



Introduction

California Department of Health Care Services

- School Based Administrative Activities Program (SMAA)
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Purpose of this Training

- » Annual training is provided for regional/county senior coding staff who will then train their primary coding staff. (SMAA Manual 6-17)
- » Provide guidance to assist in correctly coding all activities.
- » Provide examples of submitting Clarifying Questions (CQ).
- » Provide examples for coding Time Survey Participant (TSP) responses.
- » Provide an update on Local Educational Agency Medi-Cal Billing Option Program (LEA BOP) policy.

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Training Overview

- » Update: Centers for Medicare and Medicaid Services (CMS) Guidance Melissa (SMAA)
- » Section 1: Participant Pools & Activity Codes Ankita (LEA Ops)
- » Section 2: Reimbursable SMAA Activity Codes Levi (SMAA)
- » Section 3: Non-Reimbursable SMAA Activity Codes Rida (SMAA)
- » Section 4: Direct Service Activity Codes Lydia (LEA Ops)
- » Section 5: Health Education and Anticipatory Guidance Monica (LEA Ops)
- Section 6: Interrelated, Parallel, and Non-Parallel Activity Codes Terry (SMAA)
- Section 7: Clarifying Questions (CQ) Ezralene (SMAA)
- » Section 8a: Moment Response and Code Assignments Muhammad (SMAA)
- » Section 8b: Moment Response and Code Assignments Rehana/Edward (LEA Ops)

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2023 CMS Comprehensive Guide

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2023 CMS Comprehensive Guide

- » Released on May 18, 2023
- » Current SMAA Manual, Sections 5 and 6 policy remains
- » DHCS will submit a SPA by June 30, 2026
- » DHCS draft RMTS manual with CMS

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2023 CMS Comprehensive Guide

- » Next CMS information Webinar 9/28/2023
- » DHCS will work with stakeholders in the upcoming months
- » Send questions to your LEC coordinator or your Regions Analyst.

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Section 1: Participant Pools and Activity Codes

Participant Pool 1 List Direct Service Practitioners

Psychology and Counseling Services:

- » Associate marriage and family therapist
- » Licensed Marriage and family therapist
- » Credentialed school counselor
- » Credentialed school psychologist
- » Credentialed school social worker
- » Licensed clinical social worker

Respiratory Care Services:

» Licensed respiratory care practitioner

- » Licensed psychiatrist
- » Licensed psychologist
- » Licensed educational psychologist
- » Licensed physicians
- » Licensed physician assistant
- » Registered associate clinical social worker

Speech Therapy Services:

- » Licensed speech-language pathologist
- » Credentialed speech-language pathologist
- » Speech-language pathology assistant

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Guiding Principle

42 CFR 433.15(b)(7)

» All activities the Secretary of Health and Human Services finds necessary for <u>proper and efficient administration of the State</u> <u>Plan</u>.

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Participant Pool 1 List Direct Service Practitioners cont.

Nutrition Services:

- » Registered dieticians
- » Certified nurse practitioners
- » Certified public health nurses
- » Licensed physicians
- » Licensed physician assistants
- » Licensed registered nurse
- » Registered credentialed school nurse

Occupational Therapy:

- » Licensed occupational therapist
- » Licensed occupational therapy assistant

Physical Therapy:

- » Licensed Physical therapist
- » Licensed physical therapist assistant

Targeted Case Management (TCM)

» Program specialist

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Vision Services:

- » Licensed optometrist
- » Licensed physician
- Licensed physician assistant
- » Registered credentialed school nurse

Orientation and Mobility:

Orientation and mobility specialists

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Participant Pool 1 List Direct Service Practitioners cont.

Hearing Services:

- » Licensed audiologist
- » Credentialed audiologist
- » Licensed physician
- » Licensed physician assistant
- » Credentialed speech-language pathologist
- » Registered school audiometrist
- » Registered credentialed school nurse who is also a registered school audiometrists

Nursing Services:

- » Registered credentialed school nurse
- » Licensed registered nurse
- » Certified public health nurse
- » Certified nurse practitioner
- » Licensed vocational nurse
- » Trained health care aide

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Reimbursable IEP/IFSP Assessment Services by Practitioner Type

Practitioners and Treatments

| Practitioner | IEP/IFSP Treatment Services | Non-IEP/IFSP Treatment Services | тсм |
|--|-----------------------------------|---------------------------------------|-----|
| Associate marriage and family therapist | Yes | Yes | Yes |
| Audiologist | Yes | Yes | No |
| Certified nurse practitioner/Public health nurse | Yes | Yes | Yes |
| Credentialed school counselor | Yes | Yes | Yes |
| Credentialed school psychologist | Yes | Yes | Yes |
| Credentialed school social worker | Yes | Yes | Yes |
| Licensed clinical social worker | Yes | Yes | Yes |
| Licensed educational psychologist | Yes | Yes | Yes |
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Participant Pool 2 List Administrative Service Personnel -cont.

Directors, Administrators, Principals and Coordinators:

- » Director various selected positions (Speech, Nursing, etc.)
- » Director/Administrator various selected positions (i.e. Mental Health, Speech, Nursing, etc.)
- » Special Education Administrators
- » Medical Administrative Coordinator/Assistant
- » Pupil Support Services Administrators
- » Principal and/or Assistant Principal
- » Principal at Special Education Schools
- » Student Support Services Coordinator/Case Manager

» Coordinator – various selected positions (Medi-Cal, Mental Health, Speech, Nursing, etc..)

Instructors:

- » Instructor, Orientation and Mobility (visually handicapped)
- » Education/Instructional Aides
- » Special Education Support Technician/Assistant
- » Teacher various selected positions (special ed, alternative ed, resource, SDC)

Participant Pool 2 List Administrative Service Personnel

Direct service practitioners:

- » Direct service practitioners (Pool 1) that are unqualified to bill under LEA BOP (i.e. an SLPA without supervision)
- » Direct service practitioners (Pool 1) that are not providing direct billable health services

Liaisons:

- Parent Community Facilitator/Liaison
- » Community Liaison

Health Care:

- » Health Care Assistant/Advocate
- » Health Center Staff (i.e. manager, secretary, office manager, clerk, assistant, director, coordinator, etc.)
- » Health Technician/Specialist
- » Health Services Special Education Teachers
- » Medical Assistant
- » Medical Interns

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Activity Codes

- Code 1 School-Related, Educational, and Other Activities
- » Code 2A Direct Medical Services Billable
- Code 2Z Direct Medical Services Non-billable
- » Code 3 Non-Medi-Cal Outreach
- » Code 4 Medi-Cal Outreach
- » Code 5 Facilitating Application for Non-Medi-Cal Programs
- Code 6 Facilitating Medi-Cal Application
- Code 7 Referral, Coordination, and Monitoring of Non-Medi-Cal Services
- Code 8 Referral, Coordination, and Monitoring of Medi-Cal Services
- » Code 9 Arranging Transportation for Non-Medi-Cal Services

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Participant Pool 2 List Administrative Service Personnel cont.

Clerical and Secretarial Staff:

- » Office Clerical Staff (i.e. technician, secretary, office manager, clerk, assistant, etc.)
- » Secretary, Sr. Secretary
- » Family Resource Center Staff (i.e. manager, secretary, office manager, clerk, assistant, director, coordinator, etc.)

Speech and Language:

- » Sign Language Interpreter
- » School Bilingual Assistant
- » Translator; Sr. Translator
- » Interpreters & Interpreter Assistants

Other:

- » Transportations Planner/Router
- » Organization Facilitator
- » Placement Assistant
- » Professional Expert
- » Pupil Support Technicians
- Other groups/individuals that may be approved by DHCS.

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Activity Codes

- » Code 10 Arranging Transportation in Support of Medi-Cal Services
- » Code 11 Non-Medi-Cal Translation
- Code 12 Translation Related to Medi-Cal Services
- Code 13 Program Planning, Policy Development, and Interagency Coordination Related to Non-Medi-Cal Services
- Code 14 Program Planning, Policy Development, and Interagency Coordination Related to Medi-Cal Services
- » Code 15 Medi-Cal Claims Administration, Coordination, and Training
- » Code 16 General Administration/ Paid Time Off
- » Code 17 Not Working/Not Paid
- » Code 18 Invalid Moment/No Response

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RMTS Moment Notification

- TSPs will be notified one student attendance day before the sampled moment and will have four student attendance days to respond.
- Clarifying questions can be asked within 15 calendar days of the moment.
 - » TSPs will still have five student attendance days to respond to any clarifying questions.

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Section 2: Reimbursable SMAA Activity Codes

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Reimbursable SMAA Activity Codes

- » Code 4 Medi-Cal Outreach
- » Code 6 Facilitating the Medi-Cal Application
- » Code 8 Referral, Coordination, and Monitoring of Medi-Cal Services
- Code 10 Arranging Transportation in Support of Medi-Cal Services
- Code 12 Translation Related to Medi-Cal Services
- Code 14 Program Planning, Policy Development, and Interagency Coordination Related to Medi-Cal Services
- » Code 15 Medi-Cal Claims Administration, Coordination, and Training
- » Code 16 General Administration / Paid Time Off
- » SMAA Manual Section 5

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Code 4 – Medi-Cal Outreach

- » Code 4 is reserved for activities that inform potentially eligible individuals about Medi-Cal programs and how to access them.
- » This includes the following activities:
 - Bringing potentially eligible individuals into the Medi-Cal system for the purpose of determining eligibility.
 - Including informing children and their families on how to effectively access, use, and maintain participation in all health resources available through Medi-Cal
 - Related paperwork, clerical activities, or staff travel required to perform these activities, including initiating and responding to e-mail and voicemail regarding eligibility.

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Code 4 Medi-Cal Outreach

- » Outreach materials should be submitted to DHCS.
- » LEAs are only reimbursed when conducting outreach for the populations served by their schools (i.e., students and their parents or quardians).
- » Activities that are not considered Medi-Cal outreach under any circumstances are:
 - General preventive health education programs or campaigns addressed to life-style changes in the general population (e.g., maintaining healthy teeth and gums, antismoking, alcohol abstinence, etc.).
 - Outreach campaigns directed toward encouraging persons to access social, educational, legal, or other services not covered by Medi-Cal.

Code 4 Examples

» Code 4

 "Passed out pamphlets to students for a local health clinic that accepts Medi-Cal students and families."

» Not Code 4

 "Provided information to students about the educational assistance programs." (Code 3)

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Code 6 - Facilitating the Medi-Cal Application

- » Code 6 should be used when TSPs are assisting individuals in completing the Medi-Cal application.
- » This includes the following activities:
 - · Guiding individuals or families to complete a Medi-Cal application,
 - Related paperwork, clerical activities, or staff travel required to perform these activities.
 - Initiating and responding to e-mail and voicemail regarding applications.
- » Note: This activity does not include the actual determination of Medi-Cal eligibility.

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Code 6 Examples

» Code 6

 "Discussed Medi-Cal eligibility and assisted with the completion of the Medi-Cal application with a parent."

» Not Code 6

 "Discussed the procedures for obtaining and completing a CalWORKs application with a parent." (Code 5)

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Code 8 – Referral, Coordination, & Monitoring of Medi-Cal Services

- » Code 8 should be used when TSPs perform referrals for, coordinate, and/or monitor the delivery of Medi-Cal covered services.
- » This includes the following:
 - Making referrals for and/or coordinating medical or physical examinations and necessary medical/mental health evaluations.
 - Related paperwork, clerical activities, or staff travel necessary to perform these activities.
 - Initiating and responding to e-mail and voicemail for Medi-Cal covered services.

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Code 8 – Referral, Coordination, & Monitoring of Medi-Cal Services cont.

- The following activities are considered part of the education mandate and must not be claimed as Code 8:
 - · Making sure the IEP meeting is conducted.
 - Referral and coordination for the assessment of IEP meeting services.
 - · Developing the initial IEP meeting goals.
 - Determining eligibility for special education.
 - · Determining the student's placement.
 - · Writing the IEP.
 - · Ensuring Parental sign-off is obtained.
 - · Confirming IEP meetings with the parents are scheduled.
 - · Completing the IEP meeting.
- » These activities should be coded to Code 1 instead.

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Code 8 Examples

» Code 8

• "I was referring the parent to a Medi-Cal physician for an evaluation based on the physical symptoms the parent explained."

» Not Code 8

- "I was referring student to tutoring group for help with their math classes." (Code 7)
- "I was working with the IEP team to develop IEP goals." (Code 1)

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Code 10 – Arranging Transportation in Support of Medi-Cal Services

- » This code should be used when a TSP is assisting an individual or family in obtaining transportation to Medi-Cal health-related services including:
 - Scheduling or arranging transportation to Medi-Cal covered services.
 - The time spent by a transportation supervisor or staff in coordinating transportation to Medi-Cal health-related services.

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Code 10 – Arranging Transportation in Support of Medi-Cal Services cont.

- » Not included in Code 10 are the following:
 - Providing the actual transportation service.
 - Any activity that contributes to the actual billing of transportation as a medical service.
 - Accompanying the student to a Medi-Cal covered service.
 - Calling 911.

Code 10 Examples

» Code 10

 "Arranged transportation for a student in Medi-Cal to attend a speech therapy appointment."

» Not Code 10

 "Arranged medical transportation for a school sporting event." (Code 9)

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Code 12 – Translation Related to Medi-Cal Services

- This code should be used when a TSP is providing translation services as a third party to facilitate access to Medi-Cal covered services.
- » Translation can only be allowable as an administrative activity if it is not included as part of a direct medical service.
- » Note: Translation services that occur during an IEP meeting may be assigned to Code 12 depending on the moment response.
 - TSP translating as 3rd party = Code 12
 - TSP translating own work = Code 2Z

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Code 12 Examples

» Code 12

 "I translated for a parent and the speech therapist during a meeting where they discussed Medi-Cal covered speech therapy services."

» Not Code 12

 "I was translating report card comments for a parent." (Code 11)

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Code 14 – Program Planning, Policy Development, and Interagency Coordination Related to Medi-Cal

- » This code should be used when TSPs perform activities associated with the development of strategies to improve the coordination and delivery of Medi-Cal covered services to students and their families.
- » This code can also be used when TSPs are performing collaborative activities with other agencies and/or providers for the purposes of increasing access to Medi-Cal covered services.
- For a moment to be coded to Code 14, the TSP should have program planning and/or policy development in their job description.

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Code 14 Examples

» Code 14

 "Met with the County Health Department to develop strategies for increasing the capacity of school Medi-Cal health programs."

» Not Code 14

 "Developing strategies to increase services offered to families and their children." (Code 13)

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Code 15 – Medi-Cal Claims Administration, Coordination and Training

- The code should be used when the TSP is a LEC or LEA coordinator and they are performing activities that are directly related to Medi-Cal Administrative Activities claims administration, coordination, and/or training activities.
- » This includes the following:
 - Related paperwork, clerical activities, or staff travel necessary to perform these activities.
 - Initiating and responding to e-mail and voicemail regarding Medi-Cal administration, coordination, and training.

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Code 15 Examples

» Code 15

 "As the district's MAA coordinator, I trained staff on state, federal, and local requirements for SMAA claiming."

» Not Code 15

• "I was completing payroll." (Code 1)

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Code 16 – General Administration / Paid Time Off

- » Code 16 should be used for general administration activities & paid time off.
- » The general administration activities must be administrative and clerical activities related to facilities, district functions, and operations.
- » This includes related paperwork, clerical activities, or staff travel to perform these activities.

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Code 16 – General Administration / Paid Time Off

- » Activities that must not be coded to Code 16:
 - Functions that are considered overhead:
 - Payroll.
 - Maintaining inventories.
 - · Developing budgets.
 - Executive functions.
 - · Similar overhead-related activities.
 - These activities are only allowable through the application of an approved indirect cost rate and must be coded to Code 1.
 - General administration related to students, instruction, and curriculum.
 - Any other activity that is not directly related to general administration of facilities, district functions, and operations.

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Code 16 Examples

» Code 16

- "I was completing an annual evaluation on a teacher."
- "I was interviewing SLPs to fill a vacancy."
- "I was filling out personal mileage reimbursement forms."

» Not Code 16

- "I was completing purchase orders." (Code 1)
- "I was checking e-mails." (Code 1)

Section 3: Non-Reimbursable SMAA Activity Codes

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Non-Reimbursable SMAA Activity Codes

- » Code 1 School-Related, Educational, and Other Activities
- » Code 3 Non-Medi-Cal Outreach
- » Code 5 Facilitating Application for Non-Medi-Cal Programs
- Code 7 Referral, Coordination, and Monitoring of Non-Medi-Cal Services
- » Code 9 Arranging Transportation for Non-Medi-Cal Services
- » Code 11 Non-Medi-Cal Translation
- Code 13 Program Planning, Policy Development, and Interagency Coordination Related to Non-Medi-Cal Services
- » Code 17 Not Working/Not Paid
- » Code 18 Invalid Moment/No Response

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Code 1: School Related, Educational, and Other Activities

- This code should be used for school-related activities that are not health related, such as:
- Social services
- Educational/teaching services
- Employment and job training that is specific to education/curriculum
- Other activities that are not health related
- » Note:
 - This code is the code of last resort. If the activity does not clearly fit in any other code, it should be coded to code 1.

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Code 1 Examples

- » Providing classroom instruction and monitoring student academic achievement.
- » Performing administrative activities or participating in training related to instructional or student-focused areas.
- » Preparing for or providing disciplinary behavior management principles to students.

Code 3 - Non-Medi-Cal Outreach

- This code should be used when a TSP is performing activities that inform eligible or potentially eligible individuals about non-Medi-Cal programs, such as:
 - Social
 - Vocational
 - Education
- » It also includes describing the range of benefits that are covered under those programs or explaining how to obtain enrollment in those programs.

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Code 3 Examples

- » Informing families about non-Medi-Cal wellness programs.
- » Conducting outreach campaigns to access social, educational, legal, or services not covered by Medi-Cal.
- » General preventive health education programs for lifestyle changes.

Code 5 – Facilitating Applications for Non-Medi-Cal Programs

- This code should be used when a TSP is informing an individual and/or family about programs such as CalWORKs, Food Stamps, WIC, childcare, legal aid, and other social or educational programs.
- » It includes related paperwork, clerical activities, or staff travel required to perform these activities.

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Code 5 Examples

- » Explaining the eligibility or assisting the individual/family on application for a non-Medi-Cal Program.
- » Helping a student fill out a CalWORKs health questionnaire or applying for college financial assistance.
- » Developing and verifying eligibility for the National School Lunch Program.

Code 7 – Referral, Coordination, & Monitoring for Non-Medi-Cal Services

- This code should be used when a TSP is making referrals for, coordinating, and/or monitoring the delivery of non-Medi-Cal services, such as educational services.
- » It includes related paperwork, clerical activities, or staff travel required to perform these activities.

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Code 7 Examples

- » Making referrals for, coordinating, or monitoring the delivery of scholastic, vocational, and other non-health-related examinations.
- » Inquiring if social services can assist with finding a childcare/after-school program for a foster youth student.
- » Discussing a student's lack of academic progress and developing a plan to support the student.

Code 9 – Transportation for Non-Medi-Cal Services

- This code should be used when a TSP is assisting or accompanying an individual to obtain transportation to services that are not covered by Medi-Cal.
- » It includes related paperwork, clerical activities, or staff travel required to perform these activities.

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Code 9 Examples

- » Scheduling or arranging transportation to social, vocational, educational, or any other non-Medi-Cal services, programs, and activities.
- » Arranging transportation for field trips or school sporting events.
- » Reviewing transport arrangements to take homeless students to a college placement interview.

Code 11 – Non-Medi-Cal Translation

- This code should be used when a TSP is providing translation services for non-Medi-Cal activities.
- » It includes related paperwork, clerical activities, or staff travel required to perform these activities.

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Code 11 Examples

- » Arranging translation related to social, educational, and vocational services.
- » Arranging translation with the secretary to assist a parent with finding childcare services.
- » Arranging translation services to assist the individual to access and understand the state education or state-mandated health screenings.

Code 13 – Planning/ Development/ Interagency Coordination

- This code should be used when TSPs perform collaborative activities with other agencies to develop strategies to improve coordination and delivery of non-medical/non-mental health services.
- » It includes related paperwork, clerical activities, or staff travel required to perform these activities.
- » Only TSPs whose position descriptions include program planning, policy development, and interagency coordination can perform this activity.

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Code 13 Examples

- » Identifying gaps or duplication of other non-medical services (e.g., social, vocational, and educational programs) to students and their families.
- » Meeting with the County Department of Social Services to discuss coordination of services.
- » Developing procedures for tracking families' requests for assistance with non-medical services and the providers of such services.

Code 17 – Not Working/ Not Paid

- » This code should be used when a TSP responds to a moment and indicates they were not working at the time of the moment, or they were on an unpaid lunch break or other unpaid break/time off.
- » Used for moments received by a position that is vacant.
 - Pre-certification
 - Post-certification
- » PPL # 19-030 provides further guidelines on TSP replacement and vacancies for RMTS.

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Code 17 Examples

- » My random moment happened during our lunch time. I was sitting at my desk eating my lunch.
- **Note:** The RMTS software will initially ask the TSP if they were working at the time of their assigned moment. LEA Coordinators may assist in verifying attendance during the coding review process.

Code 18 – Invalid Moment/No Response

This code should be used when an active TSP fails to provide a response to an assigned moment within the required four student attendance day response time.

» Note:

- For TSPs who were on leave but failed to notify their coordinator prior to the moment expiration, Code 18 will be initially assigned to a non-response until the TSP's leave status is verified by the LEA Coordinator.
- If the TSP's leave status can be verified as paid leave, the moment is <u>reassigned to Code</u>
 <u>16</u>. If the leave status is verified as un-paid leave, then the moment is <u>reassigned to Code</u>
 <u>17</u>.

» Example:

• When a TSP is at work during their moment and decides not to answer the moment within the specified time.

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Section 4: Direct Service Activity Codes (LEA BOP)

Code 2 – Direct Medical Services

- » Code 2 is split into two different sub-codes:
 - 2A (allowable under the LEA BOP) Medically necessary direct medical services, including:
 - Assessments
 - · Direct medical treatment services
 - Allowable Targeted Case Management (TCM) services
 - Extensions of a billable direct medical service
 - 2Z (unallowable) Includes a noncovered direct medical service, or an extension of a noncovered direct medical service.

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Pre-Sample Question

This question is asked to TSPs in Participant Pool 1

- "Was this activity related to an assessment or screening, or related to a service that is authorized in an Individualized Education Plan (IEP), Individual Family Service Plan (IFSP), or other service/care plan?"
 - Potential answers to pre-sample question:
 - Yes = Code 2A or 2Z (Review moment response to confirm).
 - No = Unlikely to code 2A. Review moment response and code accordingly.
 - Not Sure = Ask a Qualifying Question. Review moment response and code accordingly.

Code 2 – Direct Medical Services

- » An extension of a direct medical service includes, but is not limited to:
 - Patient follow-up
 - · Patient counseling
 - Patient assessment
 - Patient education
 - Parent consultations*
 - Billing activities
 - All related paperwork, clerical activities, or staff travel required to perform these
 activities.

*Parent consultations may also be Code 8 (referrals for, coordinating, and/or monitoring the delivery of Medi-Cal covered services), depending on moment response. Teacher consultations can also be Code 2 or Code 8 depending on the TSP's Cost Pool.

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Code 2A – Allowable Direct Medical Services Examples

- Providing direct treatment services, such as speech, occupational, physical, and other therapies.
- » Assessment of students, including mandated screening tests.
- » Interviewing student and/or parent when conducting an assessment.
- » Completing treatment session notes.
- » Traveling to and from the treatment location.
- » TCM related direct medical service activities.
- » Specialized physical health care services such as catheterization, gastric tube feeding and suctioning.
- » Mental health counseling, including substance abuse counseling and guidance.
- » Following cleaning protocols before/after student specific service (including COVID protocols).

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Code 2A – Direct Medical Services Examples

- » "I was writing a report for a speech assessment."
- » "I was assessing a student's hearing."
 - General screenings are code 2A if done by a TSP from Pool 1
- "I was writing a student assessment report in preparation for an upcoming Individualized Education Program (IEP) meeting."
- "I was discussing a student's psychological assessment results with his parent."
- » "I was completing progress notes for a student that had just finished a therapy session."
- "I was referring a student to another medical practitioner to receive additional medical services per the student's care plan."

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Code 2Z – Unallowable Direct Medical Services Examples

- Direct care services that are not medically necessary (e.g., treatments not listed in an IEP meeting, IFSP meeting or IHSP).
- » Administering first aid or emergency services.
- » Participating in IEP/IFSP meetings.
- » Supervising a direct medical service.
- » This could be a Code 16 for general administration/paid time off → Ask a Clarifying Question.
- » Supervisory review of treatment logs or progress notes.
- » Providing Applied Behavioral Analysis (ABA) services to a student.
- » Monitoring students related to a short-term illness or recent injury.
- » Any direct medical service response by a Pool 2 TSP.
- » General cleaning up/organizing materials for the next day.

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Code 2Z – Unallowable Direct Medical Services Examples

- » "I was taking the temperature of a student with a headache."
- "I was providing first aid to a student."
- » "I was inventorying medical supplies."
- "I was reporting out a student's psychological assessment results during a student's IEP meeting."
- » I was editing an IEP."

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Code 2 - FAQ #1

Q: In a situation where a TSP responds to a moment by saying they were discussing a student's covered direct medical service with another TSP, does it matter if the TSP was the service practitioner or the consulting practitioner?

- » A: For moments when two direct service practitioners are discussing services that one of them is providing to a student, it would be coded as follows:
 - If the TSP responding is the one providing the services, it would be Code 2A as an extension of a direct medical service.
 - If the TSP is talking to the direct service practitioner and discussing services that the practitioner is providing, it would be Code 8 for coordination of services.

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Code 2 - FAQ #2

Q: A Participant Pool 1 TSP answered "no" to the moment being related to a care plan. But the moment response identified that the action was related to an IEP. Would the moment be coded 2A and override the initial "no" response?

» A: Yes. The moment would be coded 2A and override the initial "no" response if the moment clearly indicates that it was a part of a care plan.

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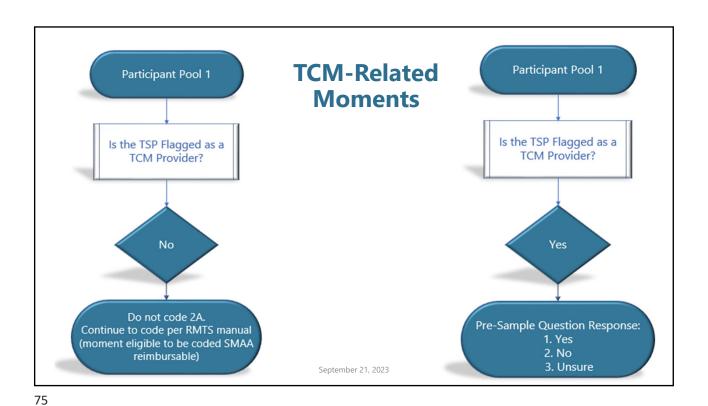
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Code 2 – FAQ #3

Q: If a TCM-certified TSP provides a moment response that indicates they completed TCM related services, how would it be coded?

- » A: The coder must look at the TSP's response to pre-sample question #2 and proceed as described below. If the TSP's response to pre-sample question #2 was:
 - Not sure → Ask a clarifying question and code according to the RMTS manual.
 - No → Cannot be Code 2A. Continue coding per the RMTS manual.
 - Yes → Code to either Code 2A or 2Z.
- » Please remember: Moments from TCM certified TSPs in Participant Pool 1 cannot be coded to codes 8, 10, or 12.

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Coding TCM-Related Moments

» If the TSP is TCM-certified for LEA BOP, then you check the TSP's answer to the pre-question.

Vestigate of the pre-question of the pre-

Code 2A or 2Z

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Ask a clarifying question to get more information if necessary.

If not, continue coding to the RMTS

Manual.

Do not code 2A, 8, 10 or 12.

Continue coding to RMTS Manual

Training Related FAQ

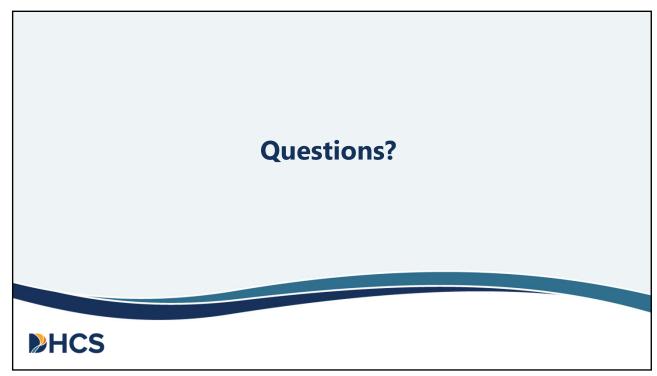
Q: What differentiates the trainings being coded to Codes 1, 2Z, or 16?

- » Code 1 is typically used for trainings that are school, curriculum, or education related.
- » Code 2Z is for Participant Pool 1 TSPs being trained on how to conduct a direct service.
- » Code 16 is used for trainings that are more general in nature, including school/district wide trainings.

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Section 5: Health Education and Anticipatory Guidance

Current Policy

- » The <u>Bright Futures Periodicity Schedule</u> includes routine health education/ anticipatory guidance (e.g., age-appropriate risk factor reduction counseling).
- Considered to be an assessment in the LEA BOP; must be a face-to-face, individual service or telehealth.
- » Health education and anticipatory guidance can be provided by:
 - · Physicians and physician assistants
 - Licensed/credentialed psychologists
 - · Licensed/credentialed social workers and associate clinical social workers
 - Marriage and family therapists and associate marriage and family therapists
 - School counselors
 - Nurses
- » LEA BOP is in the process of implementing additional guidance to LEAs on what constitutes health education/anticipatory guidance.

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Service Examples

- » Promoting an alcohol and drug-free lifestyle/preventing alcohol and drug use.
- » Promoting healthy eating and nutrition.
- » Promoting mental and emotional health (discussing signs/symptoms of depression, anxiety, or other behavioral health issues).
- » Promoting physical activity and personal health/wellness.
- » Promoting safety and injury prevention.
- » Promoting a tobacco-free lifestyle.
- » Preventing violence and intentional injury.
- » Providing information on pregnancy and STD/STI prevention.
- » Providing information about the benefits of healthy lifestyles and practices.
- » Providing age-specific information on health and safety-related topics.

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Coding – 2A versus Other Codes

» Code 2A (when pre-question response is 'yes'):

- Risk-factor reduction counseling
- Discussions with parents on age-appropriate development or concerns
- Discussions on risks of alcohol and drug abuse with a student
- Pregnancy prevention discussions with a student
- Crisis intervention (e.g., meeting on grief/loss, suicidal ideation)

» Would <u>Not</u> Classify as Code 2A:

- On-going grief counseling services for students without a care plan
- Sending flyers home with students
- Talking to an entire class about benefits of a healthy lifestyle
- Doing a suicide awareness/prevention talk with a classroom
- Discussing puberty/sex ed with a 5th grade class

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Moment Review Example #1 SCHOOL PSYCHOLOGIST

Participant Pool: 1

PS Q2: Not sure

Who: Guidance counselor and a student.

What: Suicide risk assessment

Why: Student reported wanting to harm self.

CQ Asked: What kind of plan resulted from the assessment, if any?

CQ Response: A support plan was developed with student and parent when

she came in to pick him up, provided referral for counseling and

important phone numbers, parent will communicate with

current psychiatrist.

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Answer #1 Code

2A

Reason: A one-on-one risk factor reduction service is being provided as a direct service and qualifies for Code 2A.

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Moment Review Example #2 LICENSED MARRIAGE AND FAMILY THERAPIST

Participant Pool: 1

PS Q2: Yes

Who: Student

What: Talking to a student and providing grief support after loss of

a parent.

Why: Student is in crisis and struggling with loss.

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Answer #2 Code

2A

Reason: A one-on-one anticipatory guidance is being provided.

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Moment Review Example #3 SCHOOL COUNSELOR

Participant Pool: 1

PS Q2: No

Who: Myself

What: Developing a flyer on mental health resources and

programs.

Why: Post-COVID mental health struggles.

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Answer #3 Code

3

Reason: General preventative health education programs or campaigns addressed to lifestyle changes in the general population; this is not a direct service so not eligible for Code 2A.

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Moment Review Example #4 LICENSED CLINICAL SOCIAL WORKER

Participant Pool: 1

PS Q2: No

Who: The crisis team of a local high school.

What: Presenting a professional development on suicide risk

assessment.

Why: To train the school crisis teams on policy and

protocol.

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Answer #4 Code

16

Reason: Although this involves a risk factor reduction topic, this is not a direct service, it is a training.

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Moment Review Example #5 SCHOOL NURSE

Participant Pool: 1

PS Q2: No

Who: A diabetic student.

What: Reviewing glucose monitor, warning signs and action steps

when levels are low.

Why: The student's glucose levels were low, and I was helping her

understand what could have led to this and what to do next

time.

CQ: Does this student have a care plan, such as an IEP or 504

Plan, in place?

Response: Yes, she has a 504 Plan for management of diabetes.

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Answer #5 Code

2A

Reason: Although the pre-question was no, a CQ clarified that there is a 504 Plan in place for this student related to her diabetes, therefore making this a 2A.

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Section 6: Interrelated, Parallel, and Non-Parallel Activity Codes

| Activity Codes | | | | |
|-----------------------|---|---|--|--|
| rictivity codes | SMAA Parallel Codes | | | |
| | Non-Medi-Cal | Medi-Cal | | |
| Parallel | Code 3 Non Medi-Cal Outreach | Code 4 Medi-Cal Outreach | | |
| Non-Parallel | Code 5 Facilitating Application for Non Medi-Cal Programs | Code 6 Facilitating Medi-Cal Application | | |
| Interrelated | Code 7 Referral, Coordination, and Monitoring of Non Medi-Cal Services | Code 8 Referral, Coordination, and Monitoring of Medi-Cal Services | | |
| LEA BOP | Code 9 Arranging Transportation for non-Medi-Cal Services | Code 10 Arranging Transportation in Support of Medi-Cal Services | | |
| 2A 2Z | Code 11 Non Medi-Cal Translation | Code 12 Translation Related to Medi-Cal Services | | |
| | Code 13 Program Planning, Policy Development, and Interagency Coordination Related to Non Medi-Cal Services | Code 14 Program Planning, Policy Development, and Interagency Coordination Related to Medi-Cal Services | | |
| September 21, 2023 95 | | | | |

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Activity Codes

Parallel

Non-Parallel

Interrelated

| SMAA Non-Parallel Codes | | |
|--|---|--|
| Code 1 School-Related, Educational, and Other Activities | Code 15 Medi-Cal Claims Administration, Coordination and Training | |
| | Code 16 General Administration/Paid Time Off | |
| | Code 17 Not Working/Not Paid | |
| | Code 18 Invalid Moment/No Response | |

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Activity Codes

Parallel

Non-Parallel

Code 1

School-related, Educational, and Other Activities

&

<u>Code 16</u> General Administration/Paid Time Off

Interrelated

Code 2

Direct Medical Services

&

Code 8
Referral, Coordination, and
Monitoring of Medi-Cal
Services

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Code 1

School-related, Educational, and Other Activities

- · School-related activities that are not health-related
- Activities specific to education/curriculum
 - · Teaching services
 - · Social services
 - Training services
- Includes activities that are primary job duties outside of those relating to Medi-Cal
- "Last Resort" Code
 - If an activity does not clearly fit in any other code, it should be coded to code 1.



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<u>Code 16</u>

General Administration/Paid
Time Off

Facilities, District Functions & Ops

• General administration duties that are **specific to** administrative/clerical activities related to facilities, district functions and operations

Paid Time Off

- · This code also captures paid time off.
 - · Defined as an individual who is being paid but is not at work
 - · Includes lunch, breaks, leave, vacation or other paid time not at work

Training

- Must be general in nature and unrelated to curriculum, instruction or students
 - · School-wide training, Professional Development, Staff meeting



Note: If an activity does not fit into a specific activity code, then it must be coded to code 1 and <u>not to code 16</u>.

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<u>Code 1</u> School-related, Educational, and Other Activities

Vs.

<u>Code 16</u> General Administration/Paid Time Off

| Code 1 | Code 16 |
|---|---|
| Education Requirements Performing administrative or clerical activities specific to instructional, curricular, student-focused areas (e.g., attendance) Performing activities related to immunization requirements for school attendance Enrolling new students or obtaining registration information Compiling, preparing, and reviewing reports on textbooks or attendance Reviewing the education record for students who are new to the school Conducting external relations related to school/educational issues/matters | Education Requirements • Does not qualify under Code 16 |
| Instruction Providing classroom instruction (including lesson planning) Testing, correcting papers, completing reports Monitoring student academic achievement | • Does not qualify under Code 16 |



| <u>Code 1</u> | Code 1 | Code 16 |
|---|---|--|
| School-related, Educational, and Other Activities VS. Code 16 | • Developing, coordinating, and processing the components of the IEP for a student, which includes ensuring that annual reviews of the IEP are conducted, parental sign-off is obtained, IEP meetings are scheduled, and the IEP is completed | • Does not qualify under Code 16 |
| General Administration/Paid Time Off | Performing administrative or clerical activities related to general operations such as accounting, budgeting (including budget development and monitoring of program expenditures), payroll, purchasing and data processing (when these activities are not included in the indirect rate) Compiling, preparing, and reviewing reports related to instruction, curriculum, or student operations | Operations Fulfilling administrative and oversight responsibilities as Assistant Superintendent, Principal, or Assistant Principal Compiling, preparing, and reviewing reports related to overall general operations, but unrelated to the instructional, curricular, or student information |
| Interrelated V | September 21, 2023 | 101 |

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Code 1 Code 16 Code 1 School-related, Educational, **Meetings and Training Meetings and Training** and Other Activities • Coordinating, participating in, or Coordinating, participating in, or presenting training necessary to presenting training related to curriculum, instruction, student focused clarify site and district policy, areas with the goal to improve the procedures or issues related to Vs. delivery of student services for employees. programs other than Medi-Cal. Attending or facilitation of school or unit staff meetings, board meetings, Attending or facilitation of school or unit Code 16 staff meetings, board meetings, or or required in-service trainings and General Administration/Paid required in-service trainings and events events (not related to curriculum, Time Off related to curriculum, instruction, or instruction, or students). student focused areas including Professional Development trainings discipline and behavior. **Review and Planning Review and Planning** Reviewing technical literature and · Reviewing articles related to curriculum research articles. and instructional services. Evaluating curriculum and instructional services, student/teacher policies, and procedures as they relate to student instruction for the school site or district. Interrelated September 21, 2023

| | Code 1 | Code 16 |
|--|--|---|
| Code 1 School-related, Educational, and Other Activities VS. Code 16 General Administration/Paid | Supervision Providing general supervision of students (e.g., playground, lunchroom) Conferring with students/parents about discipline, academic matters, or other school non-health related issues Applying discipline activities with students Handling behavioral issues with students | Providing general supervision of staff, including supervision of student teachers or classroom volunteers Evaluation of employee performance (including person being evaluated) |
| Time Off | Survey Participant Paperwork Paperwork related to initial IEP development Completing student academic progress reports | Survey Participant Paperwork • Completing expense claims as required for work-related travel |
| | Paid Time off Does not qualify under Code 1 | Paid Time off Paid time off (when you are being paid, but you are not at work) |
| Interrelated | September 21, 2023 | Includes vacation days, jury duty, sick leave and lunch breaks (if it is paid time) 109 |

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Code 8

Referral, Coordination, and Monitoring of Medi-Cal Services

- Referrals for, coordinating, and/or monitoring the delivery of Medi-Cal covered services
- Includes:
 - Related paperwork, clerical activities, or staff travel necessary to perform these activities
 - Gathering any information in advance that may be required for medical/dental/mental health referrals



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Code 8

Referral, Coordination, and Monitoring of Medi-Cal Services

42 CFR 440.169

- Ensure the care plan is effectively implemented
- Monitoring may be conducted as frequently as necessary to help determine whether the following conditions are met:
 - Ensuring services are being furnished in accordance with the individual's care plan;
 - Ensuring services in the care plan are adequate; and
 - Reviewing if there are changes in the needs or status of the eligible individual
- Adjustments to the care plan and service arrangements with providers



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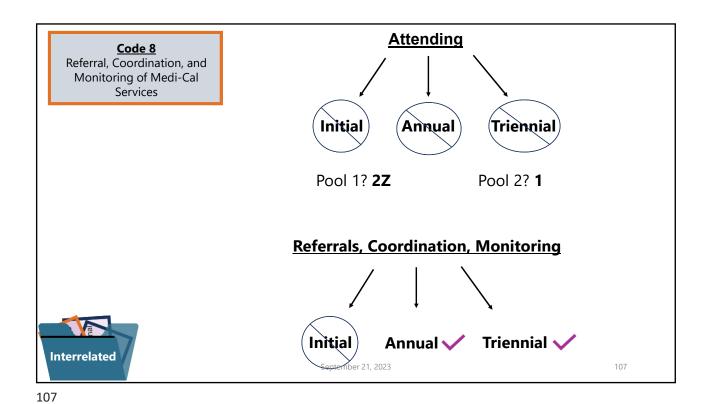
Code 8

Referral, Coordination, and Monitoring of Medi-Cal Services

- Attending IEP meetings is part of an education mandate and <u>must not be assigned to Code 8</u>.
 - Initial assessments leading to IEP meetings must not be assigned as Code 8.
 - Once an IEP is established, Code 8 can be assigned to referrals, coordination, and monitoring of services.
- Referral, coordination and monitoring of services provided <u>outside of an IEP/IFSP</u> may be assigned as Code 8.



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Vs.



- The TSP's Participant Pool should be examined when coding for Code 2 versus Code 8.
- Moments for TSPs in <u>Participant Pool 2</u> should never be assigned to Code 2A; however, Code 2Z may be relevant for these TSPs:
 - For example, a speech language pathologist in Participant Pool 2 may submit a moment related to the provision of speech therapy services.
- When two direct service practitioners are discussing a student's progress, it is important to examine which TSP is performing the direct medical service.
- The TCM Decision Tree will help central coding staff evaluate TCM-related moments.



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Section 7: Clarifying Questions

109

Definition

- » Clarifying Questions (CQs)
 - Open-ended question used to gain additional information to assign the correct activity code.

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Clarifying Question for RMTS Pre-Sample Question

- » Guidance is specific for Participant Pool 1 TSPs.
- » Effective SFY 2021-22:
 - Coders should ask Participant Pool 1 TSPs a clarifying question when their response to pre- sample question 2 ("Was this activity related to an assessment or screening, or related to a services that is authorized in an IEP, IFSP or other service/care plan?") directly conflicts with the TSP's narrative to the moment.
- » For example:
 - If the TSP responds "no" to pre-sample question 2, but their narrative response references an IEP student and/or services.
 - In this case, DHCS suggests asking a clarifying question, such as "Was the activity being conducted at the time of your moment related to services authorized in an IEP, IFSP or service/care plan? or " Was the activity being conducted at the time of your moment related to an assessment [or screening] service?".

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Clarifying Questions (CQs)

- » Are relayed through the System Software Platforms.
- » Must be open-ended and cannot be a leading.
- » Used to gain clarity on moment responses.
- » No more than two (2) can be asked for a given moment response.
 - Both CQs must be issued within 15 calendar days from the moment response.
- » May be presented in the form of a statement.
- » A 10% sample is reviewed quarterly.
- » Reminder: When in doubt ask a CQ.

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Example of Open-ended Questions

- » In detail, what were you discussing during the one-minute survey?
- » Can you describe the topic being discussed during the time of the one-minute survey?
- » Without violating privacy, can you provide detail of what was being discussed during the one-minute survey?
- » Please indicate what was being discussed during the IEP meeting.
- » Note: No Personal Identifiable Information (PII).

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Example of Leading Questions

- » Did you discuss a Medi-Cal service at the meeting you attended?
- » You were performing a Medi-Cal service, correct?
- » Is the activity described in this moment related to a Medi-Cal service?

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Section 8a: Moment Response and Code Assignments (SMAA)

115

Moment Response #1 HEALTH CARE ASSISTANT

Participant Pool: 1

PS Q2: No.

Who: I was alone.

What: I was delivering supplies.

Why: Classrooms needed face mask for adults and

children, disinfecting wipes, and gloves.

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Answer #1 Code

1

Reason: Anything related to illness prevention protocols would fall under code 1.

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Moment Response #2 PRINCIPAL

Participant Pool: 2

Who: I was by myself.

What: I was on the computer.

Why: I was checking e-mails.

CQ1: Please describe the nature of the e-mail.

Response: The e-mail was regarding renting the football field

for an event.

September 21, 2023 118

Answer #2 Code

16

Reason: Typically checking e-mails would be code 1; however, this was related to general school facilities, it is code 16.

September 21, 2023 1

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Moment Response #3 SCHOOL PSYCHOLOGIST

Participant Pool: 1

PS Q2: Yes.

Who: I was with the speech language pathologist.

What: We were discussing special education programs and speech

language services for a student who was just assessed for initial

placement.

Why: We were performing this activity to determine what the student

will need in order to progress in his educational development.

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Answer #3 Code

1

Reason: Developing the initial IEP is a part of an education mandate. This includes related activities such as developing the initial IEP goals, determining eligibility for special education, determining the student's placement, and writing the IEP.

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Moment Response #4 SPEECH LANGUAGE PATHOLOGIST

Participant Pool: 1
PS Q2: No.

Who: No one, I was by myself.

What: I was writing an e-mail to another Speech Language Pathologist in another

district.

Why: To try and obtain a file for a student.

CQ 1: Please elaborate further on the purpose of the e-mail written during the 1-

minute moment and expand on the reason for obtaining the student file.

Response: There is a new student enrolling at Brightwood, and parents do not have a

copy of the child's IEP. I was writing an e-mail to the previous SLP to obtain

a copy of the student's IEP and to request his file be sent over.

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Answer #4 Code

8

Reason: SLP to another SLP requesting information for coordination of Medi-Cal service.

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Moment Response #5 SPEECH LANGUAGE PATHOLOGIST Pool 1

Participant Pool: 1

PS Q2: Yes.

Who: I was with the school psychologist.

What: I was discussing a new student who will be transitioning to ATP during the

summer.

Why: To learn about a new student's speech/language goals and services,

including her AAC needs.

CQ 1: Please define the acronyms ATP and AAC. Please avoid using acronyms

when responding to your moment.

Response: Adult Transition Program (ATP) and Augmentative and Alternative Communication

(AAC)

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Answer #5 Code

8

Reason: Based on 8L from the SMAA Manual. The TSP was discussing with the school psychologist to coordinate or review a student's needs for health-related services covered by Medi-Cal.

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Moment Response #6 COORDINATOR OF SPECIAL EDUC

Participant Pool: 2

Who: Alone.

What: Running a Preschool Special Education Transition Meeting.

Why: Preschool aged students transition to Kinder and must have an

IEP meeting.

CQ 1: What type of services does the preschool student currently

receive that will be transitioned to an IEP?

Response: Speech and Language, Specialized academic instruction,

Occupational Therapy

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Answer #6 Code

1

Reason: Code 1 because developing the initial IEP is a part of an education mandate.

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Moment Response #7 COUNSELOR

Participant Pool: 2

Who: A student.

What: Explaining wellness services.

Why: Student self-referred and wanted more information.

CQ 1: Please provide detail of the type of wellness services

you were explaining during the one-minute survey?

Response: Counseling in our wellness center.

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Answer #7 Code

7

Reason: Wellness services are not considered Medi-Cal related services.

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Moment Response #8 SPEECH/LANGUAGE SPECIALIST

Participant Pool: 1

PS Q2: Yes.

Who: Myself.

What: Parent phone calls, left voicemails with both parents.

Why: To request that parents sent AT/AAC (Augmentative and Alternative

Communication Device) device for communication to school with

student.

CQ 1: What does AT/AAC stand for?

Response: AT/AAC is an Augmentative and Alternative Communication

Device.

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Answer #8 Code

8

Reason: The TSP was Coordinating the completion of the prescribed services.

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Moment Response #9 SDC TEACHER

Participant Pool: 2

Who: I was working with students in Directed Study class who have IEPs or

504s.

What: I was working with a student who was struggling in an online English

class, and she was stressed and overwhelmed near the point of tears. We determined a game plan on how to manage her stress and

we determined a game plan on now to manage her stress and

reached out to her counselor.

Why: As part of my position, I work with students on a variety of different

subjects and try to support mental health as they arise, but staffing is

thin with counselors and school psychologists.

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Answer #9 Code

1

Reason: Please re-assign to Code 1 per SMAA Manual section 5-3 letter D. Should have asked a clarifying question asking what specific activity the TSP was performing during the 1-minute moment.

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Moment Response #10 DIRECTOR

Participant Pool: 2

Who: Special Ed Administrators.

What: Planning for the mental health needs of

students.

Why: A part of my job.

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Answer #10 Code

1

Reason: A CQ is needed to determine what type of planning the TSP was doing; educational assistance, assessments, referrals, staffing, etc. Without knowing that, it can't be accurately coded and can't be reimbursed by SMAA.

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Moment Response #11 PSYCHOLOGIST

Participant Pool: 1

PS Q2: Yes.

Who: Behavior Specialist II, Lead Special education teacher,

assistant principal, and speech therapist.

What: Developing a behavior support plan for a student with an IEP.

Why: Student's negative behaviors have escalated in the last week,

so the team came together to develop a behavior plan for this

student before he returns from suspension.

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Answer #11 Code

8

Reason: Referral, Coord., and Monitoring of Medi-Cal Services. However, please ask a CQ next time to determine 2 things:

- 1) If the student already had behavioral interventions in their IEP
- 2) If this occurred during an IEP meeting

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Moment Response #12 PSYCHOLOGIST

Participant Pool: 1

PS Q2: Yes.

Who: Teacher of Special Education.

What: Discussing a behavior of a student.

Why: Due to a behavior incident on Thursday.

Discussion included scheduling an IEP to

document incident.

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Answer #12 Code

1

Reason: Behavioral issues are typically Code 1 unless already established through an IEP. A CQ should have been asked to clarify if the student already had an IEP, or if the TSP wanted to create an initial IEP. Without knowing that, we can't allow it to be coded to a reimbursable code.

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Moment Response #13 CREDENTIALED SCHOOL PSYCHOLOGIST

Pool: 1

PS Q2: Yes.

Who: School Psychologist.

What: Consult for Behavior.

Why: Planning for behavior intervention.

CQ 1: Please confirm, was this consultation for a student? If so, who

will be presenting and working with the student towards their

behavior intervention?

Response: It was for a student, and the school psychologist I was

consulting with will be working with the IEP team.

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Answer #13 Code

8

Reason: It is a code 8 activity based on section 5-10 bullet L, "Participating in a meeting/discussion to coordinate or review a student's needs for health-related services covered by Medi-Cal."

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Moment Response #14 LICENSED OCCUPATIONAL THERAPIST

Pool: 1

PS Q2: Yes.

Who: SPED Teacher.

What: Discussing tomorrow's morning occupational therapy

group.

Why: Creating secondary plans, due to having to be in an

IEP at that time.

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Answer #14 Code

1

Reason: Without a CQ, we can't determine whether the secondary plans were OT or educationally based.

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Moment Response #15 OFFICE CLERICAL STAFF

Pool: 2

Who: I was alone in my office.

What: Working on submitting Office Depot and Southwest

orders for the end of the school year.

Why: To supply the school with necessary items to end the

school year.

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Answer #15 Code

1

Reason: TSP is performing clerical activities specific to instructional or curriculum areas.

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Moment Response #16 CREDENTIALED SCHOOL COUNSELOR

Pool: 1

PS Q2: No.

Who: School Principal, 2 Sixth Grade Teachers, and a consultant

specializing in Positive Behavior Intervention Supports applications.

What: We were going through Tier 1, 2, and 3 data filling out the Positive

Behavior Intervention Supports application for Sky View Elementary.

Why: Every year our school applies for an award/recognition for the

Positive Behavior Intervention Supports we are providing for our

students on campus.

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Answer #16 Code

1

Reason: Would not be Code 16 because it is meant for the general administration of building and facilities. This should be code 1 as it is related to receiving an award. It is important to consider if Medi-Cal should be paying for this activity. Code 1 should be code used if the activity does not fit in any other code.

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Section 8b: Moment Response and Code Assignments (LEA BOP)

Code 2A and 2Z

- » In LEA BOP, there are two codes that are reviewed which are code 2A and 2Z.
 - » Code 2A Includes medically necessary direct medical services, or an extension of direct medical services that are allowable covered services under the LEA BOP.
 - » <u>Code 2Z</u> This code includes non-covered direct medical services, or an extension of non-covered direct medical service.

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LEA OPS – Our Reviews

- What it looks like:
 - » We pull moments and sort for all 2A and 2Z moments
- » What we look for:
 - » How the TSP responded to the pre-sample question
 - » If the moment is related to a billable direct service
 - » Whether the moment was performed by an allowable service practitioner
 - Whether or not the moment is related to an IEP, IFSP, or other IHSP/Care Plan (if needed for that particular service)
 - » Make sure that no Personal Health Information (PHI) has been mistakenly added to the moment responses
- » What we use:
 - » SMAA Manual Section 5
 - » LEA BOP Provider Manual

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Moment Response #1 OCCUPATIONAL THERAPIST

Participant Pool: 1

PS Q2: Yes.

Who: I am by myself.

What: I was organizing treatment supplies and

creating a sample project for a pending OT

sessions.

Why: In order to provide students with an activity

related to the acquisition of their IEP goals.

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Answer #1 Code

2A

Reason: This moment is an extension of a covered LEA BOP occupational therapy service for an IEP student and is considered a Code 2A.

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Moment Response #2 LICENSED SPEECH LANGUAGE SPECIALIST

Participant Pool: 1

PS Q2: Yes.

Who: By myself.

What: I was writing a report for an upcoming IEP meeting.

CQ: What report were you writing?

A: I was writing an assessment report.

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Answer #2 Code

2A

Reason: Code 2A includes evaluating the student and developing a report that will be presented at an upcoming IEP meeting.

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Moment Response #3 LICENSED SPEECH LANGUAGE SPECIALIST

Participant Pool: 1

PS Q2: Yes.

Who: By myself.

What: I was editing/finalizing an IEP.

Why: In preparation for an upcoming IEP meeting.

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Answer #3 Code

2Z

Reason: Preparing for IEP/IFSP meetings, including writing or editing an IEP/IFSP is not a medically necessary service. (Note: the IEP/IFSP is a requirement of Department of Education, not Medicaid)

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Moment Response #4 LICENSED NURSE

Participant Pool: 1

PS Q2: Yes.

Who: Myself in the office.

What: Talking to a parent to update a health

assessment.

Why: To finish a health assessment for an upcoming

IEP meeting.

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Answer #4 Code



Reason: Code 2A includes interviewing the parent/guardian when conducting an assessment.

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Moment Response #5 SPEECH LANGUAGE PATHOLOGIST

Participant Pool: 1

PS Q2: Yes.

Who: I was by myself.

What: I was documenting therapy services.

Why: I was reporting what happened in the student's

session today.

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Answer #5 Code

2A

Reason: Documenting direct services are considered a Code 2A (extension of a medical service).

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Moment Response #6 LICENSED VOCATIONAL NURSE

Participant Pool: 1

PS Q2: No.

Who: Myself.
What: Driving.

Why: To get to my next student.

CQ 1: What services would you provide student upon arrival and is

it an IEP directive service?

Response: Yes, I was driving to see a student with an IEP. I am a

diabetic nurse and my students that day were at different school

sites.

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Answer #6 Code

2A

Reason: Travel to or from a direct service is an example of indirect service time. Since the student has an IEP, this moment is considered a 2A.

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Moment Response #7 LICENSED OCCUPATIONAL THERAPIST

Participant Pool: 1

PS Q2: Yes.

Who: I was by myself.

What: I was researching an adaptive device for a student to

use in therapy sessions and in the classroom due to

motor deficits.

Why: To improve effective treatment for a student with

cerebral palsy.

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Answer #7 Code

2A

Reason: This qualifies as pre-service time for a direct medical service.

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Moment Response #8 LICENSED SPEECH THERAPIST

Participant Pool: 1

PS Q2: Yes.

Who: Student.

What: I was completing a standardized assessment

with a 3rd grade student.

Why: I was completing this assessment as part of a

triennial evaluation.

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Answer #8 Code



Reason: Completing an assessment for a triennial evaluation is considered a Code 2A.

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Moment Response #9 CREDENTIALED SCHOOL PSYCHOLOGIST

Participant Pool: 1

PS Q2: Yes.

Who: Special education teacher, 2 instructional assistants, and 7 special education pre-

school students.

What: I was conducting an observation of a student in a pre-school special education class.

Why: I was performing this activity as part of a comprehensive assessment for the

purpose of transition planning to kindergarten next school year.

CQ 1: Please elaborate further on the reason for the comprehensive assessment in which

you were observing the student during the 1-minute moment.

Response: The reason for the comprehensive assessment for this student is a mandated

Transition-to-Kinder assessment as the student is currently in a pre-school special

day class and will be in kindergarten next year.

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Answer #9 Code



Reason: Observing a student in the classroom to gather information for the student's assessment is a Code 2A.

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Moment Response #10 LICENSED/CREDENTIALED SPEECH-LANGUAGE PATHOLOGIST

Participant Pool: 1

PS Q2: Yes.

Who: Student and parent.

What: Consulting with the parent, providing strategies to

support language development at home.

Why: As part of the student's IEP to facilitate language

development.

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Answer #10 Code



Reason: this is an example of allowable pre- and post-service.

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Moment Response #11 CREDENTIALED SPEECH LANGUAGE PATHOLOGIST

Participant Pool: 1

PS Q2: Yes.

Who: I was by myself.

What: I was entering progress reports into SIS.
Why: This activity is related to my student's IEPs.

CQ 1: Please specify and provide further details on the aspect of the IEP you were

entering into SIS during the 1-minute moment.

Response: Progress notes.

CQ 2: Please specify the aspect of the IEP the progress notes worked on during the 1-

minute moment address.

Response: I was entering student progress notes into the SIS system for the students on my

caseload.

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Answer #11 Code



Reason: Paperwork associated with the delivery of direct care services, including the preparation of progress notes, is a Code 2A.

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Moment Response #12TRAINED HEALTH CARE AIDE

Participant Pool: 1

PS Q2: No.

Who: I was with staff and students.

What: I was helping students with educational chores.

Why: These chores are on their IEPs to help with life

skills.

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Answer #12 Code

2A

Reason: This is a moment describing a THCA assisting in IEP directed activities of daily living (ADL), which are allowable.

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Moment Response #13 CREDENTIALED SPEECH LANGUAGE PATHOLOGIST

Participant Pool: 1

PS Q2: Yes.

Who: I was in the office by myself.

What: I was writing an assessment report.
Why: To finish assessing the student.

CQ 1: Please specify the type of assessment report written during the minute moment.

Response: Tri

CQ 2: Please specify the reason for the triennial assessment report written during the 1-minute

moment and provide further details on what the assessment addresses.

Response: The assessment is to evaluate student's use of an AAC device.

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Answer #13 Code

2A

Reason: Writing a report to summarize assessment results and recommendations is considered a Code 2A.

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Moment Response #14 PSYCHOLOGIST

Participant Pool: 1

PS Q2: No.

Who: I was by myself.

What: I was cleaning the table, and chair where I will be testing a

student later, the person that tested a student the day

before didn't wipe it down.

Why: For my safety and the safety of the students coming on

campus to test for their assessment.

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Answer #14 Code

2A

Reason: Pool 1 practitioners following cleaning protocols before/after student specific service is covered under code 2A.

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Moment Response #15 SPEECH LANGUAGE PATHOLOGIST

Participant Pool: 1

PS Q2: Yes.

Who: I was by myself.

What: I was creating a lesson for a group therapy

session.

Why: I have a session tomorrow and need to

develop materials.

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Answer #15 Code

2A

Reason: Planning activities for services when students have IEPs/IFSPs/Care Plans are considered a Code 2A.

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Moment Response #16 SCHOOL NURSE

Participant Pool: 1

PS Q2: No.

Who: Knights Ferry staff.

What: Vision screening for second graders.

Why: Mandatory screening.

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Answer #16 Code



Reason: A CQ should have been asked. Was the TSP conducting a screening, in a training about vision screening, taking a break during the vision screening? This moment response does not allow for accurate coding.

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Moment Response #17 SCHOOL NURSE

Participant Pool: 1
PS Q2: No.

Who: Coworker.

What: Checking incoming e-mails regarding new medication orders for a

student that is not on an IEP.

Why: New medication orders need to be reviewed by the nurse.

CQ 1: For the new medication orders that you were reviewing at the time

of your moment (8:18 AM), can you please clarify what type of medical/health need it was addressing and if it will be included on

a care plan?

Response: It was for an Epi Pen due to an allergy to fish. No separate care plan

will be done.

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Answer #17 Code

2Z

Reason: The student does not have a care plan (and one will not be developed, as noted in the moment response).

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Moment Response #18 SPECIAL EDUCATION TEACHER

Participant Pool: 2

Who: My co-teacher, paraprofessional, and our class of

students.

What: I was providing training and coaching to the paraprofessional

regarding the support needs of one of the students with an IEP.

Why: I was performing this activity because the student has complex needs

including communication needs, executive function needs, motor planning needs, and self help needs. Specific training is essential for

the student to be properly supported.

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Answer #18 Code

2Z

Reason: This is a participant pool 2 practitioner so the moment would not be eligible for a Code 2A. Based on the SMAA Manual, Code 2Z, bullet D reads, "Training a direct service practitioner on how to conduct a direct service".

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Moment Response #19 SCHOOL NURSE

Participant Pool: 1

PS Q2: Yes.

Who: Working alone.

What: I was reviewing student lists for initial and three-

year IEPs.

Why: This activity helps me plan and know who are the

students that I have to assess.

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Answer #19 Code

2Z

Reason: This moment was more of a general planning activity, versus tied to a assessing a specific student and would therefore be a Code 2Z.

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Moment Response #20 LICENSED/CREDENTIALED SPEECH LANGUAGE PATHOLOGIST

Participant Pool: 1

PS Q2: No.

Who: I was with a SLPA.

What: Reviewing schedules, groups, and student goals.

Why: To ensure students are receiving speech service

minutes as listed in their IEPs and to discuss therapy

strategies to support student progress toward

goals.

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Answer #20 Code

2Z

Reason: This moment was more of a general planning activity, versus tied to a assessing a specific student and would therefore be a Code 2Z.

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Moment Response #21 CREDENTIALED SCHOOL COUNSELOR

Participant Pool: 1

PS Q2: No.

Who: One of my students on my caseload who does not

have an IEP.

What: Teaching a lesson.

Why: I was working with my student to support their

social-emotional well-being.

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Answer #21 Code

2Z

Reason: Counseling provided to students without IEPs/IFSP/Care Plans cannot be coded to 2A.

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Moment Response #22 TRAINED HEALTH CARE AID

Participant Pool: 1

PS Q2: No.

Who: Other students on lunch and staff on lunch duty.

What: I was supervising a student at lunch time.
Why: I was instructed by my administration.

CQ 1: Can you please provide the purpose for supervising the student at lunchtime and

why this support was necessary?

Response: This support is necessary since it is in the nurse's assessment but not in her

accommodations or services section of the IEP.

CQ 2: Can you please clarify how the support you were providing was in the nurse's

assessment, what type of assessment was that related to and to address what area

of need?

Response: A recommendation by the nurse in the health/status summary on the present levels

page of the IEP and on the School Health Assessment for Triennial IEP Evaluation. Access to one-on-one paraprofessional for the student is recommended due to high

fall risk related to left sided weakness/possible periods of vision loss.

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Answer #22 Code

2Z

Reason: The services provided are not part of accommodations or services section of the IEP. In order for this to be a code 2A, the accommodation would need to be part of the IEP.

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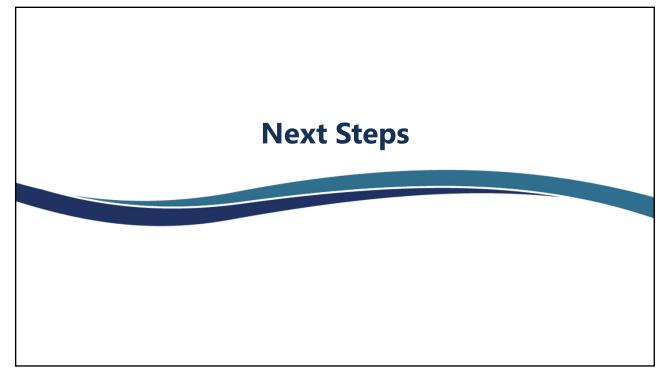
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RMTS Coding Appeals

- Each LEC will produce a Quarterly Coding Report (QCR) within 30 calendar_days of coding being finalized for the quarter.
- Each claiming unit will have 30 calendar days to review the QCR data to ensure accuracy and submit corrections to the LEC.
- For any specific coding assignment for which the claiming unit and LEC are unable to reach an agreement, the coding appeals process can be utilized (process contained in SMAA Manual, 6-24).
- Once a LEC has decided on the correction request, they will need to CC the LEA and submit a coding appeal request to DHCS within 30 calendar days.
- » DHCS will issue a written decision to all parties involved within 60 business days after the request for appeal has been received.

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Next Steps

- » A PDF copy of this presentation will be provided for all attendees.
- » For any further questions or concerns please e-mail the RMTS mailbox (RMTS@dhcs.ca.gov)

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