

INITIATIVE TO EXPAND BEHAVIORAL AND OTHER HEALTH SERVICES IN ALL MICHIGAN SCHOOLS

Michigan schools are greatly under resourced with behavioral health, nursing, and other health staff. Over the past several years, organizations representing a wide range of interests came together to advance address this challenge with the goal to design a system of care for school aged youth that is high quality, responsive to local needs, and financially sustainable.

There was a recognized opportunity to obtain federal Medicaid matching funds for health and mental health services provided to general education students through an expansion of Michigan's existing School Based Services (SBS) Program. This general education expansion evolved into what is now called **Caring for Students (C4S)** which officially launched October 1, 2019.

While this expansion work was underway at the Medical Services Administration (MSA) within the Michigan Department of Health and Human Services (MDHHS), concerns for school safety deepened and the need for behavioral health services for the general school population gained greater recognition. As a result, Michigan's legislature amended the School Aid Act and added millions in state general funds for the 2018-19 fiscal year toward mental health services in local schools. The law directed these funds to be distributed evenly through Intermediate School Districts (ISDs). This new funding became known as "**31n**" in recognition of the section of the School Aid Act that authorized this funding.

The legislature put several conditions on 31n funding. ISDs were required to submit an application detailing how the funds would be used and requirements met. The conditions included, among others, a commitment to maintain the existing level of services and use these new funds to expand services, to maintain a 20% local match, and to work under the direction of MDE and MDHHS to obtain additional federal Medicaid funding as appropriate. Effectively, the 31n funding helps to jumpstart the broader initiative but is understood to only begin to address the level of need across the state.

While 31n funding impacts only a limited number of districts, the C4S initiative is statewide and an opportunity for virtually all schools providing general education to capture additional funding. There is the expectation that this will result in a meaningful amount of expanded service opportunities for local schools to use to expand health and behavioral health services for students. The Medicaid match builds on existing state and local spending for health services to general education students so both the total generated and its distribution across the state is difficult to estimate.

CARING 4 STUDENTS FREQUENTLY ASKED QUESTIONS

1. What is Caring for Students (C4S)?

C4S allows measures to be taken to better address the behavioral health of all students. The Medicaid policy for C4S was issued effective October 1, 2019. Essentially, C4S builds on the policy and methodology used to obtain federal Medicaid funding for health services to special education students (called School Based Services or SBS). One key difference is that 95% of the new federal funds for C4S will go to local education agencies (instead of the 60% for SBS). C4S allows Intermediate School Districts (ISDs), Detroit Public Schools Community District (DPSCD), and the Michigan School for the Deaf (MSD) to bill Medicaid for health and mental health services provided to general education students with Medicaid.

Health services staff in the general education environment will need to be trained on reporting along with local finance and administration. The C4S methodology and its operational components are in the process of being disseminated. Statewide trainings and communication for all local school districts are in development.

2. What is the effective date for C4S?

C4S began October 1, 2019.

3. Who qualifies for C4S services for billing purposes?

Only services to general education students that have Medicaid qualify for C4S reimbursement.

4. How are services reported?

Services provided with respect to C4S are reported the same way as School Based Services (SBS). The Service Provider must input daily/monthly notes into the ISD's electronic system. The Service Provider's name must appear on the Staff Pool List under Direct Service.

5. What positions are allowed to provide service for C4S?

To be sure you only add qualified medical and behavioral health staff to the Direct Services pool please review the expanded list of eligible staff:

- MDE - credentialed master's level school psychologist
- Board - certified behavioral analyst (BCBA)
- Board - certified assistant behavioral analyst (BCaBA), under the supervision of a BCBA
- Licensed master's level professional counselors (LPC)

- Limited - licensed master's level professional counselors (LLPC) under the supervision of licensed master's level professional counselor LPC)
- Licensed master's level marriage and family therapist
- Licensed master's level social workers (LMSW)
- Limited - licensed master's level social workers (LLMSW) under the supervision of a LMSW
- Qualified school nurse, as defined by Public Act 269 of 1955 as amended
- Certified nurse practitioner (NP)
- Certified clinical nurse specialist (CNS)

If the practitioner's daily responsibilities include direct medical therapies/treatments and/or evaluations /assessments, you can exit the practitioner from the Administrative Outreach Program (AOP) pool and add the practitioner to the Direct Service pool.

https://www.michigan.gov/documents/mdhhs/MSA_19-26_667170_7.pdf

6. Are there any changes with respect to Random Moment Time Study (RMTS) Rules?

The Centers for Medicare and Medicaid Services (CMS) process for the Random Moment Time Study (RMTS) has changed. Effective October 1, 2019, time study participants will be notified of time studies exactly 24 hours prior to the date and time of the scheduled moment. In addition, participants must complete the time study within 48 hours. Since, RMTS results are the tool used to identify Medicaid reimbursable costs, staff will need to make every effort to comply with this new requirement.

7. What types of notifications are required and how frequently?

One-Time Consents – C4S

Obtain one-time consents when students qualify for the C4S program and when the student has a plan of care (504 plan, behavioral health plan, individualized health plan, and /or nursing plan) that prescribes necessary medical and behavioral health services.

One-Time Consents – SBS

Since your district is only required to obtain Medicaid Parental Consent once, you should have a consent form on file. Follow your ISD's procedure for parental consent.

Annual Notifications – Parental Consent and Annual Notification are required. Remember to give all (SBS and C4S) parents a copy of the "Medicaid Parental Consent Notification" each school year, as required by Medicaid policy. To ensure forms are being provided annually, many districts include them in their student's 'Annual Enrollment Packets' or they include them in their 'Procedural Safeguards'.

8. Record Retention:

For State and Federal audit purposes, districts must maintain all required Medicaid claiming and reimbursement documentation (IEPs, METs, REEDs, Evaluations, Service Notes, Prescriptions, Orders, Authorizations, Personal Care Logs, Supervision Logs, Driver Logs) for a minimum of 7 years plus the current year.

9. How much funding will be generated as a result of C4S and how will it be distributed?

It has not been determined exactly how much each ISD will receive from the MDHHS for C4S. At this point in time, Medicaid will use the same criteria used for SBS.

10. How will Caring for Students affect quarterly and annually reporting?

Since service provider(s) will appear on the staff pool list, you will enter the information on the Quarterly Financials the same as you would for SBS. To date, there are no changes in the way you will also complete the annual Facility Settlement. You will complete it as you have in years past. MDHHS will calculate the percentages for SBS and C4S based on the responses from the RMTS.