliance. The TA center will play an important role in supporting states' understanding of the new guidance.

At the same time, the TA center will need to support states who want to take advantage of the new guidance to expand, enhance or further implement their programs. We anticipate growth the number of states interested in school Medicaid thanks to the upcoming grants to be administered under the new statute.

Since 2016, Healthy Schools Campaign (HSC) has led the Healthy Students, Promising Futures Learning Collaborative to advance access to Medicaid-funded school health services. To date, 24 states and more than 30 school districts have participated. Of the 17 states so far that have expanded their school Medicaid programs beyond IEP services, 12 of those states are active participants in the Learning Collaborative.

Through the Learning Collaborative, HSC has developed firsthand knowledge of both the interest schools have in Medicaid financing and the challenges they face in navigating payment requirements and coordinating with Medicaid systems. Examples of the challenges encountered include the following:

- Developing and submitting state plan amendments (SPAs) to expand school Medicaid programs
- Documenting medical necessity
- Ordering, referring and prescribing providers
- Establishing administrative claiming programs
- Aligning state Medicaid and state education requirements for qualified school health providers
- Obtaining parental consent to bill Medicaid and understanding when consent is needed
- Leveraging school telehealth to expand access to care

The TA center should be well positioned to answer these questions.

*CMS should lead the TA center*

The TA center should be housed at CMS with a strong coordinating role for the Department of Education (ED). Many of the primary issues that need to be addressed for schools to access Medicaid require specific Medicaid policy and operational expertise. Fundamentally, under both current and potential future policy, schools will operate as Medicaid providers, with all the attending rules and regulations. State Medicaid agencies and school districts must successfully navigate oversight and audit processes.

Reports issued by the Office of Inspector General have documented non-compliance issues, leading to financial consequences that can deter school participation. Having CMS serve not just as the agency writing guidance, but also as the agency providing technical assistance, interpreting policy and clarifying any gray areas, is the best way to encourage schools to use Medicaid and to ensure that they do so quickly and in alignment with federal policy.

Given ED's critical role in supporting school health, it should play a strong coordinating role with CMS, potentially including co-developing the scope of work for the TA center and participating in proposal review and ongoing operational oversight.

### *The TA center should serve states and school districts*

Federal TA resources currently do not exist to support school Medicaid. Technical assistance should be available to state Medicaid agencies, state education agencies and school districts, as each plays a key role in implementing a strong, effective school Medicaid program. The TA center should be able to support the needs of each of these entities so that together they can implement a robust and compliant school Medicaid program.

The primary purpose of the TA center would be to assist states and school districts on an as-needed basis. It should be open to “all comers,” and not limited by arbitrary requirements. While we anticipate that the TA center would play a strong supporting role in assisting states who are awarded a grant under the new statute, we stress that all states need technical assistance to administer their programs.

In addition, the TA center should proactively share best practices and information with the field, including hosting regular webinars and trainings on school Medicaid, publishing briefs on key school Medicaid issues and maintaining a website to facilitate information sharing.

The TA center might also support trainings for stakeholders or groups of states to identify and eventually disseminate best practices for the field. It should also collect data from states and school districts about their school Medicaid programs to inform the TA center’s work, as well as to inform the field and federal agencies.

### **States and School Districts Are Ready for a TA Center**

There is an historic opportunity to support states and school districts in expanding access to school health services by strengthening and expanding school Medicaid programs. While momentum around school Medicaid has been building, the school Medicaid TA center will ensure states and school districts can implement, enhance and expand their school Medicaid programs. Now is the time to provide states and school districts with the TA needed to ensure they are fully able to leverage this opportunity.