

RMITS Moments: Best Practices and Audit-Ready Documentation

Agenda

- » Section 1: Random Moment Time Study (RMTS) Refresher
- » Section 2: Best Practices for Moment Responses
- » Section 3: Audit-Ready RMTS Documentation

Meeting Goals

- » Know why RMTS moments matter and learn best practices for moment responses.
- » Learn the difference between direct service and administrative activity documentation requirements.
- » Understand the importance of documenting RMTS moments and know how to gather supporting documentation for audit purposes and reduce potential negative audit findings.

Reminder: New Term!

The Local Educational Consortium (LEC) will be referred to as the **RMTS Administrative Unit (RMTS AU)** in alignment with the TSIP.

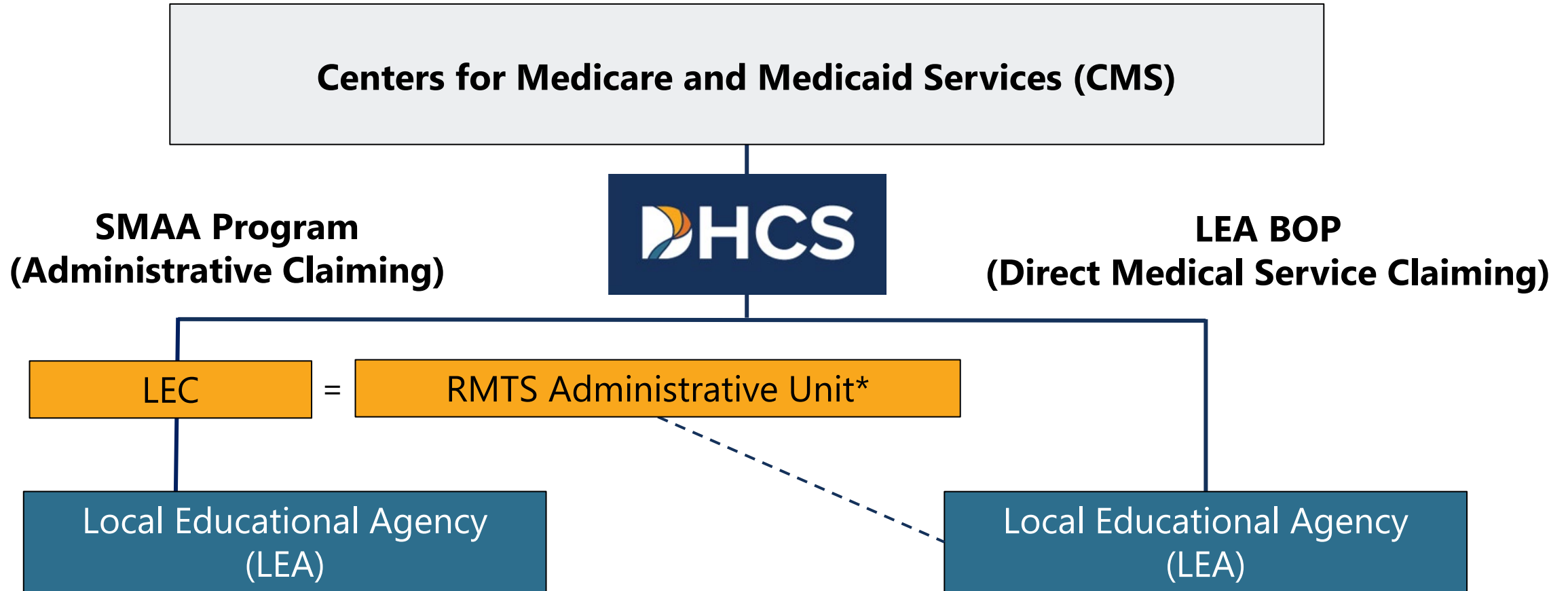
Reminder: Throughout this session is new information to reflect the proposed changes within the Time Study Implementation Plan (TSIP) pending CMS approval.

Commonly Used Acronyms

CMS	Centers for Medicare and Medicaid Services	PTO	Paid Time Off
CQ	Clarifying Question	QCR	Quarterly Coding Report
DHCS	Department of Health Care Services	RMTS AU	RMTS Administrative Unit
DMSP	Direct Medical Services Percentage	RMTS	Random Moment Time Study
IEP	Individualized Education Plan	SMAA	School-Based Medi-Cal Administrative Activities
IFSP	Individualized Family Service Plan	SMA	State Medicaid Agency
IHSP	Individualized Health and Support Plan	SSP	System Software Platform
LEA BOP	LEA Medi-Cal Billing Option Program	TSIP	Time Study Implementation Plan
LEA	Local Educational Agency	TSP	Time Study Participant
OIG	Office of Inspector General		

RMTS Refresher

School-Based Medicaid Agency Oversight



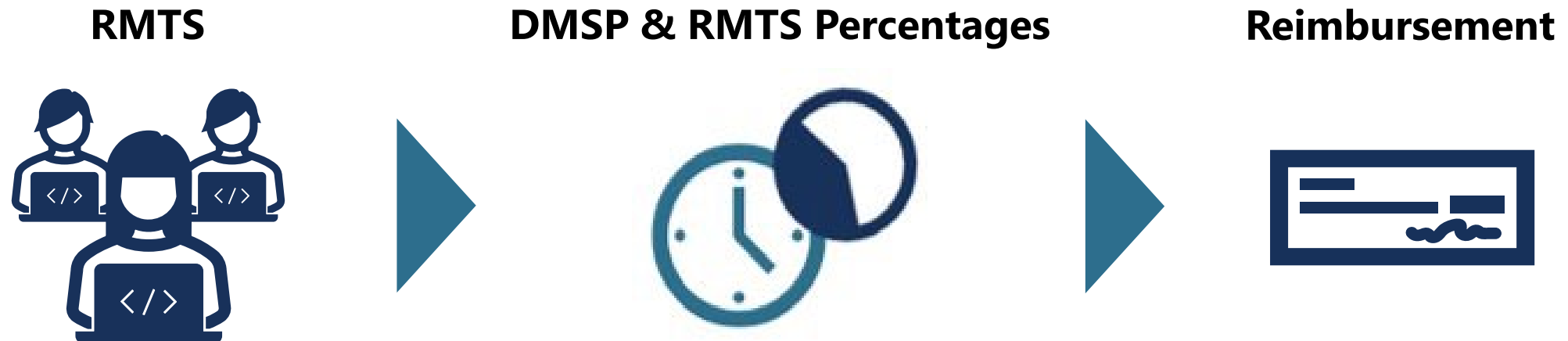
***Local Educational Consortium (LEC) will now be referred to as RMTS Administrative Unit (RMTS AU) to align with the TSIP *for the purposes of RMTS*.**

RMTS at a Glance

- » Federally approved method to document the proportion of time staff spend on Medicaid-reimbursable activities.
- » Randomly-selected staff report the activity they were doing during a single, one-minute moment.
- » Moments are coded either reimbursable or non-reimbursable.
- » Supports LEA BOP and SMAA cost allocations.

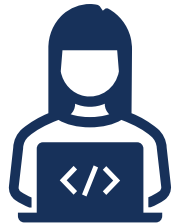
Financial Impact of RMTS

- » RMTS results translate into the percentages used in both programs: Direct Medical Services Percentage (or DMSP) in LEA BOP and the RMTS Percentages for SMAA.
- » These percentages directly impact how much reimbursement LEAs can claim.



Time Study Participant (TSP) List

- » A LEA's TSP List includes all eligible staff that potentially perform direct services or administrative activities.
- » Including eligible staff on the TSP List allows LEAs to claim costs under either the LEA BOP or SMAA program.
- » **Participant Pool 1:** Employed practitioners that perform direct medical services.
- » **Participant Pool 2:** Employed staff or contractors (SMAA only) that perform activities that support the administration of Medicaid.



Reminder! A TSP cannot be listed in both Participant Pools.

How Does RMTS Impact Your LEA?

- » Detailed moment responses are used to calculate RMTS results each quarter.
- » Helps determine federal reimbursement.
- » Participation is required to meet compliance requirements.
- » Compliance ensures funding and audit readiness.

Best Practices for Moment Responses

Understanding RMTS Moments



Purpose of a Moment

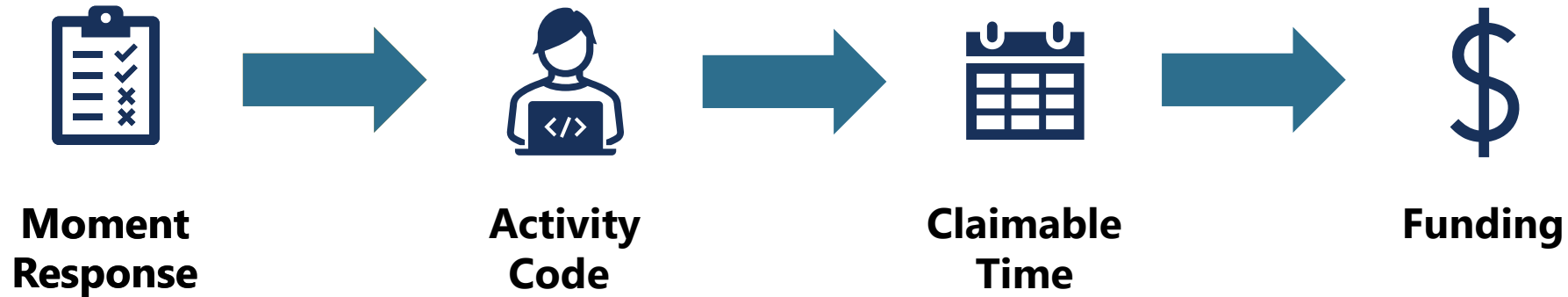
- » The purpose of a moment is to **understand what a TSP was doing at a specific moment in time.**
- » This information is used to determine whether their activity is reimbursable under Medicaid.
- » Questions are asked to **gather enough detail** to accurately capture the activity and its purpose:

Who?

What?

Why?

Impact of Moments on Funding



- » Moment responses drive activity codes which determine:
 - Reimbursable or non-reimbursable LEA BOP and SMAA activities
 - Federal reimbursement
- » Claimable time is represented through the DMSP and RMTS Percentages.
- » Detailed responses = More information to ensure accurate coding.
 - Incomplete or vague responses = Potential lost reimbursement

Understanding RMTS Moment Questions

- » Each moment consists of a series of questions that will cover:
 - **Were** you working at the time of your moment?
 - **Who** were you with?
 - **What** were you doing?
 - **Why** were you performing the activity?
 - **Pool 1 Only (post-question):** Was the activity an assessment, screening or a service included in a care plan (IEP, IFSP, IHSP, 504 plan, etc.)?
- » **Clarifying Questions (CQs):** When a moment response is not detailed enough to identify the activity during the moment, up to two CQs may be asked.

Reminder! To qualify as a reimbursable moment, the narrative responses must clearly demonstrate that the activities or services directly benefit the Medicaid program.

85 Percent Compliance Response Rate

- » A compliance test that ensures that at least 85 percent of moments receive a “valid” response (e.g., a response within the required response timeframe).
- » Helps ensure that RMTS results accurately reflect the activities of the entire population being surveyed.
- » Calculated at an aggregate level (not by participant pool).
 - **Important Note:** DHCS’ analysis shows that Pool 2 TSPs respond to moments at a lower rate, which negatively impacts the total aggregate response rate across both participant pools and affects the LEA’s compliance. Late or missing responses further reduce RMTS percentages and directly impact the LEA’s ability to meet the 85 percent compliance rate.

Overview of Steps in Moment Response Process

- » Receive one-day notification of a moment.
- » Moment date/time occurs. Continue work as usual.
- » Provide timely moment response.
- » *(If not enough detail)*: Receive CQ(s) requesting additional information on moment response.
- » Respond to CQs within 5 student-attendance days of receiving the question.



Effective Moment Responses



Response Best Practice: P.O.I.N.T.

Did the moment response 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.

Did the Moment Response get to the P.O.I.N.T.?

Who were you with? No one, I was by myself.

What were you doing? I was documenting 30 minutes of pragmatic speech therapy services for a student.

Why were you performing this activity? The purpose of documentation of speech services is to record the activities required to implement the student's IEP.

Post-Question Response: Yes.

P	Primary focus is documenting services . ✓
O	Objective is to implement the student's IEP . ✓
I	Insight is provided identifying the documentation was for a speech therapy service . ✓
N	Necessary Detail with a clear understanding of who they were with, what they were doing, and why . ✓
T	Timely submission of moment response. ✓

This moment response is sufficient and got to the **P.O.I.N.T.**!

Example: Effective Response

» A good TSP moment response will include **all** of the below components:

Action

- What *specific* action was being taken?
- What is the TSP's role in the action?

Recipient of Action

- Who was the action for?
- Who was impacted by the action?

Reason / Context

- Why was the action taken?
- Was this action pursuant to an IEP/ IFSP/Plan of Care?

I was in the middle of a catheterization for a student with an IEP and doctor's orders.

Action + Recipient of Action + Reason/Context

A CQ may be leveraged to gather any missing components in a TSP response.

Clarifying Questions (CQs)

- » A Clarifying Question is:
 - Follow-up to a submitted moment when a response does not have sufficient detail.
 - Posed by a reviewer to a TSP.
 - Intended to gain additional information / clarity on the moment's activity and purpose.

- » If asked, the TSP will have **5 LEA working days** to respond to a CQ.

Reminder! CQs can be avoided if the initial moment response submitted is to the P.O.I.N.T.!

Strengthening Moment Responses: Post-Question for Pool 1

Was the activity an assessment, screening or a service included in a care plan (IEP, IFSP, IHSP, 504 plan, etc.)?

- » Previously, the Pool 1 moment question was asked as an introductory pre-question; however, the answers often contradicted the TSPs' narrative responses for the subsequent moment questions, as shown in the example below:
 - **Pre-question: No**, activity is not related to a care plan.
 - **Narrative:** Collaborating with another staff regarding a student with an IEP.
- » Effective July 1, 2026, the Pool 1 moment question will be asked as **a concluding post-question after the narrative moment questions.**

Strengthening Moment Responses: Gaps to Avoid

- » **Gap #1:** Response does **not appropriately answer** question.
- » **Gap #2:** Response **lacks detail** or context.
- » **Gap #3:** Response includes **multiple activities** occurring at time of moment.
- » **Gap #4:** Response **includes acronyms** or internally-used language.
- » **Gap #5:** TSP **fails to respond by the deadline** (currently 4 student-attendance days).

Gap #1: Response Does Not Appropriately Answer Question



Insufficient response: "I was doing my job."



Sufficient response: "I was providing counseling to a student."

Gap #2: Response Lacks Detail or Context



Insufficient response: "Doing Paperwork."



Sufficient response: "Reviewing Medi-Cal consent forms for a student to ensure documentation was complete."

Gap #3: Response Includes Multiple Activities



Insufficient response: "Monitoring Dexcom readings for diabetics, answering calls and emails from parents and staff, planning make-up hearing and vision screenings, planning assessments for IEPs, documenting IEPs."



Sufficient response: "I was on a phone call with a parent to coordinate the student's IEP-related services."

Gap #4: Response Includes Acronyms



Insufficient response: "Preparing for a CFT meeting that will take place this afternoon with JPD."



Sufficient response: "Preparing for a Child and Family Team meeting that will take place this afternoon with representatives from the county juvenile probation department."

Gap #5: Failing to Respond Timely

- » A response cannot be provided once the response grace period closes (currently, four student attendance days)*.
- » Non-responses impact RMTS results.
- » Non-responses can impact the statistical validity of the sample.
- » Work with TSPs to understand the importance of responding to the RMTS - failure to respond impacts funding!

***Response period is subject to change July 1, 2026.**

Best Practice: Pointers for a Good Response

- ✓ Respond as soon as possible.
- ✓ Use complete sentences.
- ✓ Describe the exact *singular* activity occurring at the moment.
- ✓ Provide enough detail to avoid reviewer follow up.
- ✗ Avoid acronyms (unless spelled out).
- ✗ Do not use names or student-identifying information.

How RMTS Coordinators Can Support Effective Moment Responses

- » Train TSPs on the importance of responding quickly and providing a detailed response.
- » Use the **P.O.I.N.T.** framework to guide TSPs in writing clear, complete, and supportable responses.
- » Address common errors through:
 - Reviewing coded moments and identify trends.
 - Tailoring your trainings to address deficits.
 - Referring TSPs to the **RMTS Quick Reference Guide**.

Key Takeaways

» **TSPs** should:

- Use the **P.O.I.N.T.** framework to provide detailed responses that are accurate, supportable, and audit-ready.
- Maintain supporting documentation for any moment response.
- Respond to moments and CQs timely and accurately to support appropriate coding and reimbursement for your LEA.

» **RMTS Coordinators** should:

- Work closely with your RMTS AU, fiscal team, and practitioners to ensure program success and compliance readiness.
- Monitor TSP responses and timeframes to identify trends for training.
- Provide ongoing training and support to TSPs.

Knowledge Check

» What is **NOT** a best practice for an effective moment response?



- A) Provide detail on why you were doing the activity.
- B) Focus on the singular activity performed at the moment.
- C) Exclude any identifying information, such as student and colleague names.
- D) Use acronyms so that your response is short.

Answer

» **D) Use acronyms so that your response is short.**

Remember that the person reading your response may not be familiar with acronyms.

» Option A is incorrect because explaining why the activity was performed **supports** accurate coding.

» Option B is incorrect because RMTS moments **must** reflect a single activity at a specific point in time.

» Option C is incorrect because identifying information should **never** be included in moment responses.

Audit-Ready RMTS Documentation

Why Documentation Matters

- » Documentation is an important component of the RMTS process.
- » Past OIG audits have asked for documentation to support moment responses.
 - Moment responses without proper documentation have been disallowed.
- » Documentation serves three purposes:
 - Supports the code assigned to the activity.
 - Upholds the integrity of the time study.
 - Protects your LEA in the event of an audit.

What “Audit-Ready” Means

- » Audit-ready documentation is:
 - **Accurate:** It supports the activity described in the moment.
 - **Available:** Can be provided quickly if requested.
 - **Aligned:** It clearly supports Medicaid-reimbursable work.
- » Documentation must already exist from the time the activity occurred.



Documentation Examples

» LEA Direct Service (Code 2A) Moment Documentation:

- Student care plan (IEP/IFSP/IHSP)
- Authorization for services
- Documentation of services delivered on the date of service (codes, times, location, provider)
- Clinical notes and treatment logs (signed/dated)
- Practitioner licensure/certification and qualification records
- Practitioner schedules and payroll records
- Contracts with medical providers
- Copy of the service claims submitted to DHCS (as applicable)

» LEA Administrative Activity Moment Documentation:

- **Detailed RMTS Moment Narrative**
- Documentation of paid time off (PTO)
- *Optional* supporting documents (in addition to narrative responses), including:
 - Medicaid outreach materials or flyers
 - Referrals for Medicaid services
 - Calendar entries, emails, or meeting notes
 - Medicaid policy development details

Best Practices for LEAs

» To stay audit-ready year-round:

- Gather documentation as you go.
- Organize files by Quarter → TSP → Moment Code.
- Maintain a folder for Quarterly Coding Report (QCR) certification and supporting items.
- Train TSPs annually and refresh mid-year.
- Use calendars, notes, and emails to reinforce moment narratives.

Key Takeaways for LEAs

- » RMTS documentation is essential for claiming Medicaid funding.
- » Strong documentation protects your LEA in audits.
- » Direct service moments require specific, detailed documentation.
- » Reimbursable administrative moments must clearly show that the activity supports Medicaid covered services.
- » If a moment response lacks detail, it cannot be coded as a Medicaid-reimbursable activity.

Knowledge Check



- » Which statement is TRUE about RMTS documentation?
- A) LEAs must upload documentation into the RMTS System Software Platform (SSP) when responding to a moment.
 - B) Moments do not require documentation.
 - C) LEAs must keep documentation for reimbursable moments and provide it upon request.
 - D) Documentation is only needed if the TSP receives a clarifying question (CQ) on their moment response.

Answer

- » **C) LEAs must keep documentation for reimbursable moments and provide it upon request.**
- » Option A is incorrect because LEAs are not required to upload documentation into the RMTS SSP. Documentation is maintained in LEA files and made available only if requested.
- » Option B is incorrect because Code 2A and paid time off moments require supporting documentation.
- » Option D is incorrect because documentation is not limited to moments with a CQ. Some moments without a CQ still require documentation, while some CQ moments may be coded as non-billable activity and do not require supporting documentation.

Documentation Requirements



Additional Supplemental Documentation for Audit Support per CMS

Source Documents and Materials	Additional Documentation to Support the Billing of a Medicaid Direct Medical Service Claim	Additional Documentation to Support a Time Study (For a Direct Medical Service or Administrative Activity)
School attendance records for the date(s) of service on the claim	✓	✓
Prior authorizations	✓	-
Medical Plans of care	✓	-
Provider agreements	✓	-
Medical provider qualifications associated with licensing/certification and evidence of provider licensure/certification	✓	✓
Enrollee's medical records	✓	✓

Additional Supplemental Documentation for Audit Support per CMS

Source Documents and Materials	Additional Documentation to Support the Billing of a Medicaid Direct Medical Service Claim	Additional Documentation to Support a Time Study (For a Direct Medical Service or Administrative Activity)
Documentation of the service performed on the date of service (e.g., service and diagnostic codes, start and finish time of the service), including clinical notes signed and dated by provider (including service claims)	✓	✓
Transportation logs	✓	-
Payroll records associated with school personnel providing services	✓	✓
Copies of contracts with medical providers	✓	✓
Copy of the service claims submitted to the SMA or Managed Care Organization	✓	✓

Additional Supplemental Documentation for Audit Support per CMS

Source Documents and Materials	Additional Documentation to Support the Billing of a Medicaid Direct Medical Service Claim	Additional Documentation to Support a Time Study (For a Direct Medical Service or Administrative Activity)
IEP or Individualized Family Service Plan	✓	✓
Prescriptions/referrals for IEP services	✓	✓
Documentation regarding where the service was provided and who provided the service	✓	✓

Additional Supplemental Documentation for Audit Support per CMS

Source Documents and Materials	Additional Documentation to Support the Billing of a Medicaid Direct Medical Service Claim	Additional Documentation to Support a Time Study (For a Direct Medical Service or Administrative Activity)
Cost reports	-	✓
Time study source documents	-	✓
Sign-in sheets from training sessions	-	✓
Copies of any manuals related to the time study, Cost Allocation Plan (CAP), and procedures associated with Medicaid SBS reimbursement	-	✓
National Provider Identifications of the LEA or provider	-	✓

Direct Service Moment Documentation

- » Consider what the TSP was doing during the moment surveyed.
 - This determines the specific documentation needed to substantiate the moment response.

- » Documentation to support direct service moments may include:
 - **IEP/IFSP/IHSP/Care Plan** to support the service
 - **Authorization** for services
 - **Initial assessments**, even if they do not result in a care plan
 - **Documentation of the service** on the date claimed (e.g., progress notes, service logs, start/end times, etc.)

Common Documentation Errors and Federal Audit Findings

- » Missing or insufficient supporting documentation to validate the moment.
 - Missing IEP/IFSP/IHSP/Care Plan associated with the service.
 - Missing authorization for services, or authorization was not provided by a qualified practitioner.
 - Missing or incomplete progress notes or service logs.
 - Nature and extent of the service is not clearly described.
 - Missing signature of a qualified practitioner, or supervising practitioner when required.



Example: Direct Service Documentation for Moments

Licensed Physical Therapist in Participant Pool 1 receives a moment:

Who were you with?	<i>A student.</i>
What were you doing?	<i>I was in a therapy session.</i>
Why were you doing this?	<i>The student's IEP requires physical therapy services twice a week.</i>
Post-Question for Pool 1:	<i>Was this activity related to an assessment or screening, or related to a service that is authorized in an IEP, IFSP, or other service/care plan?</i>
Post-Question Answer:	<i>Yes</i>

Examples of possible (but not limited) direct service documentation to support the moment:

- The student's IEP
- Progress or session notes with date of service and detail of session
- Calendar entry showing the TSP was in a therapy session during the assigned moment
- The attendance record showing the student was at school on the day of the service

Example: Extension of a Direct Service Documentation for Moments

Credentialed School Psychologist in Participant Pool 1 receives a moment:

Who were you with?	<i>No one – I was alone.</i>
What were you doing?	<i>I was writing a report.</i>
Why were you doing this?	<i>Summarizing assessment results in preparation for an upcoming IEP meeting.</i>
Post-Question for Pool 1:	<i>Was this activity related to an assessment or screening, or related to a service that is authorized in an IEP, IFSP, or other service/care plan?</i>
Post-Question Answer:	<i>Yes</i>

Examples of possible (but not limited) documentation to support the moment:

- The student's assessment results
- The resulting assessment report that the TSP is writing
- The student's IEP or documentation that the IEP was not (yet) established
- Calendar entries showing the TSP was holding time working on the report at the time of the moment and the upcoming IEP meeting

Example: Extension of a Direct Service Documentation for Moments

Licensed Speech Language Pathologist in Pool 1 receives a moment:

Who were you with?	<i>No one.</i>
What were you doing?	<i>Preparing activity for upcoming session.</i>
Why were you doing this?	<i>The student's IEP requires therapy twice a week.</i>
Post-Question for Pool 1:	<i>Was this activity related to an assessment or screening, or related to a service that is authorized in an IEP, IFSP, or other service/care plan?</i>
Post-Question Answer:	<i>Yes</i>

Examples of possible (but not limited) documentation to support the moment:

- The student's IEP
- Progress or session notes with date of service and detail of session
- Calendar entries showing the TSP was preparing for the session at the time of the moment and the upcoming session with the student

Example: Direct Service Documentation for Moments

Credentialed School Psychologist in Participant Pool 1 receives a moment:

Who were you with?	<i>A student.</i>
What were you doing?	<i>Conducting an assessment.</i>
Why were you doing this?	<i>Triennial evaluation.</i>
Post-Question for Pool 1:	<i>Was this activity related to an assessment or screening, or related to a service that is authorized in an IEP, IFSP, or other service/care plan?</i>
Post-Question Answer:	<i>Yes</i>

Examples of possible (but not limited) direct service documentation to support the moment:

- The student's current IEP
- The triennial assessment / report for IEP
- Attendance records on the date of the moment

The possible documentation discussed in each moment example are all good to have to support the direct service moments.

Key Takeaways

- » Administrative activity moment narrative responses may serve as the supporting documentation for the moment.
- » Code 2A moment responses must be supported by clear and complete documentation.
- » Strong documentation clearly describes the nature and extent of the service, including specifics like start/end times and details of the service provided.
- » Missing, incomplete, or vague documentation, lack of required signatures, or providing services not reflected in a care plan may increase risk of adverse findings during an audit.
- » Strong documentation = stronger audit readiness.

Knowledge Check

Licensed Occupational Therapist in Participant Pool 1 receives a moment:

Who were you with?	<i>A student.</i>
What were you doing?	<i>In a session working on fine motor skills.</i>
Why were you doing this?	<i>The student's IEP requires this assistance.</i>
Post-Question for Pool 1:	<i>Was this activity related to an assessment or screening, or related to a service that is authorized in an IEP, IFSP, or other service/care plan?</i>
Post-Question Answer:	<i>Yes</i>



- » What types of documentation could be maintained to support this moment?

Answer

- » The **student's care plan (IEP)** documenting the student's need for occupational therapy (OT) services.
- » The **authorization** from a qualified practitioner for the student to receive OT treatment services.
- » **Signed progress notes or service logs** for the therapy session, including nature, extent or units of service provided on the date of the moment.
- » TSP's **calendar entry** for the scheduled session's date and time.
- » **School attendance records** confirming the student was in school the day of the service.

Administrative Activity Documentation Requirements (*Pool 1 & Pool 2*)



Administrative Activity Moment Documentation

- » **Primary Support: Detailed RMTS moment narrative**
 - **A more detailed administrative moment = better support for coding**
- » If the moment response does not have enough detail to substantiate the moment itself, LEAs may also maintain additional supporting documentation to support such moments.
- » Documentation may include but is not limited to:
 - Medicaid outreach materials/flyers
 - Referrals for Medicaid services
 - E-mails
 - Meeting notes
 - Medicaid policy development details
 - Calendar entries (to support appointments/meetings/work tasks)
- » **Remember!** LEAs must maintain documentation of Paid Time Off (PTO).

Example: Administrative Activity Documentation for Moments

Director of Student Services in Participant Pool 2 receives a moment:

Who were you with?	<i>I was on the phone with a non-public agency.</i>
What were you doing?	<i>Arranging transportation for a student, to and from the non-public agency.</i>
Why were you doing this?	<i>Fulfilling District's responsibilities in his IEP to ensure that he receives his speech therapy services.</i>

Examples of possible administrative activity documentation to support the moment:

- Student's IEP
- Calendar entries
- Referral for Medicaid services

Example: Administrative Activity Documentation for Moments

Special Education Teacher in Participant Pool 2 receives a moment:

Who were you with?	<i>Teachers.</i>
What were you doing?	<i>Staff Meeting.</i>
Why were you doing this?	<i>Administration was providing recent updates.</i>

Note: A CQ would be asked of the TSP since there is not enough detail in the response. If the TSP identified the type of updates that were being discussed at the meeting, then there should be enough details to help code the moment.

Examples of possible administrative activity documentation to support the moment:

- Meeting notes
- Calendar entries
- Medicaid outreach materials/flyers (if applicable)

Example: Administrative Activity Documentation for Moments

School Social Worker in Participant Pool 2 receives a moment:

Who were you with?	<i>School counselors and Admin.</i>
What were you doing?	<i>Weekly PLC* Meeting.</i>
Why were you doing this?	<i>Collaborating of student services.</i>

Note: A CQ would be asked of the TSP since there is not enough detail in the response to help identify what was being discussed at that exact moment. It is not clear whether the meeting involved Medicaid-related activities or educationally related activities.

Examples of possible administrative activity documentation to support the moment:

- Meeting notes
- Calendar entries

*Note: * Spell out acronyms! In this instance, PLC stands for Professional Learning Community.*

Example: Administrative Activity Documentation for Moments

Special Education Coordinator in Participant Pool 2 receives a moment:

Who were you with?	<i>In a meeting with a vendor that provides aide for students.</i>
What were you doing?	<i>Discussed a student who requires medical eligible health services through an aide.</i>
Why were you doing this?	<i>Ensure students are provided appropriate health care services.</i>

Examples of possible administrative activity documentation to support the moment:

- Referral for Medicaid services
- Meeting Notes
- Calendar entries
- E-mails

Key Takeaways

- » Thorough documentation is essential to ensure your LEA receives the funding for administrative activities.
- » Documentation should clearly support the activity described in the RMTS moment.
- » More documentation = stronger audit readiness.

Knowledge Check



- » A counselor receives a moment while they are speaking with a parent on the phone regarding a student's recent challenges at school. The counselor provides guidance and assists the parent in coordinating with the school and the student's therapist. What are some ideas for documentation that could support this moment?

Answer

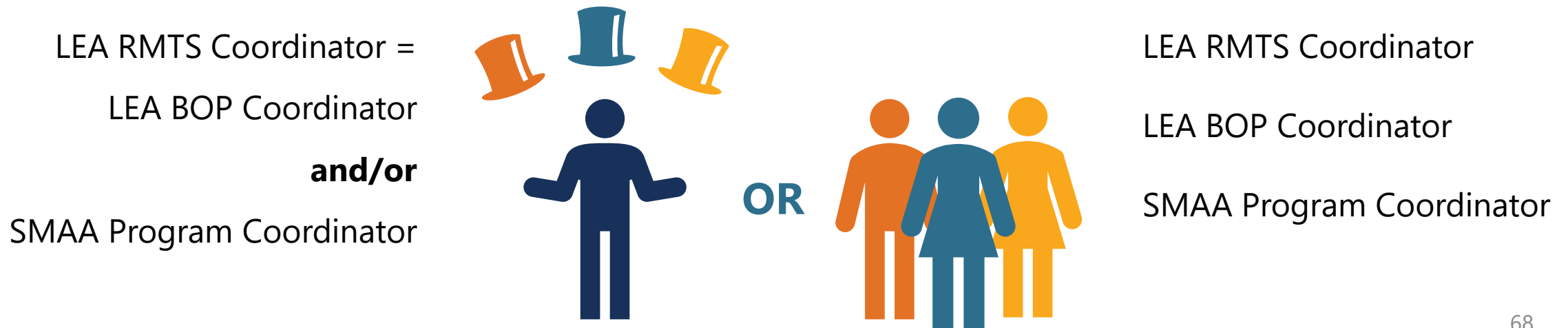
- » Detailed moment response narrative
- » Meeting notes
- » E-mails to staff, therapist and/or parent
- » Calendar entries supporting the meeting
- » Referral for mental health services

LEA RMTS Coordinator's Review of Coded Moments: Reviewing the Quarterly Coding Report (QCR)



Who is the LEA RMTS Coordinator?

- » The LEA RMTS Coordinator is the person that supports the administration of the RMTS for their LEA for either/both the LEA BOP and SMAA Program.
 - May have a different title at your LEA, such as District SMAA Coordinator, LEA Coordinator or something else.
 - The LEA RMTS Coordinator might be the same person that coordinates both the LEA BOP and the SMAA program or it might be a separate person.



What is the Quarterly Coding Report (QCR)?

- » **Definition:** The Quarterly Coding Report (QCR) is a LEA-specific report generated by the RMTS AU including all sampled moments in the quarter and each moment's assigned Activity Code.
- » **NEW!** DHCS will provide a **standardized QCR Coding and Documentation Certification Form** available for each quarter.
 - The form is used by the LEA Coordinator(s) to certify that the LEA maintains supporting documentation for moments and agrees with the codes assigned to each moment.
 - The form will be incorporated into the Quarterly Coding Report (QCR) or attached to the report.

Why the QCR Matters

- » The QCR serves as a tool for LEA RMTS Coordinators to examine their TSP responses and how those responses were coded. It can also be used:
 - To verify the accuracy of their coding.
 - To gather documentation to support the moment responses.
 - As a resource to review TSP responses to better manage their TSP lists.
- » When an LEA certifies the QCR, they are indicating that they have the appropriate documentation to support the moments for their TSPs and that they agree with the coding assigned to each moment.
 - Having documentation that supports moments can help LEAs prevent costs from being disallowed during audits and keep more federal dollars.

RMTS AU Oversight

- » RMTS Administrative Units must:
 - Assign Activity Codes within 30 calendar days after the quarter closes.
 - Provide the QCR to participating LEAs, once coding is complete.
 - Work with LEAs to resolve any coding disputes before certification of the QCR.
 - Submit the signed QCRs to DHCS upon request.

LEA Responsibilities

» LEAs have 30 calendar days to review the QCR. They must:



» Certify the agreement with the QCR **(or)**



» Submit coding correction requests to their AU.



» Gather and keep documentation to support Code 2A moments.

- For reimbursable Administrative Activity Codes, LEAs may choose to maintain additional documentation beyond the detailed moment narrative.

LEA Responsibilities (Continued)

- » Effective in July 2026, **a new form - The Coding and Documentation Certification Form - will be used to certify the QCR.**
- » Documentation is required to support moments.
 - **Questions on documentation?** See our [General and Code 2A Documentation Training](#).
 - It is ***not*** required to provide documentation at the time of signing the certification, but signing it indicates that appropriate documentation to support the moments is available.
- » A physical audit “binder” is not required.
 - Documentation may be kept electronically and should be available upon request by federal or state Medicaid oversight agencies.

Coding Correction Review Process

- » If there is no request for corrections, the LEA certifies the QCR.
- » If the LEA disagrees with coding detailed on the QCR, the RMTS AU has 30 calendar days to:
 - Review coding correction requests.
 - Make corrections if appropriate.
- » If there is a request for corrections and the RMTS AU and LEA do not agree on a correction within 30 days, **a coding decision may be elevated to DHCS through a coding appeal.**

Note: While 2z moments are the most frequently appealed moment code, any coded moment may be appealed.

Coding Appeals Process

- » Appeals are submitted by the RMTS AU on behalf of the LEA.
- » The LEA does not certify the QCR until appeals are resolved (LEAs have the right to appeal any moment's code).
- » DHCS requests the reason for correction and may request supporting documentation to evaluate the appeal.
- » DHCS issues a written decision within 60 business days of receiving the appeal request.
- » Once resolved and coding changes are updated, LEA RMTS Coordinator certifies the QCR.

QCR Review Process Example: Quarter 2

December 31

Quarter 2 Ends
(last moment
sampled)

January 30

RMTS AU
Completes
Coding

March 1

LEA Reviews,
and Certifies or
Requests
Corrections

March 31

RMTS AU and
LEA Agree or
Submit Appeal
to DHCS

June 26

DHCS Makes
Appeal Decision

Key Takeaways

- » LEAs have 30 calendar days to review the QCR. Within the 30 days, they must certify the agreement with the QCR or submit the coding correction request(s) to their RMTS AU.
- » LEAs must keep documentation to support reimbursable direct service moments (Code 2A) and paid time off moments.
- » DHCS will provide a new standardized QCR Coding and Documentation Certification Form for the RMTS AUs to provide to their LEAs.
 - The form is used to certify coding and assure DHCS that the LEA maintains supporting documentation for moments.
 - LEAs should not sign the QCR until all coding appeals have been finalized.

Knowledge Check

» Starting with the July – September 2026 quarter, which of the following statements about the QCR process is TRUE?



- A) LEAs have 60 business days to review and certify the QCR.
- B) LEAs must certify the QCR and submit the Coding and Documentation Certification Form after reviewing and resolving any corrections.
- C) Documentation for Code 2A moments must be submitted at the time of certification.

Answer

- » **B) LEAs must certify the QCR and submit the Coding and Documentation Certification Form after reviewing and resolving any corrections.**
 - Note: The Coding and Documentation Certification Form is incorporated into the QCR review process to ensure compliance and audit readiness.
- » Option A states that 60 business days is allowed for certifying the QCR. This is incorrect; LEAs have 30 calendar days to review and certify the QCR if there are no coding correction requests.
- » Option C stated that you must submit documentation when certifying, but that is not required.
 - LEAs do not submit supporting documentation to the RMTS AU. LEAs just need to keep moment documentation on file in case of an audit.

Wrap Up and Next Steps



Key Compliance Takeaways

- » Participation in RMTS is required for LEA BOP and SMAA.
- » TSPs must respond to moments timely, and responses must accurately reflect a one-minute snapshot.
- » Documentation is required and must be readily available for audits.
 - Supporting documentation for moments, TSP lists / calendars / schedules, and Quarterly Coding Report Certification.
- » The QCR must be reviewed and certified by LEAs.

LEA Responsibilities and Best Practices

- » Work closely with your RMTS AU for direction on RMTS timelines and compliance areas.
- » Provide ongoing training and support to TSPs.
 - Encourage TSPs to respond the day they receive their moment.
 - Use the P.O.I.N.T. framework to help TSPs write effective responses.
- » Maintain audit-ready documentation for RMTS, including all reimbursable activities.
 - Keep documentation organized and updated as moments occur.
- » Review and certify the QCR within 30 days.

Resources – Supporting LEA BOP

- » [CRCS Administration and Audit Checklist](#)
- » [General and Code 2A Documentation Training](#)
- » [LEA BOP Trainings Webpage](#)
- » [LEA BOP Webpage](#)
- » [Technical Assistance Request Form](#)
- » [Subscribe to the LEA BOP LISTSERV](#)

Resources – RMTS and SMAA

- » [2023 CMS Guide to Medicaid Services and Administrative Claiming](#)
- » [2026 Draft of California's Proposed Time Study Implementation Plan \(TSIP\)](#) (pending CMS approval)
- » [CMS Medicaid SBS Federal Documentation Requirements Guide](#)
- » [RMTS Administrative Unit Service Regions](#)
- » [SMAA Manual](#)
- » [Subscribe to the SMAA LISTSERV](#)

QUESTIONS

Please submit additional questions to the RMTS Inbox:
RMTS@dhcs.ca.gov