This Update has been revised since its original publication. Revised information appears in red text on page 5.

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ForwardHealth UPDATE

Wisconsin serving you

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ADDITIONAL SCHOOL-BASED SERVICES CHANGES

This ForwardHealth Update describes Centers for Medicare & Medicaid Services (CMS)-required policy changes to school-based services (SBS), based on guidance from CMS, developed after passage of the Bipartisan Safer Communities Act Public Law 117-159.

- Requires use of an individual National Provider Identifier (NPI) on certain SBS claims.
- Includes Random Moment Time Study-eligible school days and notification and response time frame changes.
- Narrows the definition of what's considered specialized transportation.

Previous Updates 2025-20, "School-Based Services Expansion," and 2025-22, "Claims Submission Information for Expanded School-Based Services," included initial SBS expansion information.

AFFECTED PROGRAMS

BadgerCare Plus, Medicaid

TO

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

QUICK LINKS

- Provider Enrollment Information page
- Provider Identification topic #3421
- School-Based Services service area
- Resources for School-Based Services Providers page

WISCONSIN DEPARTMENT of HEALTH SERVICES

Required Individual National Provider Identifiers

CMS conducted an audit of SBS claims and determined that they would no longer accept a district-wide NPI (Type 2) for the prescribing, referring, or ordering provider on SBS claims. Effective for dates of service on and after July 1, 2026, certain SBS claims (listed in the next section) for services requiring a prescription, referral, or order must include the prescribing, referring, or ordering provider's individual NPI (Type 1). This provider must be enrolled as a Medicaid provider.

Note: The NPI requirement is an additional requirement for SBS. All other SBS requirements continue to apply, including that all students must have a treatment plan.

School-Based Services Claims That Require the Provider's Type 1 National Provider Identifier

Starting July 1, 2026, ForwardHealth will require the individual NPI of the provider who prescribed, referred, or ordered the service within their scope of practice on claims for these SBS-allowable services:

- Nursing services
- Occupational therapy
- Physical therapy
- Speech and language pathology services
- Attendant care services

School districts have several options to meet this requirement. Schools can:

- Hire or contract with a physician, physician assistant, or advanced practice registered nurse to refer services. This clinician must be enrolled with Wisconsin Medicaid.
- Set up a system for families to have their Medicaid-enrolled primary care providers use their NPIs to sign off on their children's treatment plans. Districts using this option should explain the process to families and their physicians through informational sheets or forms.
- Have school providers such as physical therapists, occupational therapists, speech-language pathologists, or school nurses obtain an NPI, enroll with Wisconsin Medicaid, and then refer services within their scope of practice.

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

Submitting National Provider Identifiers on Claims

The SBS provider's NPI must be included when submitting claims for the previously described services or they will be denied.

School-Based Services Claims That Do Not Require the Provider's Type 1 National Provider Identifier

ForwardHealth will not require an individual NPI on claims for SBS-allowable:

- Dental services.
- Mental health services.
- Physician services.
- Psychological counseling.
- Social work.
- Transportation services.

Obtaining a National Provider Identifier

Providers must meet federal qualifications to obtain an NPI. Refer to these NPI resources:

- Provider Identification topic #3421 for general information about NPIs
- The National Plan and Provider Enumeration System website for information and instructions on how to apply for an NPI

Note: To obtain an NPI for SBS, physical therapists, occupational therapists, and speech-language pathologists must be licensed by the Department of Public Instruction (DPI). Speech-language pathologists must meet the qualifications outlined in 42 C.F.R. § 440.110(c)(2) in addition to being licensed by DPI.

Enrolling as a Prescribing/Referring/Ordering Medicaid Provider

If an SBS provider is already enrolled as a Medicaid provider, they do not need to enroll a second time as a prescribing/referring/ordering provider. Their current Medicaid enrollment is sufficient.

If a provider needs to enroll with Wisconsin Medicaid solely as a prescribing/referring/ordering provider, they can visit the ForwardHealth Portal (the Portal) for more information and to enroll. The Provider Enrollment Information page provides general information on Medicaid enrollment requirements and the

DID YOU KNOW?

ForwardHealth Online Handbook Procedure Codes topic #1480 includes a list of allowable SBS procedure codes.

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Prescribing/Referring/Ordering Providers page for specific information for this provider type and to begin the enrollment process.

How to Begin the Enrollment Process on the Portal

SBS providers can begin a new provider enrollment application by:

- Clicking Start or Continue Your Enrollment Application on the Provider Enrollment Information page of the Portal.
- Clicking Medicaid Prescribing/Referring/Ordering Provider Enrollment Application in the To Start a New Prescribing/Referring/Ordering Enrollment section of the Certification homepage.

Providers should choose the enrollment type that matches their license and education level. For example:

- A registered school nurse can enroll as a nurse in independent practice providing private duty nursing services as outlined in Wis. Admin. Code § DHS 105.19 or as a nurse practitioner as outlined in Wis. Admin. Code § DHS 105.20.
- A school speech-language pathologist can enroll with a speech-language pathologist provider type and a speech therapy specialty.

During the online provider enrollment process, SBS providers will be asked to enter their license number. SBS providers should enter either:

- Their Department of Safety and Professional Services license number.
- Their DPI license number if they have one.

Random Moment Time Study Changes

The annual SBS cost report includes information about how much time staff spend doing certain activities. Selected staff at school districts and charter schools must participate in a Random Moment Time Study to collect this information.

Effective July 1, 2026, ForwardHealth will implement these new CMS requirements for time studies:

- **Districts will be provided with two days' notice of time study moments** by the Wisconsin Department of Health Services' (DHS') contractor, Public Consulting Group (PCG). This is a change from the previous five days' notice.

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- **Staff included in the time study sample must complete the time study information within two school days of the sampled moment.** This is a change to the current five-day reporting window.
- The time study includes all regular school days occurring in August and September, beginning on the first day that staff report back to work for the regular school year based on the earliest date for any participating district in Wisconsin. Currently, a time study does not occur during the July to September quarter.
- The time study will change from three quarters to two semesters.
  - The first semester begins on the day staff return at the earliest date for any school district in Wisconsin and continues through December 31.
  - The second semester begins on January 1 and continues through June 30.
- From July 1 to the day before the first day staff members return at the earliest date for any district in Wisconsin, a period exists for the collection of allowable costs, but PCG will not conduct a time study during this time.

ForwardHealth encourages schools to review their time study procedures and documentation to ensure staff compliance with time study reporting requests and the new timelines as previously described.

Federally Required Changes to Specialized Transportation Requirements

CMS has narrowed the definition of specialized transportation to mean that a child must be transported on a physically modified vehicle (for example, a vehicle with a wheelchair lift, ramp, or special harness). In addition, CMS requires that:

- The child has transportation included in an Individualized Education Program (IEP).
- The required vehicle modification is specifically documented in the IEP (for example, "child requires a wheelchair ramp on the bus").

Therefore, effective July 1, 2026, ForwardHealth will no longer cover transportation in a regular vehicle as specialized transportation if the only modification is the presence of an aide to assist a child.

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ForwardHealth encourages schools to review the impact of this change and work to potentially identify other funding sources (such as the Individuals with Disabilities Education Act) for transportation if needed.

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 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.

REMINDER

The Resources for School-Based Services Providers page of the Portal includes links to important resources (for example, trainings, frequently asked questions, cost reporting resources).

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This Update was issued on 04/30/2026 and information contained in this Update was incorporated into the Online Handbook on 07/02/2026.

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/.

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