



SOUTHERN PLAINS EDUCATION COOPERATIVE

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Dear Senator Kunesh and members of the Senate Education Finance Committee:

This is in support of Senate File 1028 which would allow school districts to bill medical assistance for the important behavioral health services to students in special education. This bill provides more than \$10 million in medical assistance funds at no cost to the state of Minnesota at a time when the cross subsidy is skyrocketing.

My understanding is that the Department of Human Services has some concerns related to this bill. DHS would like to clarify that mental health practitioners would only work within their scope of practice. School social workers are governed under a code of ethics and are obligated to work within this scope. I do not have a problem with this section of the amendment to the bill; however, I do not believe that it is necessary.

The Department of Human Services (DHS) also has a concern that a Diagnostic Assessment (DA) would not be required. However, the Centers for Medicaid and Medicare Services encourages states to allow school districts to bill without a DA. This bill does not ask for something that is not already being allowed. Minnesota's Certified Community Behavioral Health Clinics allow for billing based on a comprehensive evaluation. This evaluation is similar to the comprehensive evaluation conducted as part of the special education process. The information captured by the comprehensive special education fulfills all relevant portions of the DA criteria.

Previously our cooperative was certified as a Children's Therapeutic Services and Support (CTSS) provider. Due to our remote status with very rural communities, it was extremely difficult to staff this program as well as the reimbursement rate did not off-set the costs of duplicative paperwork requirements. When we discontinued CTSS we hired the same staff that we had previously contracted with when we provided CTSS. These staff now provide the same skilled services within our programs, but are able to focus on student needs rather than duplicative paperwork. When we do have situations that require a DA to connect students to services outside of the school district, the mental health professional we employ utilizes information from the special education evaluation in order to complete the DA.

Please pass Senate File 1028 to capture the Medical Assistance funds due to school districts as is allowed in neighboring states.

Sincerely,

Dr. Sarah A. Mittelstadt