



LEA Medi-Cal Billing Option Program

November 10, 2020

1:30-2:30pm

Time Survey Participant (TSP) Training

TRAINING TO BEGIN AT 1:30PM



Introductions

California Department of Health Care Services (DHCS)

Administers the Local Educational Agency Medi-Cal Billing Option Program (LEA Program) and School-Based Medi-Cal Administrative Activities Program (SMAA Program)

Guidehouse (formerly Navigant Consulting)

Contractor to DHCS
Provides assistance to DHCS as a subject-matter expert



Agenda

Section	Topic
1	TSP List Development for Q3
2	TSP Equivalency Requests
3	TSP List Development for Q1
4	LEA Specific Scenarios



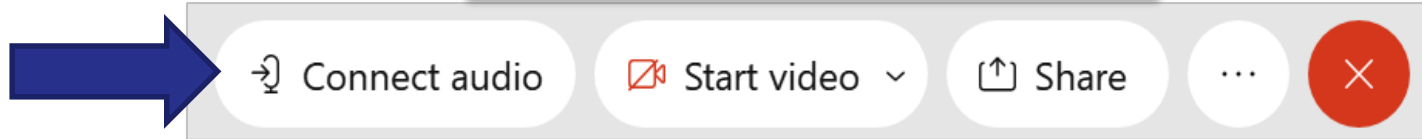
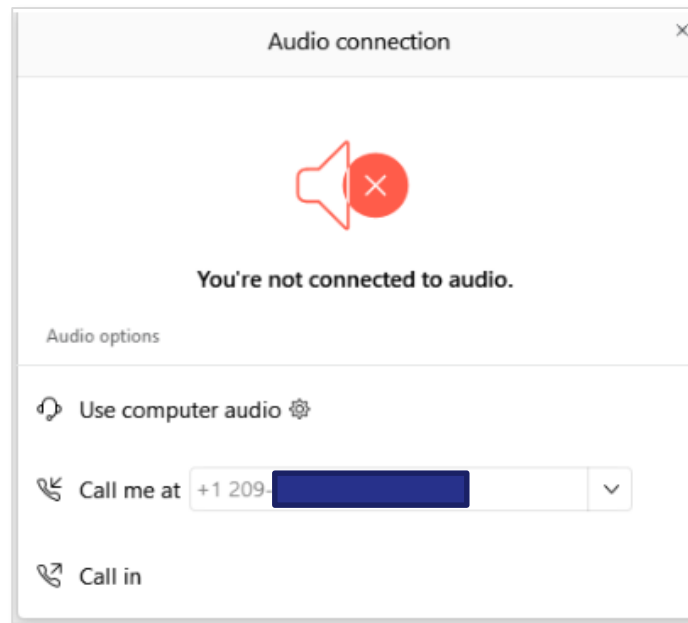
Housekeeping Items

- Questions
 - Submit via the **Q&A function** (*not* the chat function)
 - Time for Q&A at end of each section
 - A FAQ document will be compiled with selected questions submitted via the Q&A function and those sent to LEA@DHCS.CA.gov – DHCS **will not** be responding to every question
- Training materials will be distributed to all stakeholders on the LEA Program listserv
- LEA Program listserv:
<http://apps.dhcs.ca.gov/listssubscribe/default.aspx?list=DHCSLEA>



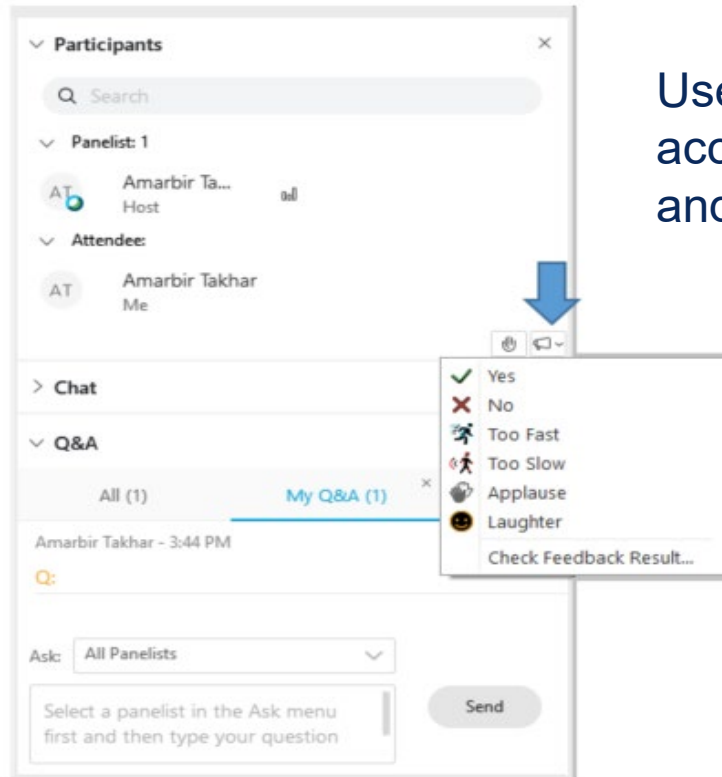
Webex Audio Help

- Connect to meeting audio:
 - Open the event from Webex rather than calling the Webex call-in number, and use the call-in options provided there
 - Select microphone icon at bottom of screen
 - Select the option for how you would like to connect



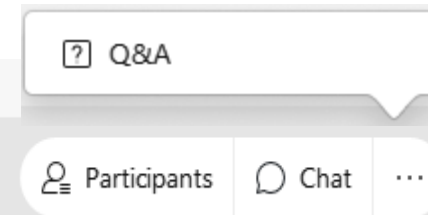


Chat, Feedback, and Q&A



Use the bottom right bubble to access the Participant, Chat, and Q&A window.

The Q&A window is accessed by clicking the button with three dots then select the Q&A pop up.





Section 1

TSP List Development for Q3



Random Moment Time Survey (RMTS)

The RMTS is a time study mechanism that California uses to determine **the amount of time spent** on activities throughout a participant's workday

As of SFY 2020-21, both school-based programs are incorporated into **one RMTS**

Time Survey Participants (TSPs) are identified by LEA Coordinators and **must respond to RMTS moments**

RMTS webpage contains additional resources:

<https://www.dhcs.ca.gov/provgovpart/Pages/School-Based-RMTS.aspx>



Types of TSPs

TSPs are classified by the LEA Coordinator as either:

- **Pool 1 participants:** direct health service practitioners that are qualified to bill under the LEA Program

Example: A school nurse that provides direct health services to students

- **Pool 2 participants:** administrative claiming staff that will not bill direct medical services

Example: A case manager that links families to health insurance or refers and coordinates health, dental or mental health services



Pool 1 (Direct Service) – Approved Participants

- Certified Nurse Practitioners
- Certified Public Health Nurses
- Credentialed Audiologists
- Credentialed School Counselors
- Credentialed School Psychologists
- Credentialed School Social Workers
- Credentialed SLPs
- Licensed Audiologists
- Licensed Clinical Social Workers
- Licensed Educational Psychologists
- Licensed Marriage and Family Therapists
- Licensed Occupational Therapists
- Licensed Optometrists
- Licensed Physical Therapists
- Licensed Physicians
- Licensed Physician Assistants*
- Licensed Psychiatrists
- Licensed Registered Nurses
- Licensed Respiratory Care Practitioners
- Licensed SLPs
- Licensed Vocational Nurses
- Occupational Therapy Assistants*
- Orientation and Mobility Specialists*
- Physical Therapist Assistants*
- Program Specialist

* Denotes a recently approved LEA Program practitioner in State Plan Amendment 15-021



Pool 1 (Direct Service) – Approved Participants Cont.

- Program Specialists
- Registered Associate Clinical Social Workers*
- Registered Credentialed School Nurses
- Registered Dietitians*
- Associate Marriage and Family Therapists*
- Registered School Audiometrists
- Speech-Language Pathology Assistants*
- Trained Health Care Aides



Pool 2 (Administrative) – Approved Participants

- Community Liaison
- Coordinator, various selected positions (i.e., Medical, Mental Health, Speech, Nursing, etc.)
- Direct health service practitioners (Pool 1) that are unqualified to bill under the LEA Program reimbursement rules (i.e., a practitioner that requires supervision to bill under LEA Program but the LEA does not have a supervisor to oversee the services, etc.)
- Direct health service practitioners (Pool 1) that are not providing direct billable health services (i.e., a practitioner that is in a supervisory role)
- Director/Administrator - various selected positions (i.e., Mental Health, Speech, Nursing, etc.)
- Education/Instructional Aides
- Family Resource Center Staff (i.e., manager, secretary, office manager, clerk, assistant, director, coordinator, etc.)
- Health Care Assistant/Advocate
- Health Center Staff (i.e., manager, secretary, office manager, clerk, assistant, director, coordinator, etc.)
- Health Technicians/Specialist
- Interpreters/Interpreter Assistants
- Medical Administrative Coordinator/Assistant
- Medical Assistant
- Medical Interns
- Office Clerical Staff (i.e., technician, secretary, office manager, clerk, assistant, etc.)
- Organization Facilitator
- Parent Community Facilitator/Liaison
- Principal and/or Assistant Principal
- Pupil Support Services Administrators
- Pupil Support – Technicians
- School Bilingual Assistants
- Special Education Administrators
- Special Education Support Technician/Assistant
- Student Support Services Coordinator
- Teacher- various selected positions (i.e., special education, alternative education, resource, SDC)
- Translator; Senior Translator
- Transportation Planner / Router
- Other groups/individuals that may be approved by DHCS



Exclusions from Pool 1

- The following should be **excluded from the Participant Pool 1 TSP list**:
 - ✗ Direct health service contractors
 - ✗ Any participant that is not qualified to bill for direct medical services under SPA 16-001
 - ✗ Any qualified practitioner that the LEA does not intend to bill for during the upcoming quarter
 - ✗ Any participant that is 100% federally funded in the upcoming quarter

Note: If the LEA has not determined a practitioner's funding source, they should be included on the TSP list, and federal funds will be backed out on the CRCS.



Time Survey Participant (TSP) List Development

LECs/LGAs and DHCS **will review** TSP lists before the start of each quarter

However, when creating the TSP list, **LEAs are responsible** for its development and **ensuring its accuracy** based on LEA Program requirements

Please refer to [PPL #20-008 “TSP List Certification Statement for the RMTS”](#) for additional guidance on LEA Coordinator certification requirements



Frequently Asked Questions

Question #1: Who selects the participants, and how do they determine who is a TSP?

- **Answer:** LEA Coordinators for the School-Based Medi-Cal Programs will determine which practitioners will be TSPs.

Question #2: Is participating in RMTS mandatory or voluntary for TSPs?

- **Answer:** It is mandatory for all TSPs, both Pool 1 and Pool 2, to participate in RMTS.

Question #3: Can secretaries be considered Pool 1 TSPs if they also provide medication administration and first aid?

- **Answer:** Secretaries are not considered eligible Participant Pool 1 practitioners.



Frequently Asked Questions (cont'd)

Question #4: If a TSP can be placed in either Participant Pool 1 or Participant Pool 2, the LEA can decide where to place the TSP, correct?

- **Answer:** Assuming the TSP meets all necessary requirements for both Participant Pool 1 and Participant Pool 2, the LEA can decide which cost pool is best suited for the TSP. However, in determining which list to place a TSP on, the LEA should evaluate the TSP's primary role/objective. If the TSP's primary job duties relate to providing direct health services to students (and the LEA intends to bill for such services through the LEA Program), the TSP would be considered a Participant Pool 1 TSP.



Frequently Asked Questions (cont'd)

Question #5: What if a LEA intends to have a practitioner bill during an upcoming quarter, but the provider ends up not doing so? What is the effect on the LEA?

- **Answer:** This may occur in certain circumstances such as if the practitioner does not provide a covered service to a Medi-Cal student. However, the intention is that the practitioner is qualified to bill and expects to bill under the LEA Program if they are included as a Participant Pool 1 Time Survey Participant (TSP).



QUESTIONS – SECTION 1

*While DHCS is compiling questions submitted via the Q&A function, a **practice session** will be initiated.*

Any additional questions can be submitted to the LEA Program Inbox:

LEA@DHCS.CA.gov



Section 2

TSP Equivalency

Requests



Outstanding Q2 TSP Equivalencies

On September 16, 2020, the LEA Program sent out an e-blast with the following information:

- *DHCS will conditionally approve the outstanding TSP Equivalency Requests as of September 16, except for the following scenarios:*
 - *Special Education Teachers as THCAs*
 - *Job titles with Program Specialists*
 - *Job titles under the “Other job classifications approved by CMS”*



Outstanding Q2 TSP Equivalencies (cont'd)

DHCS is working with a **subcommittee consisting of LEAs, LECs and LGAs** to determine a solution and provide guidance on any TSP that was conditionally approved and later deemed to be an unbillable job title.



Update on Q2 List

- 250 Individual requests reviewed
- 100 Emails left for review with an estimated 150-200 individual requests
- DHCS will respond by the end of November



Q3 and Onward TSP Equivalencies: Submission Requirements

When submitting a TSP Equivalency Request Form:

- Use the following **naming convention**:
Region#SchoolNameProposedJobTitle
 - Example: 01ABCUnifiedParaprofessional
- Use the following **E-mail Subject Line**:
Region # School Name TSP Equivalency Request
 - Example: Region 1 ABC Unified TSP Equivalency Request
- **Include Job Description** (Per [PPL #20-031](#))
 - If possible, include request form and job description in one PDF document
 - Highlight the job functions that you will be billing for under the LEA BOP
- Make sure the PDF is **not locked** for editing



Q3 and Onward TSP Equivalencies: Which TSPs Require an Equivalency?

Equivalency Request Forms are required for those TSPs that **do not clearly align with the approved job categories**

- Approved job categories are based on the current State Plan
- [PPL #20-031](#) states:
 - The Participant Pool 1 TSP Equivalency Request Form must be used to submit exceptions for a specific job classification, which covers multiple TSPs who perform and bill for LEA BOP services, or for one (1) individual TSP that provides direct medical services but may not necessarily fit the job categories listed in Participant Pool 1



Q3 and Onward TSP Equivalencies: Examples of Requests

Approved Job Category: Licensed Vocational Nurse

<u>Acceptable</u>	<u>Needs TSP Equivalency Request Form</u>
LVN Nursing, LVN, Vocational Nurse	Medical Procedures Specialist, Health Care Specialist

- If the phrase “nurse” is in the job title, DHCS **will not** request a TSP Equivalency Request
- Please keep in mind that the LEAs are still responsible for ensuring that **all job qualifications are met** prior to including a TSP on the TSP list



Q3 and Onward TSP Equivalencies: Job Descriptions

The job description should clearly show that the TSP's **job functions align with billable services** under the LEA Program

Examples of what is appropriate:

- “Provide a variety of specialized health care services to physically disabled students”
- “Perform specialized health care services such as catheterization, oral suctioning and gastrostomy tube feedings”
- “Perform tasks such as feeding and toileting students”



Q3 and Onward TSP Equivalencies: Job Descriptions (cont'd)

Examples of unbillable services:

- “Performs a variety of clerical duties related to the maintenance of a student's medical records”
- “Assist staff with the development and presentation of learning materials and instructional exercises”
- “Observes and records information about student’s behavior.”
- “Basic First Aid and CPR”/ “assist with a variety of medical emergencies”
- “Assist with screenings”



Q3 and Onward TSP Equivalencies: Job Descriptions (cont'd)

Example 1: Approved Equivalency Request for Specialized Health Care Assistant as THCA

CLASS TITLE: SPECIALIZED HEALTH CARE ASSISTANT

BASIC FUNCTION:

Under the direction of the Principal/Vice Principal in coordination with the school nurse provide a variety of specialized health care services to physically disabled students; maintain and process a variety of records related to assigned activities; provide assistance in classrooms.

REPRESENTATIVE DUTIES:

Perform a variety of specialized health care services such as catheterization, oral suctioning and gastrostomy tube feedings for physically disabled students; clean catheters and administer chest percussion and postural drainage procedures; assist with range-of-motion exercises and oral care. *E*

Provide a variety of health care services to physically disabled students such as bandaging, taking temperatures and blood pressure readings, diapering and other related services. *E*

Administer prescription medicine to students according to established time lines, State laws and physician instructions. *E*

Administer nebulizer treatments; monitor peak flow meter readings. *E*



Q3 and Onward TSP Equivalencies: Job Descriptions (cont'd)

Example 2: Denied Equivalency Request for Instructional Assistant as THCA

DUTIES

Tutors individual pupils or groups of pupils; Arranges bulletin boards and other displays; In the temporary or indirect absence of the classroom teacher, supervises pupils in the classroom and resource programs; Following the teacher's plan, prepares and assists in instructing pupils in the use of a variety of supplementary instructional materials and audiovisual aids; Administers, scores, and records grades of tests; Oversees and performs clean up activities; Supervises pupils at assemblies, on field trips, and in the play areas; Maintains class rolls, attendance, and other records as directed; Operates audiovisual equipment; Participates in staff development programs as directed; May transport pupils or parents to the home, school, or community service agencies for conferences and consultations when other transportation is unavailable; May accompany pupils on buses during field trips and provide instruction while en-route; Establishes, maintains, and/or supports standards of personal conduct and discipline in accordance with the current discipline policy approved by the board of education; Performs other duties reasonably related to the job class.



Q3 and Onward TSP Equivalencies: LEA Program Provider Manual

Nursing and School Health Aide Services*

Nursing services include functions such as basic health care associated with actual or potential health or illness problems or the treatment thereof. Nursing services include all of the following:

- Direct and indirect patient care services that ensure the safety and protection of patients; and the performance of disease prevention and restorative measures
- 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, dentist, podiatrist, or clinical psychologist as defined by Section 1316.5 of the *Health and Safety Code*
- The performance of skin tests, immunization techniques and the withdrawal of human blood from veins and arteries
- Observation of signs and symptoms of illness, reactions to treatment, general behavior, or general physical condition that may result in the determination of abnormal characteristics, and implementation of appropriate reporting, referral, standardized procedures, or changes in treatment regimen in accordance with standardized procedures

* Trained health care aides must be trained in the administration of specialized physical health care as specified in *California Education Code*, Section 49423.5, and may render LEA services only if supervised by a licensed physician or surgeon, a registered credentialed school nurse or a certified public health nurse.



Q3 and Onward TSP Equivalencies: ADL Assistance Examples

Examples of Covered Services

- **Feeding** (e.g., being able to get food from a plate into one's mouth and chopping, pureeing or grinding food)
- **Dressing and grooming** (e.g., selecting clothes, putting them on/off and adequately managing one's personal appearance)
- **Bathing** (e.g., washing face/body in the bath or shower)
- **Toileting** (e.g., getting to and from and transfer on/off toilet)
- **Assist a student to ambulate, position or transfer** (e.g., from one location to another or moving to and between surfaces such as from a wheelchair to a toilet)
- **Bowel and bladder care**
- **Cuing, redirecting or monitoring** to ensure the student performs ADL tasks because a cognitive impairment prevents an individual from knowing when or how to carry out the task
- **Observation/monitoring and redirection/intervention** to assist with completion of ADLs

Examples of Services that are Not Covered

- Assisting with **educational activities** (e.g., tutoring, preparation of educational materials, Braille interpretation)
- **Classroom support** (e.g., redirecting, cueing/intervening to help a child stay on task to complete school assignments)
- **Instrumental Activities of Daily Living (IADLs)** (e.g., assistance with meal preparation, household chores, teaching a child to grocery shop, manage finances, etc.)
- Assisting with ADLs that a **typically developing child** of the same age could not safely and independently perform without adult supervision
- Monitoring or observation of a child who may have **behavioral episodes** in the classroom



Deadline for Q3 TSP Equivalencies

TSP Equivalencies for SFY 2020-21 Q3 are due to DHCS by **November 17, 2020**

RMTS@DHCS.CA.gov

***Approved TSP Equivalencies for Q2
DO NOT need to be re-submitted***



Helpful Reminders...



Only submit a TSP
Equivalency Request Form
when it is needed

Ensure the **PDF is not
locked** for editing

**Use the correct naming
convention:**

Region#SchoolName
ProposedJobTitle

Include a **corresponding
job description** when
submitting a request



Frequently Asked Questions

Question #1: When was the PPL on the TSP equivalency process issued?

- **Answer:** An e-blast was sent on July 31, 2020 notifying all stakeholders that [PPL #20-031](#), titled “Notification of New Requirements for Time Survey Participant (TSP) Equivalency Requests,” was issued, along with the TSP Equivalency Form. Both the PPL and the Form are posted on the [LEA Program PPL webpage](#).

Question #2: Who will be fielding the TSP Equivalency Forms that are submitted by LEAs?

- **Answer:** LEA Program staff at DHCS will review the TSP Equivalency Forms submitted for a Pool 1 TSP. SMAA Program staff at DHCS will review the TSP Equivalency Forms submitted for a Pool 2 TSP.



Frequently Asked Questions (cont'd)

Question #3: Do LEAs still need to submit another TSP Equivalency Form if an equivalency has been granted for a previous quarter?

- **Answer:** No. If DHCS grants approval for the exception request, no further requests need to be made for the specific job classification.

Question #4: To clarify, the LEA is responsible for the submission of TSP Equivalency Request Forms?

- **Answer:** That is correct. The LEA is responsible for submitting TSP Equivalency Request Forms to DHCS at RMTS@DHCS.CA.gov. Please keep your LEC/LGA informed during this process, as well, since they will need to know which positions have been approved and are appropriate to include when finalizing the random sample.



QUESTIONS – SECTION 2

*While DHCS is compiling questions submitted via the Q&A function, a **practice session** will be initiated.*

Any additional questions can be submitted to the LEA Program Inbox:

LEA@DHCS.CA.gov



Section 3

TSP List Development for Q1



Q1 TSP List – [PPL #20-046](#)

Q1 TSP lists will be **developed retrospectively** based on employed practitioners that are qualified to provide and bill for LEA services

TSP Equivalency Forms for Q1 direct health service practitioners will be due to DHCS by **December 31st**

Q1 TSP lists will be **developed and maintained by LEAs** for audit and review purposes

The SFY 2020-21 Q1 TSP list will be applicable to costs on the SFY 2020-21 CRCS **due March 2022**



Q1 TSP List – Example

Step 1 - Quarter 2 Approved TSP List

<u>Participant Name</u>	<u>Job Title</u>	<u>Job Classification</u>
Sarah Smith	Speech and Hearing Specialist	Licensed SLP
Tim Anderson	Occupational Therapist	Licensed OT
Jennifer Jacobs	Paraprofessional	Trained Health Care Aide

- LEAs should begin with the approved Pool 1 TSP list for Q2
- Note that TSP Equivalency Requests related to Q2 may be applied retroactively to Q1



Q1 TSP List – Example (cont'd)

Step 2 - Additions to Quarter 2 TSP List

Participant Name	Job Title	Job Classification	Requires a TSP Equivalency Form? (yes/no)	Equivalency Approved by DHCS? (yes/no)
Justin Schmidt	Extended School Year Specialist	Other positions approved by CMS for the LEA BOP	Yes	Yes

- Then, LEAs will include any participants that were **not included** in the approved Quarter 2 TSP list, but **were eligible** to provide and bill for LEA covered services in Q1
- This may include employees such as Extended School Year (ESY) employees, if the employees meet LEA Program requirements



Q1 TSP List – Example (cont'd)

Step 3 - Deletions to Quarter 2 TSP List

Participant Name	Job Title	Job Classification
Sarah Smith	Speech and Hearing Specialist	Licensed SLP

- Then, LEAs will exclude any participants that were in the approved Quarter 2 TSP list, but **were not eligible** to provide and bill for LEA services in Q1
- Reasons for excluding an employee may include the following, among other reasons:
 - (1) the employee was not yet hired,
 - (2) the employee was not providing covered direct medical services as a routine part of their job, or
 - (3) the employee was on leave



Q1 TSP List – Example (cont'd)

Step 4 - Final Q1 List

Participant Name	Job Title	Job Classification
Tim Anderson	Occupational Therapist	Licensed OT
Jennifer Jacobs	Paraprofessional	Trained Health Care Aide
Justin Schmidt	Extended School Year Specialist	Other positions approved by CMS for the LEA BOP

- LEAs should maintain backup documentation supporting their Q1 Pool 1 TSP list development and should be able to produce the Q1 list during audit or review
- Costs for Q1 on the CRCS for each fiscal year will be limited to those employees on the Q1 TSP list, using the methodology described



Frequently Asked Questions

Question #1: Do TSP Equivalency Requests submitted for Q2 need to be re-submitted for Q1?

- **Answer:** No. Approved TSP Equivalency Requests related to Q2 may be applied retroactively to Q1. In order to retroactively apply the approval of a Q2 TSP Equivalency Request to Q1, the same job description used to support the Q2 request must also be applicable to Q1 TSPs.

Question #2: Do Q1 TSP lists need to be submitted to DHCS?

- **Answer:** No. LEAs must maintain backup documentation supporting the development of the Q1 Participant Pool 1 TSP list and must be able to produce the Q1 list during audit or review. Costs for Q1 on the CRCS for each fiscal year must be limited to those employees on the Q1 list.



QUESTIONS – SECTION 3

*While DHCS is compiling questions submitted via the Q&A function, a **practice session** will be initiated.*

Any additional questions can be submitted to the LEA Program Inbox:

LEA@DHCS.CA.gov



Section 4

LEA Specific Scenarios



Special Education Teachers as Trained Health Care Aides (THCAs)

- Special Education Teachers **should not be included** in Pool 1 as THCAs
- Special Education Teachers primarily provide **instruction** rather than medically necessary health services
- DHCS **will remove** teachers as THCAs in the final review process for each quarter
 - For Q2 TSP lists, if LEAs included Special Education Teachers as THCAs, their costs should be removed in the CRCS



ERMHS Practitioners

- Educationally Related Mental Health Services (ERMHS) practitioners primarily provide **educationally-based services** rather than medically necessary health services
- ERMHS practitioners included in Pool 1 **must also be providing medically necessary services** billable under the LEA Program
 - Small working group to be formed to further understand the role and responsibility as a potential TSP



ERMHS Practitioner Example

Equivalency Request for Educational Therapist as Credentialed School Counselor:

Educational Therapist

DEFINITION

Under the supervision of the Director of Special Education and designee, the Educational Therapist will serve as the professional clinician, providing non-medical educational therapy and consultation for students who exhibit serious and persistent emotional, mental and/or other behavioral challenges. The Educational Therapist will use established clinical methods and procedures for assessment, planning and implementation of treatment plans. The Educational Therapist, Special Education additional duties will include providing Educationally Related Mental Health Services (ERMHS) per the Individual Education Plan (IEP) including progress monitoring, service tracking and participation in students' IEPs. All work is performed within the limits of the licensing board and professional standards and adheres to California Education Code and regulations.

ESSENTIAL FUNCTIONS

- Select, administer and interpret a wide variety of psychological testing instruments and conduct clinical interviews and observations for the evaluation of students with educationally based social/emotional and behavioral difficulties
- Utilize assessment, interview and observation data to determine student need for mental health services
- Provide crisis intervention and individual counseling for students on clinical issues including, but not limited to, treatment and medication compliance, depression, anxiety and other mental and/or behavioral health matters that interfere with students' educational progress
- Provide individual and group therapy with focus on clinical issues related to lack of educational progress



Program Specialists

- Program Specialists are only approved rendering practitioners for Targeted Case Management (TCM) services
- Special Education Teachers can be included in Pool 1 as Program Specialists if they provide billable TCM services under the LEA Program



QUESTIONS – SECTION 4

*While DHCS is compiling questions submitted via the Q&A function, a **practice session** will be initiated.*

Any additional questions can be submitted to the LEA Program Inbox:

LEA@DHCS.CA.gov