

Random Moment Time Sampling Guidance for School District Administrative Claiming

The purpose of this email is to provide guidance to school districts and private/charter schools on random moment time sampling (RMTS) for school district administrative claiming. Based on guidance provided by CMS and the telemedicine guidance sent to districts on March 31st the Agency has updated guidance regarding school district administrative claiming during COVID-19.

Random moment time sampling (RMTS)

- If school is in session but being conducted remotely, for the purpose of the RMTS used in allocating Medicaid administrative cost, the participant working remotely may respond to the sampled RMTS moment.
- For those individuals who are sampled, but are not working, the sample moment should be coded to paid time not working if they are salaried, or unpaid time if they are furloughed without pay or in some other unpaid status at the time of the sample moment. The moments that are coded to paid time not working should be reallocated across the other activity codes and a portion of the costs recognized.
- In alignment with the telemedicine guidance sent to districts on March 31st, the Agency is considering schools open but working remotely as of April 1, 2020.
- The Agency recognizes that RMTS overall staff participation may be affected by the COVID-19 pandemic. During the timeframe of the declared Public Health Emergency, districts may refer students to providers in the community if they are a Medicaid eligible provider to meet the requirement for one claim to be submitted for therapies (PT, OT, SLP), behavioral health, and nursing services. (For further information please refer to SDAC guide page 2-5)

Plans of Care/Individualized Education Plans (IEPs)

- If the plan of care/IEP states group therapy but individual therapy is provided due to the provider/school staff working remotely to ensure the child can continue services outlined on their plan of care/IEP, then the service should be billed as individual.
- All IEPs must be signed by the appropriate providers, even if they are being done remotely, to ensure compliance. An adjusted IEP outlining acceptable modifications to the frequency and duration of services with signature from the appropriate provider may be submitted during the time of remote learning due to COVID-19.

Telemedicine for school-based services

- Please refer to the telemedicine guidance for school-based services sent to districts on March 31st for information on what is allowable for telemedicine purposes. Districts should follow this guidance for telemedicine purposes.