

NURSING SERVICES: DMAS REQUIREMENTS FOR SERVICE COVERAGE

Medicaid School Services
Provider Training 2023



Objectives

- To provide training on provider requirements, covered services, documentation requirements, and the Random Moment Time Study



Describe billing/claims requirements for skilled nursing services

- Address **Ordering and Referring Prescriber (ORP) National Provider Information (NPI)** requirements
- Random Moment Time Study

Nursing Services

Disclaimer:

The new requirements detailed in this presentation will go into effect upon *Centers for Medicaid Services* (CMS) approval of Virginia's state plan amendment.

Health Care Professionals working in Schools

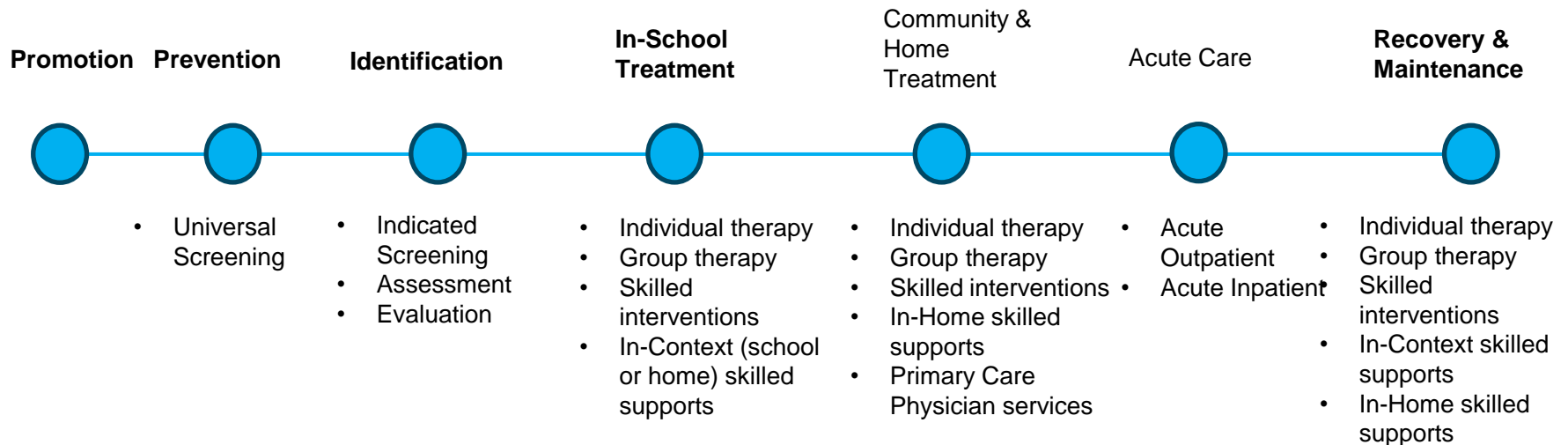
“...the school setting offers a unique opportunity to enroll children in Medicaid and facilitate access to coverage as well as provide health services directly to ANY Medicaid enrolled children. Schools provide a venue to enhance early identification of health needs and connect students to a broad range of health care services, including behavioral health resources.”

- Centers for Medicare and Medicaid Services, May 2023

<https://www.medicaid.gov/resources-for-states/medicaid-state-technical-assistance/medicaid-and-school-based-services/index.html>

School Services on the Continuum of Care

- School-based practitioners provide important **health-related** services on the continuum of care for the children you serve.



Continuum of Care

- School division direct services are an important healthcare component on the continuum of care in a school setting.
- Other healthcare providers, such as long-term care providers and hospital providers, are also on the continuum.
- All services on the continuum represent important **health care** services.
- The direct services that school divisions provide are not “less than” other services and settings.
- When students receive services both in-school and out, the services that school divisions provide do not duplicate services in other settings, but rather compliment them.
- Schools provide important **health care** services, which when taken together with community-based services, can address the full scope of services that kids need on the complete continuum of care.

Health Care Professionals working in Schools

- As a provider working under the scope of your license, you are a health care provider, providing services in an education setting.
- Anytime that you are wearing your discipline's "hat" remember that you are bringing your skills, training, experience and scope of license to the work that you are doing, including:
 - Direct services with student(s)
 - Preparation/planning for services and paperwork/follow-up activities related to services (report writing, documentation, etc.)
 - Bringing your skills/training/license to contribute to a meeting, consultation, communication, coordination, training and other similar activities.
- When you are doing an activity that can be done by an unlicensed provider (lunch duty, bus duty, teaching, etc.), this is considered educational.
- It's important to keep your role as a health care professional in mind when responding to the RMTS. (More to come on RMTS later in this presentation.)

Covered Nursing Services

- Two “types” of nursing services
 1. Nursing services provided pursuant to a student-specific physician, nurse practitioner or physician assistant order, and;



1. *Nursing services that are not provided pursuant to a student-specific physician, nurse practitioner or physician assistant order.*

Covered Nursing Services

1). Nursing services provided pursuant to a student-specific physician, nurse practitioner or physician assistant order



New

- Inclusion in the IEP is no longer required!!
- Skilled nursing services must be determined to be **medically necessary**
- Ordered by a physician, nurse practitioner (NP), or physician's assistant (PA) **who is enrolled with DMAS as an ordering, referring or prescribing (ORP) provider**
- The National Provider Identifier (NPI) of a DMAS-enrolled ordering, referring or prescribing (ORP) provider **must be included on service claims as a referring provider for school-based services.**

Ex: Providing medically prescribed interventions, medication administration, health care procedures that require the skill level of a licensed nurse.

Covered Nursing Services



New!!

2). Nursing services that are NOT student specific*

These requirements will be effective upon CMS approval of our plan

- ***Inclusion in the IEP is no longer required**
- Provided pursuant to a standing order, as defined by the Virginia Department of Health, for a school-based health service, or based on a school health treatment protocol established by a supervising physician
- Provided as unplanned, acute nursing care to address a health or acute condition rendered by licensed nurses in a manner consistent with VA. Board of Nursing licensure, VA Department of Health (VDH) School Health Guidelines and guidance from VA Department of Education.

Ex: Providing acute nursing care to injured children and staff, providing everyday care of acutely ill children, and managing children with communicable diseases, when care requires the skill level of a licensed nurse OR conducting state mandated hearing or vision screens that require the skill level of a licensed nurse.

Nursing Services

- Provided by a RN or LPN licensed by the Virginia Board of Nursing and employed by or under contract with the school division.
 - LPN's work under the direct supervision of an RN which is consistent with the regulatory standards of the Board of Nursing.
- The RN or LPN providing the service must participate in DMAS, Random Moment Time Study.
- Rendered in accordance with the licensing standards and criteria of the Virginia Board of Nursing

Documentation

Documentation of nursing services must be completed as soon as possible, **but before a claim is submitted. The claim must meet timely filing requirements.**



Documentation of All Nursing Services

Student-specific (planned) and non-student specific (unplanned) nursing services must include:

- Medicaid/FAMIS ID #
- Nursing Assessment/Medical/treating diagnoses;
- Date (month/day/year), time of day, and amount of time (total number of minutes) of the nursing service entered by the responsible licensed nurse;
- Nursing service rendered;
- Student's response to treatment;
 - N = Normal
 - V = Variance from normal or standard. Note: If the student's response is a variance from normal or standard, the responsible licensed nurse must document a written explanation of the variance.

**Documentation of All
Nursing Services
includes: continued**



- Care coordination activities directly related to the service provided including notifying parents, calling the physician or notifying emergency medical services, as applicable;
- Identification of the nurse rendering the service; and
- Signature of the licensed RN or LPN that rendering the service.

POC for Nursing Services with a Student-Specific Order (planned)

- Documentation of nursing care provided pursuant to a Plan of Care (POC) must also include:
 - Any prescribed drugs which are part of the POC, including dosage, route of administration and frequency;
 - Any changes from the physician, physician assistant or nurse practitioner written order;
 - Signature of a licensed RN as confirmation that services rendered by themselves or persons under their direction/supervision were carried out according to the POC.



Screenings and Assessments

NEW

Health screenings and assessments provided pursuant to a standing order or *school health treatment protocol* are documented in the same manner as any nursing service.

Documenting the Plan of Care

- The Plan of Care (POC) details the plan for providing all nursing services ordered by an appropriately qualified physician, PA or NP for the student.
- Nursing services ordered by multiple qualified providers may be listed on a single POC document.
Ex: students with chronic health conditions are often seen by multiple health care providers.

Documenting the Plan of Care

- The POC must be:
 - must be signed and dated before the start date of services.
 - signed by a Registered Nurse
 - renewed at least every 12 months.
 - can be amended within the one year at any time the written orders are changed.

Documenting Nursing Services

- Nursing services that exceed the physician's, PA's, or NP's written order for nursing services should not be billed to DMAS

Documenting Nursing Services

- The Nursing POC must include:
 - Student's name
 - Student's Medicaid/FAMIS ID number
 - Date of POC implementation
 - ICD-10 code (diagnosis code)
 - Medical condition(s) to be addressed by nursing services
 - Goals and objectives to be addressed

Documenting Nursing Services

- Planned procedures, medication, or treatment for each goal.
- Schedule for delivery of procedures, medication or treatments, including dose and route (for medications) and frequency.
- Discontinue date (if applicable)
- Comments (if applicable)

Documenting Nursing Services

- Name of child's primary care physician
- Signature of the RN that oversees execution of the POC.

Nursing Plan of Care (POC)

**Department of Medical Assistance Services / Local Education Agency Services
Nursing Services Plan of Care**

Student Name: _____
Last First

Medicaid/FAMIS ID#: _____

Date of POC Implementation (mm/dd/yy): _____ ***ICD Code(s):** _____
(for billing purposes)

Identifying Issue: _____

**Note: Select ICD Diagnosis Code from student's medical history. Inserting this code does not constitute a medical diagnosis.*

Goals and Objectives:

1. _____
2. _____
3. _____
4. _____

| Goal # | Medication, Treatment or Procedure | Dose | Frequency | Discontinue | Ordering Provider | Comment |
|--------|------------------------------------|------|-----------|-------------|-------------------|---------|
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Prescriber: _____ **Primary Care Physician:** _____
Print Name (Forward copy to PCP) Print Name

RN: _____
Print Name Signature Initials Date Signed (mm/dd/yy):

DMAS 39
RVSD0220

Nursing - Billing for Services

- Nursing services will be limited to 8 hrs per day (32 units)



- A unit is 15 minutes of nursing care.



Billing for Nursing Services

Written orders for all nursing services billed to DMAS must be maintained and readily available .



Nursing - Student Log

- **Must include:**
 - Student's name
 - Month and year
 - Medicaid or FAMIS ID number (must be on each page of the nursing record)
 - Name, title, and initials of LPN/RN documenting on the nursing log

Nursing - Student Log

- Date of service
- Time of day
- Amount of time (in minutes)
- Nursing procedure, medication administration or treatment
- Response to procedure (Normal or Variance)
- Comments if variance
- Initials of nurse completing the procedure

Nursing - Student Log

- Supervision (if required) must be documented by each supervising nurse.
 - Supervisory date
 - Status and concerns
 - Comments and recommendations, initials
 - Signature of LPN and date
 - Signature of RN and date

Documenting Nursing Services

- **NEW-** Documentation must be complete, including signatures, prior to submitting an interim claim to DMAS. The claim must also meet the DMAS timely filing requirements.
- It must include the date, time of day and the amount of time to complete the procedure. This includes one-on-one nurses providing continuous care.

Nursing - Documentation of Services

- Supervisory visits are required as often as needed to ensure both quality and appropriateness of services.
- If nursing procedures are performed by a LPN, they **must** be supervised by a Registered Nurse in accordance with the Board of Nursing regulations.

Nursing - Documentation of Services

- Nursing services documentation will be in accordance with the:
 - Virginia Board of Nursing
 - Department of Education statutes, regulations and standards relating to school health services
 - DMAS Local Education Agency (LEA) Provider Manual
 - Chapter VI (Utilization Review)

Nursing - Service Limitations

- Utilization Review/Quality Assurance reviews will be performed by DMAS to determine if services are appropriately provided to Medicaid recipients and to ensure the services are medically necessary and appropriate.
- Failure to document services in the child's school nursing record will be considered not performed and at utilization review by DMAS, payment may be revoked.



Nursing-related Personal Care

Services that do not require the skill level of a RN or LPN may not be billed as nursing services, but may be billed as personal care services.

- delivered under the supervision of a RN or LPN within their scope of nursing practice are covered by DMAS.
- Personal care services that require the skill level of a RN or LPN for supervision (ex: tube feeding, catheterization)
- must be ordered by a HCP: physician, physician's assistant or nurse practitioner.
- must be documented in the Personal Care Services Plan of Care.

Nursing-related Personal Care Services

These services must:

- be delivered under the supervision of a RN or LPN within their scope of nursing practice are covered by DMAS.
- require the skill level of a RN or LPN for supervision (ex: tube feeding, catheterization)
- require an order by a HCP: physician, physician's assistant or nurse practitioner.
- be documented in the Personal Care Services Plan of Care.

Nursing-related Personal Care

- The National Provider Identifier (NPI) number of a DMAS-enrolled physician, physician's assistant or nurse practitioner qualified to order skilled personal care services supervised by an RN must be included on all claims for services.
- NOTE: Personal Care services for ADLs/IADLs **do not** require a physician, PA or NP order;
- an ORP or NPI is **not required** on claims for personal care services.

Nursing - Procedure Code

One code is used for all nursing services: **T1002**

DMAS modifiers for reimbursement:

- UC -Nursing Services pursuant to physician order (include ordering provider NPI as referring provider)
- UD -School health nursing services not pursuant to a student-specific order
- TM -for services provided pursuant to a student's IEP
- TR -for services that are not provided pursuant to a student's IEP.

Calculation of Billable Units

- To calculate nursing services, add the amount of minutes for all procedures for the month the service delivered and then divide by 15 (a unit) to get the total number of units to be billed.
- Then, multiply the number of units by the rate for nursing services to determine the amount to be billed.
- One-on-one nursing care can be billed for up to 8 hours a day (32 nursing units), based on physician order.



RMTS for Nurses

Did you know?

- The Random Moment Time Study (RMTS) determines how much federal funding your school division is eligible to receive through the Medicaid and Schools program.
- Reimbursement is not based on “billing” for services.
- Reimbursement is based on how all the school-based staff across the state answer their “moments.”
- RMTS is actually a statewide group project! The responses from each individual staff member impact reimbursement for your school division, and for all school divisions in the state!



Health-Related work activities go far beyond time spent directly with students

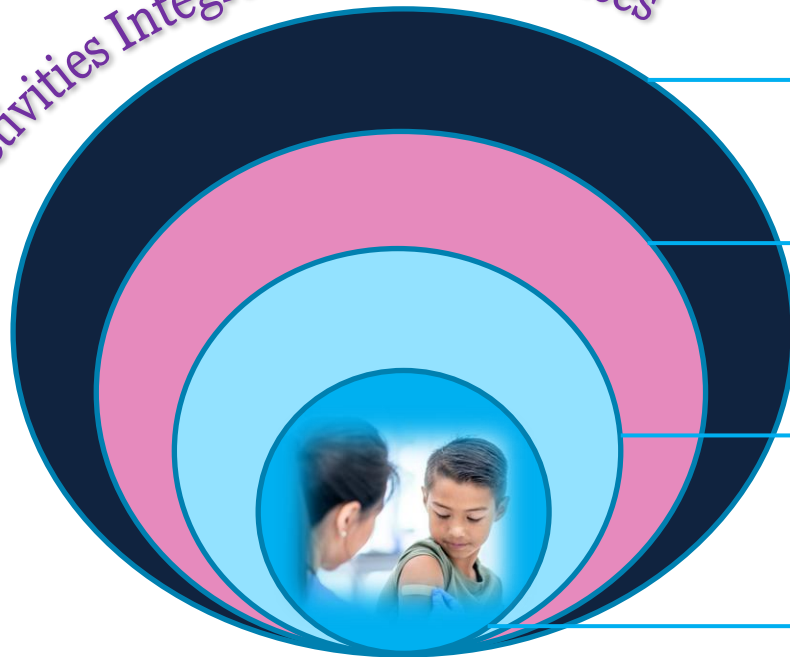
Reimbursable work activities are generally categorized for Medicaid purposes into two categories:

- Direct health care services, including all components that are integral to the delivery of services
- Medicaid “Administrative” activities

Medicaid Direct Service Reimbursable Work Activities

It's all about **PROVIDING** health care in an educational setting:

Activities Integral to Direct Services



program planning

Planning related to meeting health needs

document service(s)

Service notes; Medicaid billing

prepare for service(s)

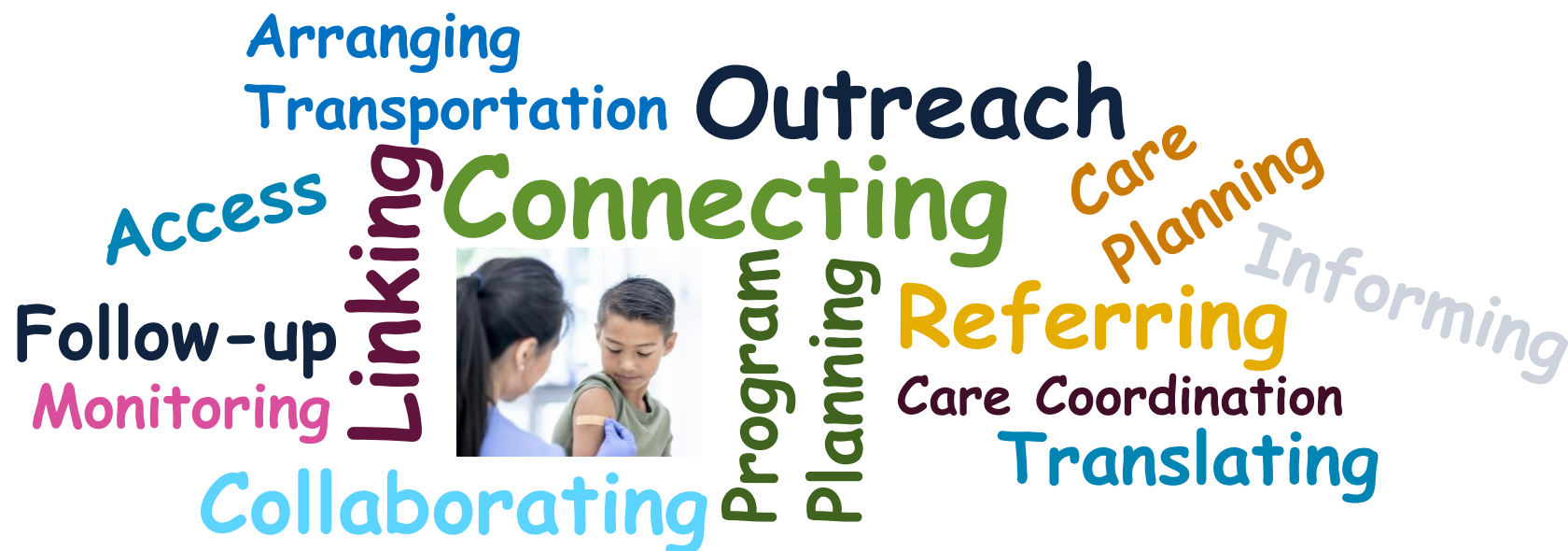
gather supplies; set-up for next student; review notes/records/POC

provide service(s)

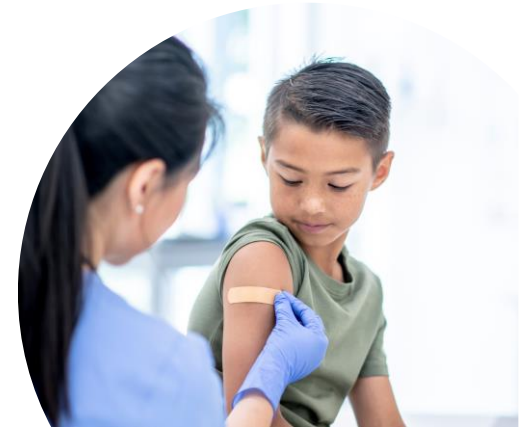
Face to face with student(s)

Medicaid Administrative (Indirect Service) Reimbursable Work Activities

It's all about **ACCESS** to health care services:



Since so much of your day is spent “wearing your licensed hat” and doing things that support student health, what does that look like when responding to a random moment?



Vignette 1: Unplanned Nursing Assessment & Intervention

- When a student arrives in the health room/clinic unexpectedly due to illness or injury, the nurse utilizes a skilled nursing assessment to determine appropriate intervention(s).
- As a licensed provider, you are performing the nursing assessment under your scope and standards of practice, or your domains of professional practice.
- These are skilled health-related services, regardless of the result/outcome of the assessment.

Vignette 1: Unplanned Nursing Assessment & Intervention

Q1: What type of activity were you doing?

- a) Working with student(s) regarding **EDUCATION / ACADEMICS** skills / issues / needs

Q2: What, specifically, were you doing?

- a) TEACHING or tutoring an academic subject
- b) Providing CLASSROOM / ACADEMIC SUPPORT or assistance
- c) ACADEMIC TESTING (includes proctoring AP exams, statewide testing, etc.)
- d) Other choices...

- a) Working with student(s) regarding **HEALTH CARE** (e.g., PT, OT, SPL, Nursing, dental, vision, hearing, mental and/or behavioral health)

Q2: What, specifically, were you doing?

- a) Providing NURSING service or evaluation
- b) Providing CRISIS INTERVENTION services for urgent HEALTH needs (for example: suicide risk or threat assessment, overdose, urgent behavioral or physical health interventions)
- c) None of the above (after selecting this response, a text box will open for you to type your answer)
- d) Other choices...

Vignette 1: Unplanned Nursing Assessment & Intervention

Q3: Was this activity pursuant to a student's IEP?

- a) Yes, my work activity was pursuant to a student's IEP
- b) No, my work activity was not pursuant to a student's IEP

Q4: Who were you working or interacting with?

- a) Student(s)
- b) Student(s) and School Staff
- c) Other choices...

Q5: Why were you performing this activity?


- a) TRIAGE, ASSESSMENT AND/OR TREATMENT OF ILLNESS, INJURY OR OTHER PHYSICAL OR BEHAVIORAL HEALTH CRISIS: The service was necessary and required the skills and training of my license.
- b) Triage, Assessment and / or Treatment of illness or injury to a student, which was medically necessary per program guidelines and was within the scope of practice allowed by my clinical license.
- c) Nursing services were appropriate, but did NOT require the skill level of my clinical license AND/OR were not medically necessary per program guidelines and/or exceeded the number / amount of prescribed services.
- d) Other choices...

Vignette 2: Documenting / Charting

- Time spent doing things that are integral aspects of providing services, such as preparing/getting ready to provide a service and doing documentation/notes and other activities that are part of completing the full process of providing services are all treated the same as the time spent directly with the student.
- Be careful not to describe these activities as “clerical tasks” or in other terms that fail to communicate the connection between the task and the provision of a skilled service.
- These are skilled health-related activities.

Vignette 2: Documenting / Charting

Q1: What type of activity were you doing?


- a) PREPARATION or FOLLOW-UP ACTIVITIES RELATED TO WORKING WITH STUDENT(S) regarding **EDUCATION or ACADEMICS**
-  b) PREPARATION or DOCUMENTATION ACTIVITIES RELATED TO WORKING WITH STUDENT(S) regarding **HEALTH CARE** (e.g., PT, OT, SPL, Nursing, dental, vision, hearing, mental and / or behavioral health)
- c) GENERAL ADMINISTRATIVE or clerical work unrelated to any of the categories above
- d) Other choices...

Vignette 2: Documenting / Charting

Q1: What type of activity were you doing?

- a) PREPARATION or DOCUMENTATION ACTIVITIES RELATED TO WORKING WITH STUDENT(S) regarding **HEALTH CARE** (e.g., PT, OT, SPL, Nursing, dental, vision, hearing, mental and / or behavioral health)

Q2: What, specifically, were you doing?

-  a) Preparation or documentation activities related to HEALTH CARE (e.g., PT, OT, SPL, Nursing, hearing, vision, mental and / or behavioral health) services
- b) CLEANING / BREAKING DOWN after provision of HEALTH-related services
- c) WRITING PROGRESS REPORTS for HEALTH-related services
- d) Other choices...

Vignette 3: Student Response Team or Child Study Team Meeting


- Any school health professional is participating in these types of team meetings to provide the clinical perspective of your license and training.
- Yes, these teams have a goal of improving attendance, preventing truancy, and increasing student academic success.
- But the licensed professional is qualified to assess the health-related barriers and challenges a student faces that contribute to poor attendance and poor academic achievement.
- You bring your skilled expertise to address health-related concerns to this meeting/effort.

Vignette 3: Student Response Team or Child Study Team Meeting

Q1: What type of activity were you doing?

- a) Planning or participating in MEETING / CONVERSATION regarding SPECIFIC STUDENT(S), including phone and email conversations

Q2: What, specifically, were you doing?

- a) **EDUCATION / ACADEMIC** or SOCIAL related PARENT MEETING / CONFERENCE / COMMUNICATION (including phone or email)
- b) **EDUCATIONAL, ACADEMIC**, VOCATIONAL or SOCIAL services FOCUS: any other MEETING / COMMUNICATION / CONSULTATION regarding EDUCATIONAL OR ACADEMIC issues for a specific student (other than an IEP or Section 504 meeting)
- c) **HEALTH-related** PARENT MEETING / CONFERENCE / COMMUNICATION (including phone or email but NOT and IEP, IFSP or 504 meeting)
-  d) **HEALTH-related** FOCUS: any other MEETING / COMMUNICATION / CONSULTATION regarding HEALTH / MEDICAL issues for a specific student (other than an IEP / IFSP or Section 504 meeting)
- e) Other choices...

Vignette 3: Student Response Team or Child Study Team Meeting

Q1: What type of activity were you doing?


- a) Planning or participating in GENERAL MEETING / CONVERSATION - NOT regarding any specific student(s), including phone and email conversations

Q2: What, specifically, were you doing?

a) **EDUCATIONAL, ACADEMIC, VOCATIONAL or SOCIAL services** FOCUS: Staff / Faculty / Department or other meeting

b) **BEHAVIOR / DISCIPLINE** FOCUS: Staff / Faculty / Department or other meeting

 c) **HEALTH-related** FOCUS: Staff / Faculty / Department or other meeting

 d) None of the above (after selecting this response, a text box will open for you to type your answer)

e) Other choices...

Note: If you choose to write in your own response using the “none of the above” option, you need to say more than “child study team meeting” (for example). You need to convey your role in the meeting as a health care professional.

Vignette 4: Care Coordination & Referral


- School nurses collaborate and consult with other professionals in the school, such as teachers and administrators, to help support student health. You also collaborate and consult with community health partners, such as pediatricians and others. And sometimes you refer a student/family to a community provider for follow-up care and other necessary health services.
- All of these activities are aspects of care coordination and referral services, which are an important part of ensuring that your students receive necessary health care services.

Vignette 4: Care Coordination & Referral

Q1: What type of activity were you doing?

- a) Planning or participating in MEETING / CONVERSATION regarding SPECIFIC STUDENT(S), including phone and email conversations

Q2: What, specifically, were you doing?

- a) **EDUCATIONAL, ACADEMIC**, VOCATIONAL or SOCIAL services FOCUS: any other MEETING / COMMUNICATION / CONSULTATION regarding EDUCATIONAL OR ACADEMIC issues for a specific student (other than an IEP or Section 504 meeting)
-  b) **HEALTH-related** FOCUS: any other MEETING / COMMUNICATION / CONSULTATION regarding HEALTH / MEDICAL issues for a specific student (other than an IEP / IFSP or Section 504 meeting)
- c) None of the above (after selecting this response, a text box will open for you to type your answer)
- d) Other choices...

Note: If you choose to write in your own response using the “none of the above” option, you need to say more than “child study team meeting” (for example). You need to convey your role in the meeting as a health care professional.

Vignette 5: Supervision of an assistant

- School nurses are often responsible for clinical supervision of assistant-level staff.
- Clinical supervision's purpose is to establish, maintain and elevate the level of performance of the supervisee and provide skilled clinical oversight on proper implementation of care plans and nursing interventions to ensure the quality of care that the students receive when treated by an assistant.
- This is a skilled health-related interaction.

Vignette 5: Supervision of an assistant

Option
1

Q1: What type of activity were you doing?

- a) Planning or participating in MEETING / CONVERSATION regarding SPECIFIC STUDENT(S), including phone and email conversations

Q2: What, specifically, were you doing?

- a) HEALTH-related FOCUS: any other MEETING / COMMUNICATION / CONSULTATION regarding HEALTH / MEDICAL issues for a specific student (other than an IEP / IFSP or Section 504 meeting)

Option
2

Q1: What type of activity were you doing?

- a) TRAINING, Professional Development or Conference activity

Q2: What, specifically, were you doing?

- a) MENTORING / COACHING / TRAINING with other staff member(s)

Vignette 5: Supervision of an assistant

Q1: What type of activity were you doing?

Option
3

- a) GENERAL ADMINISTRATIVE or clerical work unrelated to any of the categories above

Q2: What, specifically, were you doing?

- a) SUPERVISORY functions, including performance evaluations, supervision, classroom observation (for the purpose of performance eval)

Q1: What type of activity were you doing?

Option
4

- a) Working with student(s) regarding HEALTH CARE (e.g., PT, OT, SPL, Nursing, dental, vision, hearing, mental and/or behavioral health)

Note: if the supervision is occurring simultaneously/concurrently with providing a service (maybe you're modeling and training; or maybe the assistant is servicing, but you're observing/ coaching / providing feedback and oversight) Then we want you to indicate that you're working with a student regarding health care as the 'primary' thing occurring.

In conclusion

These changes to the Medicaid in Schools Program will allow schools to expand school services to all Medicaid-eligible students outside of an IEP.

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