A Look at Colorado's Proposed School Health Services Updates

Presented by Dario Avila, Frontline Education



Frontline Education - School Medicaid Webinar Series

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October 7, 2026

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Welcome & Introduction

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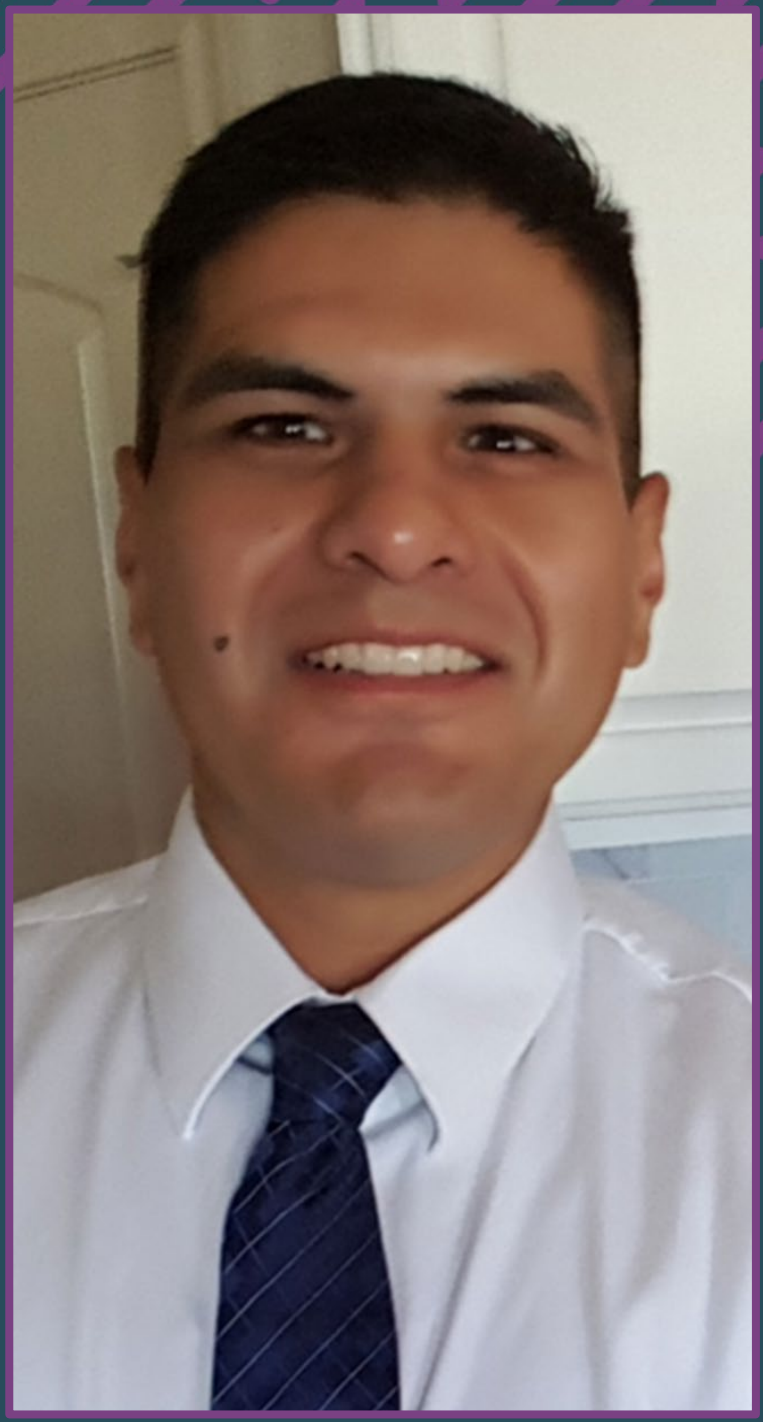
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Welcome & Introduction

Dario Avila, Frontline Education – Solution Strategist

Mr. Avila holds a Bachelor of Arts degree in Sociology from The University of Texas at Austin. He worked for the Health and Human Services Commission (HHSC) from 2005 – 2019. Much of that time was spent overseeing the day-to-day operations of the School Health and Related Services (SHARS) and Medicaid Administrative Claiming (MAC) programs. He served on the National Alliance for Medicaid in Education (NAME) Board of Directors from 2015 - 2019 and was elected NAME President for the 2018 – 2019 year.

Before joining Frontline, Mr. Avila spent six years with a Medicaid services vendor, where he led sales, marketing, and customer support efforts for school districts across Texas. Today at Frontline Education, Dario serves as a Solution Strategist, partnering across sales, product, implementation, and marketing teams. He supports Medicaid-focused sales engagements, helps districts identify opportunities to strengthen compliance and reimbursement, and remains involved long after implementation to ensure districts continue to succeed. He also plays a key role in shaping product strategy, supporting Medicaid initiatives, and advancing Frontline's thought leadership through webinars and industry education.

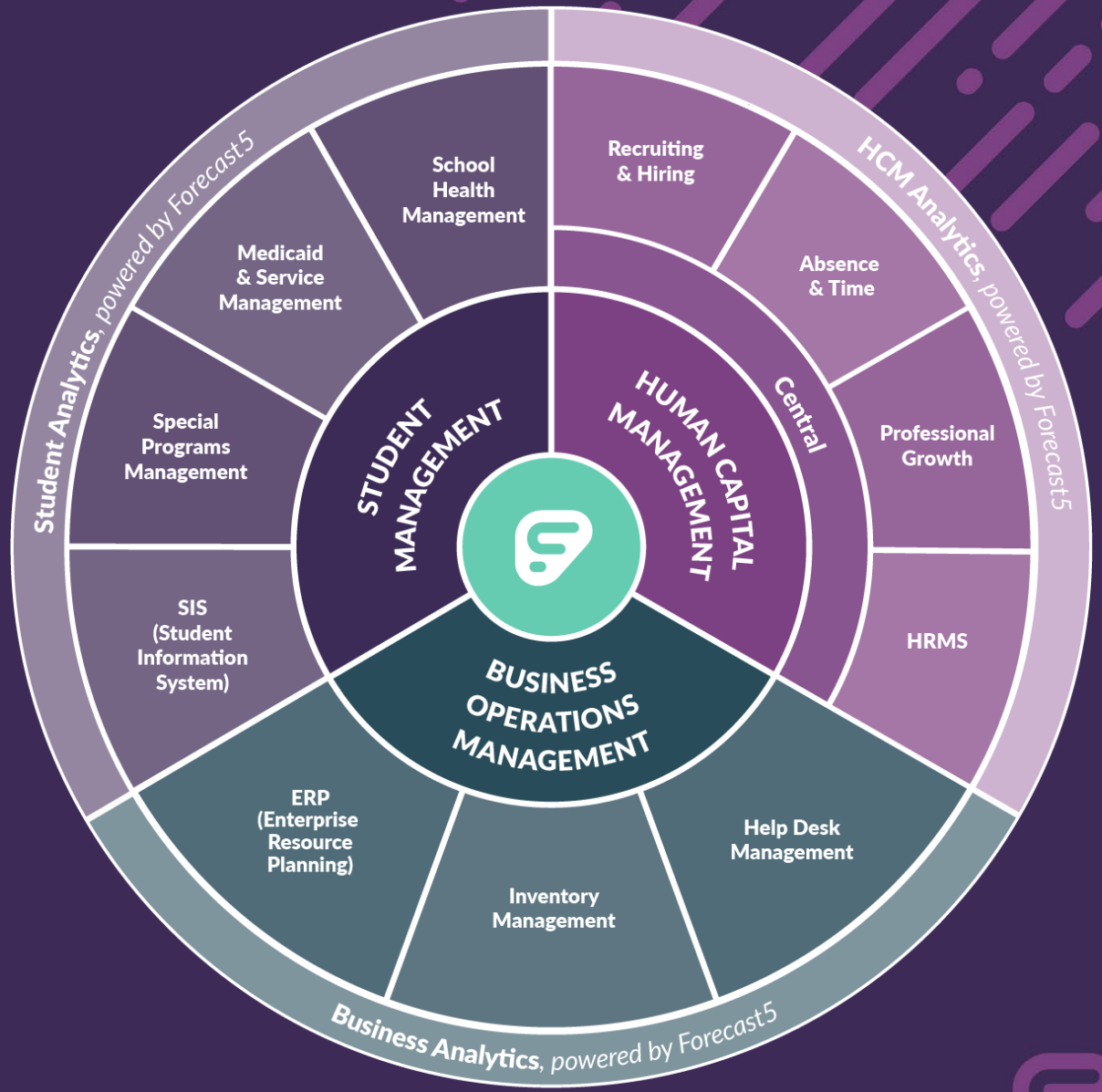


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What is Frontline?

School administration software purpose-built for K-12 to empower educators.

We provide innovative, connected solutions for student and special programs, business operations, and human capital management with powerful data and analytics.

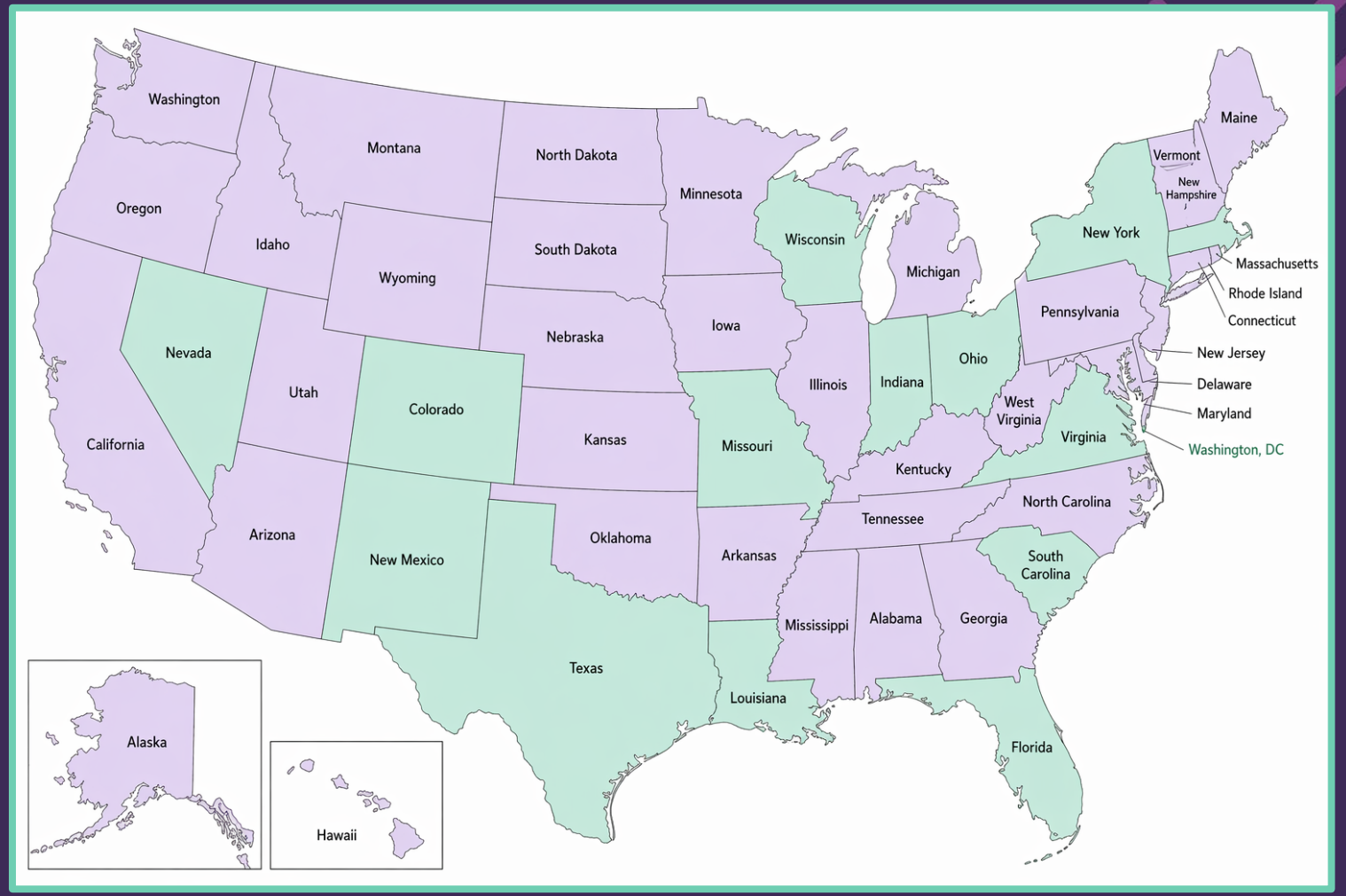


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Welcome & Introduction

Frontline Medicaid:

- Over 500 school districts
- 15 states served
- 2.5 million students



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SERVICE TRACKING & MEDICAID

Maximize reimbursement. Minimize compliance risk.

Frontline's integrated platform helps districts capture every eligible dollar — with built-in safeguards that keep you audit-ready year-round.

- Automated service documentation aligned to Medicaid requirements
- Real-time compliance monitoring and built-in audit trail
- Seamless school Medicaid billing and claims submission
- Expert guidance from nationally recognized Medicaid specialists

Reimbursement optimization

Capture every eligible dollar

Compliance confidence

Audit-ready year-round

SHARS billing

Seamless claims submission

Medicaid Strategist

Dario Avila — 20 yrs experience

We make a difference

- We serve as a **consistent partner of school districts through every dimension of the company.**
- We are comprised of an outstanding team with **domain expertise and unmatched skills.**
- We provide technology that **supports the growth of people and optimizes processes.**
- We leverage best practices, data and insights to **accelerate decision-making.**
- We earn the **trust of K-12 education leaders.**

Frontline exists to enhance efficiency and improve performance so school leaders can focus on strategic initiatives that impact student outcomes.

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SHSP Overview

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SHSP Overview

Colorado's School Health Program allows participating public school districts and Boards of Cooperative Education Services (BOCES) to claim federal Medicaid (Health First Colorado) reimbursement for medical and health-related services provided to eligible students.

- Reimbursement is available for Medicaid-eligible children under age 21 for covered medically necessary services provided pursuant to an IEP, IFSP, Section 504 plan, other individualized health or behavioral health plan, or Medicaid-eligible children under age 21 that have other medical plan(s) of care (outside of IEPs/IFSPs) where medical necessity has been established.

- Colorado is considered a (school) Medicaid expansion state.

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SHSP Overview

- Claiming school-based services does not reduce or diminish a student's regular Medicaid benefits outside of the school setting.
- Funds recovered by school districts must be reinvested back into health-related services and programs to enhance student wellness.

Covered Services		
Audiology Services	Personal Care Services	Specialized Transportation
Counseling	Physical Therapy	Speech Therapy
Nursing Services	Physician Services	Vision Services
Occupational Therapy	Psychology	
Orientation, Mobility	Social Work Services	

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SHSP Overview

- Colorado's SHSP program employs a cost-based reimbursement methodology.
- The billing providers are the Local Education Agencies (LEAs) and Boards of Cooperative Educational Services (BOCES).
- SHSP is run by the Department of Health Care Policy and Financing and the Colorado Department of Education.

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SHSP Overview

- On December 17, 2025, the Department of Health Care Policy and Financing submitted a SPA and Time Study Implementation Plan (TSIP).
- The anticipated implementation date of program changes was July 1, 2026.
- To date, the proposed changes are still pending CMS approval.

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RMTS Updates

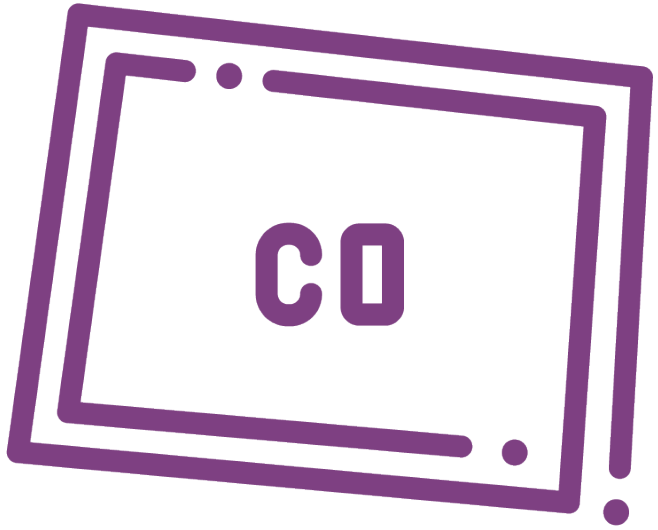
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RMTS Updates

- Colorado's Random Moment Time Study is expanding to include all four quarters of the year.
  - July through September
  - October through December
  - January through March
  - April through June



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RMTS Updates

- Adding the July-September quarter required clarification of how Extended School Year (ESY) services and staff should be treated.

  Under the proposed methodology:

  - The first day included on the RMTS calendar should generally be the date staff return for the **regular school year**, not the first day students return.
  - ESY dates should **not** be treated as the beginning of the regular school-year RMTS period.
  - Employees who perform both ESY work and regular-school-year allowable activities may still appear on the Staff Pool List (SPL).
  - Staff who perform **only ESY responsibilities should not be included on the SPL**.
  - Costs associated exclusively with ESY work are expected to be **excluded from SHS financial reporting** under the revised methodology.

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RMTS Updates

- Pending CMS approval, an additional cost pool will be added to the state's RMTS.
  - Currently, Colorado's RMTS has two cost pools (Administrative Personnel and Direct Service)
  - The new structure adds a separate Personal Care only cost pool
    - The Personal Care pool would include:
      - Personal Care Aides/Teacher's Aides
      - Health Technicians
    - The Personal Care pool would also have its own cost base and RMTS percentages.

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RMTS Updates

- RMTS sample size being reduced to 4,620 total moments per quarter:
  - Admin Cost Pool: 1,540
  - Direct Service Cost Pool: 1,540
  - Personal Care Cost Pool: 1,540

- The required 85% response rate still applies.

- The reduction in the RMTS sample size is due to the policy change that allows for a higher margin of error with time study results.

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Specialized Transportation

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Specialized Transportation

- The presence of a bus aide alone, no longer qualifies a trip as specialized transportation.

- Under the proposed methodology, beginning July 1, 2026, the student would need to require a physical modification of the vehicle prescribed in the student's IEP for the trip to qualify for Medicaid reimbursement.

- Personal care services provided by bus aides while on the bus are still reimbursable, however, the service would need to be claimed under the Personal Care Service category, and the position would need to be included on the district's SPL.

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Specialized Transportation

- Only Specialized Transportation designation:
  - Describes a vehicle that has been physically modified and **exclusively** transports special education students with specialized transportation equipment prescribed in their IEP.
  - Describes drivers that **only** drive/work on physically modified vehicles that **exclusively** transport special education students with specialized transportation equipment prescribed in their IEP.



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Specialized Transportation

- Not Only Specialized Transportation designation:
  - Describes a vehicle that is used for at least one route transporting special education students with specialized transportation equipment prescribed in their IEP and is also used to transport IEP students that do not require specialized equipment.
  - Describes drivers that transport at least one special education student with specialized equipment prescribed in their IEP in a vehicle that has been physically modified to fit the needs of the student(s) but that also includes students who do not require specialized equipment.



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Specialized Transportation

- One-Way Trip Ratio
  - Applied to all transportation costs
  - Numerator is supplied by PCG
  - Denominator is populated by the district
  - Bus logs are required to reconcile the one-way trip ratio

NUMERATOR
Total number of one-way trips for Medicaid enrolled students requiring specialized transportation and who received an IEP mandated, reimbursable service on that same day

/

DENOMINATOR
Total number of one-way trips for all students transported on specially adapted vehicles

= One-Way Trip Ratio

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Specialized Transportation

- Non-Specialized One-Way Trip Ratio
  - Applied to all transportation costs designated as “Not Only Specialized Transportation”
  - Bus logs are required to reconcile the ratio

NUMERATOR
Total number of one-way trips for IEP students receiving a specialized transportation service

/

DENOMINATOR
Total number of one-way trips for all students transported in the district (including specially and non-specially adapted vehicles)

= Non-Specialized One-Way Trip Ratio

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Personal Care Services

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Personal Care Services

- Safety monitoring
  - Medical necessity required in IEP or other medical plan of care in order for the service to be reimbursable
  - Service may potentially be identified as an unallowable Personal Care Service
    - Cueing has also been identified as another service that CMS may determine is not reimbursable

- Districts should not simply transfer every paraprofessional into the new Personal Care pool.
  - They should review job duties and identify which staff actually perform allowable personal care or other Medicaid-related activities.
  - Paraprofessionals whose duties are solely educational should not appear on the SPL.

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Questions/Resources/Contact Information

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Questions/Resources/Contact Information

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Frontline Education:
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Questions/Resources/Contact Information

- 2026 SHS Annual Training Presentation: https://hcpf.colorado.gov/sites/hcpf/files/2026%20HCPF_CDE%20Annual%20Training_PCG-ACSlides%20%282%29.pdf
- Colorado HCPF SHS: https://hcpf.colorado.gov/school-health-services
- Frontline Medicaid Resource Cener: https://www.frontlineeducation.com/special-ed-software/school-medicaid-resources/

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