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The Online Handbook has not yet been revised to include information in this Update.

ForwardHealth UPDATE

Wisconsin serving you

Your First Source of ForwardHealth Policy and Program Information

SCHOOL-BASED SERVICES EXPANSION

Effective for the 2025–2026 school year, ForwardHealth will expand school-based services (SBS) for Medicaid-enrolled students who are between 3 and 21 years old during the school term. Changes include:

- Expanding member eligibility.
- Expanding allowable provider types.
- Expanding allowable services.

Guidance from the Centers for Medicare and Medicaid Services encourages states to increase student access to SBS beyond individualized education plan (IEP) services. This guidance is related to the Bipartisan Safer Communities Act Public Law 117-159.

ForwardHealth encourages SBS providers to begin identifying additional eligible students and covered services as described in this ForwardHealth Update ahead of the upcoming 2025–2026 school year. **More information about this expansion (including billing guidance, allowable procedure codes, and claims submission information) will be included in future Updates in 2025 and 2026.**

AFFECTED PROGRAMS
BadgerCare Plus, Medicaid

TO
HealthCheck Other Services Providers, Occupational Therapists, Physical Therapists, Physician Clinics, Physicians, School-Based Services Providers, Speech-Language Pathologists, HMOs and Other Managed Care Programs

The information provided in this ForwardHealth Update is published in accordance with Wis. Admin. Code §§ DHS 105.53 and 107.36.

WISCONSIN DEPARTMENT of HEALTH SERVICES

Upcoming Online Information Session

ForwardHealth will offer an online information session about the SBS expansion from 9:30–10:30 a.m. on July 23, 2025. This session will give attendees an opportunity to learn more about the expansion and how to prepare for these changes, as well as the opportunity to ask any questions. Providers must register to attend. A recording of the session will be posted to the Trainings page of the ForwardHealth Portal (the Portal) after the session. The training will be listed under the Provider/Service Area Specific drop-down menu.

Expanded Member Eligibility

With this expansion, all eligible Medicaid-enrolled students with general health care service needs can receive SBS. Students who have any of the following plans are now eligible for SBS:

- IEP
- Individualized Family Service Plan (IFSP)
- 504 Plan
- Individualized Health Plan
- Behavioral Health Plan
- Other plans developed by a medical professional within their scope of practice where medical necessity has been established, as defined by Wis. Admin. Code § DHS 101.03(96m)

Required Plan Documentation

When providing SBS to a Medicaid-enrolled student, providers must document details about the services in the student's plan (regardless of plan type) including:

- A statement or justification of medical need or a disability condition statement
- A list of services being provided
- Start date
- End date
- Description of scope
- Details about frequency
- Details about duration

There may be additional documentation requirements depending on the services provided.

QUICK LINKS

- School-Based Services service area of the ForwardHealth Online Handbook
- Trainings page

The information provided in this ForwardHealth Update is published in accordance with Wis. Admin. Code §§ DHS 105.53 and 107.36.

Documentation Retention

Providers are reminded that they must follow the documentation retention requirements per Wis. Admin. Code § DHS 106.02(9). Providers are required to produce or submit documentation, or both, to the Wisconsin Department of Health Services (DHS) upon request. Per Wis. Stat. § 49.45(3)(f), providers of services shall maintain records as required by DHS for verification of provider claims for reimbursement. DHS may audit such records to verify the actual provision of services and the appropriateness and accuracy of claims. DHS may deny or recoup payment for services that fail to meet these requirements. Refusal to produce documentation may result in denial of submitted claims, recoupment of paid claims, application of intermediate sanctions, or termination from the Medicaid program.

New Allowable Provider Types

All SBS providers must be employed by or contracted with a local education agency, such as a school district, Cooperative Educational Service Agency (CESA), County Children with Disabilities Education Board, or charter school. Some provider types require licensing by the Wisconsin Department of Public Instruction (DPI).

The SBS expansion includes these new allowable provider types:

- Clinically trained mental health professionals as defined in Wis. Admin. Code § PI 34.0375:
  - Operating within their scope of practice as defined under state law
  - Providing medical or other remedial care under 42 C.F.R. § 440.60 or rehabilitative services under 42 C.F.R. § 440.130
- Physicians or other providers:
  - Operating within their scope of practice under Wis. Admin. Code § N 8.02(1) with prescribing authority granted under Wis. Stat. § 441.16(2)
  - Providing services identified in the member's treatment plan as defined in Wis. Admin. Code § DHS 105.53(3)(a)3
- Dentists or dental hygienists operating within their scope of practice as described in Wis. Admin. Code §§ DHS 105.06(1) and 105.06(2)

DID YOU KNOW?

ForwardHealth will offer an online information session about the SBS expansion on July 23, 2025. Providers must register to attend. A recording of the session will be posted to the Trainings page of the Portal after the session.

The information provided in this ForwardHealth Update is published in accordance with Wis. Admin. Code §§ DHS 105.53 and 107.36.

New and Expanded Allowable Services

Effective for the 2025–2026 school year, ForwardHealth will cover new and expanded SBS.

New Services

- Physician services:
  - Performing evaluation and management services
  - Screening and referring for treatment of health needs
  - Providing treatment
  - Performing medication management
  - Explaining treatments, therapies, and physical or mental conditions to family members, school districts, or the CESA
- Dental services:
  - Performing oral evaluations
  - Performing oral assessments
  - Applying fluoride and dental sealants (when provided by a dentist or dental hygienist)

Expanded Services

- Attendant care:
  - Preparing food, assisting with and monitoring eating, feeding, and swallowing
  - Performing routine personal hygiene
  - Dressing
  - Toileting and diapering
  - Transferring
  - Performing routine care of personal assistive devices
  - Supervising and cuing of activities
- Additional medically necessary nursing services and medical services added within the provider's scope of practice
- Coaching as an allowable occupational therapy, physical therapy, and speech-language pathology service
- Psychological, counseling, social work, and mental and behavioral services:
  - Performing marriage and family therapy
  - Providing substance use disorder services

The information provided in this ForwardHealth Update is published in accordance with Wis. Admin. Code §§ DHS 105.53 and 107.36.

Additional Information

For general SBS policy and coverage information and requirements, refer to the School-Based Services service area of the ForwardHealth Online Handbook.

IN THE KNOW

Stay current by signing up for ForwardHealth's email subscription service. Select from a list of service areas to receive policy, training, and benefit information specific to those areas.

The information provided in this ForwardHealth Update is published in accordance with Wis. Admin. Code §§ DHS 105.53 and 107.36.

The ForwardHealth Update is the first source of program policy and billing information for providers.

Wisconsin Medicaid, BadgerCare Plus, SeniorCare, and Wisconsin Chronic Disease Program are administered by the Division of Medicaid Services within the Wisconsin Department of Health Services (DHS). The Wisconsin HIV Drug Assistance Program and the Wisconsin Well Woman Program are administered by the Division of Public Health within DHS.

For questions, call Provider Services at 800-947-9627 or visit our website at www.forwardhealth.wi.gov/.