

May 5, 2020

The Honorable Seema Verma  
Administrator  
U.S. Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

Dear Administrator Verma:

On behalf of the 19 undersigned national organizations, we write to ask that CMS issue further guidance to States that would enable greater flexibility and efficiency in the delivery of healthcare services, particularly mental health services, to children during this crisis.

We acknowledge and appreciate the responsiveness and receptivity to program flexibility that Centers for Medicaid and Medicare (CMS) has demonstrated during this COVID-19 pandemic. As the pandemic has created unprecedented challenges, it has also led to some creative and effective responses that CMS has supported to address the impact of this crisis in the provision of school-based Medicaid services. As education and health care stakeholders committed to ensuring children continue to access critical healthcare services during this pandemic we ask that CMS enable States to adjust their school-based claiming practices and permit the utilization of a CMS-approved cost report, so districts can receive reimbursement of their health and related services, including mental health services, more efficiently.

For over thirty years, Medicaid has helped cover the costs for certain medically necessary services provided in school-based settings to children eligible for special education services. This includes services provided by school-based providers like school nurses, occupational and physical therapists, audiologists, speech-language pathologists, school psychologists and other specialized instructional support personnel that students rely upon for educational and health care services during the school day. Medicaid can also reimburse school districts for health and mental health services delivered in schools to Medicaid enrolled students and for providing other screening, diagnosis and treatment services like vision and hearing screenings, and diabetes and asthma management.

School districts deliver health services effectively and efficiently since school is where children spend most of their days. School districts that participate in the Medicaid program utilize this funding stream to pay the salaries of school personnel who can deliver healthcare services directly to children or to expand healthcare services to children. Unfortunately, many districts that have high numbers of Medicaid-eligible children do not even attempt to participate in the Medicaid program due to the administrative challenges associated with billing Medicaid.

Furthermore, to mitigate the impacts of our current crisis, school districts must prioritize the delivery of more mental health supports and services to more children than ever before. School districts must also find resources to ensure all healthcare providers, including mental health providers, are able to connect with students under their care and deliver Medicaid-reimbursable services to them remotely. Consequently, when schools do re-open, students will enter classrooms with more serious health conditions and multiple, unaddressed health needs that will impede learning. Providers, in turn, will face even larger caseloads and have less time to spend on administrative paperwork.

By leveraging an existing and proven process for Medicaid claiming that ensures strong accountability

measures, we believe that the ability of stakeholders to respond to the current crisis and provide essential services would be greatly enhanced by allowing and encouraging States to utilize a cost-based rather than an encounter-based approach to claiming and reimbursement. In particular, this flexibility would ensure our providers, who are providing telehealth services to students under crisis conditions that were never contemplated, can provide mandated services. Further, it would enable districts of all sizes to effectively respond to the COVID-19 crisis while ensuring they have the resources needed to provide these critical health services to students.

We urge you to carefully consider the important benefits that Medicaid provides to our nation's most vulnerable children in schools. It is critical that during this crisis, school personnel and school-based providers are focused on providing essential and mandated health and mental health services to children. If you have questions or would like more information please reach out to Sasha Pudelski from AASA at [spudelski@aasa.org](mailto:spudelski@aasa.org).

Sincerely,

AASA, The School Superintendents Association  
American Association for Psychoanalysis in Clinical Social Work  
American Federation of State, County and Municipal Employees  
American Federation of Teachers  
American Physical Therapy Association  
American Occupational Therapy Association  
American Speech-Language-Hearing Association  
Anxiety and Depression Association of America  
Association of School Business Officials International  
Children and Adults with Attention-Deficit/Hyperactivity Disorder  
Global Alliance for Behavioral Health and Social Justice  
Mental Health America  
National Association of Pediatric Nurse Practitioners  
National Association of School Nurses  
National Association of School Psychologists  
National Association of Social Workers  
National Education Association  
National Women's Law Center  
National Register of Health Service Psychologists