



FY25-26 SBAP Session: Where Are We Now, Where Are We Going?

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Key Topics

- **CMS TAC Grant**
 - First Year Activities
 - First Year Results
 - Second Year Award
 - Second Year Activities
- **Anticipated Changes**
 - State Plan Amendment
 - Time Study Implementation Plan
- **Timelines and Participation Opportunities**



CMS TAC Grant



CMS School-Based Claiming Guidance & Grant

- **The Centers for Medicare & Medicaid Services (CMS) issued *Delivering Services in School-Based Settings: Comprehensive Guide to Medicaid Services and Administrative Claiming (CMS Guidance)* in May 2023.**
- **The updated CMS Guidance document supersedes prior guidance from 1997 and 2003.**
- **CMS also awarded grants to 18 states in 2024, including Pennsylvania, that provide funding over a three-year period.**
- **The grant funds must be used to bring SBAP into compliance with the 2023 CMS Guidance by July 1, 2026, and to work toward expansion of services.**

Year One Activities

July 1, 2024 – June 30, 2025

- **Gathered stakeholder feedback through surveys and in-person meetings across the state.**
 - Stakeholders included Local Education Agencies (LEA), service providers, and families.
- **Increased professional development opportunities through the National Alliance for Medicaid in Education, Inc. (NAME).**
 - Provided membership to NAME for one staff member from each participating LEA.
 - Supported the attendance of six LEA staff at the annual NAME Conference in Denver, Colorado.
- **Increased engagement through Conference attendance and additional statewide trainings.**

Year One Activities (cont.)

- **Used the data collected through surveys and other outreach to:**
 - Understand the barriers faced by LEAs in providing care to students
 - Identify providers that LEAs already utilize and would benefit from being able to bill for their services through SBAP
 - Identify service types that could be added or expanded to capture more of the services that are provided in schools
- **Prepared for changes that will require updates to Pennsylvania's Medicaid State Plan, which is submitted to and approved by CMS.**



Year One Results

- **Successes:**

- Over 300 LEAs took advantage of the NAME Memberships.
- Six LEA staff members were able to attend the NAME annual conference and have their expenses reimbursed through grant funds.
- DHS held seven stakeholder session in Spring 2025 to connect with and gather feedback from LEAs around the State.

- **Challenges:**

- Survey feedback represented a small percentage of stakeholders.
- Changes on the Federal level impacted Commonwealth staff's ability to travel. One stakeholder session was held virtually, which presented challenges for engagement and recording.



LEA Voices in Year One

Stakeholder Feedback – What We Learned

- **Facilities and Materials & Supplies**
 - **Lack of physical space – HIPAA concerns, barrier to care**
 - **Old buildings with no budget for renovations, relying on local taxes**

"We go into a lot of places and everywhere space is tight. In one LEA, they can use an empty classroom, or the OT uses the cafeteria outside of lunch time. Providers have to get creative to find a space to provide services. A lot of providers are doubling up; we don't have designated space for health services."

"Sometimes these creative spaces include closets/former closets, rooms separated into multiple spaces, and hallways. Needs and resources change daily and quickly."

"We contract out with a psychologist to provide evaluations and services. They need a room with a closed door to do this. Sometimes, if there's no room, he'll have to leave without providing the services."

Stakeholder Feedback – What We Learned (cont.)

- **Staffing & Capacity**

- Lack of credentialed providers, high caseloads
- Time constraints on providers delivering and documenting services
- Mental health crisis is affecting the whole state

“Behavioral Service caseloads get even more full than SLPs. They spend so much time on logging that we have started writing those services out of IEPs to cut down on the administrative burden.”

“I lost one of my favorite PTs because of overwhelm, so she went part-time, but then it was a revolving door trying to fill the gap in her caseload.”

“We didn’t have any staff for vision or deaf and hard of hearing at the beginning of the year, so they were working hard to catch up with compensatory services, but we also have to look out of state to find providers to meet student’s needs.”

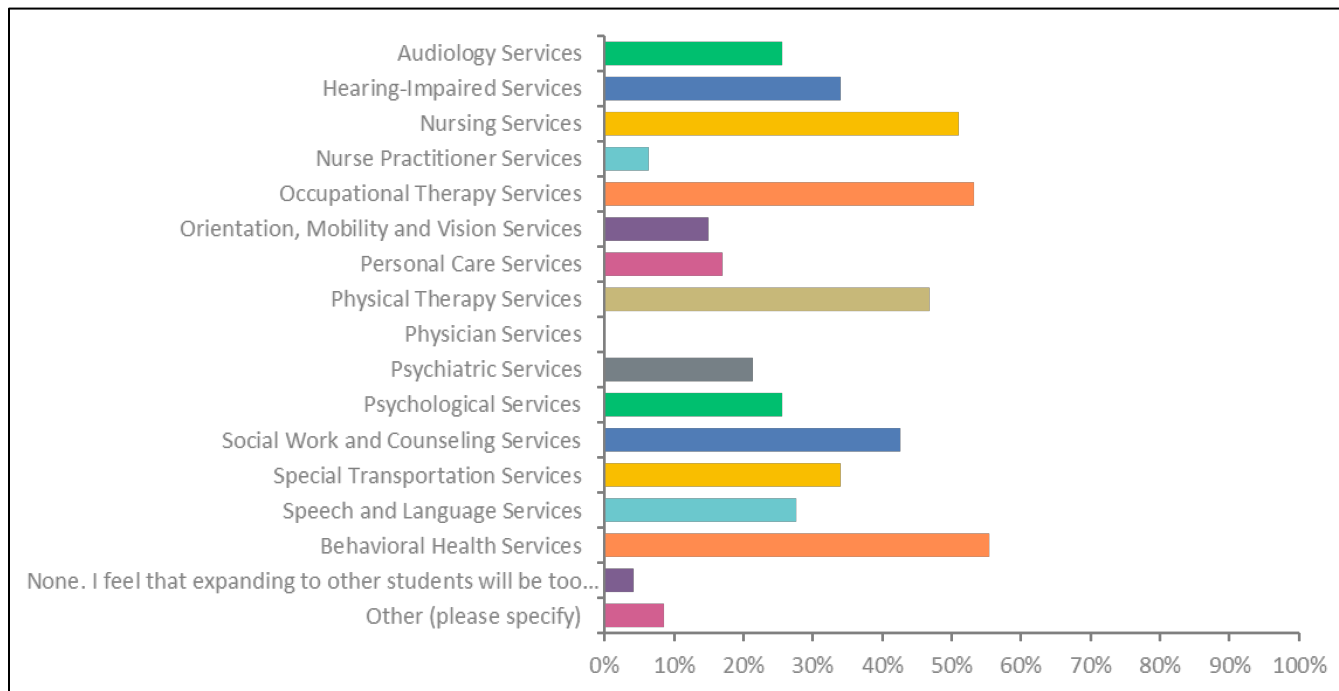
Stakeholder Feedback – What We Learned (cont.)

- **Services & Providers**
 - Lack of Physicians to authorize Personal Care Assistance (PCA) and Assistive Devices
- **Documentation**
 - High School Diplomas
 - Parental Consents
- **Unique Setting Considerations: Urban**
 - Safety and security concerns
 - Travel distances may be shorter, but parking challenges are greater
- **Unique Setting Considerations: Rural**
 - Transportation issues for both students and providers – barrier to care
 - Availability of technology and high-speed internet: in some areas, no options for internet, or LEA unable to provide a hotspot to families for telehealth
 - Lack of community providers, long wait times
- **Setting Considerations: Overlap**
 - English Language challenges
 - Absenteeism



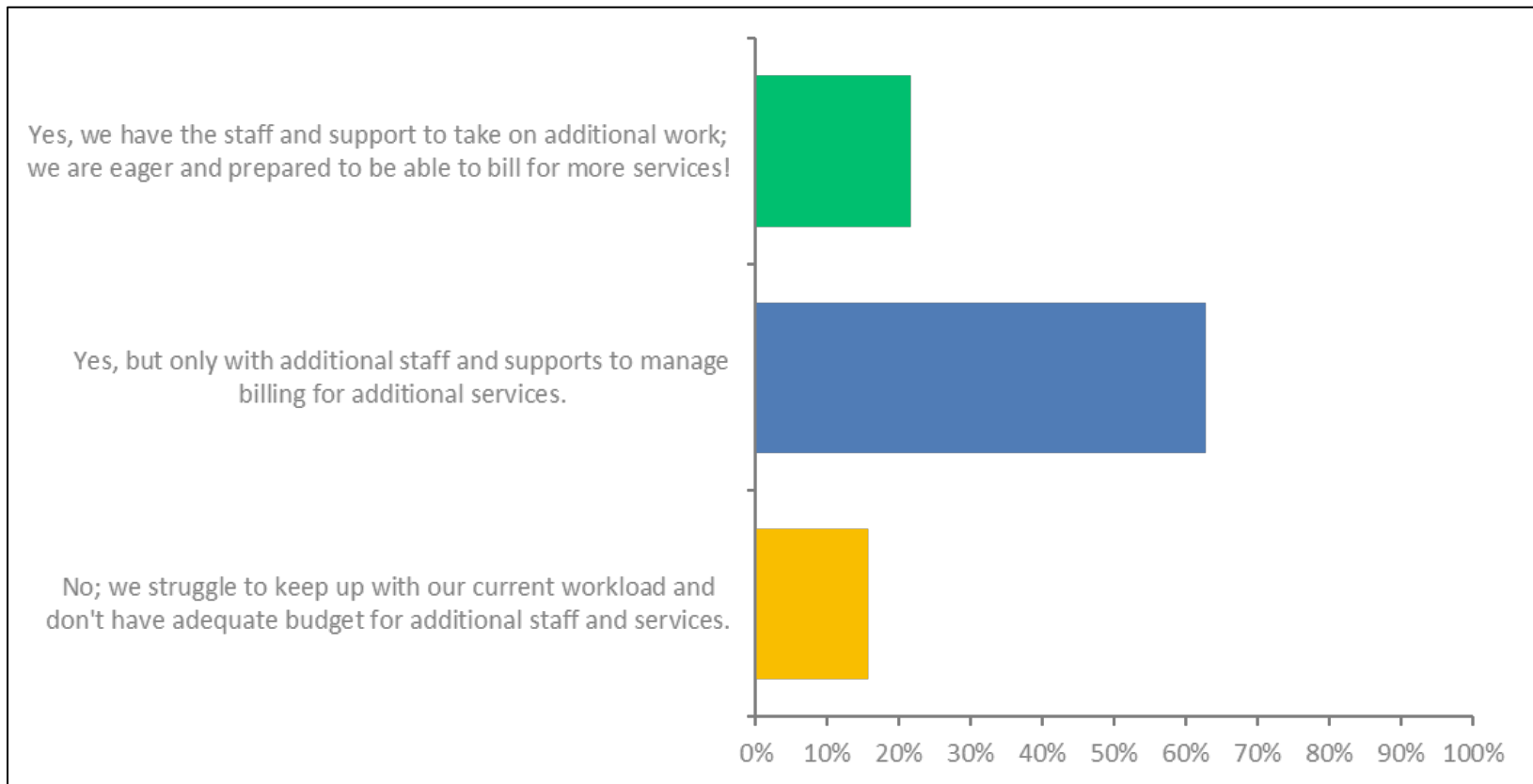
Stakeholder Feedback – What We Learned

- **What services do LEAs think should be considered for expansion first?**
 - Participants shared that LEAs are already providing services beyond those listed in Section 3 of the SBAP Handbook and for more students than just those with an IEP



Stakeholder Feedback – What We Learned (cont.)

- While meeting participants were overall supportive of additional billing opportunities, survey results suggest that additional support may be needed to manage an expansion.



Stakeholder Feedback – Key Takeaways

- ***There is a mental health crisis in Pennsylvania.***
 - LEAs in every region stressed the impact that receiving SBAP reimbursement for behavioral health services and providers would make.
- **Schools have become a health-care provider for students, sometimes the primary care option for students in rural and low socioeconomic areas.**
- **Schools are struggling to meet needs for delivering services, including:**
 - Finding adequate and appropriate spaces
 - Attracting and retaining staff, specifically qualified providers

Stakeholder Feedback – Key Takeaways (cont.)

- **Administrative supports are not sufficient to address the administrative requirements of the MA Program.**
- **Restrictions within Pennsylvania’s Medicaid State Plan serve to create additional barriers to reimbursement for services to students.**
- **LEAs have expressed the financial need for Pennsylvania to allow billing for more of the services they are already providing, specifically:**
 - Cover services delivered to MA-enrolled students who do not qualify for IEPs
 - Cover services delivered by provider types not currently included in the Medicaid State Plan

Year One – Final Thoughts

- **Change is hard and not always what we want it to be.**
 - Implementing the CMS rules on specialized transportation
 - Updating the notification & response windows in RMTS
 - Implementing the July – September time study
- **Change is unpredictable and often out of our control.**
 - New administration => New priorities
 - Federal budget impact on state budget
- **So, what's next?**
 - Thoughtful changes to Pennsylvania's Medicaid State Plan
 - Required updates to the Time Study Implementation Plan
 - Continued engagement with stakeholders, including focus groups

Plans for Year Two

Year Two – Planned Activities

July 1, 2025 – June 30, 2026

- **Submit Medicaid State Plan Amendment to CMS for approval**
 - Compliance requirements will be addressed first
- **Submit Time Study Implementation Plan to CMS for approval**
- **Meet with LEA focus groups for discussion and input regarding the expansion of SBAP services**
- **Evaluate technology solutions for infrastructure and program needs and barriers identified by LEAs**
- **Conduct in-person training and support for LEAs**
- **Develop education and training videos to build online resource library for participating LEAs**

Year Two – Opportunities

- **How can you benefit and participate?**
 - Make sure that your LEA has taken advantage of a membership in NAME
 - Attend the NAME Annual Conference in Philadelphia, October 7 - 10
 - Participate in Coffee Hours and keep an eye out for SBAP updates to be sure you get the latest information

Please note, the plans shared on this and subsequent slides were in place at the time of the original fall training presentation on September 10, 2025. Many planned grant activities were affected by the absence of an enacted state budget as well as the federal government shutdown.

Anticipated Changes



Compliance Requirements

- **Some changes must be made to come into compliance with CMS Guidance by July 1, 2026**
 - Establish processes for an active time study in the July-September quarter
 - Update response window to two days for random moments
 - Ensure compliance with published definition for the IEP Ratio for cost settlement

Collateral Changes

In addition to the documents that must be submitted to and approved by CMS, other changes will have to take place:

- **Handbook Updates**
- **Changes to SSG Systems**
- **Additional trainings related to policy and system changes**



Timelines and Participation Opportunities



NAME

- Requests to continue or initiate an annual membership to NAME through the grant funds must be submitted by 9/30/2025.
- Early Bird Registration for the NAME Annual Conference ends on 10/1/2025. Information can be found here:
https://www.medicaidforeducation.org/images/name_images/documents/Register.pdf
- There will be six LEA staff local to the Philadelphia area and six from across the state that will be attending the NAME Conference through grant funds. (Which we will announce today!)*
- If you're a member of NAME but would like to be more involved through committee participation, volunteering at the conference, etc., please reach out to info@medicaidforeducation.org

***As noted on slide 20, due to the state budget impasse, travel to and attendance to at NAME Conference did not occur as planned.**



Focus Groups

- **Individuals who attended one of the stakeholder meetings in early 2025 had the opportunity to sign up to participate in a focus group.**
- **We currently have LEA representatives assigned to each of four different focus groups:**
 - School-Based Mental Health Services (no spaces available)
 - Approved Direct Service Providers
 - Administrative Supports
 - Billing for all MA-enrolled students
- **Groups will be capped at 12 members each, but there are still seats available in three of the groups. Please send an email to the SBAP Resource Account by 9/19/2025 if you are interested in joining.**

Document Submission & Issuance

DOCUMENT	STATUS	DATE
2025 SBAP Handbook	Currently in review	October - November
State Plan Amendment	Drafting	Submit by 12/2025
Time Study Implementation Plan	Drafting	Submit by 12/2025

Please note that the State Plan Amendment and the Time Study Implementation Plan will each have a 90-day period for CMS to review, ask for additional information, and approve or deny.

Resources

Thank you for participating!

DHS SBAP Policy Resource Account

RA-PWSBAP@pa.gov

