



SCHOOL NURSING Fact Sheet

Medicaid Reimbursement for School Nursing Services

School nursing is an important resource for school children to access health care and preventive health services, particularly for rural and medically underserved children. School nurses provide a broad scope of services ranging from administering screening tests, managing chronic conditions, and educating children about healthy lifestyle choices, to handling life-threatening allergy and asthma events.¹ For many children, the school nurse may be the only health care provider they will see all year.² Because school nurses are trained to understand the complexity of the relationship between physical and emotional well-being and academic success, they play a unique and valuable role in ensuring that students are healthy and able to learn.³

Medicaid is a significant payer for child and adolescent health care in the United States, covering 36% of school aged children in 2015.⁴ Given competing priorities for limited resources in schools, school nurses' ability to bill Medicaid enables them to more readily provide important preventive and other health care services, expanding school children's access to health care generally, but particularly in rural and underserved areas where it is needed most.

How do state laws address Medicaid coverage for school nursing services?

Across the country, states treat Medicaid coverage for school nursing services differently. Few state laws specifically provide for Medicaid coverage for school nursing services not provided in accordance with a student's Individual Education Plan (IEP), although some states do address these specific coverage decisions in either informal state policies or Medicaid state plan amendments (SPAs). A Medicaid state plan is an agreement between a state and the federal government describing how that state administers its Medicaid programs.⁵ Massachusetts allows school nurses to bill Medicaid for *all* Medicaid-eligible services through the SPA approved by Centers for Medicare & Medicaid Services (CMS) in early 2017.⁶ Other states, such as Florida and Kentucky, only address Medicaid reimbursement for school-based health care services that are provided to students with certain disability classifications, including students with an IEP.⁷ Many states, such as Connecticut, have promulgated guidance documents that outline reimbursable services by the type of practitioner that may provide the service. Following are examples of several state policies regarding Medicaid coverage of school nursing services. This is not an exhaustive list, but is designed to illustrate the many ways that states have chosen to address Medicaid billing for school nursing services.



Medicaid Billing for School Nursing Services Addressed by Statute

- **Florida:** Medicaid will reimburse school districts for diagnostic, screening, preventive, and rehabilitative services provided for students with specified disabilities, such as those listed in an IEP.⁸
- **Connecticut:** Medicaid will reimburse school districts for “eligible special education and related services” provided at school through the Medicaid School Based Child Health Program administered by the state Department of Social Services.⁹

Medicaid Billing for School Nursing Services Addressed in Administrative Regulations

- **Maryland:** Medicaid will reimburse for certain services provided by school nurses who are Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) certified providers.¹⁰ While Medicaid will also reimburse for certain services provided in a school-based health center, registered nurses are not listed as among the reimbursed providers by regulation.¹¹
- **Kentucky:** Medicaid will reimburse school districts for Medicaid-covered school nursing services provided in accordance with a student’s IEP.¹²
- **Mississippi:** Medicaid will reimburse public schools or certified public school districts for EPSDT School-Health Related Services or Health Related Early Intervention Services from Medicaid.¹³
- **Oregon:** Medicaid will reimburse publicly funded education agencies for nursing services listed in an IEP.¹⁴

Medicaid Billing for School Nursing Services Addressed in State Medicaid Plan Amendment

- **Massachusetts:** School nurses may obtain reimbursement for all services eligible under Medicaid.¹⁵

Medicaid Billing for School Nursing Services Addressed in Informal Policies

- **California:** Medi-Cal will reimburse a local education agency (LEA) for the school nursing services not authorized in a student’s IEP or the services authorized by an Individualized Family Services Plan (IFSP) which are limited to a maximum of 24 services (assessments and treatments) per 12-month period.¹⁶
- **Texas:** Medicaid will reimburse an LEA and shared service arrangements¹⁷ the school nursing services listed in an IEP.¹⁸
- **New York:** Medicaid will reimburse school districts and certain schools for nursing services listed in an IEP.¹⁹
- **Virginia:** Medicaid will reimburse school divisions for the school nursing services listed in IEP and EPSDT.²⁰

Most states that allow reimbursement for school nursing services do so for nurses practicing in school-based health centers or for services listed in student IEPs. As most school nurses do not work within school health centers and the scope of school nursing services extends well beyond those listed in IEPs, state laws that expressly allow Medicaid billing for preventive and health care services provided by school nurses represent an opportunity to expand school children’s access to health care and to improve child and adolescent health. Given the important role that school nurses play in both health and education of children, states should consider expanding Medicaid coverage for school nursing services via amending state laws.²¹



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¹ Robert Wood Johnson Foundation, *Unlocking the Potential for School Nursing: Keeping Children Healthy, In School, and Ready to Learn* (Aug., 2010), <https://campaignforaction.org/wp-content/uploads/2016/06/rwjf64263.pdf>.

² Kerri McGowan Lowrey, *How the Law can Help Realize the Potential of School Nursing in Public Health*, the Network for Public Health Law (June 6, 2017), https://www.networkforphl.org/the_network_blog/2017/06/06/897/how_the_law_can_help_realize_the_potential_of_school_nursing_in_public_health/?utm_source=Network+Report+6-8-17&utm_campaign=Network+Report+6-8-17&utm_medium=email&utm_content=306.

³ *Id.*

⁴ Georgetown University Health Policy Institute, Center for Children and Family, *Medicaid's Role for Young Children* (December, 2016), <https://ccf.georgetown.edu/wp-content/uploads/2017/02/MedicaidYoungChildren.pdf>.

⁵ Medicaid, *Medicaid State Plan Amendments*, <https://www.medicaid.gov/state-resource-center/medicaid-state-plan-amendments/index.html>.

⁶ Massachusetts's State Plan Amendment submitted to CMS (June 17, 2017), <https://www.medicaid.gov/State-resource-center/Medicaid-State-Plan-Amendments/Downloads/MA/MA-16-012.pdf>; Eva Marie Stahl, Health Policy Hub, *Massachusetts: State Plan Amendment Paves the Way for Medicaid in Schools*, Dec. 12, 2017, <https://www.communitycatalyst.org/blog/massachusetts-state-plan-amendment-paves-the-way-for-medicaid-in-schools#.WudZIS-ZPX8>.

⁷ An Individual Education Plan is a plan or program developed to ensure that a child who has a disability identified under the law and is attending an elementary or secondary educational institution receives specialized instruction and related services. School Nursing Services that might be mentioned in an IEP include, but are not limited to: early identification and assessment of disabilities in children; counseling services, including rehabilitation counseling, etc. Center for Parent Information and Resources, *All About the IEP*, Sep. 8, 2017, <http://www.parentcenterhub.org/iep/>. Mental Department of Health and Mental Hygiene, Center for Maternal and Child Health, *Role of the School Nurse in Implementing Section 504 and Individualized Education Program Services-Maryland State School Health Guideline* (Dec. 2007).

<http://marylandpublicschools.org/about/Documents/DSFSS/SSSP/SHS/SHSGuidelines/RoleofHealthStaffImplementing504Schools.pdf>. Center for Parent Information and Resources, *Related Services*, Nov. 1, 2017, <http://www.parentcenterhub.org/iep-relatedservices/>.

⁸ Fla. Stat. §§393.063, 409.9071, 409.9072 (2016); Florida Agency for Health Care Administration, *Florida Medicaid's Covered Services and HCBS Waivers, Medicaid Certified School Match Program*, http://www.fdhc.state.fl.us/medicaid/Policy_and_Quality/Policy/behavioral_health_coverage/spec_health_serv/Certified_School_Match.shtml (Last visited Apr. 11, 2018).

⁹ Conn. Gen. Stat. Ann. § 10-76d(a) (West 2017); Department of Social Services, *Medicaid School Based Child Health Program, User Guide*, Oct. 2017, at 1, http://www.portal.ct.gov/-/media/Departments-and-Agencies/DSS/Health-and-Home-Care/Reimbursement/School-Based-Healthcare-Program/SBCH_User_Guide_updated_2017.pdf?la=en.

¹⁰ Md. Code Reg. 10.09.50.04 (2018).

¹¹ Md. Code Reg. 10.09.76.02 (2018) states that a physician, nurse practitioner, physician assistant, dentist, or dental hygienist providing services in an SBHC must be licensed. There is no mention of registered nurses.

¹² 907 Ky. Admin Regs. 1:715 (2018).

¹³ 23-223 Miss. Code R. § 1.2.

¹⁴ Or. Admin. R. 410-133-0120 (2018); Oregon Health Authority, *School-Based Health Services Program*. (Last visited on May. 10, 2018).

¹⁵ Massachusetts's State Plan Amendment submitted to CMS (July 1, 2016), <https://www.medicaid.gov/State-resource-center/Medicaid-State-Plan-Amendments/Downloads/MA/MA-16-012.pdf>.

¹⁶ Local Educational Agency Billing and Reimbursement Overview, p 6-7, 9, <http://www.dhcs.ca.gov/provgovpart/Documents/ACLSS/Manuals/LEA%20Manual/LEAProviderManual10-2014.pdf>. (Last visited Apr. 11, 2018).

¹⁷ According to the Texas Education Agency, "a shared services arrangement exists when two or more local education agencies (LEAs) enter into an agreement for the performance and administration of a program," including special education services. See, e.g., Texas Education Agency, Shared Services Arrangement Procedures at https://tea.texas.gov/Finance_and_Grants/Grants/Federal_Fiscal_Compliance_and_Reporting/IDEA_Fiscal_Compliance/Shared_Services_Arrangement_Procedures/.

¹⁸ Texas Education Agency, School Health and Related Service, https://tea.texas.gov/Academics/Special_Student_Populations/Special_Education/Programs_and_Services/School_Health_and_Related_Services/ (Last visited Apr. 11, 2018).

¹⁹ New York State Department of Health, Medicaid in Education Alert (Mar. 4, 2015), http://www.oms.nysed.gov/medicaid/medicaid_alerts/alerts_2015/15_02_clarification_medicaid_reimbursement_nursing_services_3_4_15.pdf; New York State Plan Amendment 09-61 (Jun. 11, 2010). http://www.oms.nysed.gov/medicaid/resources/state_plan_amendment/nys_spa_09-61.pdf.

²⁰ Virginia Department of Education, Medicaid & Schools, http://www.doe.virginia.gov/support/health_medical/medicaid/index.shtml (Last visited Apr. 11, 2018).

²¹ Maryland Department of Education, School-Based Health Centers, <http://marylandpublicschools.org/about/Pages/DSFSS/SSSP/SBHC/index.aspx>. (Last visited Apr. 30, 2018); Robert Wood Johnson Foundation, Unlocking the Potential for School Nursing: Keeping Children Healthy, In School, and Ready to Learn (Aug., 2010), <https://campaignforaction.org/wp-content/uploads/2016/06/rwjf64263.pdf>; In school year 2007-2008, all 1,455 public schools in Maryland had school health services, usually staffed by a registered nurse; the same year, SBHCs served 72 of the 1455 public schools.