

Rule Impact Statement (2025)

A. Purpose of the proposed rule and legal authority (75 OS § 253(B)(2)(b)(1), 75 OS 303(D)(2)(a))

This proposed rule is intended to clarify reimbursement language for Early and Periodic Screening, Diagnostic, and Treatment (EPSDT) visits, specifying that sports physicals cannot be reimbursed when they are performed as a stand-alone service or the only service of the day.

Legal authority: The Oklahoma Health Care Authority Act, Section 5007 (C)(2) of Title 63 of Oklahoma Statutes; the Oklahoma Health Care Authority Board; Section 5013.2 of Title 63 of Oklahoma Statutes.

B. Brief description of the proposed rule (75 OS 253(B)(2)(b)(3))

The OHCA proposes this policy revision to add language specifying that sports physicals that occur during an Early and Periodic Screening, Diagnostic, and Treatment (EPSDT) visit can occur but are not billable as a stand-alone service. Revisions also include clarifying language that sports physicals do not meet EPSDT screening requirements and cannot be reimbursed when performed as the only service of the day.

C. Classification of proposed rule (75 OS 253(B)(2)(b)(2))

Classification: ☒ Nonmajor

Justification: (Include estimate of total implementation and compliance costs over 5 years and basis for estimate. If $\geq \$1,000,000 \rightarrow$ classified as major.)

Total implementation and compliance costs for 5 years is estimated to be budget neutral.

Total annual implementation and compliance costs:

Total annual costs are estimated to be budget neutral.

Methodology used to calculate costs (75 OS 253(B)(2)(b)(7)):

As total annual costs are estimated to be budget neutral, no methodology for cost calculation was used.

D. Description of affected classes of persons most likely to be impacted by the proposed rule

(75 OS 253(B)(2)(b)(4), 75 OS 303(D)(2)(b))

The proposed rule changes are most likely to impact providers as they cannot be reimbursed for a service that is not defined as an EPSDT service.

E. Description of classes who will benefit from the proposed rule *(75 OS 253(B)(2)(b)(5), 75 OS 303(D)(2)(c))*

The proposed rule changes are likely to benefit OHCA and providers as this revision clarifies what is billable and reimbursable under an EPSDT visit.

F. Comprehensive economic impact analysis *(75 OS 253(B)(2)(b)(6), 75 OS 303(D)(2)(d))*

Methodology used to calculate costs *(75 OS 253(B)(2)(b)(7))*:

A comprehensive economic impact analysis and associated cost methodology were not utilized as the proposed rule is estimated to be budget neutral.

G. Probable costs and benefits to OHCA and other agencies *(75 OS 253(B)(2)(b)(6), 75 OS 303(D)(2)(e))*

The total cost for SFY 2026 and 2027 is estimated to be budget neutral. There are no anticipated implementation costs to OHCA or other agencies.

H. Economic impact on political subdivisions and whether their cooperation is required *(75 OS 253(B)(2)(b)(8), 75 OS 303(D)(2)(f))*

The proposed rule changes will not have an economic impact on any political subdivision or require their cooperation in implementing or enforcing the rule changes.

I. Economic impact on small businesses *(75 OS 253(B)(2)(b)(9), 75 OS 303 (D)(2)(g))*

The agency does not anticipate that the proposed rule changes will have an adverse effect on small businesses.

J. Measures taken to minimize compliance costs and assessment of less costly, less intrusive, or nonregulatory alternatives (75 OS 253(B)(2)(b)(10), 75 OS 303(D)(2)(h))

The agency has taken measures to determine that there are no other legal methods to achieve the purpose of the proposed rule. Measures included a formal public comment period and tribal consultation.

K. Effect of the rule on public health, safety, and the environment (75 OS 253(B)(2)(b)(11), 75 OS 303(D)(2)(i))

The proposed rule is not expected to affect public health, safety, or the environment as it pertains solely to billing and reimbursement practices under EPSDT.

L. Detrimental effects if the proposed rule is not implemented (75 OS 253(B)(2)(b)(12), 75 OS 303(D)(2)(j))

If the proposed rule is not implemented, providers will continue to seek clarifying information about reimbursement and billing for sports physicals under EPSDT from OHCA.

M. Summary of and preliminary comparison to existing or proposed federal regulations (75 OS 303(D)(2)(n))

The proposed rule aligns with, but does not duplicate, federal regulations for EPSDT required activities at 42 CFR 441.56

N. Analysis of alternatives to adopting the proposed rule (75 OS 303(D)(2)(l))

The agency considered implementing this policy through provider letters, however, this rule was the best approach to ensure clarity and enforceability.

O. Estimates of internal OHCA employee time and other resources used to develop the proposed rule (75 OS 303(D)(2)(m))

OHCA has spent approximately 90 hours developing the proposed rule.

P. Date statement prepared or modified (75 OS 253(B)(2)(b)(13), 75 OS 303(D)(2)(k))

Prepared: September 24, 2025

Modified date: November 18, 2025