

School-Based Services Random Moment Time Study (RMTS) Coder Training

July 29, 2026

Welcome



Department of Health Care Services (DHCS)

Local Educational Agency Medi-Cal Billing Option Program (LEA BOP)

Provider Relations Unit

- Sarah Borkowski - **Manager**
- Lacey Allred
- Luke Foster
- Leilany Perez
- Trung Tran
- Robin Singh

Department of Health Care Services (DHCS)

School-Based Medi-Cal Administrative Activities (SMAA) Unit

- Tara Gutierrez - **Manager**
- David Bang
- Muhammad Fazel
- Jorge Alvarez
- Melissa Giamugnani

Housekeeping

» Closed Captions (CC)

- Live captions are available.
- Click “**More**” in your Teams toolbar, then select “**Language and Speech**” and “**Show Live Captions.**”

» No Recording

- This training will not be recorded. Updated slides will be shared with attendees following the training as needed.

» Questions

- Please hold all questions until the Questions & Answers session at the end of each section.
- Track your questions and slide number for easy reference.
- Any unanswered questions can be submitted to RMTS@dhcs.ca.gov.

Purpose of Coder Training

- » This annual training is provided by DHCS for RMTS Administrative Unit (RMTS AU) coding staff to support accurate and consistent coding of RMTS moments.
- » Per **W&I Code 14132.47** and **42 CFR 433.15(b)(7)**, DHCS is required to conduct annual training for staff involved in the RMTS process to ensure integrity and proper administration.
- » Today's training will:
 - Review RMTS activity codes 1–18 and coding best practices
 - Reinforce moment response quality expectations and documentation requirements
 - Support coders at all experience levels in applying consistent, accurate coding standards

Coder Training Agenda

Day 1:

- Section 1: Coding Impact and Overview
- Section 2: Codes 1-18
- Section 3: LEA BOP: Service Categories and New Practitioner Types
- Section 4: Day 1 Wrap Up

Day 2:

- Section 5: Coder Training Exercise
- Section 6: Hard to Code Moments

Reminder!

» Policy guidance to use:

- Time Study Implementation Plan (TSIP)
- LEA BOP Provider Manual - **current**
- SMAA Manual – **current (minus Sections 5 and 6)**
- Any future Policy and Procedure Letters (PPLs)

» What **not** to use:

- Previous guidance issued via e-mail
- PPLs or FAQs that have been pulled down or archived

Coding Impact and Overview



Overview of Coding Impact for Fiscal Year (FY) 2025-26

Time Study Participants (TSPs)

SMAA: 60,000

LEA BOP: 33,000

Participating LEAs

SMAA: 800

LEA BOP: 849*

*(*624 enrolled plus consortia members)*

Moments Assigned to TSPs

116,000

(Pool 1 and Pool 2 Combined)

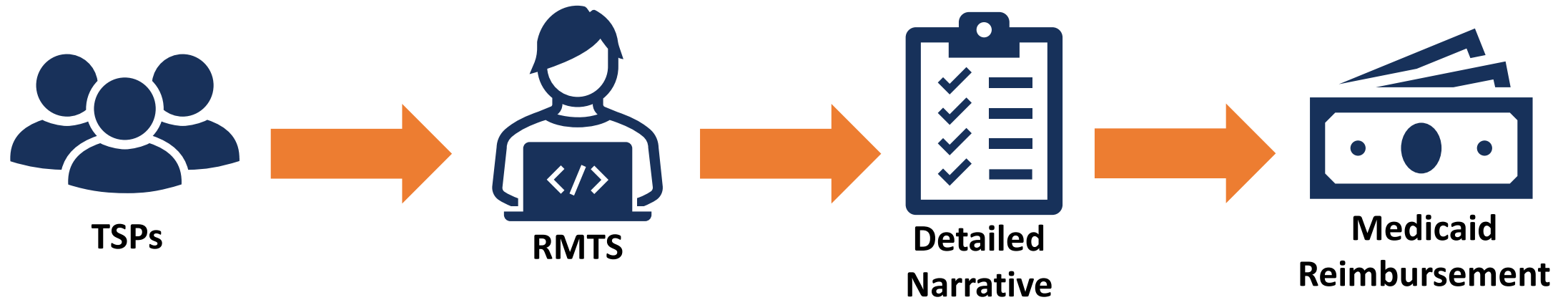
FY 2025-26 Payments to LEAs

SMAA: \$140 million

LEA BOP: \$668 million

School-Based Programs

FY 2026-27 Mantra: Detailed Narrative



- » A detailed narrative is critically important because it:
- Serves as documentation supporting the activity.
 - Essential for correct coding.
 - Accurately codes moments as reimbursable or non-reimbursable.

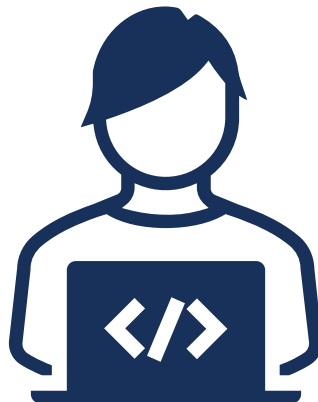
SMAA Program

FY 2026-27 Mantra: Detailed Narrative

Coders' Responsibility

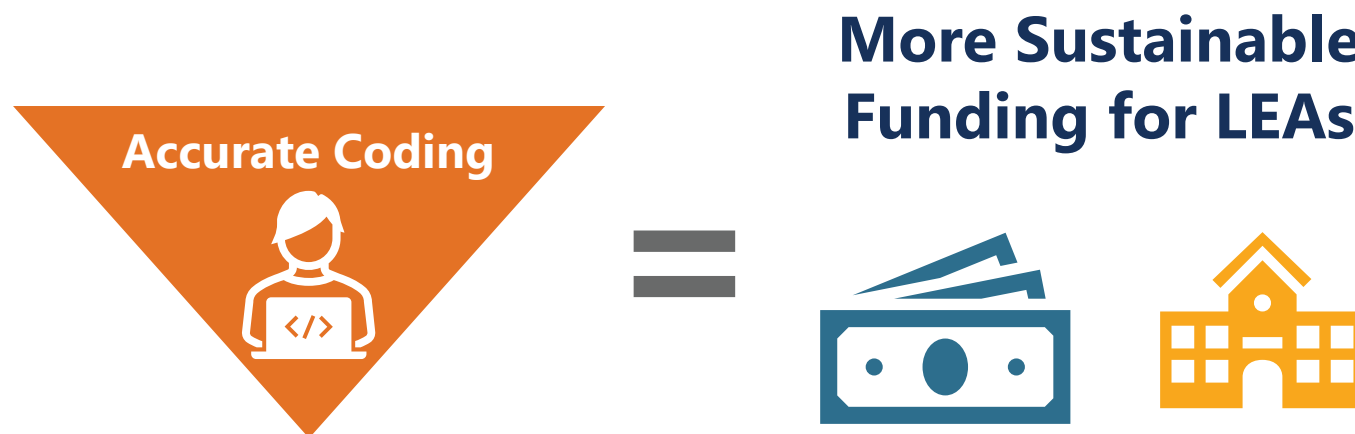
Thorough detail in narrative

- ✓ Did the TSP answer without abbreviations and without identifiable information
 - ✓ *Does the content make sense*
- ✓ Did the TSP answer appropriately without acronyms
 - ✓ *Can you understand the activity if you had no knowledge of their job*
- ✓ Did the TSP give proper detail about the moment
 - ✓ *Do you have to make any assumptions or does the moment stand for itself*



Impact of Coding – LEA BOP

- » Higher Direct Medical Services Percentage (DMSP) = higher portion of costs a LEA may receive.
- **Example:** An LEA in a RMTS AU had a **47.35% DMSP** and was owed **\$13,180,852** in reimbursements. If the RMTS AU had a **53.54% DMSP**, the LEA would be owed **\$14,761,808** for costs of providing the exact same services.
- Coding has a direct relationship to reimbursement.



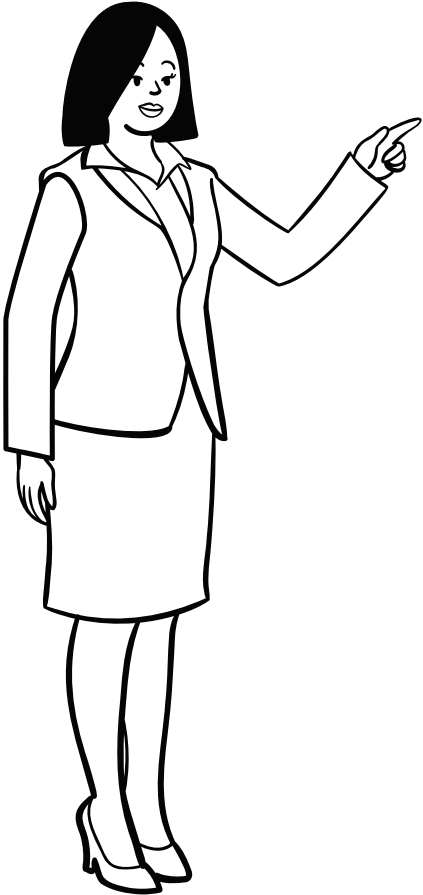
LEA BOP FY 2026-27 Mantra: Master Code 2

Accurate coding for LEA BOP begins with strong
Code 2 knowledge.

Become an expert in coding 2A/2Z Moments.



Decoding Moments Using the P.O.I.N.T Framework



P

Primary Focus

What was the primary topic or focus of the TSP's activity?

O

Objective

Why was the TSP completing the activity?

I

Insight

What insight was provided for the activity that the TSP was performing?

N

Necessary Detail

Is there any additional detail you can extract from a clarifying question?

T

Timely

If clarifying questions are required, be sure to ask them in a timely manner (up to two CQs per moment response are allowed within 15 working days from the date the TSP completed their initial moment response).

Source: [How to Answer RMTS](#)

The Importance of “Necessary Detail”



TSPs must describe in detail what they were doing at their assigned moment, why they were doing it, and, if applicable, to whom they were providing a service.



Moments with sufficient and necessary detail help determine if the activity is Medicaid-related.



Detailed narratives helps to support accurate coding.

Reminder! A detailed response can be enough supporting documentation to support an administrative moment, but a response lacking enough detail must result in a non-reimbursable code.

Coders can help by asking clarifying questions!

Details in Moment Responses: Who, What and Why

- » **Who:** TSPs are not required to identify anyone by name but, they should state who they were working with (e.g., a student, colleague, parent) during their moment.
- » **What:** TSPs must provide the details for the primary focus of the activity, whether it was health-related and what type of service or treatment was provided (if applicable).
- » **Why:** TSPs must describe why they were doing the activity which could include information about a care plan.

Note: TSPs providing a direct medical service must act within their scope of practice.

Pool 1: Pre-Question to Post-Question

Two thick, wavy lines in shades of blue and teal sweep across the middle of the slide, creating a decorative horizontal band.

New! Post-Narrative Question

- » Direct service practitioners (Pool 1) will receive a fifth question to help determine if the activity is reimbursable under LEA BOP.
- » This “post-question” was previously a “pre-question”.
 - Language has been revised.
- » Post-question goal is to improve TSP accuracy of identifying whether their activity is (or is not) related to a plan of care.

Direct Service Practitioners: Pre-Question → Post-Question

Post-Question Details

Post-Question (Pool 1 Only): *“Is the activity in your response (including pre- and post-service time) being performed as part of the student’s plan of care?”*

Response options include:

- » **Yes, this confirms the activity was performed in accordance with one of the following (select one):**
 - The student’s IEP/IFSP.
 - The student’s other type of care plan, such as a 504 plan, a student health plan, or a nursing plan.
 - The student’s behavioral health plan.
 - Doctor’s orders/prescription.
 - The student’s vision/hearing screening or assessment.
 - The student’s physical, mental, or behavioral health screening or assessment.
 - Required Immunization, or other covered EPSDT (Early and Periodic Screening, Diagnostic, and Treatment) services.
- » **No, the activity was not applicable to any of the above.**

Post-Question Response: A 'Yes' Response

Post-Question (Pool 1 Only): *"Is the activity in your response (including pre- and post-service time) being performed as part of the student's plan of care?"*

- » **Response of "yes"** does not automatically qualify the moment as a Code 2A.
 - The response is a clue for coders and should be evaluated in context with the narrative response.
 - The goal of a care plan is to document supports that help the child succeed at school, so a "yes" response does not always qualify as Code 2A.

IEP-Driven Activity ("Yes") and Not Considered a 2A

Who were you with?	What were you doing?	Why were you doing this?
A student	Helping student on an IEP apply for community college.	Students need to apply for college.
With a student who has an IEP and deficient credits	Working on a graduation plan.	Part of IEP goals and diploma.
The IEP Team	Reviewing a student transcript.	To make sure the student was on track to graduate.
Myself	Making a copy of an IEP .	The parent wanted a copy.
Myself	Reviewing student files.	To determine which IEP students will need triennial assessments this fall.

Post-Question: A 'No' Response

Post-Question (Pool 1 Only): *"Is the activity in your response (including pre- and post-service time) being performed as part of the student's plan of care?"*

- » **Response of "no"** does not disqualify a moment as a Code 2A.
 - If the moment response indicates a covered health service, you **must ask a CQ** to determine that the post-question was answered incorrectly.

Important! Effective July 1: If a TSP responds "no" to the post-question, but the rest of the moment supports a Code 2A, the coder must ask a Clarifying Question to assign Code 2A.

Possible CQs for a “No” Response

Post-Question (Pool 1 Only): *“Is the activity in your response (including pre- and post-service time) being performed as part of the student’s plan of care?”*

- Instead of re-asking the post-question, focus the CQ on the narrative response:
 - ✓ *“Was [this activity] supported by a doctor’s orders?”*
 - ✓ *“Was the therapy you provided to support services in an IEP?”*
 - ✓ *“Was this service related to a mandated [vision/hearing] screening?”*
 - ✓ *“Did the student have doctor’s orders that require continuous monitoring during the day?”*
 - ✓ *“Was this activity done to prepare for [or wrap up] a direct service?”*

Aligning Moment Narrative & Post-Question

- » **Moment narrative response** can be used to provide details of the service/activity and insight into if the moment is a reimbursable service.
- » **Post-question response** can be used to validate the moment narrative response to confirm whether the moment may be a reimbursable service.
- » **Never make assumptions.** If the moment narrative and post-question responses contradict one another, you cannot confidently code the moment to a 2A and a CQ must be asked.

*Effective October 1, 2026, when the narrative response and post-question do not align, you **MUST** ask a clarifying question (CQ). The only exception to this requirement is when the TSP's narrative response is related to training and professional development activities that improve the delivery of Medicaid covered services (see TSIP, page 49). When a CQ is required, and not asked, or a response to a CQ is not provided, assign to Code 2Z.*

Clarifying Questions



Clarifying Questions (CQs)

- » Follow-up questions asked to TSPs for moments with insufficient detail to obtain needed clarification on the activity and its purpose to assign the correct activity code.
- » A maximum of **two** CQs can be asked for a given moment response.
- » Good CQs will always:
 - Be fact-based;
 - Avoid judgements/emotions in the question;
 - Not subtly suggest or imply a desired answer; and
 - Not lead the TSP to get a desired response.



Helping TSPs Get to the P.O.I.N.T. *Without Leading the TSP*

» Once the missing components of a response are identified, CQs may be asked to gather targeted information.

» Both open-ended questions and yes/no questions can be utilized as a CQ.

- Be careful to not inadvertently craft a “leading” yes/no question that implies a “correct” response.



Important!

Yes/No questions are *not* necessarily leading questions.



Leading Yes/No Question:

“This ADL service was detailed in the student’s plan of care, correct?”



Not Leading Yes/No Question:

“Was this activity detailed in the student’s IEP, care plan, or doctor’s orders?”

Helping TSPs Get to the P.O.I.N.T.

Example CQs to Clarify the Action



CQs asked to clarify the action help identify what specific action was being taken or the TSP's role in the action.

- » *You have listed several tasks in your response. Can you describe the specific activity you were performing during this minute?*
- » *Without violating the student's privacy, please provide the topic being discussed during your one-minute moment.*
- » *You indicated that you were driving to the school site at the time of your moment. What were you going to be doing once you arrived?*

Helping TSPs Get to the P.O.I.N.T.

Example CQs to Clarify the Recipient of Action



CQs asked to clarify the recipient of an action help identify who the action was for or who was impacted by the action.

- » *What materials were you prepping during your moment? And what were they used for?*
- » *Were you working with one student or multiple students at the time of your moment?*
- » *Please clarify who you were with at the time of your moment (do not use names, only classifications, such as "a student" or "another psychologist" or "the IEP team").*

Helping TSPs Get to the P.O.I.N.T.

Example CQs to Clarify the Reason/Context



CQs asked to clarify the reason or context of an action help identify why the TSP was doing the action or if the action was pursuant to an IEP/IFSP/Plan of Care.

- » *Can you clarify what monitoring you were providing to the student at the time of your moment?*
- » *Does this student's Plan of Care require continuous help for the student during the day?*
- » *Please confirm, did this activity take place during an IEP meeting?*
- » *Were you receiving training or providing it to others?*

Important Note!

- » As a reminder, the goal when asking CQs is to gather enough information for accurate coding while maintaining student privacy.
 - CQs that prompt details regarding a student's needs or their session is not appropriate.
- » When reviewing a moment, and there is not enough information, you need to consider or confirm with a CQ:
 - Is this an eligible practitioner?
 - Are they providing a direct service or an extension of one?
 - Is this part of a care plan, assessment, or screening?
 - Is this a reimbursable activity?



Pool 1 Example Where a CQ Could Add Clarity

Credentialed School Psychologist

Post-Question:	<i>Not sure</i>
Who were you with?	<i>Myself</i>
What were you doing?	<i>Preparing for an IEP meeting -- printing out the report, updating SEIS, etc.</i>
Why were you doing this?	<i>To prepare for an IEP meeting</i>

Final Code: 2Z

Potential Code: 2A, if the CQ response supports that code.

Potential CQ: *You have listed several tasks in your response. Can you describe the specific activity you were performing during this moment?*

Potential Response: *I was updating their goals in SEIS.*



Pool 1 Example Where a CQ Could Add Clarity

Trained Health Care Aide

Post-Question:	<i>Yes</i>
Who were you with?	<i>Co-workers, students</i>
What were you doing?	<i>Supervising, feeding student</i>
Why were you doing this?	<i>My job assignment, responsibility</i>

Final Code: 2Z (since it was undetermined if specific activity was supervising or feeding).

Potential Code: 2A, if the CQ response supported that the THCA was feeding the student.

Potential CQ: You mentioned a couple of activities. Please clarify what you were specifically doing at the time of your one-minute moment

Potential Response: Feeding the student.



Pool 1 Example Where a CQ Would Strengthen the Moment Response

Registered Associate Clinical Social Worker

Post-Question:	<i>No</i>
Who were you with?	<i>A student</i>
What were you doing?	<i>Providing counseling services</i>
Why were you doing this?	<i>Student is mandated to meet for counseling</i>

Final Code: 2Z

Potential Code: 2A, if the CQ response supports the code.

Potential CQ: *You noted that the student was mandated to meet for counseling. Were these counseling services included in a care plan for the student? If not, why were they mandated to meet?*

Potential Response: *Yes, counseling services are a part of this student's care plan.*



Pool 2 Moment – CQ Needed

Teacher	
Who were you with?	<i>I was with a school counselor and the parents of a student</i>
What were you doing?	<i>Discussion strategies for behavioral improvement</i>
Why were you doing this?	<i>To support a student to improve his behavior</i>
Clarifying Question:	<i>N/A</i>
TSP Answer:	<i>N/A</i>

Original Code: 1

Potential Code: 8 if the CQ response supports the code.

Potential CQ:

What type of support and strategies were being discussed?



Pool 2 Moment – CQ Needed

SR. School Therapist

Who were you with?	<i>By myself</i>
What were you doing?	<i>Reviewing PT documentation and servicing</i>
Why were you doing this?	<i>It is a role of mine as a SR. Physical Therapist</i>
Clarifying Question:	<i>Please provide more information about the purpose of the data collection regarding PT documentation and servicing.</i>
TSP Answer:	<i>Our director is asking us to collect data regarding specific PTs for a Data Dialogue meeting tomorrow morning.</i>

Original Code: 16

Potential Code: 14 if CQ response supports the code.

Potential second CQ:

Please describe what type of data is being collected, and what the data will be used for without any personal identifiers.

Response and CQ Timeline

- » Moment response and CQ timeline (up to 1-day notice, 3-LEA working days to respond, up to 2 CQs within 15 days of response)

Moment Response Timeline				
Receive E-mail	Reminder	Response Window	Clarifying Question	TSP Response
TSP receives e-mail notification one day prior, takes note of day/time for moment.	TSPs may receive a reminder	TSPs have three-days to respond after initial notification	Up to two CQ's can be asked within 15 working days of the initial response	TSP has five LEA working days to reply to each CQ.

Questions?

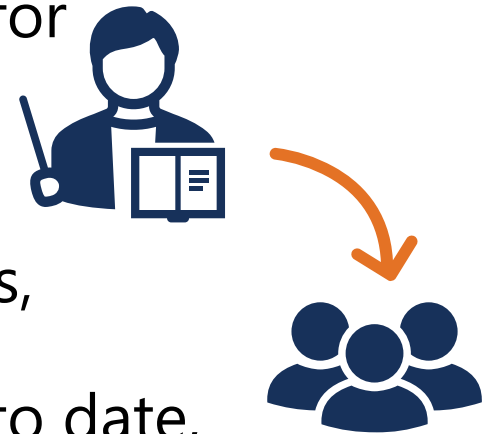


Codes 1-18



Code 1 - School-Related and Educational Activities

- » This code should be used when TSPs perform school-related activities that are not health-related, such as social, educational, and teaching services, and employment and job training required for employment.
- » Examples:
 - Academic and educational staff meetings (student meetings, school, staff, off-site, etc.).
 - Routine maintenance of files to ensure student files are up to date, including checking that immunizations are current to comply with school attendance policies.
- » Additionally, this code should be used for responses that are returned with entirely blank fields or that contain unacceptable content, such as "N/A".



Code 1 - Continued

» Developing, coordinating, and monitoring that the educational components of the IEP/IFSP for a student, which includes the following activities:

- Ensuring annual reviews of the IEP are conducted,
- Ensuring that parental sign-off on the IEP/IFSP is obtained,
- Scheduling or attending the IEP/IFSP team meetings (**Note: If a health service practitioner's moment occurs when they are reporting out to the IEP/IFSP team on their health-related findings, time may be eligible for a Code 2A**), and
- Completing the educational components of the IEP/IFSP, including updating progress indicators such as grades and attendance, recommending appropriate educational placement, and drafting details for adaptive physical education services.



Note: If a moment response (from either a Pool 1 or 2 TSP) states the TSP was attending an IEP meeting, **not reporting out**, it is a Code 1. For Pool 1 **only**, if the TSP states they are reporting out on their assessment results or recommended services, it is eligible for a Code 2A.

Example: Code 1

Special Education Teacher in Pool 2	
Who were you with?	<i>By myself.</i>
What were you doing?	<i>Answering emails.</i>
Why were you doing this?	<i>I was responding to a parent email answering questions about credit recovery options for their child.</i>

Code 2A - Direct Medical Services Covered by the LEA BOP

- » This code should be used when **Pool 1 TSPs** provide medically necessary LEA BOP covered health services. This includes *pre- and post-time* directly related to providing direct care services when the student is not present, including paperwork related to the service.



» Examples:

- Assessment services (IEP/IFSP initial evaluations, triennial reviews, non-IEP/IFSP assessments)
- EPSDT Services
- Treatment Services
- Targeted Case Management (TCM) Services

The Individuals with Disabilities Education Act (IDEA) & LEA BOP



- » The Individuals with Disabilities Education Act (IDEA) requires LEAs to provide a free appropriate public education (FAPE) for students with disabilities.
 - LEAs have a legal obligation to ensure services included in an IEP/IFSP are provided to students.
 - A service can be both educationally **and** medically necessary (a health-related intervention needed for the student to participate in school).
- » LEAs employ/contract with health service practitioners (e.g., nurses, psychologists, speech therapists, etc.) to provide these services to students.
 - LEAs that participate in the LEA BOP can receive federal reimbursement for medically necessary direct medical services included in an IEP/IFSP that are provided to students.

Types of Care Plans

» Common Care Plans Include:

- **IEP/IFSP:** Legally mandated plans under the Individuals with Disabilities Education Act (IDEA) that provide tailored support for children with disabilities. Required evaluation timing – Initial Evaluation, Annual, Triennial. Can be amended, as needed.
- **504 Plan:** Details accommodations / supports that a student needs to participate in school activities but does *not* include special education services. Required under Section 504 of the Rehabilitation Act to ensure students with disabilities receive a free appropriate public education (FAPE) by removing barriers and providing equal access to general education.
- **Individualized Health Plan/Individualized Health Support Plan (IHSP):** Details a student's routine health needs and staff actions (e.g., medication, monitoring, daily care). Not tied to special education or a 504 Plan.

Other Care Plans/Authorizations

- **Nursing Plan:** A nurse-created health plan detailing skilled medical care and monitoring (e.g., treatments, specialized health care procedures). Usually supported by a physician's orders.
- **Behavioral Health Plan (various names):** Plan that addresses challenging behavioral health needs (can exist with an IEP or 504 Plan).
- **Safety Plan / Crisis Plan:** Plan that details how staff will respond to safety risks or crisis situations.
- **Bright Futures Periodicity Schedule:** General recommendations supported by the American Academy of Pediatrics; can substitute for a student-specific care plan for screenings, evaluations, immunizations.

Example: Code 2A

Speech Language Pathologist in Pool 1	
Who were you with?	<i>By myself</i>
What were you doing?	<i>I was driving to a school.</i>
Why were you doing this?	<i>To assess a student for upcoming triennial.</i>
Post-Question:	<i>Yes</i>
Code:	Code 2A. Reference TSIP under Code 2A: Pre- and post-service time includes travel to/from the direct service treatment session.

Code 2A Guidelines

- » Pool 2 Direct Service Practitioners may not receive a 2A.
 - Example: A Speech Language Pathologist that is providing speech therapy and listed in Pool 2 on the TSP list is not eligible for a Code 2A.
- » A moment cannot be coded a 2A if the practitioner is providing services outside the scope of LEA BOP services.
 - Example: A psychologist providing substance use counseling is not a covered LEA BOP service and should not be coded as 2A.



Expanded Code 2A Definition



Expanded Code 2A Definition

- » Services newly qualifying as a Code 2A include:
 - ✓ Developing a **treatment plan**
 - ✓ **Reporting out** to a parent or school personnel on a student's health-related findings, performance, or progress (including reporting out during IEP meeting)
 - ✓ **Evaluating a student in crisis**, including conducting a threat/risk assessment or discussing results/developing a student's safety plan
 - ✓ **Crisis counseling** treatment services (pursuant to a plan), including ongoing counseling support after a crisis occurs
 - ✓ If no plan is established, but the student is receiving ongoing counseling treatment services, appropriate code is 2Z.

New 2A: Developing a Treatment Plan

- » Developing a medical plan of care, or “treatment plan”, for a student, including outlining the student’s need for medical services, can be coded to 2A.

Example Moment – Occupational Therapist	
Who were you with?	<i>By myself.</i>
What were you doing?	<i>Writing a treatment plan.</i>
Why were you doing this?	<i>To develop interventions to assist a student in reaching their IEP goals.</i>
Post-Question:	<i>Yes - The student's IEP/IFSP.</i>

Developing a Treatment Plan (*Not 2A*)

- » Supervisory activities are still not eligible for a Code 2A, even when they relate to review of treatment plans.

Example Moment – Licensed MFT	
Who were you with?	<i>Myself.</i>
What were you doing?	<i>Reviewing my Marriage and Family Therapist Graduate Trainees' treatment plans.</i>
Why were you doing this?	<i>To be sure effective and successful therapy is provided to students in our district.</i>
Post-Question:	<i>No, the activity was not applicable to any of the above.</i>

Correct Code: Code 2Z

New 2A: Reporting Out Health Findings / Progress

- » Actively reporting out health findings, present levels of performance, progress towards goals, and / or impact of a student's disability on performance to a parent or school personnel may be coded to 2A.

Example Moment – Speech Language Pathologist	
Who were you with?	<i>The IEP Team.</i>
What were you doing?	<i>I was presenting assessment data as part of a transition IEP to kindergarten</i>
Why were you doing this?	<i>My student was transitioning to Kindergarten, and I completed a speech and language assessment.</i>
Post-Question:	<i>Yes - The student's IEP/IFSP.</i>

Reporting Out Health Findings (**Not 2A**)

- » When a TSP is reporting out to a parent, it should be an individualized situation for one student. Group referrals, such as letters sent to a group of parents, should not be coded to 2A, but instead to 8.

Example Moment – Speech Language Pathologist	
Who were you with?	<i>By myself.</i>
What were you doing?	<i>I was writing a notification to parents of several students that failed their vision screening.</i>
Why were you doing this?	<i>The students failed mandated screenings, and this information needs to be communicated to the parents so that they can follow up with the Optometrist.</i>
Post-Question:	<i>Yes - The student's vision/hearing screening or assessment.</i>

Correct Code: Code 8

New 2A: Evaluating a Student in Crisis

- » The following crisis evaluations / assessments may be coded to 2A:
- Evaluating a student in crisis
 - Conducting a threat / risk assessment
 - Discussing results of risk assessment with parents / school personnel

Example Moment – Credentialed School Counselor	
Who were you with?	<i>A student.</i>
What were you doing?	<i>Evaluating a student that was in crisis.</i>
Why were you doing this?	<i>The student disclosed thoughts of suicidal ideation.</i>
Post-Question:	<i>Yes - The student's physical, mental, or behavioral health screening or assessment.</i>

Evaluating a Student in Crisis (*Not 2A*)

- » Activities that do not relate to a crisis evaluation or assessment should not be coded to 2A.

Example Moment – Credentialed School Counselor	
Who were you with?	<i>Student.</i>
What were you doing?	<i>Talking with a student that was concerned about a peer.</i>
Why were you doing this?	<i>The student came into my office and wanted to share concerns.</i>
Post-Question:	<i>No, the activity was not applicable to any of the above.</i>

Correct Code: Code 2Z

New 2A: Crisis Counseling

- » Behavioral health counseling / treatment services, including crisis counseling that is pursuant to a treatment plan, may be coded to 2A.

Example Moment – School Psychologist	
Who were you with?	<i>A 3rd grade student.</i>
What were you doing?	<i>One-on-one crisis counseling for the student.</i>
Why were you doing this?	<i>The student was identified to need crisis support for a period of time due to the terminal illness of a sibling.</i>
Post-Question:	<i>Yes - The student's other type of care plan, such as a 504 plan, a student health plan, or a nursing plan.</i>

Crisis Counseling (*Not 2A*)

- » If the activity is not specific to providing support to a student pursuant to a treatment plan, it may not be coded to 2A.

Example Moment – Credentialed School Counselor	
Who were you with?	<i>In the hallway with a student</i>
What were you doing?	<i>I was consoling a student that was crying.</i>
Why were you doing this?	<i>The student was upset and I was trying to help get her calmed down and back to class.</i>
Post-Question:	<i>No, the activity was not applicable to any of the above.</i>

Correct Code: Code 2Z

Additional Code 2A Examples



Additional Code 2A Examples in the TSIP

» Additional Code 2A Examples in TSIP (not newly 2A moments):

- ✓ Drafting a student's **present level of performance and / or goals**
- ✓ Creating and updating **progress reports/notes (on medical services)**
- ✓ **Consulting** with other practitioners, teachers, or parents
Note: Only treating practitioner time is eligible for 2A. Individual being consulted is eligible for Code 8.
- ✓ Administering **medication / injections** (when in care plan or doctor's orders)
- ✓ Administering **routine immunizations** (according to Periodicity Schedule)
- ✓ **EPSDT services**
- ✓ **Pre- & post-service activities**
- ✓ **Training** related to improving delivery of Medicaid direct services

Example 2A: Present Level of Performance

- » IDEA requires that IEPs include “Present Levels” outlining the student’s abilities, skills and needs that tie into the goals and services for the student.
- » Drafting / updating the present levels section and/or goals is a new example in the TSIP.

Example Moment – Occupational Therapist

Who were you with?	<i>Myself</i>
What were you doing?	<i>Updating present levels for an upcoming IEP due to the student’s trouble with toileting and frequent accidents during the school day.</i>
Why were you doing this?	<i>To have present levels outlined for parents to review during IEP.</i>
Post-Question:	<i>Yes - The student’s IEP/IFSP.</i>

Present Level of Performance *(Not 2A)*

- » If the activity does not relate to **drafting or reporting out** on present levels, they should not be coded to 2A.

Example Moment – Occupational Therapist	
Who were you with?	<i>I was in an annual IEP meeting with a parent, the principal, special education teacher, physical therapist, speech therapist, and adapted physical education.</i>
What were you doing?	<i>I was listening to the speech therapist discuss communication present levels, waiting my turn to discuss OT present levels.</i>
Why were you doing this?	<i>For a student's annual IEP meeting.</i>
Post-Question:	<i>Yes - The student's IEP/IFSP.</i>

Correct Code: Code 1

Example 2A: Progress Reports

- » IDEA requires periodic reporting of progress against the IEP goals. Often provided quarterly and in alignment with distribution of report cards.

Example Moment – Speech Language Pathologist	
Who were you with?	<i>Self.</i>
What were you doing?	<i>Completing progress report comments on IEP goals for a student on my caseload.</i>
Why were you doing this?	<i>To document a student's progress toward therapy goal.</i>
Post-Question:	<i>Yes - The student's IEP/IFSP.</i>

Progress Reports *(Not 2A)*

- » Administrative tasks that relate to progress reports should not be coded to 2A. Includes making copies and delivering reports.

Example Moment – SLPA	
Who were you with?	<i>Third grade classroom.</i>
What were you doing?	<i>Delivering summer packets and progress reports, giving speech prizes.</i>
Why were you doing this?	<i>Upkeep of articulation over summer break (summer packets), Progress Reports to be sent home with report cards so these needed to go in backpacks, Speech prizes were given as a reward for participation in speech.</i>
Post-Question:	<i>No, the activity was not applicable to any of the above.</i>

Example 2A: Consulting

- » When a **treating practitioner** is consulting with other practitioners, teachers, or parents related to assessments or plan-related treatment services, those may be coded to 2A.

Example Moment – School Psychologist	
Who were you with?	<i>The ERMHS Therapist.</i>
What were you doing?	<i>Discussing a student's progress on their goals.</i>
Why were you doing this?	<i>I am assessing the student for an upcoming IEP and needed to learn how the student is progressing so that I can take that into consideration in my assessment.</i>
Post-Question:	<i>Yes – the student's IEP/IFSP</i>

Consulting (*not* 2A)

- » Consulting on academic progress or services that are not pursuant to a care plan should not be coded to 2A.
- » Non-treating practitioners consulting with the treating practitioner may not be coded to 2A (TSP being consulted = Code 8).

Example Moment – School Psychologist	
Who were you with?	<i>Another school psychologist.</i>
What were you doing?	<i>Talking about a student's concerning behavior.</i>
Why were you doing this?	<i>My colleague wanted my thoughts on additional services that we could include in the student's IEP to better support him.</i>
Post-Question:	<i>Yes – The student's IEP/IFSP</i>

Correct Code: A CQ should be asked to link the activity to a Medicaid covered service such as, "What other type of services were being considered/discussed?". If the TSP response notes the activity is linked to a Medicaid covered service, then the correct code would be Code 8.

“Consult Minutes”

- » For awareness, practitioner “**consult minutes**” can be included in an IEP and are considered a reimbursable direct service.
 - For example, a SLP will meet monthly for 30 minutes with the teacher to plan specific strategies for the teacher to implement in the classroom, effectively executing the IEP.
 - Moments may reference “consult time”, “consultative services”, “monthly consultation” or “consult minutes in the IEP”.
- » **Definition**: When a practitioner provides **guidance, coaching, modeling, or training to staff** to help them implement strategies for the student.
- » **Why a Direct Service?**: Although the recipient is the teacher/staff, not the student, the activity is tied to implementing a student’s plan-covered services and the practitioner is providing clinical/therapeutic context.
- » **Important Note**: This situation is different than when a practitioner is consulting another practitioner! In all cases, only the *treating* practitioner’s time can be considered a reimbursable direct service (2A).

Example 2A: Medication / Injections

- » Administering medication or injections that are pursuant to a treatment plan may be coded to 2A.

Example Moment – Licensed Vocational Nurse	
Who were you with?	<i>A student.</i>
What were you doing?	<i>Administering medications via G-tube.</i>
Why were you doing this?	<i>The student has doctor's orders to have medications administered while in school.</i>
Post-Question:	<i>Yes - Doctor's orders/prescription.</i>

Medication / Injections (Not 2A)

- » Medications and/or injections that are not provided pursuant to a care plan or doctor's orders should not be coded to 2A.

Example Moment – School Nurse	
Who were you with?	<i>A student.</i>
What were you doing?	<i>Waiting for parent to bring medication for student.</i>
Why were you doing this?	<i>Student had a headache, student was resting, ice pack was applied.</i>
Post-Question:	<i>No, the activity was not applicable to any of the above.</i>

Correct Code: Code 2Z

Example 2A: Immunizations

- » Routine immunizations administered in accordance with the Periodicity Schedule may be coded to 2A.

Example Moment – School Nurse	
Who were you with?	<i>I was with a student and the student's parent.</i>
What were you doing?	<i>Providing adolescent vaccines to the student.</i>
Why were you doing this?	<i>TDAP vaccine is required for seventh grade attendance, Men ACWY and HPV are recommended vaccines. All three were administered to student with parent consent.</i>
Post-Question:	<i>Yes - Required Immunization, or other covered EPSDT (Early and Periodic Screening, Diagnostic, and Treatment) services.</i>

Immunizations (Not 2A)

- » Activities that involve the routine maintenance of vaccine inventory, checking or logging temperature, ordering vaccines, etc. are not a 2A.

Example Moment – School Nurse	
Who were you with?	<i>By myself.</i>
What were you doing?	<i>Updating our vaccine refrigerator and freezer digital data logger thermometers.</i>
Why were you doing this?	<i>Previous thermometer calibration expired and needed to replace with new thermometers with current calibration.</i>
Post-Question:	<i>No, the activity was not applicable to any of the above.</i>

Correct Code: Code 2Z

Example 2A: EPSDT Benefit

- » The EPSDT benefit is available to all students under 21 years of age (regardless of IEP status), and services may qualify as 2A moments.
- » Includes both health and behavioral health services:
 - **Screening services**
 - Reviewing records to determine who is eligible for screening services
 - Scheduling and administering screenings
 - Summarizing / documenting screening results
 - Follow up on screening results, including referring a student that fails a screening
 - **NOTE:** Group referrals, such as letters sent to a group of parents informing them of screening results should be coded to Code 8, NOT Code 2A.
 - Scheduling follow-up diagnostic tests

***Example 2A:* EPSDT Benefit (continued)**

- **Preventive risk factor reduction counseling & anticipatory guidance** (developmentally / age appropriate)
 - Prevention of self harm / suicide
 - Promotion of tobacco / alcohol / drug-free lifestyle
 - Promotion of mental health, including addressing coping skills
 - Providing age-specific information on health and safety-related topics
- **Vaccine counseling**
- Other covered services listed on the **Bright Futures Periodicity Schedule**

Example 2A: EPSDT Screenings

- » Hearing and vision screenings are very common EPSDT benefits.
- » Also includes behavioral health universal screenings.
- » Activities related to participating in screenings, including scheduling, administering, scoring, documenting, and parent/guardian follow up (individual, not group follow-up).

Example Moment – School Nurse	
Who were you with?	<i>Students</i>
What were you doing?	<i>Conducting vision screenings</i>
Why were you doing this?	<i>This is a mandated service that must be conducted for these students.</i>
Post-Question:	<i>Yes - The student's vision/hearing screening or assessment.</i>

Example 2A: EPSDT Risk Factor Reduction

- » Generally, students are present; documentation of activities also eligible for 2A.
- » Purpose: To educate/inform the student on associated risks and provide guidance – quitting smoking, chronic condition management (e.g., carb counting), risks of substance use, navigating violence or nutrition challenges.
- » Could be individualized or population based.

Example Moment – School Social Worker	
Who were you with?	<i>A group of students.</i>
What were you doing?	<i>In a group on tobacco cessation.</i>
Why were you doing this?	<i>Educating students on the risks associated with smoking and sharing coping strategies.</i>
Post-Question:	<i>Yes - Required Immunization, or other covered EPSDT (early and Periodic Screening, Diagnostic, and Treatment) services.</i>

General Health Education *(Not 2A)*

- » Non-student specific and more geared toward general health education.
- » Lacks determination of medical necessity.

Example Moment – School Psychologist	
Who were you with?	<i>With two students in the commons.</i>
What were you doing?	<i>Handing out treats and information on reducing anxiety.</i>
Why were you doing this?	<i>Finals are starting and we are encouraging students to practice techniques to reduce stress.</i>
Post-Question:	<i>No, the activity was not applicable to any of the above.</i>

Correct Code: Code 2Z. j.

Example 2A: Pre & Post Services

- » Pre- and post-service activities that are **directly related** to providing a service are considered an extension of the service and may be coded as 2A.
- » Care plan must be in place for the service.
- » Why is this important?
 - LEA BOP interim payment rates incorporate pre/post-service time in the rate.
 - Coding an activity that is paid through the direct service rate as a reimbursable administrative activity would be considered “double dipping”.
- » Examples have been added to the TSIP to clarify pre/post-service time (next slide).

Example 2A: Pre & Post Services

- » Examples of pre- and post-service include:
 - Preparing for or breaking down equipment related to a treatment service
 - Planning / developing materials for a treatment service
 - Scheduling treatment services for students with care plans
 - Consulting with another practitioner / parent related to a student's service
 - Discussing a student's health-related needs, progress, or goals
 - Accompanying a student to a covered service
 - Traveling to / from a direct service
 - Completing paperwork associated with service in a student's care plan
 - Updating goals / objectives of care plans related to a student's health services

Example 2A: Pre-Service Activity

- » Activities that relate to preparing for an upcoming service (even when the student is not present) can be coded to 2A.

Example Moment – Speech Language Pathologist	
Who were you with?	<i>I was in my office alone.</i>
What were you doing?	<i>I was preparing materials for my next speech/language session/small group.</i>
Why were you doing this?	<i>I was preparing materials for my next speech/language session/small group per the students' goals/service minutes outlined in their Individualized Education Plan(s) (IEP).</i>
Post-Question:	<i>Yes – The student's IEP/IFSP</i>

Example 2A: Post-Service Activity

- » Activities that relate to completing a service that is pursuant to a Plan (even when the student is not present) can be coded to 2A.

Example Moment – School Nurse	
Who were you with?	<i>No one</i>
What were you doing?	<i>Driving back to my office from administering insulin to a student.</i>
Why were you doing this?	<i>She has orders for insulin to be administered due to her diabetes.</i>
Post-Question:	<i>Yes - The student's other type of care plan, such as a 504 plan, a student health plan, or a nursing plan.</i>

Pre- or Post-Service (Not 2A)

- » Activities that do not relate to preparing for / completing a student's assessment or plan-related service do not qualify for a 2A.

Example Moment – School Nurse

Who were you with?	<i>The student, guardian, and senior office technician.</i>
What were you doing?	<i>A new student is enrolling with the senior office tech and had a recent surgery. The mom provided a note from the doctor with restrictions and brought in medication for pain but did not have the proper medication authorization form. The form was given to mom and confidential information form was given to instructors.</i>
Why were you doing this?	<i>Proper medication administration form is necessary for nurse and trained staff to give medication at school. The confidential information for restriction note was given to instructors so that they are aware of the student's restrictions.</i>
Post-Question:	<i>No - the activity was not applicable to any of the above.</i>

Example 2A: Training

- » Training has been split into several codes in the TSIP.
- » Training that **improves the delivery of Medicaid covered services** qualifies to be coded as a 2A moment.
 - **Training** includes activities where the TSP is coordinating, conducting or attending training events, seminars, or conferences that improve the delivery of Medicaid covered services.
 - **Professional development** includes continuing education to maintain Medicaid provider status or improve service delivery.

Example 2A: Training

- » Activities that relate to training that support the delivery of direct care services can be coded to 2A.

Example Moment – Trained Health Care Aide	
Who were you with?	<i>I was with my supervisor and a student.</i>
What were you doing?	<i>Training to learn about procedures for G tube feedings.</i>
Why were you doing this?	<i>To prepare to be able to perform G tube feedings for the student this school year.</i>
Post-Question:	<i>Yes - Doctor's orders/prescription.</i>

Note: For moments specific to training or professional development that improve the delivery of direct services, a TSP may respond “No” to the post-question and a CQ is not required to assign a Code 2A. Since G-tube feeding is a Medicaid covered service, this moment may be coded to 2A, as the training is to support the delivery of a covered service.

Training (*Not 2A*)

- » Activities that do not relate to improving the delivery of Medicaid covered services, such as general all staff training, technical user training, outreach training or training required for employment should not be coded to 2A.

Example Moment – Physical Therapist	
Who were you with?	<i>Other staff in a zoom breakout room.</i>
What were you doing?	<i>Participating in a training for mandated reporters.</i>
Why were you doing this?	<i>District mandates that I take this training.</i>
Post-Question:	<i>No - the activity was not applicable to any of the above.</i>

Correct Code: Code 16

LEA BOP Assessments

» **Reminder!** When coding assessment moments for LEA BOP, it's important to recognize which activities are billable under Code 2A. Only qualified practitioners may bill for assessment activities, which include, but are not limited to, the following components:

- **Reviewing** student records (cumulative files, health history, medical records)
- **Interviewing** the student, teacher, practitioner and/or parent or guardian
- **Observing** the student in the classroom and other appropriate settings
- **Consulting** with other practitioners involved in the student's care, teachers, parents/guardians
- **Scheduling and administering** tests; scoring and interpreting results
- **Writing** a report to summarize assessment results and recommendations for services
- **Drafting or updating** the student's present level of performance and/or goals included in care plan
- **Developing** a treatment plan for a student, outlining the need for medical services
- **Reporting** out to parents and/or school personnel on student's assessment findings, progress towards meeting goals, recommendations, etc. (reporting includes during care plan meetings)
- **Evaluating** a student in crisis, conducting a threat/risk assessment, or discussing assessment results

Code 2Z - Direct Medical Services Not Covered by the LEA BOP

- » This code includes direct medical services, or an extension of a direct medical service, that are non-billable for LEA BOP reimbursement.
- » Examples:
 - Emergency cardiopulmonary resuscitation (CPR) treatment and first aid
 - Direct services provided by non-qualified practitioners (including TSPs in Pool 2)
 - Obtaining vaccines or storage supplies, inventorying vaccines or organizing supplies to prepare for a vaccination clinic
 - Monitoring students related to a short-term illness or recent injury (when monitoring is not included in an IEP/IFSP/IHSP)
 - Filling out LEA BOP administrative forms



Example: Code 2Z

Registered School Nurse Pool 1	
Who were you with?	<i>With a student and health care aide.</i>
What were you doing?	<i>I was supervising the health care aide feeding a student with a gastric tube.</i>
Why were you doing this?	<i>The health care aide requested I watch over the procedure so that it was performed correctly.</i>
Post-Question:	<i>No</i>

Questions?

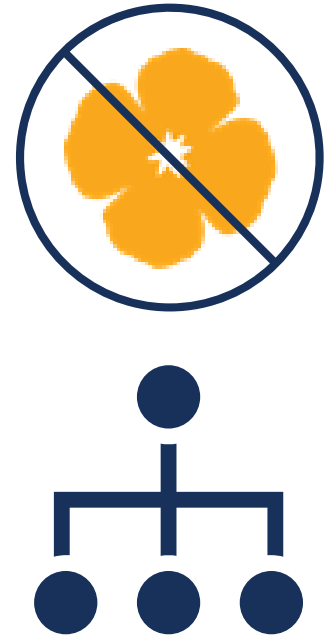
Two thick, wavy lines in shades of blue and teal sweep across the lower half of the slide, creating a dynamic, flowing effect.

Break

Please return in 15 minutes.

Code 3 - Non-Medicaid Outreach

- » This code should be used when a TSP is performing activities that inform individuals about non-Medicaid social, vocational, general health and educational programs.
- » Examples:
 - Informing families about non-Medicaid wellness programs.
 - Conducting outreach campaigns to access social, educational, legal, or services not covered by Medicaid.
 - Assisting in early identification of children with special medical or behavioral health needs.

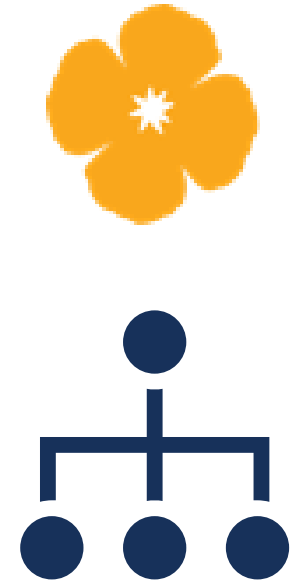


Example: Code 3

Case Manager in Pool 2	
Who were you with?	<i>I was by myself.</i>
What were you doing?	<i>Working on a schoolwide spirit week flyer for National Dropout Prevention Month.</i>
Why were you doing this?	<i>This is a district wide initiative to promote National Dropout Prevention Month at all high schools.</i>

Code 4 – Medicaid Outreach

- » Reserved for activities that inform individuals about Medicaid programs and how to access them.
- » This includes the following activities:
 - Determining student Medicaid eligibility/enrollment, describing the range of services available through Medicaid and EPSDT, the cost (if any), location, how to obtain services, and the benefits of preventive healthcare.
 - Participating in, facilitating or coordinating outreach and trainings activities designed to inform, educate, and connect students and families with available Medicaid-covered services.
 - Providing information about Medicaid covered services and/or EPSDT screenings (e.g., dental, vision and hearing screenings, recommended immunizations, etc.)

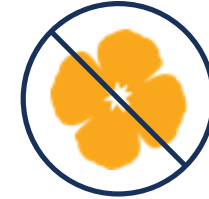


Example: Code 4

Program Manager in Pool 2	
Who were you with?	<i>My colleagues and families.</i>
What were you doing?	<i>After school event for families.</i>
Why were you doing this?	<i>As part of outreach to support families mental health and provide resources for Medi-Cal services..</i>

Code 5 – Facilitating an Application for Non-Medicaid Programs

- » This code should be used when a TSP is informing an individual and/or family about programs such as CalWORKs, Supplemental Nutritional Assistance Program (SNAP), Women, Infants and Children (WIC) Program, childcare, legal aid and other social or educational programs and referring them to the appropriate agency to complete the application.



- » Examples:

- Supporting individual or family to enroll a student in Extended School Year (ESY), credit recovery, summer school, enrichment camps or after school programs.
- Contacting families about the Universal Benefits Application (UBA) for LEAs that participate in a federal school nutrition program.
- Informing or assist an individual with a college application or financial application.

Example: Code 5

Counselor in Pool 2	
Who were you with?	<i>I was with a student.</i>
What were you doing?	<i>I was assisting the student with their college application.</i>
Why were you doing this?	<i>The student came in to see me for help.</i>

Code 6 – Facilitating the Medicaid Application

- » This code should be used when TSPs are assisting an individual or family in completing the Medicaid application.
- » Example:
 - Using client information gathered from various programs to facilitate the Medicaid application process to expand enrollment into Medicaid programs and services.
- » Note: This activity does not include the actual determination of Medicaid eligibility.



Example: Code 6

Translator in Pool 2	
Who were you with?	<i>I was working alone.</i>
What were you doing?	<i>Talking to a parent to help them with the Medi-Cal application process.</i>
Why were you doing this?	<i>The parent wants to apply for Medi-Cal and needed help understanding and completing the application process.</i>

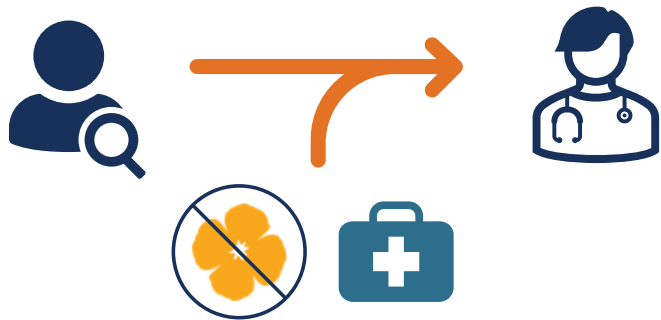
Note: Although the TSP is a translator, this moment is a Code 6 (see example c). Assisting students or families to complete a Medicaid application.

A CQ should be asked to see if any translation occurred during the moment, as the TSP did not state they were translating.

Code 7 – Referral, Coordination, & Monitoring of Non-Medicaid Services

» This code should be used when a TSP is making referrals for coordinating, and/or monitoring the delivery of non-Medicaid services, such as educational services.

» Examples:



- Making referrals for, coordinating, or monitoring the delivery of social and educational services not related to Medicaid.
- Participating in meetings to review a student's need for non-health related services.

Example: Code 7

Counselor in Pool 2	
Who were you with?	<i>I was with a 4th grade teacher.</i>
What were you doing?	<i>Consulting with the teacher regarding one of her students that I support through counseling services.</i>
Why were you doing this?	<i>To learn more about what is happening in the classroom and to advise the teacher on strategies for improving her relationship with the student based on what the student shared with me (with their permission).</i>

Code 8 – Referral, Coordination, & Monitoring of Medicaid Services

- » This code should be used when TSPs perform referrals for, coordinate, and/or monitor the delivery of Medicaid covered services.

Note: If there is an LEA BOP TCM Flag in SSP for the TSP, this moment will not be allowed as Code 8.

» Examples:

- Referring students for necessary medical, behavioral health, or substance abuse services covered by Medicaid. This may include sending notification to a group of parents whose students need additional evaluation, universal screenings or referring high risk students for additional services. (Note: a Pool 1 TSP that is following up with a parent/additional practitioner for an individual student post-service delivery would be considered an extension of the medical service and coded as 2A).
- Coordinating services identified in an IEP/IFSP/Care Plan to ensure services are being delivered in accordance with the student's plan.



Example: Code 8

Principal in Pool 2	
Who were you with?	<i>I was with the School Psychologist.</i>
What were you doing?	<i>We were discussing a potential assessment for a student.</i>
Why were you doing this?	<i>It is my responsibility to ensure we follow through with assessments when needs present themselves.</i>

Code 2 vs Code 8

Code 2 – Direct Medical Services

- » Provides direct medical services to an individual.
- » Direct medical services that are an integral part of an extension of a medical service (e.g., patient follow-up; patient education, and patient and parent consultations).
- » Pre- and Post-time directly related to providing direct care services when the student is not present, including time to complete all paperwork related to the specific direct care services, such as preparation of progress notes/reports and session notes.

Code 8 – Referral, Coordination, and Monitoring of Medicaid Services

- » Participating in a meeting/discussion to coordinate or review a student's need for health-related services covered by Medicaid (IEP meetings are not included).
- » Providing information to other staff on the child's related medical/dental/mental health services and plans.
- » Making referrals for and/or coordinating medical or physical examinations and necessary medical/mental health evaluations.

Code 8, But Really a 2A!

Credentialed School Psychologist in Pool 1

Who were you with?	<i>Myself.</i>
What were you doing?	<i>On my computer creating an assessment plan for IEP student's triennial review.</i>
Why were you doing this?	<i>The assessment plan needs to go to parents for signature before assessments can begin.</i>
Post-Question	<i>Yes.</i>

Speech Language Pathologist in Pool 1

Who were you with?	<i>I was working with teacher.</i>
What were you doing?	<i>I was providing consultation and collaboration with the teacher regarding a student's services and planning an upcoming assessment.</i>
Why were you doing this?	<i>I was performing this activity to plan for an upcoming assessment to help determine goals and services for a student to figure out what areas we should assess the student in when we propose an assessment plan for the triennial.</i>
Post-Question	<i>Yes.</i>

Code 9. Arranging Transportation for Non-Medicaid Services

- » Code 9 should be used when TSPs are accompanying or assisting an individual to obtain transportation to non-Medicaid eligible services.
- » Examples:
 - Scheduling or arranging transportation to social, vocational, educational, and/or any other non-Medicaid services, programs, and activities.
 - Arranging medical transportation (such as an ambulance) for school sporting events.
 - Accompanying a student to non-Medicaid covered services.



Example: Code 9

Special Education Coordinator in Pool 2	
Who were you with?	<i>I was with a transportation coordinator.</i>
What were you doing?	<i>I was working on scheduling transportation with the county and district for our special education students for this summer's Extended School Year, summer school.</i>
Why were you doing this?	<i>I was asked by my office assistant.</i>

Code 10. Arranging Transportation for Medicaid Services

- » Code 10 should be used when TSPs are accompanying or assisting a student or family to obtain transportation to the site where services covered by Medicaid are provided.
- » Examples:
 - Scheduling or arranging transportation to Medicaid covered services.
 - Coordinating IEP/IFSP specialized medical transportation services to the location where services are provided.



Code 10 - Continued

- » Code 10 does not include:
 - The actual transportation service.
 - Accompanying the Medicaid eligible individual to Medicaid services.
 - Arranging campus security or medical transportation for school sporting events (e.g. ambulances).
- » A TSP that participates as a TCM provider under the LEA BOP and answers “Yes” to the post-question, indicating that the activity was pursuant to an IEP/IFSP/IHSP, may not have the moment coded to Code 10.



Example: Code 10

Health Care Assistant/Advocate in Pool 2	
Who were you with?	<i>A McKinney-Vento family.</i>
What were you doing?	<i>I was arranging transportation for a student to go from school to a Medi-Cal covered behavioral health service.</i>
Why were you doing this?	<i>Student would benefit from behavior health services (as per the parent and school referral).</i>

*A McKinney-Vento family is a family who lack a fixed, regular and adequate nighttime residence.

Code 11. Non-Medicaid Translation

» Code 11 should be used when TSPs provide translation services for non-Medicaid activities.



» Examples:

- Arranging for or providing translation services (oral, written or signing services) that assist the individual to access and understand social, educational, and vocational services.
- Arranging for or providing translation services that assist the individual to access and understand general student health education outreach campaigns.

Example: Code 11

Interpreter for the Deaf (DHH) in Pool 2	
Who were you with?	<i>A group of deaf students, paraeducators, interpreters and a teacher.</i>
What were you doing?	<i>Interpreting spoken language into American Sign Language.</i>
Why were you doing this?	<i>To provide equal access to educational materials for our deaf students.</i>

Code 12. Translation Related to Medicaid Services

- » This code should be used when TSPs provide Medicaid translation services. Translation must be provided by a third-party performing a translation function for the school and it must facilitate access to Medicaid covered services. LEAs may enter into contracts or employ staff that provide translation or interpretation functions. A practitioner translating their own work must not be dual coded as translation and a direct service.

- **Note:** Translations must be associated with a covered Medicaid service to be a Code 12.

» Examples:

- Arranging for or providing translation to student/family to understand how to access the application process for Medicaid.
- Arranging for or providing translations services (oral, written, or signing services) during the IEP/IFSP/IHSP meeting to assist the student/parent to access and understand necessary care or treatment covered by Medicaid.



Code 12 - Continued

- » A TSP that participates as a TCM provider under the LEA BOP and answers “Yes” to the post-question, indicating that the activity was pursuant to an IEP/IFSP/IHSP, may not have the moment coded to Code 12.



Example: Code 12

Bilingual Translator in Pool 2	
Who were you with?	<i>I was with a teacher and a parent.</i>
What were you doing?	<i>I was interpreting for the parent and teacher for an Annual IEP for her child.</i>
Why were you doing this?	<i>I was interpreting because the parent does not speak or understand English, and the teacher does not speak or understand Spanish. Both need to communicate to see the IEP progress of the student throughout the year.</i>

Note: it may be helpful to ask a CQ to determine the exact content that was being discussed during the moment (i.e., introductions, IEP result, saying farewell, etc.)

Code 13. Program Planning, Policy Development, and Interagency Coordination Related to Non-Medicaid Services

» This code should be used when TSPs work to improve the coordination and delivery of non-medical/non-mental health services to students and their families on a large scale.

» Examples:

- Evaluating the need for non-medical services in relation to specific populations or geographic areas.
- Working with other agencies providing non-medical services to improve the coordination and delivery of services and to improve collaboration around the early identification of non-medical problems.
- Planning and policy development, interagency coordination for mandated non-medical/dental or mental health services.



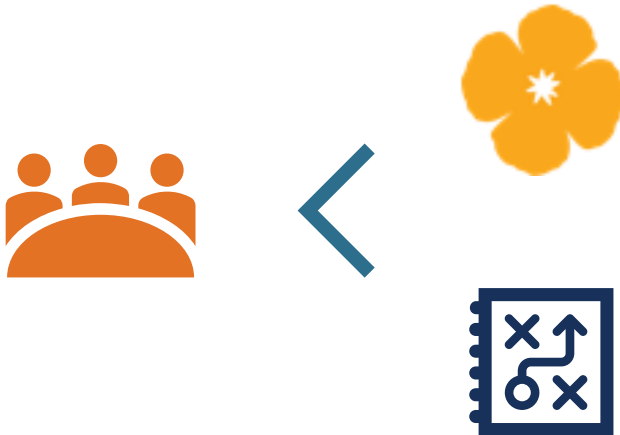
Example: Code 13

SELPA Director in Pool 2	
Who were you with?	<i>I was by myself.</i>
What were you doing?	<i>On the phone with the Superintendent discussing the changes to our Head Lice Policy.</i>
Why were you doing this?	<i>It is part of my job duties to review school district policies and make changes in accordance with new information.</i>

Code 14. Program Planning, Policy Development, and Interagency Coordination Related to Medicaid Services

» This code should be used when TSPs work to improve the coordination and delivery of medical/dental/mental health services to students and their families on a large scale.

» Examples:



- Evaluating the need for Medi-Cal services in relation to specific populations or geographic areas.
- Coordinating with interagency committees to identify, promote, and develop Medi-Cal and/or EPSDT services in the school system.
- Developing strategies to assess or increase the capacity of non-mandated school medical/dental/mental health programs.

Example: Code 14

Director of Special Education in Pool 2	
Who were you with?	<i>District Technology Specialist and Director</i>
What were you doing?	<i>Determine technology needs for the implementation of virtual speech and language supports for IEP students.</i>
Why were you doing this?	<i>We are in the immediate process of implementing virtual speech support, and this is one of the last steps prior to implementation.</i>
Clarifying Question #1	<i>Thank you for your response. Can you please describe the specific virtual speech and language support you are in the process of implementing at the time of the one-minute survey? Thank you.</i>
Clarifying Question #1 Response	<i>We contracted with an SLP to offer virtual services to our rural population with speech IEP's. We are remote and rural, recruitment for an in-service provider was not panning out, and our students were not receiving services. The meeting was a discussion about connectivity and the capability of our infrastructure and hardware so that we can best provide services to our population.</i>

Code 15 – Medicaid Claims Administration, Coordination, and Training

» This code should be used for TSPs performing administrative activities that support the provision of Medicaid covered services such as claims administration, coordination, and RMTS training activities.

» Examples:



- Serving as liaison for regional or local school-based Medicaid programs and with the State and federal governments on Medicaid administration.
- Monitoring the performance of school-based Medicaid programs.
- Administering SMAA, including overseeing, preparing, compiling, revising, and submitting claims.

Code 15 - Continued

- » Code 15 also covers the coordinating, conducting or participating in training events or seminars on administrative requirements related to Medicaid school-based services.
 - Some of the trainings that are supported are...
 - DHCS-facilitated trainings on Medicaid billing requirements, documentation requirements, audit process, practitioner enrollment as a Medicaid provider, etc.
 - Medicaid school-based RMTS requirements such as updates to the RMTS system.
 - Program and subcontractor staff knowledge on state, federal, and local requirements for SMAA claiming.



Example: Code 15

Assistant Project Coordinator in Pool 2	
Who were you with?	<i>By Myself.</i>
What were you doing?	<i>Reviewing and making edits to Q3 TSP eligible provider lists for multiple school districts.</i>
Why were you doing this?	<i>In preparation for submitting the finalized lists to in order to make updates to the RMTS software.</i>

Code 16 – General Administration/ Paid Time Off

- » This code should be used for general administrative and clerical activities related to facilities, district functions, and operations, excluding curriculum instruction.
- » When duties are not directly assignable to LEA BOP or SMAA activities.
- » Examples:
 - Reviewing non-instructional school policies, procedures, or rules.
 - Paid time off (i.e. lunch break, vacation or sick time, bio-breaks, etc.).
 - Attending or facilitating general staff or board meetings.
 - Troubleshooting technical issues related to staff computers or software systems, including student information systems.



Code 16 - Continued

» Code 16 also covers coordinating, conducting or participating in training or professional development opportunities that are policy and procedure related such as...

- School policies and procedures related to general building or district functions.
- Safety or emergency preparation (e.g. active shooter/school safety plan trainings).
- User training on student information systems, fiscal reporting, and billing platforms.
- Training required for employment (e.g. onboarding for new staff, all staff trainings).



Code 1 vs 16

Code 1. School-Related and Educational Activities

- » Performing activities that are specific to instructional, curriculum, student-focused areas, including those performed by health providers.
- » Evaluating curriculum and instructional services, policies, and procedures.
- » Non-Medicaid training and professional development activities, including coordinating, conducting or participating in training events and seminars that are student focused.
- » Academic and educational staff meetings (student meetings, school, staff, offsite, etc.).

Code 16. General Administration/Paid Time Off

- » Performing administrative or clerical activities related to general building or district functions or maintenance and operations.
- » Reviewing non-instructional school policies, procedures, or rules.
- » Coordinating, conducting or participating in other training events, seminars and professional development activities that are policy and procedure related.
- » Attending or facilitating school or unit staff meetings, including staff meetings for direct care practitioners.

Example: Code 16

Elementary Assistant Principal in Pool 2	
Who were you with?	<i>Staff.</i>
What were you doing?	<i>Working on task.</i>
Why were you doing this?	<i>Required as part of my job description.</i>
Clarifying Question #1	<i>Please be more specific and explain what work you were doing during your assigned moment and why.</i>
Clarifying Question #1 Response	<i>Updating our school site Safety Plan. It is a required procedure each year to update, review, and present the various school Safety Plans.</i>

Code 17 – Not Working/Not Paid

» This code should be used when a TSP responds that they were not working at the time of the moment and/or were on unpaid time off (e.g., unpaid lunch break).



» Also used when:

- For moments assigned to TSPs that separate from employment during the sampling period, either permanently or temporarily
- The position/moment is vacated and there is no direct replacement.
- A TSP was erroneously included in the TSP Universe (e.g., separated prior to certification).

Code 18 – No Response

- » This code should be used when a TSP fails to provide a response to an assigned moment within the required response time.
- » This code is applicable when TSPs were on leave but failed to notify their coordinator prior to moment expiration. Code 18 will be initially assigned as a non-response until the TSP's leave status is verified by the LEA RMTS Coordinator.



- If the TSP's leave status can be verified as paid leave, the moment is reassigned to Code 16.
- If the TSP's leave status relates to unpaid leave, the moment is reassigned to Code 17.

Questions?



Lunch

Please return in one hour.

LEA BOP Service Categories



LEA BOP Service Categories

» The LEA BOP service categories are:

1. **Psychology/Counseling**
2. **Nursing and School Health Aide Services**
3. **Non-Clinical Preventive Service (NEW!)**
4. Speech Therapy
5. Occupational Therapy
6. Physical Therapy
7. Vision
8. Hearing
9. Other (Orientation & Mobility, Nutrition, TCM, Respiratory Care, Physician Services)



Psychology/Counseling Services

(Provider Manual Section: *loc ed serv psych*)



Psychology/Counseling Services

- » **Definition:** Includes direct services that apply psychological principles/techniques to understand, diagnose, treat, and prevent/alleviate psychological problems, emotional or mental disorders, or behaviors.
- » **Reimbursable Services:**
 - Psychological Assessments (to determine eligibility for IEP/IFSP)
 - Psychosocial Status Assessments (IEP and non-IEP)
 - Health Education/Anticipatory Guidance (non-IEP/IFSP)
 - Adverse Childhood Experiences (ACEs) Screenings
 - Psychology and Counseling Treatments (including individual and group treatment, must be in a Plan of Care*)
 - Crisis assessments **(NEW!)**
 - Crisis counseling (when pursuant to a Plan of Care*) **(NEW!)**

****Plan of Care includes an IEP, IFSP, Individual Health and Support Plan (IHSP), 504 plan, nursing plan, etc.***

Psychology/Counseling Services

Qualified Practitioners:

- Licensed Psychiatrist
- Licensed Psychologist
- Credentialed School Psychologist
- Licensed Educational Psychologist
- Licensed Clinical Social Worker
- Credentialed School Social Worker
- Registered Associate Clinical School Social Worker
- Licensed Marriage and Family Therapist (MFT)
- Associate MFT
- Credentialed School Counselor
- Licensed Professional Clinical Counselor (LPCC) **(NEW!)**
- Associate Professional Clinical Counselor (APCC) **(NEW!)**

Health Education/Anticipatory Guidance and Adverse Childhood Experiences (ACEs) Screenings:

- All practitioners listed
- Nurses (excluding LVNs)
- Physicians and Physician Assistants

Individual/Group Counseling:

- All practitioners listed
- Physicians and Physician Assistants

Psychology Coding Examples

2A Moments

TSP was...

- » Conducting an initial mental health screening or assessment for a student without a care plan.
- » Interviewing a parent or teacher as part of an evaluation.
- » Documenting and gathering materials for an upcoming triennial 504 plan meeting.
- » Providing behavioral support for student with a care plan (even if spontaneous).
- » Traveling to/from observing a student to determine if a referral is necessary for an assessment (pre- or post-service for an assessment).

Not Code 2A

TSP was...

- » Listening to another practitioner report out at an IEP meeting (Code 2Z).
- » Making copies of documents for an initial IEP meeting (Code 1).
- » Reviewing a list of students who were referred for mental health services to arrange services (Code 8).
- » Preparing the IEP for signature after the annual meeting (Code 1).
- » Review course options with a student (Code 1).
- » Conducting a wellness check if not pursuant to a plan of care (Code 2Z).

Counseling Coding Examples

2A Moments

TSP was...

- » Providing individual counseling focused on de-escalation and coping skills after disciplinary action (for a student with a care plan).
- » Providing counseling to a group of students to promote drug, alcohol and tobacco-free/reduced ways of living (no care plan).
- » Counseling a student (referred to me by their parent) on signs of depression and how to prevent self-harm (for a student without a care plan).

Not Code 2A

TSP was...

- » Providing short-term grief counseling to student not in care plan (Code 2Z).
- » Logging hours for all counseling sessions completed for the day (Code 2Z).
- » Providing a student Substance Use Disorder counseling (Code 2Z).

Nursing Services

(Provider Manual Section: [*loc ed serv nurs*](#))

Two thick, wavy lines in shades of blue and teal sweep across the middle of the slide, creating a decorative horizontal band.

Nursing Services

- » **Definition:** Includes direct services that provide basic health care associated with actual/potential health or illness problems or the treatment, including:
- Patient care services for the safety/comfort/protection of the patient
 - Performance of disease prevention and restorative measures
 - Administration of medications and therapeutic agents
 - Performance of skin tests, immunization techniques, and blood withdrawal
 - Observation of illness signs/symptoms, treatment reactions, or other conditions that may result in treatment, reporting, referring, or emergency procedures

Nursing Services

» Qualified Practitioners:

- Nurse (Registered Credentialed School Nurse, Certified NPs, Public Health Nurses, and other licensed registered nurses)
- Licensed Vocational Nurse (LVN)
 - The only reimbursable service for LVNs are nursing treatments.

» Reimbursable Services:

- IEP/IFSP Health Assessments
- Health Education/Anticipatory Guidance
- Nursing Treatments (including ADL assistance or specialized health care procedures, part of a plan of care)
- Immunization / Vaccine Administration

Note: Additional nursing services, such as hearing and vision screenings and nutrition assessments/treatments, are also reimbursable by qualified nurses.

Nursing Coding Examples

2A Moments

TSP was...

- » Administering student's medications per doctor's orders.
- » Conducting state-mandated vision and hearing screenings.
- » Providing diabetic care to student.
- » Picking up assigned student per their schedule.
- » Reviewing a student's health care plan and doctor's notes.
- » Student immunizations.

Not Code 2A

TSP was...

- » First aid response to student injury (Code 2Z).
- » Checking emails for the day (Code 2Z).
- » Accompanying students to sports day event (Code 1).
- » Discharging student from the health office (Code 2Z).
- » Calling parents for a student not feeling well (Code 2Z).
- » Documenting all the health office visits for the day (Code 2Z).

School Health Aide Services

(Provider Manual Section: *loc ed serv nurs*)



School Health Aide Services

- » **Definition:** Includes direct patient care services, including administration of specialized physical health care and assistance with Activities of Daily Living (ADLs)
- » **Qualified Practitioners:**
 - Trained Health Care Aide (THCA)
- » **Reimbursable Services:**
 - Specialized physical health care services, such as gastric tube feeding, suctioning, oxygen administration, catheterization, and nebulizer treatments
 - Assistance with ADLs, such as eating, toileting, transferring, positioning, mobility assistance, helping with assistive devices, observing/monitoring, and redirection/intervention/cueing to assist with completion of an ADL task

Non-Covered ADL Services

- » Assisting the student with educational activities and classroom support, such as tutoring, preparation of educational materials, or Braille interpretation.*
- » Instrumental Activities of Daily Living (IADLs), such as assistance with meal preparation, household chores, teaching a child to grocery shop, managing finances, or getting around in the community by taking the bus.
- » Services provided while monitoring a group of students (e.g., in the lunchroom or on the bus).

****In cases where a physician has authorized one-on-one continuous monitoring of a student's medical condition, the continuous monitoring time is a covered LEA BOP service.***

THCA Coding Examples

2A Moments

TSP was...

- » Assisting student with feeding during lunch (when orders require this)
- » Changing a student's diaper
- » Assisting student with communication device
- » Checking student's glucose levels
- » Transferring a student from wheelchair to toilet
- » Performing continuous monitoring of a student when required by doctor's orders

Not Code 2A

TSP was...

- » Supervising students in lunchroom or during recess (Code 1)
- » Assisting to conduct vision and hearing screenings (Code 2Z)
- » Data entry for student health records (Code 2Z) *Note: this is for a group, not an individual student. An individual student would be a 2A.*
- » Providing first aid to a student with a minor injury (Code 2Z)
- » Checking a student's temperature (Code 2Z)
- » Notifying parents of student's health office visit (Code 2Z)

Non-Clinical Preventive Services (NEW!) (Provider Manual Section: *In Development*)



Non-Clinical Preventive Services

- » **Definition:** Services that focus on health navigation, education and community support to prevent chronic disease and promote well-being without requiring a clinical license.
- » **Qualified Practitioners & Reimbursable Services (NEW!)**
 - Community Health Workers (CHWs)
 - Health education to promote the beneficiary's health or address barriers to health care, including providing information or instruction on health topics.
 - Screening **not** requiring a licensed provider.
 - Screenings may include, but are not limited to, the control and prevention of chronic conditions, infectious diseases, mental health conditions, substance use disorders, and perinatal health conditions.
 - Certified Wellness Coaches (CWCs)
 - Wellness promotion and education.
 - Screening **not** requiring a licensed provider.
 - Screenings may include, but are not limited to, behavioral health risk, wellness and lifestyle factors, and chronic disease risk factors.
 - Individual and group behavioral health coaching, including wellness education, coping skills, goal setting and planning, teaching life skills, stress management, and problem solving.

Non-Clinical Preventive Services Coding Examples

2A Moments

TSP was...

- » Providing education on topics such as emotional regulation or coping skills.
- » Performing individual or group behavioral health coaching on coping skills.
- » Helping a student manage their chronic condition (e.g., helping asthmatic students manage/reduce symptoms).
- » Conducting an initial non-diagnostic assessment, such as evaluation of behavioral health to determine appropriate preventive care.

Not Code 2A

TSP was...

- » Coordinating care for a student
 - **Note:** CHWs and CWCs are not qualified TCM providers.
 - Allowable care coordination activities are not Code 2A but can be assigned a Code 8.
- » Connecting students/families to external health resources and social services. (Code 8)
- » Providing ongoing support to students without a care plan. (Code 2Z)
- » Providing ADL assistance services. (Code 2Z)

Direct Service Example

Community Health Worker in Pool 1

Who were you with?	<i>Student</i>
What were you doing?	<i>I was conducting a ACES screening with the student to identify whether they may need additional behavioral health support.</i>
Why were you doing this?	<i>The student reported depression symptoms, and I was gathering screening information to determine if a referral to a health practitioner was needed.</i>
Post-Question:	<i>Yes</i>
Code?	Code 2A. Screening and assessment are reimbursable direct services for Community Health Workers. Reference TSIP under Code 2A II.b: Schedule and administer the screening service.

Direct Service Example

Certified Wellness Coach in Pool 1

Who were you with?	<i>Student</i>
What were you doing?	<i>I was leading a one-on-one coaching session focused on teaching the student coping strategies and structured breathing techniques to help manage stress.</i>
Why were you doing this?	<i>The student has ongoing difficulty regulating emotions, and I was providing behavioral health coaching as part of their documented wellness support plan.</i>
Post-Question:	<i>Yes</i>
Code?	Code 2A. Individual and group behavioral health coaching, including coping skills, is a reimbursable direct service for Certified Wellness Coaches. Reference TSIP under Code 2A II.f: Promoting mental, behavioral, and emotional health, including signs of depression or anxiety and addressing coping skill.

Administrative Activity Example

Community Health Worker or Certified Wellness Coach in Pool 1

Who were you with?	<i>Parent</i>
What were you doing?	<i>I was helping the parent understand how to schedule a behavioral health appointment and explaining the steps to access services through their insurance.</i>
Why were you doing this?	<i>The parent was unsure how to navigate the system, so I walked them through the process and provided information on community resources.</i>
Post-Question:	<i>Yes</i>
Code?	Code 8. Health navigation to provide information or assist beneficiaries in accessing health care, understanding the health care system, and connecting to community resources is an administrative activity. It is not reimbursable under LEA BOP. Reference TSIP under Code 8h: Coordinating the delivery of interdistrict and community-based medical/mental health services for children with special/severe health care needs.

504 vs IEP Meetings



504 vs IEP Meetings

- » An IEP is an individualized education program mandated under the Individuals with Disabilities Education Act (IDEA).
- » A 504 plan is tied to a **federal civil rights law** that ensures equal access by providing accommodations.
- » A 504 plan is **not** an IEP.
 - Therefore 504 meetings are not a Code 2Z or Code 1 by default
 - Coders must review what the TSP was doing to properly code the moment
 - **When in doubt – ask a CQ!**





504 Meeting Example

Trained Health Care Aide in Pool 1

Who were you with?	<i>Nurse, Parents, Student</i>
What were you doing?	<i>Sitting in a 504 Meeting.</i>
Why were you doing this?	<i>Talking about the student's health needs in the classroom and how I can help them.</i>
Post-Question:	<i>Yes</i>

Final Code: 8

- » **Reason:** The TSP was participating in a 504 meeting, discussing how they can help with a student's health needs.
- » **Reference TSIP under Code 8m.** – "Participating in a meeting/discussion to coordinate or review a student's needs for health-related services covered by Medicaid (IEP/IFSP meetings are not included)."



504 Meeting Example

Credentialed School Nurse in Pool 1

Who were you with?	<i>Parents and Student</i>
What were you doing?	<i>In a 504 Meeting, consulting with the parent about the student's diabetes management plan.</i>
Why were you doing this?	<i>The student has a 504 plan, and I am reviewing medical logs and discussing adjustments to the student's care schedule.</i>
Post-Question:	<i>Yes</i>

Final Code: 2A

- » **Reason:** The TSP was consulting the parents which is an extension of a medical service.
- » **Reference TSIP under Code 2A –** “Direct medical services also include administrative activities that are an integral part of or an extension of a medical service (e.g., patient follow-up; patient assessment; patient counseling; patient education, and patient, parent, and practitioner consultations).”

Questions?



Day 1: Wrap Up



Highlights from Day 1

- » Covered the essentials of RMTS coding
- » Learned when and how to use Clarifying Questions (CQs)
- » Explored the expanded Code 2A definitions with real-world coding examples
- » Introduced new practitioner types and their allowable services

Key Takeaways and Reminders

- » Accurate, detailed responses are essential for program integrity and reimbursement.
- » Use the P.O.I.N.T. framework for moment narratives: Primary Focus, Objective, Insight, Necessary Detail, Timely.
- » Ensure the narrative and post-question response align. Ask CQs when needed.
- » IEP meetings and 504 meetings are coded differently. Always review the practitioner's role and activity.

What's Next? Day 2 Preview

» Hands-on Practice:

- Coding Exercises
- Hard to Code moments

» Questions & Answers



Thank You.

We will continue with Day 2
July 30, 2026, at 9:00 AM

2026 RMTS Coder Training

Day 2

Coder Training Exercise

Two thick, wavy, horizontal lines in shades of blue and teal, positioned below the title and above the footer.

Overview

DHCS conducted a brief survey of coders from June 18–30, 2026, to gather coder responses on 10 sample moments.

Participation Highlights

27 complete responses received (1 incomplete).

Survey administered anonymously.

Survey distributed to participating RMTS Administrative Units.

RMTS AUs could either answer at the AU level, the LEC level, or coder level.

Exercise Review Process

The review process for each sample moment will follow a consistent process:

1. The moment response text and survey questions.
2. The moment response text (repeated) and a breakdown of survey results.
3. When coders indicated CQs were needed, a summary of the type of CQs suggested by coders.
 - All suggested coder CQs for each question are included in today's slides as an appendix.
4. The DHCS Perspective on coding the moment , including whether a CQ was needed and a coding suggestion / TSIP reference.

Moment 1: Scenario

Participant Pool	Pool 1
Job Category	Credentialed School Psychologist
Who were you with?	Special Education Teacher
What were you doing?	Consulting on state testing accommodations for a student with an IEP
Why were you performing this activity?	State testing will start soon
Post-Question Response	Yes - The student's IEP/IFSP

Can you accurately code this moment with the information provided?

- ☐ Yes
- ☐ No

If not, what clarifying question (CQ) would you ask to gather additional information?

Moment 1: Response Analysis

Moment Details	
Participant Pool	Pool 1
Job Category	Credentialed School Psychologist
Who were you with?	Special Education Teacher
What were you doing?	Consulting on state testing accommodations for a student with an IEP.
Why were you performing this activity?	State testing will start soon.
Post-Question Response	Yes - The student's IEP/IFSP.

Key Findings*

Majority of respondents believe this moment can be coded without asking additional information.

- **Can be coded with information provided:** 17 (63%)
- **Requires clarifying question:** 11 (41%)

Code Assignment Distribution Breakdown

Activity Code Assigned	Count
Code 1 – School-Related and Educational Activities	7
Code 2A – Direct Medical Services	6
Code 7 – Referral, Coordination, and Monitoring of Non-Medicaid Services	2
Code 8 – Referral, Coordination, and Monitoring of Medicaid Services	2

* This moment had 28 completed responses, while all other moments only had 27 responses.

Moment 1: Clarifying Questions

Of the 27 respondents, **11** indicated that the moment required a clarifying question.
Of those 11 respondents, **4** asked a multi-part question.

Type of Accommodation

55% (6)

What specific **type of accommodations** were being consulted about during the one-minute survey?

Please explain **what type of accommodations** were being discussed.

Student Need

27% (3)

Can you please clarify what specific type of state testing accommodation you were consulting on during your one-minute moment and **what area of student need was that supporting?**

Please **elaborate on the student need** that it addresses.

State Testing Context

18% (2)

Could you please elaborate more on **what your consulting consisted of** and **what type of state testing** this pertained to?

Please **describe the state testing** being consulted on.

Moment 1: DHCS Perspective



Moment Summary

Psychologist consulting on state testing accommodations for a student with an IEP to prepare for testing.



Can It Be Coded As Is?

YES. The moment can be accurately coded without additional information.



CQ NOT Needed

Regardless of the need for the accommodation, the consulting is related to educational support, not Medicaid covered services.



DHCS CODING: Code 1

TSIP Citation: Code 1 - Developing, coordinating, and monitoring the educational components of the IEP/IFSP for a student.

Rationale: This activity is not being done to support a Medicaid-covered service. Although the accommodation could have resulted from a health-related need, this activity's purpose is educational support.

Moment 2: Scenario

Participant Pool	Pool 1
Job Category	Speech Language Pathologist
Who were you with?	Parents, Advocates, Teachers, Other Practitioners
What were you doing?	Holding an IEP Meeting
Why were you performing this activity?	I was reporting out on my assessment results and facilitating the meeting as the case manager.
Post-Question Response	Yes - The student's IEP/IFSP

Can you accurately code this moment with the information provided?

- ☐ Yes
- ☐ No

What clarifying question (CQ) would you ask to gather additional information?

Moment 2: Response Analysis

Moment Details	
Participant Pool	Pool 1
Job Category	Speech Language Pathologist
Who were you with?	Parents, Advocates, Teachers, Other Practitioners
What were you doing?	Holding an IEP Meeting.
Why were you performing this activity?	I was reporting out on my assessment results and facilitating the meeting as the case manager.
Post-Question Response	Yes - The student's IEP/IFSP.

Key Findings

Majority of respondents believe this moment can be coded without asking for additional information.

- **Can be coded with information provided:** 23 (85%)
- **Requires clarifying question:** 4 (15%)

Code Assignment Distribution

Activity Code Assigned	Count
Code 2Z – Non-Covered Direct Medical Services	15
Code 2A – Direct Medical Services	7
Code 1 – School-Related and Educational Activities	1

Moment 2: Clarifying Questions

Of the 27 respondents, **4** indicated that the moment required a clarifying question.
Of those 4 respondents, **1** asked a multi-part question.

Clarifying the Specific Activity

50% (2)

Which one of those activities, reporting out on the assessment results or facilitating the meeting, were you doing during your one-minute Time Study?

Clarifying the Results Discussed

25% (1)

What specific type of results were being discussed during the one-minute survey?

IEP Context and Student Need

25% (1)

What was being discussed at the IEP meeting during the time of your survey, **who, by job title, was speaking** and what **area of student need** was the meeting focused on?

Moment 2: DHCS Perspective



Moment Summary

SLP reporting out on assessment results and facilitating an IEP meeting to parents and advocates.



Can It Be Coded As Is?

NO. The moment cannot be accurately coded without additional information.



CQ IS Needed!

Moment includes multiple activities being performed at time of moment.



High Quality CQ(s) Asked:

- *"Thank you for your response, which one of those activities (reporting out on the assessment results or facilitating the meeting) were you doing during your one minute Time Study?"*
- *"Please narrow down whether you were reporting out or facilitating during the one minute time study."*

CQ options correctly ask the TSP to specify a singular activity during their moment.

Moment 2: DHCS Perspective (cont'd.)

DHCS CODING: Depends on CQ Response

1. Facilitating meeting: Code 1

TSIP Citation: Code 1 - Developing, coordinating, and monitoring the educational components of the IEP/IFSP for a student, which includes scheduling or attending the IEP/IFSP team meetings.

2. Reporting out during meeting: Code 2A

TSIP Citation: Code 2A - Includes time when a health service practitioner is reporting out on a student's health-related assessment results or is recommending services during an IEP/IFSP or other care plan meeting.

Moment 3: Scenario

Participant Pool	Pool 1
Job Category	Speech Language Pathologist
Who were you with?	Working alone
What were you doing?	I was looking over attendance for a student
Why were you performing this activity?	I wanted to make sure that I was meeting the monthly speech minutes prescribed in the IEP. I was checking to see how many sessions this student has received this month.
Post-Question Response	Yes - The student's IEP/IFSP

Can you accurately code this moment with the information provided?

- ☐ Yes
- ☐ No

What clarifying question (CQ) would you ask to gather additional information?

Moment 3: Response Analysis

Moment Details	
Participant Pool	Pool 1
Job Category	Speech Language Pathologist
Who were you with?	Working alone
What were you doing?	I was looking over attendance for a student
Why were you performing this activity?	I wanted to make sure that I was meeting the monthly speech minutes prescribed in the IEP. I was checking to see how many sessions this student has received this month.
Post-Question Response	Yes - The student's IEP/IFSP

Key Findings

Respondents agree that this response was sufficient to code.

- **100% said that there was enough information to code.**

Code Assignment Distribution

Activity Code Assigned	Count
Code 2A – Direct Medical Services	19
Code 8 – Referral, Coordination, and Monitoring of Medicaid Services	5
Code 1 – School-Related and Educational Activities	3

Moment 3: DHCS Perspective



Moment Summary

SLP reviewing a student's record to check sessions were meeting monthly IEP speech minutes prescribed.



Can It Be Coded As Is?

YES. The moment can be accurately coded without additional information.



CQ NOT Needed!

All information necessary to code is detailed in the original moment summary.



DHCS CODING: Code 8*

TSIP Citations:

- Code 8 - Developing, coordinating, and monitoring the educational components of the IEP/IFSP for a student.
- Code 8 - Monitoring and evaluating the Medicaid service components identified during an IEP/IFSP meeting as appropriate.

Rationale: Moment is not a pre/post direct service activity, as reviewing session counts is not directly tied the delivery of the service. This activity was performed to support the administration of a Medicaid covered service.

**If TSP is identified as a TCM practitioner, then moment should be coded as Code 2A (cannot be coded to Code 8).*

Moment 4: Scenario

Participant Pool	Pool 1
Job Category	Occupational Therapist
Who were you with?	A student
What were you doing?	Feeding a student
Why were you performing this activity?	It was breakfast time
Post-Question Response	No

Can you accurately code this moment with the information provided?

- ☐ Yes
- ☐ No

What clarifying question (CQ) would you ask to gather additional information?

Moment 4: Response Analysis

Moment Details	
Participant Pool	Pool 1
Job Category	Occupational Therapist
Who were you with?	A student
What were you doing?	Feeding a student.
Why were you performing this activity?	It was breakfast time.
Post-Question Response	No.

Key Findings

Majority of respondents believe this moment requires a CQ.

- **Can be coded with information provided:** 5 (19%)
- **Requires clarifying question:** 22 (81%)

Code Assignment Distribution

Activity Code Assigned	Count
Code 1 – School-Related and Educational Activities	3
Code 2A – Direct Medical Services	1
Code 2Z – Non-Covered Direct Medical Services	1

Moment 4: Clarifying Questions

Of the 27 respondents, **22** indicated that the moment required a clarifying question.
Of those 22 respondents, **10** asked a multi-part question.

Authorization

45% (10)

You answered “No” to the pre-question. Was the activity conducted at the time of your moment related to an assessment service or services **authorized in an IEP, IFSP, or service/care plan?**

Please specify why the feeding is needed. **Was this authorized in a care plan or Dr. order?**

Student Need for Feeding

32% (7)

Can you please specify **why this particular student needed your assistance / support** with feeding at breakfast time, what student need was this activity supporting, and was it related to a service authorized in an IEP, IFSP, or other service/care plan?

How Feeding Occurred

23% (5)

Can you please describe **how you were feeding the student** and indicate if this is related to the student IEP/IFSP/other care plan?

Moment 4: DHCS Perspective



Moment Summary

OT is feeding a student, however, indicates the feeding was not part of a Care Plan.



Can It Be Coded As Is?

NO. The moment cannot be accurately coded without additional information.



CQ IS Needed!

Clarification whether the activity was/was not part of a covered OT service.



High Quality CQ(s) Asked:

- *"Because you stated "no" to the post-question we must ask: does the student you were feeding have an IEP, IFSP or other care plan where feeding is outlined? What was your role in feeding the student in relation to your job as an Occupational Therapist?"*

This CQ identifies the need to clarify if feeding is included in Care Plan, however, it is also necessary to know if the OT was feeding the student as part of an OT session for the moment to be related to a covered OT service.

Moment 4: DHCS Perspective (cont'd.)

DHCS CODING: Depends on CQ Response

- 1. Feeding is confirmed as part of OT session detailed in a Care Plan: Code 2A**
TSIP Citation: Code 2A – Providing the following therapies: Occupational Therapy.
- 2. Feeding is confirmed as part of Care Plan, but not specific to OT sessions: Code 2Z***
TSIP Citation: Code 2Z – Direct services provided by non-qualified practitioners.
**OTs are not considered a qualified practitioner type for assisting with Activities of Daily Living (ADLs).*
- 3. Feeding is not confirmed as part of Care Plan: Code 1 or 2Z**
TSIP Citation: Code 1 - Providing general supervision of students (e.g., playground, lunchroom).
TSIP Citation: Code 2Z - Any direct medical treatment services that are not pursuant to a Care Plan.

Moment 5: Scenario

Participant Pool	Pool 1
Job Category	Speech Language Pathologist Assistant
Who were you with?	The SLP that I am assigned to work with on Thursday
What were you doing?	I do not remember what I was exactly doing during that exact time, but around that time I was assisting cleaning speech therapy games/toys.
Why were you performing this activity?	I was performing this activity because it is part of my job to assist with other tasks as needed.
Post-Question Response	No

Can you accurately code this moment with the information provided?

- ☐ Yes
- ☐ No

What clarifying question (CQ) would you ask to gather additional information?

Moment 5: Response Analysis

Moment Details	
Participant Pool	Pool 1
Job Category	Speech Language Pathologist Assistant
Who were you with?	The SLP that I am assigned to work with on Thursday
What were you doing?	I do not remember what I was exactly doing during that exact time, but around that time I was assisting cleaning speech therapy games/toys.
Why were you performing this activity?	I was performing this activity because it is part of my job to assist with other tasks as needed.
Post-Question Response	No

Key Findings

Majority of respondents believe this moment requires a CQ.

- **Can be coded with information provided:** 11 (41%)
- **Requires clarifying question:** 16 (59%)

Code Assignment Distribution

Activity Code Assignment	Count
Code 1 – School-Related and Educational Activities	7
Code 2Z – Non-Covered Direct Medical Services	3
Code 2A – Direct Medical Services	1

Moment 5: Clarifying Questions

Of the 27 respondents, **16** indicated that the moment required a clarifying question.
Of those 16 respondents, **3** asked a multi-part question.

Authorization

56% (9)

To the best of your knowledge, **were the games/toys that were being cleaned related to an IEP/IFSP/or other care plan?**

Were the speech toys being cleaned during your Time Study moment **in relation to a service authorized in an IEP, IFSP or care plan?**

Specific Task During Moment

38% (6)

You indicated that you do not remember exactly what you were doing during your sampled moment. **Please describe what prompted you to clean the speech therapy games/toys** during your sampled moment.

Staff Role

6% (1)

Can you please clarify **who, by job title, had utilized the speech therapy games/toys and if the therapy sessions are included in a care plan** as outlined in the post question?

Moment 5: DHCS Perspective



Moment Summary

SLPA does not remember but thinks they were cleaning speech therapy toys/games .



Can It Be Coded As Is?

YES. The moment can be accurately coded without additional information.



✗ CQ NOT Needed!

TSP explicitly indicates that they do not remember what they were doing at the time of the moment.



DHCS CODING: Code 1

TSIP Citation: Code 1 - This code should be used for responses that are returned with entirely blank fields or that contain unacceptable content.

Rationale: Because the TSP does not remember what they were doing, the moment response is unreliable. Asking a CQ for more information does not override the TSP's initial response.

Moment 6: Scenario

Participant Pool	Pool 2
Job Category	Principal
Who were you with?	With faculty and staff
What were you doing?	Meeting with faculty & staff to plan and advise on mental health and academic services
Why were you performing this activity?	Planning with faculty & staff to plan and advise on mental health and academic
Post-Question Response	N/A

Can you accurately code this moment with the information provided?

- ☐ Yes
- ☐ No

What clarifying question (CQ) would you ask to gather additional information?

Moment 6: Response Analysis

Moment Details	
Participant Pool	Pool 2
Job Category	Principal
Who were you with?	With faculty and staff
What were you doing?	Meeting with faculty & staff to plan and advise on mental health and academic services.
Why were you performing this activity?	Planning with faculty & staff to plan and advise on mental health and academic.

Key Findings
<i>Majority of respondents believe this moment requires a CQ.</i>
• Can be coded with information provided: 8 (30%) • Requires clarifying question: 19 (70%)

Code Assignment Distribution	
Activity Code Assigned	Count
Code 1 – School-Related and Educational Activities	4
Code 8 – Referral, Coordination, and Monitoring of Medicaid Services	3
Code 14 – Program Planning, Policy Development, and Interagency Coordination Related to Medicaid Services	1

Moment 6: Clarifying Questions

Of the 27 respondents, **19** indicated that the moment required a clarifying question.
Of those 19 respondents, **4** asked a multi-part question.

Specific One-Minute Activity

44% (8)

Can you **narrow your response to the one activity that you were performing** at the time of your moment?

Please elaborate and **specify the topic being discussed** during the 1-minute moment of the meeting.

Specific Mental Health Service

39% (7)

What **specifically was being discussed regarding mental health and academic services** during the time of your one-minute survey?

What **type of mental health services** were you advising on and for who?

Purpose/Student Need

17% (4)

Please describe the **purpose of the meeting and the specific topics** that were discussed during your sampled moment.

What **mental health and academic services are you referring to** and **why is it needed?**

Moment 6: DHCS Perspective



Moment Summary

Principal meeting with other staff to plan/advise on mental health and academic services.



Can It Be Coded As Is?

NO. The moment cannot be accurately coded without additional information.



CQ IS Needed!

Moment includes discussion of two topics, one of which is not a Medicaid service.



High Quality CQ(s) Asked:

- *"Please narrow down if the planning was for mental health or academic services during the one minute moment. Thank you!"*
- *"Can you narrow your response to the one activity that you were performing at the time of your moment? Were you planning with faculty & staff or were you advising on mental health or advising on academic? Can you elaborate the one thing that you were doing?"*

CQ options correctly ask the TSP to specify a singular activity during their moment.

Moment 6: DHCS Perspective (cont'd.)

DHCS CODING: Depends on CQ Response

1. Generally discussing mental health services: Code 16*

TSIP Citation: Code 16 - Attending or facilitating school or unit staff meetings, including staff meetings for direct care practitioners.

**Moment may only be coded to Code 8 if CQ response clearly details that TSP (principal) is coordinating or monitoring mental health services. Otherwise, this moment appears to be a general discussion with staff.*

2. Generally discussing academic services: Code 1

TSIP Citation: Code 1 – Academic and educational staff meetings or Evaluating curriculum and instructional services, policies, and procedures.

Moment 7: Scenario

Participant Pool	Pool 2
Job Category	Principal
Who were you with?	At a literacy training with other principals
What were you doing?	Receiving a training on Early Literacy Foundations
Why were you performing this activity?	Mandatory training
Post-Question Response	N/A

Can you accurately code this moment with the information provided?

- ☐ Yes
- ☐ No

What clarifying question (CQ) would you ask to gather additional information?

Moment 7: Response Analysis

Moment Details	
Participant Pool	Pool 2
Job Category	Principal
Who were you with?	At a literacy training with other principals.
What were you doing?	Receiving a training on Early Literacy Foundations.
Why were you performing this activity?	Mandatory training.

Key Findings

Majority of respondents believe this moment can be coded without asking for additional information.

- **Can be coded with information provided:** 25 (93%)
- **Requires clarifying question:** 2 (7%)

Code Assignment Distribution

Activity Code Assigned	Count
Code 1 – School-Related and Educational Activities	21
Code 16 – General Administration / Paid Time Off	3
Code 13 – Program Planning, Policy Development, and Interagency Coordination Related to Non-Medicaid Services	1

Moment 7: Clarifying Questions

Of the 27 respondents, 2 indicated that the moment required a clarifying question.
Of those 2 respondents, 1 asked a multi-part question.

Specific Content Training

50% (1)

What specifically was being discussed at the training during the time of your one-minute survey?

Implementation of Training

50% (1)

Can you please describe **what was specifically being presented/discussed** during your one-minute moment in relation to Early Literacy Foundations, and **how will that knowledge learned be utilized and implemented in the school setting?**

Moment 7: DHCS Perspective



Moment Summary

Principal is attending a mandatory Early Literacy Foundations training.



Can It Be Coded As Is?

YES. The moment can be accurately coded without additional information.



CQ NOT Needed!

All information necessary to code is detailed in the original moment summary.



DHCS CODING: Code 1

TSIP Citation: Code 1 - Non-Medicaid training and professional development activities, including coordinating, conducting, or participating in training events and seminars related to curriculum or instruction.

Rationale: "Early Literacy Foundations" is an education-related training topic, not a school policy, procedure, or employment-related topic (which would be Code 16 in the TSIP).

Moment 8: Scenario

Participant Pool	Pool 2
Job Category	Medical Assistant
Who were you with?	Working with Student Health and Wellness Staff
What were you doing?	Front Office Duties
Why were you performing this activity?	Answering phone calls, scheduling medical and mental health appointments, assisting students with walk-in services, and maintaining records
Post-Question Response	N/A

Can you accurately code this moment with the information provided?

- ☐ Yes
- ☐ No

What clarifying question (CQ) would you ask to gather additional information?

Moment 8: Response Analysis

Moment Details	
Participant Pool	Pool 2
Job Category	Medical Assistant
Who were you with?	Working with Student Health and Wellness Staff
What were you doing?	Front Office Duties.
Why were you performing this activity?	Answering phone calls, scheduling medical and mental health appointments, assisting students with walk-in services, and maintaining records.

Key Findings

Majority of respondents believe this moment requires a CQ.

- **Can be coded with information provided:** 6 (22%)
- **Requires clarifying question:** 21 (78%)

Code Assignment Distribution

Activity Code Assigned	Count
Code 1 – School-Related and Educational Activities	3
Code 8 – Referral, Coordination, and Monitoring of Medicaid Services	3

Moment 8: Clarifying Questions

Of the 27 respondents, **21** indicated that the moment required a clarifying question.
Of those 21 respondents, **5** asked a multi-part question.

Narrowing Specific Activity

57% (12)

Of the multiple activities listed, please **specify and provide further details on the single activity** being performed during the 1-minute moment.

Please **only list and explain the one task** you were doing during your assigned moment.

Clarifying Details / Assistance

29% (6)

Provide more **details about what the task included or what type of assistance** you were providing.

What was the **purpose of the activity** and what was the **outcome**?

Connection to IEP/IFSP

11% (1)

From the various activities/tasks provided, can you clarify which one you were mainly focused on and **whether it was related to an authorized service written in an IEP, IFSP, or other care plan?**

Moment 8: DHCS Perspective



Moment Summary

Medical Assistant performing multiple general front office duties.



Can It Be Coded As Is?

NO. The moment cannot be accurately coded without additional information.



CQ IS Needed!

Moment includes multiple activities being performed at time of moment.



High Quality CQ(s) Asked:

- *"Can you please narrow your response to the one specific activity that you were performing during your one minute moment and what was the purpose for performing that activity?"*
- *"Of the multiple activities listed, please specify and provide further details on the single activity being performed during the 1-minute moment."*
- *"Please narrow your response to the one task that you were primarily focused on at the time of your one-minute study and provide more details about what the task included or what type of assistance you were providing?"*

These CQ correctly ask the TSP to specify a singular activity during their moment.

Moment 8: DHCS Perspective (cont'd.)

DHCS CODING: Depends on CQ Response

1. Answering Calls, Walk-In Services, or Maintaining General Records: Code 1

TSIP Citation: Code 1 -

- Conducting external relations related to school educational issues/matters.
- Routine maintenance of files to ensure student files are up to date.
- Conferring with students/parents about discipline/academic matters/other school-related issues.

2. Scheduling Medicaid-Related Medical/Mental Health Appointments: Code 8

TSIP Citation: Code 8 - Arranging for Medicaid-covered medical/behavioral health diagnostic or treatment services that may be required as the result of a specifically identified medical/mental health condition.

Moment 9: Scenario

Participant Pool	Pool 2
Job Category	Attendance Clerk
Who were you with?	With the nurse
What were you doing?	Discussing a students' absences regarding health issues
Why were you performing this activity?	Student needed to be referred to doctor for absence to be validated
Post-Question Response	N/A

Can you accurately code this moment with the information provided?

- ☐ Yes
- ☐ No

What clarifying question (CQ) would you ask to gather additional information?

Moment 9: Clarifying Questions

Of the 27 respondents, **9** indicated that the moment required a clarifying question.
Of those 9 respondents, **5** asked a multi-part question.

Clarify Health Issue

56% (5)

Can you please provide the **type of health issue** the student was being referred to the doctor for the doctor's note?

Please be more specific.
What health issues do these students have?

Connect to IEP / Care Plan

33% (3)

Does the **student have an IEP, IFSP, or other service/care plan**? Why does the student **need to be referred** to a doctor?

Are the health issues that you were discussing **related to the student's IEP/care plan**?

Narrowing Specific Activity

11% (1)

Please **specify the activity** being performed and whether it is related to an IEP, IFSP, or care plan.

Moment 9: DHCS Perspective



Moment Summary

Clerk is discussing student's health-related absences, discussing need for Doctor's referral to validate absences.



Can It Be Coded As Is?

YES. The moment can be accurately coded without additional information.



CQ NOT Needed!

All information necessary to code is detailed in the original moment summary.



DHCS CODING: Code 1

TSIP Citation: Code 1 - Activities that are specific to education and students, particularly, instructional, curriculum, and student focused areas (including attendance reports and all other student records).

Rationale: While the TSP was discussing health-related absences, the need for a Doctor's referral was not related to referring for Medicaid covered services, it was needed to validate absences. The TSP job category provides important context.

Moment 10: Scenario

Participant Pool	Pool 2
Job Category	School Principal
Who were you with?	A Special Education Teacher and trainee for SSD Coordinator for College Board assessments
What were you doing?	We were discussing and planning the administration of AP Exams for students with accommodations
Why were you performing this activity?	Students who qualify for SSD accommodations through College Board have specific needs that must be met during test administration. It is vital that there be a plan in place not only to meet the needs of these students but also to ensure that test administrators have full planning and preparation to ensure full and proper administration of the AP exams
Post-Question Response	N/A

Can you accurately code this moment with the information provided?

- ☐ Yes
- ☐ No

What clarifying question (CQ) would you ask to gather additional information?

Moment 10: Response Analysis

Moment Details	
Pool	Pool 2
Job Category	School Principal
Who were you with?	A Special Education Teacher and trainee for SSD Coordinator for College Board assessments.
What were you doing?	We were discussing and planning the administration of AP Exams for students with accommodations.
Why were you performing this activity?	Students who qualify for SSD accommodations through College Board have specific needs that must be met during test administration. It is vital that there be a plan in place not only to meet the needs of these students but also to ensure that test administrators have full planning and preparation to ensure full and proper administration of the AP exams.

Key Findings
<i>Over half of the respondents believe this moment can be coded without asking for additional information.</i>
• Can be coded with information provided: 15 (56%) • Requires clarifying question: 12 (44%)

Code Assignment Distribution	
Activity Code Assigned	Count
Code 1 – School-Related and Educational Activities	12
Code 7 – Referral, Coordination, and Monitoring of Non-Medicaid Services	3

Moment 10: Clarifying Questions

Of the 27 respondents, **12** indicated that the moment required a clarifying question.
Of those 12 respondents, **6** asked a multi-part question.

Define Acronyms

50% (6)

What is SSD?

Please **define the acronym** SSD and AP.

What is AP exams and is it needed?

Acronyms are not allowed. **What is SSD** accommodations and why are they needed?

Clarify Accommodation Type

33% (4)

Please specify what **type of accommodations** are needed?

What **specific type of accommodations** was being discussed during the one-minute survey?

Connect to IEP / Care Plan

17% (2)

Are the **accommodations included in the student's IEP/care plan?**

Was it related to service/support **documented in an IEP or other service/care plan?**

Moment 10: DHCS Perspective



Moment Summary

Principal discussing and planning student accommodations for administering AP Exams.



Can It Be Coded As Is?

YES. The moment can be accurately coded without additional information.



CQ NOT Needed!

Exam/AP Testing accommodations are educational supports, not Medicaid covered services.



DHCS CODING: Code 1

TSIP Citation: Code 1 - Evaluating curriculum and instructional services, policies, and procedures.

Rationale: While a CQ may be useful to spell out "SSD" (and considered best practice), a CQ is not necessary to code this non-reimbursable moment. Planning testing accommodations (even those that stem from a health need) is not being done to support a Medicaid covered service. The reason for the activity is to prepare for academic testing, not to arrange, provide, coordinate, or monitor Medicaid covered services.

Summary of Key Findings

1. Across all 10 examples, there was **no consensus reached** on any scenario.
2. Information in one moment was considered sufficient to code by 100% of respondents (no CQ needed).
3. In 4 of the 10 scenarios, reimbursable and non-reimbursable codes were selected at nearly equal rates.
4. Potential CQs did not always align on what specific piece of information was missing from the response.

Hard to Code Moments



Note: The moments in this section are real-world examples. Potential CQs may not be listed if they were not asked. DHCS recommends asking a CQ if there are any uncertainties about a moment.



Pool 1 Hard to Code Moment

Licensed Marriage and Family Therapist

Who were you with?	<i>School Counselor</i>
What were you doing?	<i>Discussing students' psychological needs</i>
Why were you doing this?	<i>Gather data</i>
Post-Question	<i>Yes</i>
Clarifying Question:	<i>Thank you for your response. Without violating privacy what more specifically were you discussing in regard to the students' psychological needs during your one minute moment?</i>
TSP Answer:	<i>Student tools to emotional regulation, and attendance. Discussing ways to support the student. It was related to a student that we both support.</i>

Final Code: 2A

- » **Reason:** The content of the conversation directly related to assessing the student's needs and planning appropriate supports.
- » **Reference Code 2A in TSIP** – “Consulting with another health service practitioner, staff member, or parent/guardian related to a student's need for covered services.”



Pool 1 Hard to Code Moment

Registered Credentialed School Nurse

Who were you with?	<i>School Psychologist</i>
What were you doing?	<i>Student has health issue and needs classroom accommodations.</i>
Why were you doing this?	<i>Meeting to prepare a care plan to address student's needs.</i>
Post-Question	<i>Yes</i>
Clarifying Question:	<i>Please clarify who is creating the care plan.</i>
TSP Answer:	<i>I am.</i>

Final Code: 2A

- » **Reason:** This moment clearly states the two practitioners were meeting to prepare a care plan to address the student's needs.
- » **Reference Code 2A i. in TSIP** – "Develop a treatment plan (medical plan of care) for a student, outlining the need for medical services."



Pool 1 Hard to Code Moment

Licensed Vocational Nurse

Who were you with?	<i>Alone</i>
What were you doing?	<i>Logging my daily care room visits</i>
Why were you doing this?	<i>Because daily visits to the care room are to be logged daily under the medical log.</i>
Post Question	<i>No</i>
Clarifying Question:	<i>Narrowing it down to 1 activity, what was it about and why was it needed?</i>
TSP Answer:	<i>It was about daily visits to the care room, and it was needed to track visits to the care room.</i>

Final Code: 2Z

- » **Reason:** This moment clearly states that the LVN was working on a health-related administrative task but since it is not for a specific student, it falls under 2Z.
- » **Reference Code 2Z in TSIP** – “Any non-student specific tasks supporting the delivery of direct medical services...”



Pool 1 Hard to Code Moment

Credentialed School Psychologist

Who were you with?	<i>Special Education teacher</i>
What were you doing?	<i>Discussion of a pending Individualized Education Plan meeting</i>
Why were you doing this?	<i>Discussion regarding additional potential Individualized Education Plan accommodations for special education student</i>
Post-Question	<i>Yes</i>
Clarifying Question:	<i>Please elaborate on the topic being discussed during the 1-minute moment.</i>
TSP Answer:	<i>Additional Individualized Education Plan medical accommodations</i>

Final Code: 2A

- » **Reason:** The moment shows that the TSP is consulting with the teacher to potentially add more accommodations to the student's IEP.
- » **Reference Code 2A in the TSIP** - "Consulting with another health service practitioner, staff member, or parent/guardian related to a student's need for covered services."



Pool 1 Hard to Code Moment

Licensed Marriage and Family Therapist

Who were you with?	<i>With a student</i>
What were you doing?	<i>Providing counseling services to student</i>
Why were you doing this?	<i>To provide ongoing support services to student on my caseload.</i>
Post-Question:	<i>No</i>
Clarifying Question:	<i>Can you please specify if this was part of an IEP or Care Plan? What type of support was provided?</i>
TSP Answer:	<i>Services are not part of an IEP. Student is receiving individual counseling services through social worker as part of a referral made.</i>

Final Code: 2Z

» **Reason:** In the CQ response, the TSP says that the support service was individual counseling and notes that the service is part of a referral made. A referral is not sufficient for a Code 2A as counseling treatments must be established and documented in the student's care plan.

» **References:**

- **Code 2Z in the TSIP** - "Any direct medical treatment services that are not pursuant to a Care Plan. Examples of this include: Providing counseling to a student without a Care Plan (for example, spontaneous grief counseling or crisis intervention)"
- **LEA BOP Provider Manual, [loc ed serv psych](#)** - "All treatment services must be established and documented in the student's IEP, IFSP, IHSP or other care plan."



Pool 1 Hard to Code Moment

Occupational Therapist

Who were you with?	<i>Special Day Class Teacher</i>
What were you doing?	<i>Consulting on a student's sensory needs</i>
Why were you doing this?	<i>Part of IEP OT consultation services and parent questions in an email</i>
Post-Question:	<i>Yes</i>

Final Code: 2A

- » **Reason:** The TSP is providing consultation to both the teacher and parents regarding the student's sensory needs. The consultation is part of an IEP and consultation is considered an integral part of a direct medical service.
- » **Reference Code 2A in the TSIP** - "Discussing a student's health-related needs, progress or goals with a parent or teacher."



Pool 1 Hard to Code Moment

Licensed Registered Nurse

Who were you with?	<i>Alone</i>
What were you doing?	<i>Review hearing and vision results from the previous day which was our mandatory 8th grade screening at the junior high.</i>
Why were you doing this?	<i>To plan for notifying parents of fails and capturing the absences on another day.</i>
Post-Question:	<i>No</i>
Clarifying Question:	<i>Please specify who conducted the hearing and vision screening.</i>
TSP Answer:	<i>The original screenings were conducted by 5 district RNs, myself included but at the time of the survey I was reviewing the results.</i>

Final Code: 2A

» **Reason:** The TSP reviewing the screening results is a post-service activity for assessments to determine which parents need to be notified of results.

» **References:**

- **Code 2A in the TSIP** - "The LEA BOP also covers preventive EPSDT services for all students, those special education and those that do not qualify for special education services (non-IEP/IFSP services), including screening services." and "Follow-up with parents/guardians or health service professionals on screening results..."
- **RMTS Questions and Responses in the TSIP** - "The student's vision/hearing screening or assessment" is an option for the Yes response to the new Pool 1 post-question.



Pool 1 Hard to Code Moment

Licensed Vocational Nurse

Who were you with?	<i>Another staff member</i>
What were you doing?	<i>Going over the updated student medication list</i>
Why were you doing this?	<i>To ensure all students who are supposed to take medication at school come up to get medication at the designed times.</i>
Post-Question:	<i>Yes</i>
Clarifying Question:	<i>You answered "Yes" to the pre-question. Please elaborate further on how the activity relates to an assessment, IEP, IFSP, or care plan.</i>
TSP Answer:	<i>The school secretary covers the health office when the nurse is on lunch or break. Us discussing the updated list/medication log ensures that each student scheduled for medication at school gets called up at the appropriate times. This activity relates to an assessment, IEP, IFSP, or care plan by following the procedure of medication administration at school.</i>

Final Code: 8

- » **Reason:** The TSP is coordinating with a staff member to ensure the scheduled administrations of medication needed for students are provided.
- » **Reference Code 8 in the TSIP** - "Coordinating services is identified in an IEP/IFSP/Care Plan to ensure services are being delivered in accordance with the student's plan."



Pool 1 Hard to Code Moment

Licensed Registered Nurse	
Who were you with?	<i>Student</i>
What were you doing?	<i>Providing medication as order for student</i>
Why were you doing this?	<i>Doctors' orders</i>
Post-Question:	<i>No</i>
Clarifying Question:	<i>We thank you for your response to the survey. For future responses, please refrain from providing any identifying information in your response and use titles such as student, parent, teacher, etc. instead. You answered "No" to the post-question. Was the activity conducted at the time of your moment related to an assessment service or services authorized in an IEP, IFSP, or service/care plan?</i>
TSP Answer:	<i>Yes, doctors' orders</i>

Final Code: 2A

» **Reason:** Doctor's orders establish medical necessity in the response.

» **References:**

- **Code 2A in the TSIP** - "Administer medications or injections, pursuant to Care Plan, and...Administering immunizations/vaccines pursuant to the Bright Futures Periodicity Schedule and/or documenting immunizations in student record and to California Immunization Registry (CAIR)"
- **LEA BOP Provider Manual, [loc ed serv nurs](#)** – "Direct and indirect patient services, including, but not limited to the administration of medications and therapeutic agents necessary to implement a treatment, disease prevention or rehabilitative regimen ordered by and within the scope of licensure of a physician..."



Pool 1 Hard to Code Moment

Credentialed School Psychologist

Who were you with?	<i>By myself</i>
What were you doing?	<i>Creating visual supports, personalized picture cards of the student doing various regular activities around campus. The teacher took pictures and sent them to me so I could create small picture cards that could be used as a visual schedule for the student.</i>
Why were you doing this?	<i>Strategies in the care plan included use of visuals for priming and for consistency so the student knows what to expect across his day.</i>
Post-Question:	<i>No</i>
Clarifying Question #1:	<i>Please elaborate further on how the activity relates to an assessment, IEP, IFSP, or care plan.</i>
TSP Answer:	<i>Yes, this activity occurred as part of the assessment that was added to the assessment plan to look at levels of human support needed for the student to access education. Part of the outcome is to create a care plan, so the team has evidence-based strategies to support the student's behavior.</i>



Pool 1 Hard to Code Moment

Credentialed School Psychologist

Clarifying Question #2:	<i>Please explain how the student's visual schedule of regular campus activities relates to the assessment.</i>
TSP Answer:	<i>The visual supports were used to assess the student's understanding of the daily activities which will inform the development of a care plan to support the student's behavior.</i>

Final Code: 2A

- » **Reason:** Although creating visual supports is not listed, it is a pre-service activity directly related to conducting the assessment.
- » **Reference Code 2A in the TSIP** - "This code can be used when the student is present but also includes pre- and post-time directly related to providing direct care services when the student is not present, including time to complete all paperwork related to the direct care service."



Pool 1 Hard to Code Moment

Trained Health Care Aide

Who were you with?	<i>My 1-on-1 and other peers</i>
What were you doing?	<i>Supervising my 1-on-1 bounce a ball into the playhouse</i>
Why were you doing this?	<i>Last recess for the day on the playground at the blacktop</i>
Post-Question	<i>Yes</i>

Final Code: 1

- » **Reason:** The moment describes general student supervision at recess on the playground.
- » **Reference Code 1 in the TSIP** - "Providing general supervision of students (e.g., playground, lunchroom)"
- » A CQ should be asked to gather additional information and clarify the response. If the 1-on-1 required continuous monitoring all day, this may be part of a covered service.



Pool 1 Hard to Code Moment

Licensed Clinical Social Worker

Who were you with?	<i>I was meeting with a group of students at the school campus wellness center during 6th grade scheduled lunch.</i>
What were you doing?	<i>I was leading an activity related to mental health and engaging students to promote implementing strategies to reduce the stigma on mental health and address symptoms more present during the holidays.</i>
Why were you doing this?	<i>To provide psychoeducation to students related to strategies such as Art, mindfulness to practice to reduce mental health symptoms.</i>
Post-Question:	<i>Yes</i>
Clarifying Question:	<i>Please clarify if the activity that you were leading is included in a care plan as outlined in question #1?</i>
TSP Answer:	<i>Clinician completed activity "Holiday Lights," which was an art activity, providing psychoeducation to students of Art as a coping strategy utilized to reduce symptoms of stress, and engage in mindfulness practice. This group was accessible to both general education students and those with an IEP/504 in place.</i>

Final Code: 2A

- » **Reason:** This moment is coded 2a because the activity was a general mental health wellness group open to both general education and special education students and provided pursuant to an IEP/IFSP/504/IHSP or other care plan.
- » **Reference Code 2A in the TSIP** – “This code can be used when the student is present but also includes pre- and post-time directly related to providing direct care services...”



Pool 1 Hard to Code Moment

Credentialed School Psychologist

Who were you with?	<i>I was by myself in the office.</i>
What were you doing?	<i>I was working on a manifestation determination report (MDR) for an upcoming manifestation determination amendment IEP meeting.</i>
Why were you doing this?	<i>One of my counseling caseload students is being considered for disciplinary action by the assistant principal due to getting into a physical altercation. I was working on a report to determine whether the incident was due to the student's disability or a failure to implement his IEP.</i>
Post-Question:	<i>Yes</i>

Final Code: 1

- » **Reason:** The practitioner was working on a MDR, which is part of the IEP disciplinary process and not a medically necessary assessment or treatment covered by the LEA BOP.
- » **Reference Code 1 in the TSIP** - "Applying discipline activities"
- » A CQ was needed to clarify which part of the MDR the TSP was working on, as it may have involved assessment activities that could qualify as a 2A.



Pool 1 Hard to Code Moment

Trained Health Care Aide

Who were you with?	<i>Students on the bus</i>
What were you doing?	<i>Monitoring the students to ensure that ensure their health and safety as we arrived at school.</i>
Why were you doing this?	<i>Per their IEP, a few of these students require one on one care on the bus to monitor their health and safety.</i>
Post-Question:	<i>Not sure.</i>
Clarifying Question:	<i>Please specify if the activity being performed at the time of your moment is related to an assessment [or screening] service or services authorized by an IEP, IFSP, or Care Plan.</i>
TSP Answer:	<i>I'm not entirely sure. While on the bus, my job is to assist the other students if my student isn't there (and he wasn't that day). I'm not too sure about their IEP's, etc...</i>

Final Code: 2Z

- » **Reason:** The practitioner was monitoring students on the bus for health and safety, performing one-on-one oversight for students who require care per their IEP, but their assigned student was not present and they were “not entirely sure” whether the activity was pursuant to any IEP/IFSP/Care Plan, the moment cannot be tied to a verified care-plan service and must therefore be coded 2Z.
- » **Reference Code 2A in the TSIP** - “Any direct medical treatment services that are not pursuant to a Care Plan”



Pool 2 Hard to Code Moment

Health Services Technician

Who were you with?	<i>I was alone working on my computer.</i>
What were you doing?	<i>I was working on the training emails I will be sending out to our program participants for the SMAA/RMTS program.</i>
Why were you doing this?	<i>I was performing this activity, because the SMAA/RMTS program participants are required to be trained every quarter in preparation to answer the survey they may receive.</i>

Correct Code: 15

Details: See TSIP, Code 15, example (e) – Coordinating, conducting or participating in training event or seminars on administrative requirements related to Medicaid school-based services.²⁴⁰



Pool 2 Hard to Code Moment

Health Services Technician

Who were you with?	<i>By myself.</i>
What were you doing?	<i>Reviewing a transcript.</i>
Why were you doing this?	<i>To enhance A-G and graduation rate.</i>

Correct Code: 1

Details: See TSIP, Code 1, example (e) – Monitoring student academic achievement.



Pool 2 Hard to Code Moment

Health Services Technician

Who were you with?	<i>I was with our Principal, RTI Specialist, School Psychologist and a partnering School Therapist from a local community-based provider.</i>
What were you doing?	<i>I was participating in a team meeting, reviewing student needs and identifying strategies to help students be successful. The focus was on both academics and social-emotional needs.</i>
Why were you doing this?	<i>The meeting was held to debrief on incidents taking place earlier in the day/week. All members had interacted with the identified students and had relevant information to share with the team.</i>
Clarifying Question:	<i>If you recall, please specify and provide further details on the single topic or student discussed during the precise 1-minute moment.</i>
TSP Answer:	<i>At the time of the survey, I had been in a 45-minute-long team meeting where various students with various needs were discussed. As I mentioned already in my initial response to these questions, we reviewed student's academic performance and social-emotional needs. This included students with attendance, behavior and mental health needs.</i>

Correct Code: 1

Details: See TSIP, Code 1, example (e) – Monitoring student academic achievement.



Pool 2 Hard to Code Moment

School Nurse

Who were you with?	<i>School psychologist.</i>
What were you doing?	<i>Discussing instructional aide needed for a student who has an IEP.</i>
Why were you doing this?	<i>The needed time for a student health condition has changed and the aide services needs to be expanded.</i>
Clarifying Question:	<i>Can you please explain what health condition prompted the discussion with the School Psychologist regarding the IEP student needing an instructional aide and what type of support would the aide services include/provide?</i>
TSP Answer:	<i>The student on the IEP has toileting support needs. The psychologist wanted to use the aide who supports this student for another student (to share the personnel support with another student). The School Psychologist wanted to know exactly how much time in the school day her aide was actually needed in order to determine if the same aide could also be used to support another student.</i>
Correct Code: 8	

Details: See TSIP, Code 8, example (m) – Participating in a meeting/discussion to coordinate or review a student's needs for health-related services covered by Medicaid.



Pool 2 Hard to Code Moment

Principal

Who were you with?	<i>Lead Maintenance personnel at our site.</i>
What were you doing?	<i>Debriefing an irrigation related issue that impacts our staff.</i>
Why were you doing this?	<i>I was gathering information to determine next steps for the site.</i>

Correct Code: 16

Details: See TSIP, Code 16, example (h) – Performing administrative or clerical activities related to general building or district function or maintenance and operations.



Pool 2 Hard to Code Moment

Special Education Teacher

Who were you with?	<i>Special education team.</i>
What were you doing?	<i>Working on a staffing for a student's placement, services, and goals in special education.</i>
Why were you doing this?	<i>Describing a student's academic abilities via standardized assessment scores and present levels of performance.</i>

Correct Code: 7

Details: See TSIP, Code 7, example (c) – Participating in a meeting/discussion or coordinate or review a student's need for scholastic, vocational, and non-health-related services not covered by Medicaid.



Pool 2 Hard to Code Moment

Program Manager

Who were you with?	<i>The Deaf and Hard of Hearing Program Specialist and Program Specialist from Head Start.</i>
What were you doing?	<i>Observing an inclusive Deaf and Hard of Hearing classroom and learning more about this inclusion program.</i>
Why were you doing this?	<i>As part of my role as a Program Administrator who supervises our teams that support preschool programs, to gather information that may be helpful to bring back to our member districts.</i>

Correct Code: 14

Details: See TSIP, Code 14, example (e) – Evaluating the need for Medicaid services in relation to specific populations or geographic areas.



Pool 2 Hard to Code Moment

School Counselor

Who were you with?	<i>I was in a large room with administrators, parents and counselors.</i>
What were you doing?	<i>We were presenting about our new Wellness Center and our Counseling services.</i>
Why were you doing this?	<i>We want to be inclusive to our community, and we want to create mental health awareness.</i>

Correct Code: 4

Details: See TSIP, Code 4, example (b) – Informing Medicaid eligible and potential Medicaid eligible children and families about the benefits and availability of services provided by Medicaid, including services provided through EPSDT program.

Questions?



Thank You!



Appendix 1: Proposed Clarifying Questions (CQs) Submitted as Part of the Coder Training Exercise



Moment 1: Clarifying Questions

01	What specific type of accommodations were being consulted about during the one-minute survey?	07	Can you describe the accommodation being consulted on during the one-minute survey?
02	Please elaborate on the type of accommodation.	08	Please describe the state testing accommodation being consulted on.
03	Please specify what type of accommodations are needed?	09	Please elaborate on the type of accommodations being discussed and the student need that it addresses.
04	Could you please elaborate more on what your consulting consisted of and what type of state testing this pertained to?	10	Please explain what type of accommodations were being discussed.
05	Can you please clarify what specific type of state testing accommodation you were consulting on during your one-minute moment, what area of student need was that supporting, and how was it aligned with an authorized service/support documented in an IEP, IFSP, or other service/care plan as indicated in your post-question response?	11	What type of state testing accommodations were you consulting about and what area of need do the accommodations support?
06	I would ask what type of accommodation was being consulted on.		

Moment 2: Clarifying Questions

01	What specific type of results was being discussed during the one-minute survey?
02	I would ask to please narrow down whether they were reporting out of facilitating during their one minute time study.
03	Thank you for your response, which one of those activities (reporting out on the assessment results or facilitating the meeting) were you doing during your one minute Time Study?
04	What was being discussed at the IEP meeting during the time of your survey, who, by job title, was speaking and what area of student need was the meeting focused on?

Moment 4: Clarifying Questions

01	Because you stated "no" to the post-question we must ask, does the student you were feeding have an IEP, IFSP or other care plan where feeding is outlined? If not, what was your role in feeding the student in relation to your job as an Occupational Therapist?	06	Can you please specify why this particular student needed your assistance/support with feeding at breakfast time, what student need was this activity supporting, and was it related to a service that is authorized in an IEP, IFSP, or other service/care plan?
02	Please specify why the feeding is needed. Was this authorized in a formal care plan or Dr. order?	07	I would ask how the student was being fed and if this was related to an IEP/IFSP or care plan.
03	Please specify why you were feeding the student and is there a doctor order or care plan in place?	08	Can you please describe how you were feeding the student and indicate if this is related to the student IEP/IFSP/other care plan? Thank you
04	Can you please specify if these services are part of an IEP or Formal Care Plan?	09	Please describe how you are feeding the student. Was this activity related an IEP, IFSP or Care Plan? Thank you!
05	Can you explain in detail the reason/purpose the student required your assistance in eating breakfast?		

Moment 4: Clarifying Questions (continued)

10	Thank you for your response, without violating privacy, how were you feeding the student during you one minute Time Study and was this activity authorized in the student's IEP, IFSP or care plan?	15	You answered "No" to the pre-question. Was the activity conducted at the time of your moment related to an assessment service or services authorized in an IEP, IFSP, or service/care plan?
11	Please confirm, does the student need your physical assistance to eat needs due to their IEP, care plan or other service plan in place? If yes, please confirm "Yes" as this is related to an IEP/care plan.	16	Please confirm, does the student require assistance with feeding as stated in their IEP, care plan or any other service plan?
12	Does the student have an IEP, IFSP, or other service/care plan?	17	Please explain if the student has an IEP or Care Plan that requires you to feed them.
13	Please confirm if this activity related to the student's IEP/care plan.	18	Can you please clarify if the student feeding is authorized in an IEP, IFSP or other care plan as outlined in the post question?
14	Why did you need to feed the student? If related to an IEP/care plan, please confirm this.		

Moment 5: Clarifying Questions

01	Can explain for what purpose where the speech therapy games/toys used?	05	Thank you for your response, were the speech toys being cleaned during your Time Study moment in relation to a service authorized in an IEP, IFSP or care plan?
02	I would ask to the best of their knowledge, if the toys she was cleaning were related to an IEP/IFSP or other care plan during the one minute time study.	06	If these materials were for students with IEPs/care plans, please confirm your answer to post-question. Pre and post work for direct services normally requires a YES response to post question based on your title.
03	To the best of your knowledge, were the games/toys that were being cleaned related to and IEP/IFSP/or other care plan?	07	What were you doing at the exact time of your moment received? Was this related to a student with an IEP, IFSP, or other service/care plan?
04	To the best of your knowledge were the speech therapy games/toys related to a service in a IEP/IFSP/or other type of care plan?	08	Pre and post work for direct services that are related to an IEP/care plan can be considered a yes. Please confirm if the activity you were working on is related to a student's IEP/care plan.

Moment 5: Clarifying Questions (continued)

09	Confirm the task you were completing during your moment and if related to an IEP/care plan, confirm this as well.	13	You answered no to the pre-question. Was the discussion at the time of the moment related to an assessment service or services authorized in an IEP, IFSP, or care plan?
10	Please confirm, you mentioned cleaning therapy games/toys. Was this part of a therapy session for student(s) on an IEP, care plan or other service plan?	14	You indicated that you do not remember exactly what you were doing during your sampled moment. Please describe what prompted you to clean the speech therapy games/toys during your sampled moment.
11	You said no to the post question but in your position typically pre and post work requires a yes response. Please go back to your calendar and see if you can find out what you were doing.	15	What were the toys used for?
12	Can you please clarify who, by job title, had utilized the speech therapy games/toys and if the therapy sessions are included in a care plan as outlined in the post question?		

Moment 6: Clarifying Questions

01	What specifically was being discussed regarding mental health and academic services during the time of your one-minute survey? Thank you	05	I would ask if they could please specify if they were planning on mental health OR academic services during their one minute time study.
02	Can you narrow your response to the one activity that you were performing at the time of your moment? Were you planning with faculty & staff or were you advising on mental health or advising on academic? Can you elaborate the one thing that you were doing?	06	Can you please narrow down and describe the specific mental health or academic service being planned during the one minute survey? Thank you
03	Can you please elaborate more on what your mental health planning consisted of?	07	Please narrow down if the planning was for mental health or academic services during the one minute moment. Thank you!
04	Can you please narrow down your response to the specific type of service and area of need the discussion was mainly focused on during your one-minute moment survey, and describe what that entailed and who (by job title/agency) would be responsible for implementing it?	08	Thank you for your response, without violating privacy please provide more information regarding which specific service was being discussed during your one minute Time Study.

Moment 6: Clarifying Questions (continued)

09	Please provide more details on what plans were discussed in regards to the mental health and academic services for students. Be specific.	13	Can you please narrow your response to the one item that you were discussing with the faculty & staff during the time of your one minute study and what were you advising the staff about in order to plan for academic or mental health services?
10	What type of mental health services were you advising on and for who?	14	Please elaborate and specify the topic being discussed during the 1-minute moment of the meeting.
11	Please provide further details on the topic being discussed during the 1-minute moment.	15	Narrowing it down to one minute. Can you please describe specifically what you were discussing at the time of your survey.
12	Please give more detail. What type of mental health services are you referring to?	16	Please describe the purpose of the meeting and the specific topics that were discussed during your sampled moment.

Moment 7: Clarifying Questions

01	What specifically was being discussed at the training during the time of your one-minute survey? Thank you
02	Can you please describe what was specifically being presented/discussed during your one-minute moment in relation to Early Literacy Foundations, and how will that knowledge learned be utilized and implemented in the school setting?

Moment 8: Clarifying Questions

01	This survey only represents one-minute, can you narrow it down to one activity/item you were performing during the one-minute survey? Thank you	06	Can you please narrow down and describe the specific activity being performed during the one minute survey? Thank you
02	Narrowing it down to one activity, what were you doing during your assigned moment date and time?	07	Without violating student privacy, please narrow down the specific activity performed during the one minute moment. This information will help code the activity accordingly. Thank you!
03	Can you please narrow your response to the one specific activity that you were performing during your one minute moment and what was the purpose for performing that activity?	08	Thank you for your response, which one of the above activities were you doing during your one minute Time Study?
04	From the various activities/tasks provided in your response, can you please clarify which one you were mainly focused on during your one-minute moment, and explain what type of activity, assistance/information, and need that involved, including whether it was related to an authorized service that is written in an IEP, IFSP, or other care plan?	09	Please provide details on the one task you were completing during your one minute moment.
05	I would ask to please narrow down the describe the specific student accommodation and to spell out the the acronym SSD.	10	What was the one task that you were completing during the date and time of your moment received?

Moment 8: Clarifying Questions (continued)

11	What one activity were you working on during your one minute survey and why? What was the purpose of the activity and what was the outcome?	16	You must be specific to the 1 task you were working on during your 1 minute moment time. Please only list the 1 task you were working on and give detail on why.
12	Confirm the one task you were completing at the time of your moment and explain why you were doing this.	17	Please narrow your response to the one task that you were primarily focused on at the time of your one minute study and provide more details about what the task included or what type of assistance you were providing?
13	Of the multiple activities listed, please specify and provide further details on the single activity being performed during the 1-minute moment.	18	Of the multiple activities listed, please specify and provide further details on the single activity being performed during the 1-minute moment and whether it is related to an IEP, IFSP, or care plan.
14	Please specify and elaborate further on the single activity performed during the 1-minute moment.	19	Narrowing it down to one activity. Please describe what you were doing at the time of your survey.
15	Please only list and explain the one task you were doing during your assigned moment. Please be specific without using names and using titles only when providing the explanation.	20	Thank you for your response, can you please narrow it down to one activity that was being performed during your one-minute moment?

Moment 9: Clarifying Questions

01	Can you please provide the type of health issue the student was being referred to the doctor for the doctors note? Thank you.	06	Please explain what the health issues were. Does the student have an IEP, care plan, or other service plan?
02	Please specify what the discussion was about and why it was needed.	07	Please be more specific. What health issues do these students have? Moments are specific to 1 task, if you were talking about 1 student only, please be specific to that person only.
03	Can you please narrow down your response to the one specific student you were discussing during your one-minute moment, and describe the primary concern and purpose of that discussion regarding the student's absence, what type of health issue/need would the doctor referral address, and why was that necessary in order to validate the student's absence?	08	Can you please further explain why the student required the absence to be validated and what is the role of the nurse in the student's absence validation and health issues?
04	Does the student have an IEP, IFSP, or other service/care plan? Why does the student need to be referred to a doctor?	09	Please specify the activity being performed and whether it is related to an IEP, IFSP, or care plan.
05	Are the health issues that you were discussing related to the student's IEP/care plan?		

Moment 10: Clarifying Questions

01	What specific type of accommodations was being discussed during the one-minute survey?	07	Acronyms are not allowed. What is SSD accommodations and why are they needed? Are the accommodations included in the student's IEP/care plan? What is AP exams and is it needed?
02	What is SSD, what type of accommodations are needed and why?	08	What is SSD? Acronyms are not allowed. Please clarify what specific accommodations were being discussed.
03	Please specify what type of accommodations are needed?	09	Can you please further explain what the AP exams determine, what type of needs must be met for the students who qualify for accommodations and what did the plan include in order to meet those needs?
04	Can you please clarify what SSD stands for, as well as what type of accommodation and specific need prompted the discussion during your moment, and whether it was related to service/support documented in an IEP or other service/care plan?	10	Please define the acronym SSD and AP.
05	I would ask can you narrow down and describe the specific student accommodation and to please spell out the acronym SSD.	11	Please clarify without acronyms what SSD accommodations are.
06	What is SSD?	12	Please define the acronyms SSD and AP.

Appendix 2: Additional LEA BOP Guidance Based on Questions Asked at Coder Training

Two thick, wavy lines in shades of blue and teal sweep across the lower half of the page, creating a decorative border.

Code 2A: Post-Question Standards for Coding

- » Pool 1 moment narratives and Post-Question must align to be coded to a 2A. If not, the coder **must** ask a CQ.
 - Post-Questions with a “no” response must be coded to 2Z unless a CQ is asked and TSP responds clarifying the moment is related to a care plan/doctor’s orders/assessment/etc.
 - **Exception:** Moments detailing practitioner training, professional development, or continuing education that is related to the continuation of providing covered direct Medicaid services may be coded to 2A with a Post-Question response of “no”.
- » Policy will go into effect starting in FY 2026-27 Q2.
 - For Q1, coders are encouraged to ask CQs to ensure alignment between moment narrative and post-question, when possible.

Code 2A: Post-Question Standards (cont'd)

	Quarter 1 Expectations	Quarter 2 (and forward) Expectations
Coding of Moments	• Moments already coded to 2A with a Post-Question response of “no” do not need to be re-coded. • When a CQ was asked to clarify the “no” response, use that CQ response to code.	• Pool 1 moment narratives and Post-Question must align to be coded to a 2A. Otherwise, the moment must be coded as 2Z. • <u>Exception</u>: training, professional development, or continuing education that is directly related to providing covered Medicaid services (may be coded to 2A with a “no” response).
CQ Requirement	• Encouraged (not required) to ask CQs to ensure alignment between narrative and post-question, when possible.	• Post-Questions with a “no” response must be coded to 2Z unless a CQ is asked and TSP responds clarifying the moment is related to a care plan.
LEA QCR Review	• LEAs attest in Quarterly Coding Review (QCR) process that documentation supports 2A moments. • If an LEA requests a change from 2Z to 2A on a specific moment and attests that they have documentation to support this change, the moment may be coded to 2A.	
Updating SSP	• RMTS AUs are encouraged to provide detail on changes from 2Z to 2A in SSP, resulting from the QCR review process.	• For any moment changed from 2Z to 2A as part of the QCR review process, the RMTS AU <u>must</u> note the change and reason for the change in the SSP.

Code 2A: Training & Professional Development Documentation

- » Moments detailing practitioner training, professional development, or continuing education that is related to the continuation of providing covered direct Medicaid services may be coded to 2A with a Post-Question response of “no” (without a CQ).
- » Examples of LEA documentation to support a Code 2A:

Training	Professional Development	Continuing Education
Student-Specific Care Plan Detailing Service Trained On		
Agenda with Topic Description		
Meeting/Training Materials or Slides		
Calendar Entry with Topic Description/Emails regarding training		

Post-Question: Clarifying Question (CQ) Examples

- » Post-Questions with a “no” response must be coded to 2Z unless a CQ is asked and TSP responds clarifying the moment is related to a care plan.
 - CQ does not need to directly re-state the post question!
- » Example CQs:
 - *“Can you clarify if the activity you were performing is related to an assessment service, a service documented in a care plan (such as an IEP, a 504, or other plan) or intended to fulfill a doctor’s order or prescription? If yes, please clarify which one.”*
 - *“Can you clarify if the student you were working with had a care plan or doctor’s orders that led you to conduct your activity?”*
 - *“Please provide additional detail regarding the purpose for why you were conducting the activity.”*
 - *“Please clarify if the student you were working with during your activity has specific doctor’s orders or a care plan (such as, but not exclusive to, an IEP) requiring your services.”*

Post-Question: CQ Examples (Cont'd)

» Example CQs (continued):

- *"Do you plan on following up with this student on a more frequent basis? If so, how is this authorized?"*
- *"Have you met with this student before, and do you plan on meeting with them again?"*
- *"Do you plan to follow up with this student with any regularity?"*
- *"How did you come to meet with this student?"*

Note: Moments detailing practitioner training, professional development, or continuing education that is related to the continuation of providing covered direct Medicaid services may be coded to 2A even with a Post-Question response of "no".

Code 2A vs. Code 8: Pre/Post Time vs. Coordination

- » **Code 2A:** For Pool 1, pre- and post-service time must be related and integral to the provision of a covered direct service to be coded to 2A.
 - **Example:** Breaking down equipment after a direct service with a student.
 - **Rationale:** The equipment used was integral to the provision of completing a specific activity during a direct service that is outlined in the student's care plan.
- » **Code 8:** Pre- or post-service time that is related to the direct service, but whose primary purpose is for the coordination or monitoring of the direct service to ensure the service is appropriately administered, should be coded to 8.
 - **Example:** Reviewing number of sessions completed to determine alignment with IEP service provision requirements.
 - **Rationale:** Reviewing the number of sessions is not directly related to the completion of a specific activity during a direct service moment. Instead, the primary purpose of the activity is to monitor compliance with IEP requirements.

Substance Use Disorder Services

	Risk Factor Reduction (EPSDT) Related to Substance Use	Substance Use Disorder (SUD) Counseling
Purpose	• Helping students identify behaviors that increase risk of negative health, behavioral, or social outcomes. • Helping students make healthier choices, develop coping skills, or avoiding future problems. • Assessing / screening students (prior to services being established).	• Therapeutic service that helps individuals who have identified problems related to use of substances (tobacco, alcohol, drugs, etc.). • May require a higher level of specialized care.
Students Eligible	• Universal education or targeted at-risk students.	• Identified as needing treatment for SUD.
Covered LEA BOP Service?	• Yes	• No
Setting	• Individual or group of students.	• Individual or group of students.
Need for Care Plan?	• No care plan needed for service to be rendered (screening/assessment).	• N/A

Coding of Assessments

- » The following initial and other covered assessment activities should be coded to **Code 2A**:
- Reviewing student health records
 - Interviewing student/teacher/parent
 - Observing the student
 - Consulting with other practitioners/teachers/parents
 - Scheduling/administering tests
 - Scoring/interpreting test results
 - Writing report to summarize results & recommendations for services
 - Developing treatment plan
 - Reporting out to a parent and/or school personnel on a student's findings
 - Evaluating a student in crisis (conducting a threat/risk assessment or discussing results of the assessment)
 - Referring for initial assessments/screenings
 - Obtaining parental consent to assess
 - Drafting/updating present levels/goals
- » Pool 1: Referral and coordination for the initial assessment of IEP/IFSP/other care plan services must not be claimed as Medicaid administration, since those are an extension of a direct service (Code 2A).