

**Sampled moments need to be documented by school staff as a part of the State's time study methodology. This job aid is intended for Local Educational Agency (LEA) staff to understand the basic requirements of a time study, how school staff are notified of their participation, and best practices for documenting a moment.**

## Understanding Random Moment Time Study (RMTS)

### What is a Time Study?

- ▶ A time study is a way to observe and measure how staff members' time is allocated across a range of activities. An RMTS is a type of time study methodology.
- ▶ An RMTS uses a statistically valid number of sampled moments to determine how much time eligible school staff spend performing Medicaid-reimbursable work activities that adhere to specified statistical criteria for validity.

For reconciled cost methodologies, a time study is used to identify what proportion of direct services and/or administrative costs are allowable and attributable to Medicaid beneficiaries as allowable activities or reimbursable costs, and therefore are reimbursable. Within the overall cost identification process, the application of the time study statistic is Step 1 of 2\* in allocating allowable costs to Medicaid.

#### Step 1

Use of the time study percentage to estimate the portion of practitioners'/employees' salaries to allocate to medical activities.

#### Step 2

Use of the Medicaid Enrollment Ratio (MER) to determine the portion of practitioners'/employees' salary applicable to allowable Medicaid activities (Step 1) that is applicable to Medicaid. Allowable activities not subject to the MER specifically include outreach and facilitating eligibility.

\*Instead of the two-step process to allocate costs, States may construct time study activity codes to capture time spent on Medicaid-allowable direct care services and/or administrative activities. The RMTS activity codes would be structured to define moments that are BOTH associated with the delivery of Medicaid-allowable activities and delivered to Medicaid beneficiaries.

### Requirements



The RMTS methodology is approved by the Centers for Medicare & Medicaid Services (CMS) within a Time Study Implementation Plan and/or Public Assistance Cost Allocation Plan. If a State is using Certified Public Expenditures for its non-Federal share—and therefore claims for costs incurred—and uses an RMTS to allocate costs, all school districts that participate in any components of the Medicaid School-Based Services (SBS) Program should participate in the RMTS. School personnel who perform Medicaid direct services or administrative activities should be included on the RMTS Participants list(s).

RMTS participants should include all school personnel who provide direct services to children or provide administrative activities related to Medicaid, such as the following:

- » Physical Therapists
- » Occupational Therapists
- » Speech Language Pathologists
- » Nursing services
- » Mental health services

From this list, individuals are randomly selected to participate in the RMTS and document the work they completed during a specific, randomly selected moment of time.

A moment is a single 60-second period (1 minute) on a particular day during which the participant needs to document what they are doing and answer questions about their activities.



## Notification to Participate in a Time Study

Time study participants are notified by the State Medicaid SBS Program of their requirement to participate in the time study and document their sampled moment.

### Before the Moment

Sampled participants can be notified of their sampled moment date and time up to 2 days prior to the sampled moment.\*



### During the Moment

At the prescribed moment, each sampled participant is asked to record and submit his/her activity for that particular moment.



### After the Moment

Sampled participants can be allowed up to 2 days to respond to their moment.\*

\*While CMS encourages a zero-notice approach, CMS' standard is up to 2 days prior notice of a moment. CMS will also allow up to 2 business days for participants to respond to the moment. Please refer to your State's approved TSIP to identify the CMS-approved time period for prior notification and response of a moment. If a State believes that up to two days prior notice (and two days response) is still not sufficient, the State should propose an alternative to CMS and provide its rationale

## Considerations for Answering an RMTS Moment

- » Remember that the RMTS corresponds to 1 minute. Thus, answers should reflect what staff was doing during that one assigned minute.
- » Certify the accuracy of response prior to submission.

Ensure that your moments get to the **P.O.I.N.T.**



#### Primary Focus

What was the primary topic or focus of your activity?



#### Objective

Why were you completing your activity?



#### Insight

Try to provide some insight for the activity that you were performing.



#### Necessary Detail

Provide an appropriate level of detail in your answers.



#### Timely

There is a grace period to respond to your moment. When it expires, responses can no longer be accepted. If you receive a message asking you to clarify your response, please respond as soon as possible.



## Additional Resources and Examples

Information from this job aid was compiled using the following resources and State guide examples:

Delivering Services in School-Based Setting: A Comprehensive Guide to Medicaid Services and Administrative Claiming



<https://www.medicaid.gov/sites/default/files/2023-07/sbs-guide-medicaid-services-administrative-claiming-ud.pdf>

Washington: School-Based Medicaid Program Random Moment Time Study (RMTS): A Participant's Quick Reference Guide



<https://www.hca.wa.gov/assets/billers-and-providers/participant-quick-reference-guide.pdf>

MassHealth: School-Based Medicaid Program (SBMP) RMTS Participant's Quick Reference Guide



<https://www.mass.gov/doc/rmts-participant-quick-reference-guide-0/download>

MassHealth: LEA RMTS Coordinator Guide for Random Moment Time Study (RMTS)



<https://www.mass.gov/doc/lea-coordinator-guide-for-random-moment-time-study-rmts/download>

## Example of RMTS Response Options

The totality of the moment detail from the sampled participant must be sufficient for accurate coding (e.g., whether the activity is a Medicaid-claimable activity).<sup>\*</sup> When answering a moment, you will need to answer questions about what you were doing during the moment, including what services you provided, to whom you were providing services, and why you were providing services.

Questions asked during the RMTS moment will depend on a State's RMTS methodology. Below are potential questions that will be asked within the RMTS, as well as guidance for answering those moments and examples of answers that would be sufficient.



**States can choose to utilize a centralized coding, which means that sampled participants will not be required or expected to code their moments.**

	Question	Guidance	Example of Direct Service Answer	Example of Administrative Activity Answer
1	Is the service you provided part of the student's medical plan of care where medical necessity has been otherwise established?	<p>This is a multiple-choice question where you have to select one of the answer options.</p> <p>Answer Options:</p> <ul style="list-style-type: none"> <li>▪ Yes – IEP/IFSP</li> <li>▪ Yes – Medical Plan of Care other than an IEP/IFSP (ex. 504 plan, student health plan, nursing plan, physician's order, crisis intervention services)</li> <li>▪ Yes – Medical necessity established in other method</li> <li>▪ No</li> <li>▪ N/A</li> </ul>	Yes – IEP/IFSP	Yes – IEP/IFSP
2	Who were you working with during this sample moment?	You are not required to identify anyone by name but should provide context to whom you were working with (e.g., a student, colleague, parent).	"I performed treatment/therapeutic activities with a student."	"I was talking to a parent regarding the student's need for a follow-up with their primary care provider."
3	Describe in detail the activity you were performing during your sampled moment.	<p>Please answer this question even if you answered "No" to the first question.</p> <p>What was the primary focus of your activity?</p> <p>If health related, what type of service or treatment?</p>	"Therapeutic activities provided to the student included sit-to-stand transfers from a wheelchair and sitting balance exercises."	"I was coordinating with the parent to set up follow-up care after I provided the student therapeutic activities that included sit-to-stand transfers from a wheelchair and sitting balance exercises."
4	Describe in detail why you were doing this activity during your sampled moment.	<p>Was it pursuant to an IEP?</p> <p>How was it authorized?</p> <p>Did the service meet Medicaid medical necessity requirements?</p> <p>Were you acting within the scope of your clinical license?</p>	"I was performing the PT service for the student because it was a part of the student's IEP."	"I coordinated the completion of the PT service pursuant to the student's IEP to provide continued care."