

In February 2026, the Trump Administration released the [State Medicaid & CHIP Toolkit for Children's Behavioral Health Services and the Early and Periodic Screening, Diagnostic and Treatment \(EPSDT\) Requirements](#) (CMS Toolkit) for state Medicaid and CHIP agencies aimed at expanding behavioral health services through the EPSDT benefit. EPSDT is the signature Medicaid benefit that requires access to preventive, dental, mental health, and necessary treatment services to correct or ameliorate health conditions for children. The CMS Toolkit includes recommendations for services, payment, policy, and effective strategies for providing behavioral health services, affirming the Administration's support of Infant and Early Childhood Mental Health (IECMH) promotion and prevention services, like those provided by [HealthySteps](#), a program of [ZERO TO THREE](#).

## HealthySteps: An Evidence-Based Model for Preventive Behavioral Health Services

### Core Components (Services)

#### TIER 1. UNIVERSAL SERVICES

1. Child developmental, social-emotional & behavioral screening
2. Screening for family needs (i.e., maternal depression, other risk factors, social determinants of health)
3. Family support line (e.g., phone, text, email, online portal)

#### TIER 2. SHORT-TERM SUPPORTS (specific, time-limited concerns)

- All Tier 1 services plus...
4. Child development & behavior consults
  5. Care coordination & systems navigation
  6. Positive parenting guidance & information
  7. Early learning resources

#### TIER 3. COMPREHENSIVE SERVICES (families most at risk)

- All Tier 1 & 2 services plus...
8. Ongoing, preventive team-based well-child visits

HealthySteps, a program of ZERO TO THREE, transforms the promise of pediatric primary care through a team-based approach that integrates a HealthySteps Specialist, a child development and behavioral health prevention and promotion expert, into the health care team. All children ages 0-3 and their families receive a **tiered model of services**, from universal screenings to risk-stratified supports, including **care coordination** and onsite intervention, as needed.

## HealthySteps and CMS Toolkit Alignment

There is close alignment between the HealthySteps model and the strategies outlined in the CMS Toolkit.

Notably, Section 2 of the CMS Toolkit embraces the foundational principles of HealthySteps "The earliest years of life are a critical window to promote a strong foundation for mental health and prevent and address emerging concerns." HealthySteps directly advances many policy levers within the CMS Toolkit. Several Core Components of the model directly align with specific strategies in Section 2 of the Toolkit, as outlined below.

# CMS EPSDT Toolkit for Children’s Behavioral Health: Alignment with HealthySteps

## **Strategy 2.3: Encourage primary care providers to conduct developmental and behavioral health screenings by developing specific reimbursement rates for these screenings.**

HealthySteps practices routinely monitor and screen all children age 0-3 for language, social-emotional, developmental, and behavioral concerns on a recommended screening schedule, using validated screening tools (Core Component 1) and follow up to ensure children and families receive needed services.

## **Strategy 2.4: Allow behavioral health services to be provided without a formal behavioral health diagnosis and ensure providers are aware of this policy.**

A primary barrier to early intervention for behavioral health concerns is the requirement of a formal diagnosis for Medicaid reimbursement. A child may show clear signs of needing support, but the challenges may not yet reach diagnostic criteria. Environmental factors and early symptoms of distress can and should be treated. This is the essence of prevention: to intervene early before a condition advances, and it is the fundamental approach of HealthySteps, which provides behavioral health promotion and prevention support within the primary care setting (Core Component 4).

## **Strategy 2.6: Support early intervention for behavioral health conditions by covering IECMH services.**

Per CMS, states can cover IECMH services to improve outcomes for children, build caregivers’ capacity, and facilitate early identification and treatment of behavioral health concerns before they develop into more serious behavioral health conditions.

CMS highlights Maryland Medicaid’s innovative payment mechanism for HealthySteps as an effective strategy. Maryland covers HealthySteps as part of its IECMH benefit, providing enhanced reimbursement to HealthySteps.

Note: Some children need additional support and services beyond HealthySteps and what can be provided in the primary care setting. Coverage for additional more intensive IECMH services is critical to address the full continuum of care children may require.

## **Additional Strategies**

The CMS Toolkit also focuses on improving children’s access to behavioral health care through service coordination and integration (HealthySteps Core Component 5). HealthySteps links families to early intervention, home visiting programs, behavioral health providers, and social supports — all, as the CMS Toolkit envisions, by supporting families where they are: the primary care setting.