



COLORADO
School Health Services Program

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SCHOOL HEALTH SERVICES

PROGRAM MANUAL

Section 3

Random Moment Time Study

The School Health Services Program is a joint effort between the Colorado Department of Education and
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Section 3: Random Moment Time Study

The Random Moment Time Study (RMTS) is a federally accepted method for tracking participant time and activities within school districts. The RMTS is useful because:

- It uses a verifiable, statistically valid random sampling technique that produces accurate labor distribution results
- It greatly reduces the amount of staff time needed to record an individual time study participant's activity

The RMTS method samples participants on an individual basis at random time intervals over a quarterly (three month) time period and totals the results to determine work effort for the entire population of eligible participants over that same period. The RMTS method provides a statistically valid means of determining what portion of the selected group of participants' workload is spent performing activities that are reimbursable by Medicaid.

Districts enrolled in the [School Health Services \(SHS\) Program](#) must identify staff to participate in the time study for direct medical or health-related services (Direct Services) and/or Administrative Outreach Personnel services staff cost pool. Staff members who perform the applicable services or activities are required to participate in the quarterly time study. Districts must certify that staff providing services or participating in the time study meet the educational, experiential, and regulatory requirements. Staff cost pool lists must be updated quarterly to reflect staffing changes at the district level (refer to [Appendix A.5](#)). If a staff person leaves the district and the position is then filled, the district must update the contact information associated with that position.

Although some staff may perform any combination of Direct Services and Administrative Outreach Personnel services related activities, depending on their qualifications and role, they will only be allowed to participate in one of the two following staff cost pools:

- The first staff cost pool is comprised of direct services staff, including those who conduct only direct services, and those staff who conduct direct services in conjunction with administrative services
- The second staff cost pool is comprised of administrative services staff only

3.1 Time Study Participants

The purpose of the statewide time study is to identify the proportion of direct service and administrative and outreach time allowable and reimbursable under Medicaid. The RMTS information is used in the direct services cost reporting process at the end of each fiscal year to conduct a final cost settlement. In addition, the Medicaid Administrative Claiming (MAC) program time study results for Administrative Outreach Services are applied to the allowable administrative costs of the participating districts to calculate a quarterly claim. Employees and contractors performing Medicaid

related activities in a district seeking reimbursement through the SHS Program are required to participate in the statewide time study using the approved RMTS methodology. Community providers approved by a school district or BOCES to provide services in a school setting are prohibited from being on any school district or BOCES staff pool list.

Two staff cost pools

Direct Service Providers

- Those qualified to bill direct services to Medicaid
- Time study results for administrative services are applied to the quarterly MAC claim
- Time study results for direct services are applied to annual cost settlement

Administrative Outreach Personnel

- Participants that routinely provide administrative, outreach, and program planning activities, and do not bill Medicaid for direct service
- Time study results for administrative services are applied to the quarterly MAC claim

The following staff categories have been approved to participate in the Colorado time study and are identified in Colorado's State Plan Amendment 19-0021 ([Appendix A.3](#)) and the Time Study Implementation Guide ([Appendix A.4](#)). Additions to the list may be made depending on job duties. The decision to approve additional staff categories will be made on a case-by-case basis by the Department of Health Care Policy and Financing (HCPF) and subsequently approved by the Centers for Medicare and Medicaid Services (CMS).

Direct Services Cost Pool

The following positions that are eligible to bill direct medical services in the Colorado State Plan include:

- Physician (MD or DO)
- Psychiatrist
- Nurse Practitioner
- Registered Nurse
- Practical Nurse
- Nurse Aide
- Health Technician
- Personal Care Aide/Teacher's Aide
- Bus Aide
- Psychologist (Doctoral level)

- School Psychologist (Masters level)
- Counselor (LPC)
- Social Worker (Masters level)
- Clinical Social Worker (Masters level)
- Marriage and Family Therapist (LMFT)
- Board Certified Behavior Analyst (BCBA)
- Speech Language Pathologist (SLP)
- Speech Language Pathologist Assistant (SLPA)
- Audiologist
- Audiology Candidate
- Speech/Language Impairment Teacher
- Occupational Therapist
- Certified Occupational Therapy Assistant (COTA)
- Physical Therapist (PT)
- Physical Therapist Assistant (PTA)

Administrative Services Only Cost Pool

The following staff categories are eligible to participate in MAC:

- Administrator
- Counselor*
- Interpreter and Interpreter Assistant
- Pupil Support Services Administrator
- Psychologist Intern*
- Special Education Administrator
- Program Specialist
- Non-Licensed Psychologist*
- Non-Licensed Social Worker*
- Orientation and Mobility Specialist
- Resource Specialist/Family Liaison
- School Bilingual Assistant
- Nurse*
- Special Education Teacher* - that does not provide personal care services
- Other groups or individuals that may be identified by the district and approved by HCPF

*Provider types that do not meet the definition of an eligible provider to bill direct medical services as outlined in the Colorado State Plan or are not in a position to bill direct medical services but because of their position they function in an administrative capacity.

Only staff who perform Medicaid related administrative activities, and DO NOT perform Direct Services should be included in the Administrative Outreach Personnel cost pool.

[Appendix A.2](#) includes a Provider Qualifications Quick Reference Chart.

Staff Pool List

Before the statewide time study sample is generated, each district must certify that the list of staff they submit to be added to the staff cost pool are appropriate for inclusion in the time study, subsequent claims, and the cost report. Staff deemed inappropriate during review of time study quarters will be removed from the time study and excluded from claims and the cost report. All allowable staff must be listed on an approved staff pool list prior to the start of the time study quarter.

Each quarter, the district assigned RMTS Coordinator is required to review, update changes (new staff assignments or vacancies) and certify the roster containing the staff cost pool list. In the middle of a quarter, if a staff person leaves the district and the position is then filled, the district must update the contact information associated with that position. In the event that a new position is created or a district does not include that position on the staff cost pool list created at the beginning of the quarter, the district must wait until the next quarter to add that staff person/position. Costs cannot be claimed or reimbursed for a position unless that position is included in the staff cost pool list.

The RMTS Coordinator must assign staff to a specific job category in one of the two cost pools. As mentioned in [Section 3.1](#), staff may only be listed in one cost pool. The RMTS Coordinator will determine the cost pool and position, and HCPF's vendor will use the district's certified staff list for each cost pool to generate the statewide sample for each cost pool. The vendor cannot add staff, delete vacancies, or create the staff cost pool list for any district. The cost pools and staff within those pools are completed directly by the district's RMTS Coordinator. The Staff Pool List Decision Tree is available to aid RMTS Coordinators in assigning participants to the appropriate cost pool and job category. The vendor only summarizes the individual district cost pool lists into a statewide cost pool that is used to generate the sample for the given sample period.

District staff members who participate in the time study must be assigned to a job position or category that best describes their job function. If a category includes a limited mix of job functions and titles, the functional (or working) job title must be listed beside each staff person's name.

- Colorado Random Moment Time Study Notification - prior notice 6 hours
- Colorado Random Moment Time Study Notification - prior notice of 1 hour
- Colorado Random Moment Time Study Notification - actual moment in time
- Colorado Random Moment Time Study Notification - 12 - hour late notice
- Colorado Random Moment Time Study Notification - 24 - hour late notice
- Colorado Random Moment Time Study Notification - 36 - hour late day notice

Sampled participants will be notified of their sampled moment date and time twenty-four (24) hours, six (6) hours and one (1) hour prior to the sampled moment. At the prescribed moment, each sampled participant is asked to record and submit his/her activity for that moment. The prior notices as well as the actual moment email notice provides a hyperlink with direct access to the RMTS form. The RMTS District Coordinator's Guide ([Appendix A.5](#)) contains step-by-step instructions for completing the form.

A participant will continue to receive up to three follow-up e-mails until the RMTS form is completed. The district's RMTS Coordinator will be copied on the follow-up e-mails sent to the participant. However, the participant's hyperlink which directly links to the RMTS form will not be included. All sampled moments must be returned within two days after the sampled date. Documentation of moments not received within the required time frame cannot be used in the calculation of the necessary number of moments needed for statistical validity to satisfy the level of precision of +/- 2% with a 95% confidence interval. RMTS compliance means that at minimum 85% of all district moments, state-wide, in each cost pool are completed and submitted timely, thus 'valid' moments. Valid moments include those that are completed accurately and submitted within the allowable 2 school day window. Districts that do not meet the minimum 85% compliance rate could jeopardize the state from meeting statistical validity.

For coding purposes, documentation provided by the participant for the sampled moment must sufficiently answer the five questions:

1. Were you working?
2. Is the service you provided part of the child's medical plan of care where medical necessity has been otherwise established?
3. Who were you working with during this sampled moment?
4. Describe in detail the activity you were performing during your sampled moment. Please answer this question even if you answered "No" to the first question.
5. Describe in detail why you were doing this activity during your sampled moment.

Each sampled participant must complete the five (5) questions for each moment in which they were selected. To respond to the first (1) question the participant selects the yes or no radio option. Participants will respond to question two (2) by selecting a

radio option from the drop-down menu. Responses to questions three (3), four (4), and five (5) are completed by the participant in free form text. After answering the five (5) questions, the sampled participant certifies the accuracy of their responses prior to submission.

The RMTS Coordinator is responsible for monitoring staff participating in the RMTS to ensure that moments are responded to within the required timeframe of two (2) school days. The district must maintain an eight-five percent (85%) or higher compliance rate for time study responses attributed to their staff as set forth in the [Colorado School Health Services Program Time Study Implementation Guide](#). Districts that do not meet the minimum 85% compliance rate are subject to the RMTS non-compliance process.

RMTS non-compliance process is comprised of two steps:

Step 1: After the first quarter of non-compliance

- The district will receive a warning letter from HCPF outlining the consequences for non-compliance
- The district will be required to submit Corrective Action Plan (CAP) to HCPF outlining their plan to meet compliance

Step 2: After two consecutive quarters of non-compliance

- The district may be removed from participation in the SHS program for failure to comply with the program requirement

3.3 Oversight and Monitoring

Coding Quality Assurance

An intensive quality assurance process is performed by HCPF to ensure that coding related to each RMTS participant's sampled moment is accurate. Initially, all coding is conducted centrally by HCPF's vendor. Every valid response is initially coded and then verified by an additional quality control team. This provides a check on the accuracy of each code before it is finalized. If there is insufficient information to determine the appropriate code for the activity description provided by the time study participant, the moment will be returned to the participant for additional information. If the participant does not respond to the request for additional information, then the coded response will default to non-Medicaid and be included in the overall quarterly time study results.

Each quarter, HCPF audits a 5% sub-sample of coded moments to ensure coding completeness, accuracy, and consistency. HCPF's vendor generates a random 5% sample of moments and produces a report identifying the sampled staff's name, position, district, moment due date, moment submitted date, all narrative responses, and any follow-up communications with the participant. HCPF reviews the

participants' response to each question completed for the sampled moment to determine the correct code. HCPF refers to the time study codes, and activity descriptions outlined in the Time Study Implementation Guide ([Appendix A.4](#)). HCPF's coding is then compared with the vendor's coding. If there is a discrepancy between HCPF's coding and the vendor's coding, it is summarized by HCPF in writing for the vendor to review and discuss verbally during a quarterly coding meeting. The vendor may also contact the participant if additional information is necessary to resolve the discrepancy. The centralized coding team reviews moments identified to have discrepancies and adjusts those, and any similar moments, to the coding decision identified by HCPF. Necessary changes are to be made and reflected in the final time study results for that sample period. Based on discussions with HCPF, additional guidance and training for centralized coding may occur. Additionally, HCPF may choose to broaden the sub-sample based on results of the review. The RMTS results are finalized on completion of HCPF's sub-sample review and approval.

Additional RMTS Documentation and Recordkeeping Requirements

All participating districts are required to maintain documentation supporting the RMTS results. Districts are required to maintain the following documents:

- A Direct Services staff cost pool list of eligible individuals, including job categories and applicable provider licenses and certifications.
- An Administrative Outreach Personnel services only staff cost pool list of eligible individuals, including job categories.

Districts must maintain and have available on request by state or federal entities their contract with HCPF to participate in the SHS Program. The contract requires districts to comply with all state and federal regulations regarding the SHS Program.