



Maryland Occupational Therapy Association

PO Box 36401, Towson, Maryland 21286 ♦ mota-members.com

Committee: House Ways and Means Committee

Bill Number: House Bill 689 - Maryland Medical Assistance Program – Use of Reimbursement Funds by Schools

Hearing Date: February 25, 2025

Position: Support with Amendment

The Maryland Occupational Therapy Association (MOTA) supports *House Bill 689 – Maryland Medical Assistance Program – Use of Reimbursement Funds by Schools*. The bill would direct funding from new Medicaid reimbursement opportunities to strengthen school health programs.

MOTA has been working to address the long-standing shortages of occupational therapy practitioners and other health care providers in schools. We participated in the the work of the Commission to Study the Health Care Workforce Crisis in Maryland. The Commission concluded that Maryland is far behind other states in addressing health professional shortages.¹

We have a path forward to address the shortage of school health providers. In March 2023, the Centers for Medicare and Medicaid Services released new federal guidance on reimbursement for school health services.² This guidance removes regulatory barriers and offers the opportunity for additional federal resources for school health through Medicaid reimbursement.

We would request two amendments which we believe align with the intent of the bill:

Amendment 1: Clarifying which practitioners may be reimbursed. Federal law and regulations already delineate who may bill for school health services. The practitioner must be authorized to practice either by a health occupation board or education agency. We recommend aligning the bill’s language to reflect federal guidance:

¹ [https://health.maryland.gov/docs/SB%20440%20Ch.%20708%20\(2022\)%20%E2%80%93%202023%20Final%20Report%20%E2%80%93%20Commission%20to%20Study%20the%20Health%20Workforce%20Crisis.pdf](https://health.maryland.gov/docs/SB%20440%20Ch.%20708%20(2022)%20%E2%80%93%202023%20Final%20Report%20%E2%80%93%20Commission%20to%20Study%20the%20Health%20Workforce%20Crisis.pdf)

² <https://www.cms.gov/newsroom/fact-sheets/delivering-service-school-based-settings-comprehensive-guide-medicaid-services-and-administrative>

On page 1 in lines 21-23:

(2) "PROVIDER" MEANS A ~~SCHOOL AUDIOLOGIST, SCHOOL~~
~~PSYCHOLOGIST, SCHOOL SPEECH PATHOLOGIST, AND ANY OTHER HEALTH CARE~~
~~PRACTITIONER WHO PROVIDES SERVICES TO A STUDENT IN A SCHOOL SETTING.~~
PRACTITIONER WHO IS AUTHORIZED TO PRACTICE IN A SCHOOL SETTING UNDER THE HEALTH
OCCUPATIONS ARTICLE OR EDUCATION ARTICLE INCLUDING

- (i) nurses;
- (ii) licensed clinical social workers;
- (iii) professional counselors;
- (iv) marriage and family therapists;
- (v) occupational therapists and occupational therapy assistants;
- (vi) speech language pathologists;
- (vii) physical therapists;
- (viii) school counselors; and
- (ix) school psychologists.

Amendment 2: Clarifying how funding may be spent. As we understand the bill's intention, new resources from Medicaid billing for school health must be directed towards the school health workforce. We would recommend a change in language to recognize that school health professionals are paid through salaries rather than stipend arrangements as well as that educational opportunities are not typically labeled as internships:

On page 2 in lines 8-15:

- (1) ADDITIONAL POSITIONS FOR PROVIDERS;
- (2) ~~PAID INTERNSHIPS FOR STUDENTS SEEKING TO BECOME~~
~~PROVIDERS;~~ EDUCATION OPPORTUNITIES FOR STUDENTS IN ACCREDITED HEALTH
PROFESSIONAL EDUCATIONAL PROGRAMS TO WORK UNDER A PROVIDER AS PERMITTED UNDER
THE HEALTH OCCUPATIONS ARTICLE OR THE EDUCATION ARTICLE;
- (3) ~~STIPENDS~~ SALARY INITIATIVES FOR PROVIDERS THAT ARE DESIGNED TO ADDRESS
PROBLEMS IN PROVIDER RECRUITMENT AND RETENTION; AND
- (4) ~~STIPENDS~~ SALARY INITIATIVES FOR PROVIDERS WORKING IN LOW-PERFORMING
SCHOOLS THAT ARE DESIGNED TO ADDRESS PROBLEMS IN PROVIDER RECRUITMENT
AND RETENTION.

We urge a favorable report on this bill with our proposed clarifying amendments. If we can provide

any further information, please contact Robyn Elliott at relliott@policypartners.net or (443) 926-3443.