



In Washington state, minor consent and confidentiality laws allow youth to receive certain services without involving a parent or guardian. School-Based Health Centers (SBHCs) follow the same state and federal confidentiality requirements as any other health care provider. Health information will not be shared without consent, except in very limited situations required by law. **This document explains how confidentiality is maintained throughout the care and billing process, potential privacy risks, and how to report an issue.** This process is focused on managed care organizations (MCO) Medicaid members and is specific to that company’s details.

<p><b>My CHPW health portal</b></p>	<ul style="list-style-type: none"> <li>● <b>Age 18 and older:</b> can create their own portal account with CHPW.</li> <li>● <b>Under age 18:</b> do not have portal accounts. Information is not available through a parent/guardian’s account.</li> </ul> <p><b>Potential confidentiality risk:</b> <i>A parent or guardian might create a portal account using their child’s personal information. This does not meet legal requirements. It should be corrected and reported to CHPW for resolution.</i></p>
<p><b>Receiving confidential services at an SBHC</b></p>	<p>SBHCs follow <a href="#">minor consent laws</a> and HIPAA to ensure information is private and confidential, except in certain limited situations.</p> <p>The patient may choose to sign a <i>release of information (ROI)/Authorization to Disclose Personal Health Information (PHI) Form</i> for certain information to be shared with a parent/guardian, school, school staff, or a trusted adult.</p>
<p><b>Eligibility and insurance verification</b></p>	<p>SBHCs must verify insurance coverage for each visit. Nothing from this step goes into a patient’s medical record.</p> <ul style="list-style-type: none"> <li>● Verification is completed through ProviderOne and includes: <ul style="list-style-type: none"> <li>○ MCO enrollment</li> <li>○ Assigned provider</li> <li>○ Whether the patient has other primary insurance</li> </ul> </li> </ul> <p><b>Good Cause Exemption:</b> If the patient has other primary insurance, the provider will ask if there is Good Cause Exemption. This prevents billing of their primary insurance if confidentiality is preferred.</p>
<p><b>Billing, reimbursement, and medical records</b></p>	<p><b>CHPW does not send Explanation of Benefits (EOB) for Medicaid clients.</b> An EOB shows services received, provider charges, amount covered by insurance, remaining costs such as deductible and copay. An EOB is not a bill.</p> <p>After a confidential appointment the provider sends a bill to CHPW.</p> <p><b>Potential confidentiality risk:</b> <i>If the patient has other primary health insurance, that plan may be billed, unless a Good Cause Exemption is applied.</i></p> <ul style="list-style-type: none"> <li>● CHPW is not responsible for or involved in the billing processes of other insurance companies.</li> <li>● CHPW processes the bill. <ul style="list-style-type: none"> <li>○ <b>If approved:</b> <ul style="list-style-type: none"> <li>▪ CHPW pays the health care provider.</li> <li>▪ CHPW sends Evidence of Payment (EOP) to provider.</li> <li>▪ This does not affect the patient’s medical records.</li> </ul> </li> <li>○ <b>If denied:</b> <ul style="list-style-type: none"> <li>▪ The provider can dispute the denial.</li> <li>▪ This does not affect the patient’s medical records.</li> </ul> </li> </ul> </li> </ul>



## Other considerations

<p><b>Potential risks to maintaining confidentiality</b></p>	<p><b><u>Verifying Services</u></b> CHPW may verify services when a member calls. Services received by members ages 14–18 will not be verified on a member’s call.</p> <p><b><u>Parent/guardian contacting CHPW</u></b> If the parent/guardian contacts CHPW about the patient or appointment, CHPW will not share information unless the patient has signed an <i>ROI/Authorization to Disclose Personal Health Information (PHI) Form</i>.</p>
<p><b>Exceptions to confidentiality</b></p>	<ul style="list-style-type: none"> <li>● Patient gives permission through a signed and dated <i>ROI/Authorization to Disclose Personal Health Information (PHI) Form</i>.</li> <li>● Patient indicates a risk of imminent harm to self or others.</li> <li>● Patient has a life-threatening health problem and is under age 18.</li> <li>● There is a reason to suspect abuse or neglect.</li> <li>● Certain communicable diseases must be reported to the public health department.</li> </ul>
<p><b>What is being done to address potential risks to maintaining your confidentiality at CHPW</b></p>	<p>CHPW is committed to maintaining confidentiality. We are taking additional measures to address these potential risks, including:</p> <ul style="list-style-type: none"> <li>● Adding training in confidentiality and billing to the required annual provider training.</li> <li>● Removing of patients between 14-18 from Verification of Services confirmation surveys.</li> <li>● Providing this information regarding confidentiality and any potential risks and mitigation efforts.</li> <li>● Working with the Washington School-Based Health Alliance (WA SBHA) to continuously understand and address any areas of concern expressed by SBHCs to find ways to mitigate any potential risks to your confidentiality.</li> </ul>

## What to do if confidentiality is breached

If you experience any issues with confidential services email CHPW and copy the HCA at [hcamcprograms@hca.wa.gov](mailto:hcamcprograms@hca.wa.gov) with the following information:

- Name of patient
- Date of Birth of patient
- P1 ID
- Patient Phone Number
- Provider Name & Contact Information
- Brief description of the request/issue

HCA will identify the issues within confidential billing processes to address them with the MCO. We want providers to feel confident in billing, and this process will help to quickly identify and mitigate issues as they arise.



## Confidential Billing Process for School-Based Health Centers

### **Background**

#### **About School-Based Health Centers**

A School-Based Health Center (SBHC) is a health clinic located in or next to a school. Students can get medical care, mental health services, and sometimes other support all in one place.

SBHCs are different from school health staff, like the school nurse or a school-employed counselor. They are operated by a healthcare sponsor and follow the same healthcare laws and standards as community health clinics.

SBHCs are often placed in schools where students may have barriers to getting healthcare elsewhere, such as cost, distance, or lack of transportation.

Services at SBHCs are available to all students at the school. In some cases, SBHCs may also serve students from other schools in the district, as well as families, staff, or community members.

#### **About Managed Care Organizations**

Managed Care Organizations (MCOs) are health plans that provide healthcare coverage for physical health, mental health, and substance use treatment within one system. In Washington, most students who have Apple Health Medicaid get their care through an MCO.

The state has five MCOs. When someone becomes eligible for Apple Health, they choose or are assigned to one of these plans.

*WA Health Care Privacy Toolkit*

[www.hca.wa.gov/assets/billers-and-providers/60-0077-washington-health-care-privacy-toolkit.pdf](http://www.hca.wa.gov/assets/billers-and-providers/60-0077-washington-health-care-privacy-toolkit.pdf)