School Based Medicaid Updates

Every learner who is eligible for special education services under the Individuals with Disabilities Education Act (IDEA) is entitled to a knowledgeable and trained individual to be involved in the services provided to them. For purposes of Medicaid reimbursement, the LEA Medicaid Provider Manual requires that a Mental Health Professional (MHP) must actively participate in the development and monitoring of interventions in Behavior Intervention Plans (BIPs), including review of data, evaluation of effectiveness, and determination of whether the BIP is producing the intended outcomes.

- Iowa Health and Human Services has provided that the MHP must be involved in the development of the Functional Behavior Assessment (FBA).
- Individualized Education Program (IEP) teams are responsible for developing and monitoring the BIP based on the information provided by the MHP's assessment. If the IEP team determines that mental services (e.g., Counseling, Psychological, and Social Work) are required, the MHP must be named as the service provider.
- The IEP team should review data as set forth in the IEP. The IEP, including the BIP, must be reviewed and revised, as appropriate, to address any lack of expected progress and ensure goals are appropriately ambitious and adequately address the learner's individual needs.
- IDEA Part B requires public agencies to prioritize accessing Medicaid. If the student is enrolled in Medicaid, has Medicaid billable services listed on the IEP, and parent/guardian consent has been provided, reimbursement from Medicaid is highly encouraged to be pursued as the payor before IDEA funds are utilized.

Who qualifies as a licensed Mental Health Practitioner (MHP)?

For the purposes of conducting a Functional Behavior Assessment (FBA) and/or writing a Behavior Intervention Plan (BIP), any person with the following licensure is considered an MHP:

- **Licensed through Department of Inspections and Appeals (DIAL)**: Board Certified Behavior Analyst (BCBA), Licensed Mental Health Counselor, Licensed Marital and Family Therapist, Social Worker (Bachelors, Independent or Masters Level), Licensed Psychologist
- **Licensed through Board of Educational Examiners (BOEE)**: K-12 Instructional Strategist II: BD/LD, K-12 Strategist I and II All, Social Worker (PSL), School Psychologist, School Counselor

Recommended ACHIEVE Process Changes

The ACHIEVE process changes that follow are recommended to increase compliant billing of Medicaid services provided to students:

- If an MHP is involved in the development of a BIP, they should be named as a team member, even if they do not have access to ACHIEVE.
- If paraprofessional services for behavior support are required to implement the BIP, school personnel overseeing paraprofessionals should be named as team members, even if they do not have access to ACHIEVE.
- MHPs can be named as collaborators on goals and/or have their own services (i.e., consultation) and activities (e.g., person who provides Support for School Personnel in Activities/Supports) as needed.
- MHPs can be named as an Implementation Support to school personnel as needed.
- A MHP must actively participate in the development and monitoring of interventions in BIPs, including review of data, evaluation of effectiveness, and determination of whether the BIP is producing the intended outcomes. Certain tasks may be delegated to paraprofessionals however when asked who is responsible for implementation and monitoring of BIP progress, the MHP should be named.

Contact Information

For questions related to Functional Behavior Assessment or Behavior Intervention Plan development, contact rose.cartee@iowa.gov. For questions related to school-based Medicaid, please contact jon.neas@iowa.gov, tashina.hornaday@hhs.iowa.gov, or morgan.schultz@hhs.iowa.gov.