



# School-Based Medicaid Program: Roles & Responsibilities

## School-Based Medicaid Program Roles and Responsibilities

This tool is designed to support districts in building strong oversight practices by providing operations/tasks for each major component of the SBMP. This helps LEAs clarify roles, strengthen communication with vendors, verify accuracy of information, and ensure the district maintains full compliance and audit readiness.

Each section outlines key areas every LEA should understand- from the provider contract to staff pool lists, RMTS, documentation, claiming workflows, annual cost report, and final reimbursement. The goal is to equip districts with the knowledge and tools they need to confidently manage their responsibilities, maintain oversight, and maximize program integrity and reimbursement.

### Program Integrity

Operations/Tasks	Medicaid Coord	LEA Staff	Vendor	Comments
Review of the <a href="#">School-Based Medicaid Provider Contract</a> at least yearly	-	-	N/A	-
Monitor Medicaid state laws/regulations, <a href="#">School-Based Medicaid Program (SBMP) Bulletins</a>	-	-	-	-
Provide training regarding Medicaid policies and regulatory requirements to LEA staff	-	-	-	-
Vendor oversight and compliance monitoring	-	-	N/A	-
Identify LEA staff member with primary responsibility for the LEA’s compliance with Medicaid program requirements	-	-	-	-

### Random Moment Time Study (RMTS)

The Random Moment Time Study (RMTS) determines the percentage of staff time that is reimbursable under Medicaid, making it one of the most critical components of the School-Based Medicaid Program. Accurate participant lists, work schedules, and timely responses to all moments and follow-up questions all play a direct role in the LEA’s final reimbursement. When a vendor assists



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with these activities, the LEA must still verify accuracy and maintain oversight. This section will help districts monitor all parts of the RMTS process.

Operations/Tasks	Medicaid Coord	LEA Staff	Vendor	Comments
Identify the LEA’s authorized designee(s) filling the role of RMTS Manager/Coordinator using <a href="#">SBMP Authorized Designee Information Form</a> . Note that at least one designee must be an LEA employee.	-	-	-	-
Review the <a href="#">RMTS Resources &amp; Instruction Guides</a> provided on the SBMP Resource Center at least annually	-	-	-	-
Ensure compliance with RMTS deadlines: <a href="#">Dates &amp; Deadlines FYXX</a>	-	-	-	-
Identify RMTS participants on a quarterly basis, as outlined in the <a href="#">LEA RMTS Coordinator Guide for Random Moment Time Study</a>	-	-	-	-
Create/update the LEA’s RMTS compliance plan to ensure all requirements outlined in the <a href="#">LEA RMTS Coordinator Guide for Random Moment Time Study</a> are met	-	-	-	-
Create an internal procedure for communicating staffing changes in a timely manner	-	-	-	-
Identify process(es) and responsibilities to report Change of Status when RMTS participants terminate employment, take a leave of absence, and other key changes	-	-	-	-
Train LEA staff with access to RMTS management tasks on how to enter, review, verify participant lists, district calendar, and work schedule data within the systems	-	-	-	-
Assign RMTS participating staff to appropriate RMTS Pools including <a href="#">Administrative Only pool</a>	-	-	-	-
Acquire accurate RMTS participants work schedules	-	-	-	-



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Operations/Tasks	Medicaid Coord	LEA Staff	Vendor	Comments
Enter or upload quarterly RMTS participant list in the system	-	-	-	-
Create RMTS District calendar within the system	-	-	-	-
Create RMTS participant work schedules within the system	-	-	-	-
Train returning RMTS participants yearly and new RMTS participants upon joining the time study	-	-	-	-
Identify and inform participants who to contact for RMTS questions and troubleshooting	-	-	-	-
Follow-up with participants who have unanswered moments	-	-	-	-
Define and implement procedure for RMTS participants who consistently do not respond to assigned moments	-	-	-	-
Monitor RMTS participation compliance to ensure minimum of 85% participation rate	-	-	-	-
Address RMTS non-compliance: investigate cause(s) and identify solutions	-	-	-	-
Define and implement process to gather and retain supporting documentation for RMTS moments in retrievable order for 7-year record retention period	-	-	-	-
Identify the LEA's contact for RMTS audits/reviews/record requests using the <a href="#">School District Contact Information Form</a>	-	-	N/A	-

### Administrative Activities Claiming (AAC)

AAC reimbursement can be claimed for staff costs in both the direct service and administrative only RMTS pools, as well as for other allowable administrative costs. Even when a vendor prepares the AAC quarterly expenditure reports (claims), the LEA is responsible for the accuracy of all data and compliance with all program requirements.



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Operations/Tasks	Medicaid Coord	LEA Staff	Vendor	Comments
Identify the LEA's authorized designee who will submit quarterly AAC expenditure reports (claims) using the <a href="#">SBMP Authorized Designee Information Form</a>	-	-	-	-
Review of <a href="#">LEA Instruction Guide for Administrative Activity Claiming (AAC)</a> provided on the SBMP Resource Center at least annually	-	-	-	-
Ensure compliance with AAC claim submission deadlines: <a href="#">Dates &amp; Deadlines FYXX</a>	-	-	-	-
Train LEA staff with access to the systems used for this part of the program on how to enter, review, and verify data within the system	-	-	-	-
Define and implement internal procedures and controls to ensure all expenditures and statistics reported in AAC are accurate and allowable	-	-	-	-
Create internal procedure for gathering and reporting quarterly salary and benefit expenditures for AAC	-	-	-	-
Create internal procedure for gathering and reporting quarterly contracted staff expenditures for AAC	-	-	-	-
Create internal procedure for providing quarterly student roster "snapshots" for Medicaid Eligibility matching	-	-	-	-
Identify the LEA's authorized designee who will complete quarterly Medicaid Eligibility matching process using the <a href="#">SBMP Authorized Designee Information Form</a>	-	-	-	-
Create internal procedure for gathering and reporting quarterly LEA specialized transportation information, including expenditures and student statistics	-	-	-	-
Determine process and complete annual supplemental report of Medicaid students receiving qualified specialized transportation by September 30	-	-	-	-

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Operations/Tasks	Medicaid Coord	LEA Staff	Vendor	Comments
Create internal procedure for gathering and reporting quarterly capital costs	-	-	-	-
Create internal procedure for gathering and reporting annual budgeted district-wide salaries, benefits, and FTE	-	-	-	-
Create internal procedure for gathering and reporting allowable quarterly out-of-district tuition expenditures	-	-	-	-
Create internal procedure for gathering and reporting quarterly allowable materials and supplies expenses	-	-	-	-
Identify LEA signatory and process for executing quarterly LEA Certification of Public Expenditures (CPE)	-	-	N/A	-
Determine internal process for maintaining supporting documentation for all expenditures and statistics reported in AAC for 7-year record retention period	-	-	-	-
Identify and implement desired quarterly monitoring tools and reports to track AAC program trends	-	-	-	-
Identify the LEA's contact for audits/reviews/record requests using the <a href="#">School District Contact Information Form</a>	-	-	-	-

### Direct Service Reimbursement – Services and Requirements

The SBMP covers health services provided in the school setting, including speech-language pathology, occupational therapy, and physical therapy; mental and behavioral health services; skilled nursing services; audiology services; personal care services; medical nutritional counseling; certain physical and behavioral health screenings; and ABA therapy services when all Medicaid-claiming requirements are met. Regardless of whether the LEA contracts with a vendor to assist with claim submission, the LEA is responsible for the accuracy of all data and compliance with all program requirements.



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Operations/Tasks	Medicaid Coord	LEA Staff	Vendor	Comments
Review <a href="#">Health Care Services and Supports Needs Assessment for School Districts (LEAs) in Massachusetts</a> provided on the SBMP Resource Center upon implementation of seeking reimbursement for new direct service(s)	-	-	-	-
Review <a href="#">Direct Service Claiming (DSC) Program Guide</a> provided on the SBMP Resource Center at least annually	-	-	-	-
Develop and implement policies related to performance expectations of LEA employed providers related to compliance with Medicaid program participation requirements	-	-	-	-
Develop standard contract language and implement when engaging contracted providers related to compliance with Medicaid program participation requirements	-	-	-	-
<b>If LEA seeks reimbursement for Medical services (nursing, personal care, health screenings, etc.)</b>	-	-	-	-
<ul style="list-style-type: none"> <li>Identify LEA Medical Services Coordinator(s) and define scope of responsibility for ensuring Medicaid program requirements are met for service type(s)</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>Create, review and maintain written standards of practice for medical services</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>Create, review and maintain written protocols for care plans/ individualized health plans/ treatment plans</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>Create, review and maintain written documentation protocols for medical services, including for: care plans/individualized health care plans/treatment plans, assessments, screenings, urgent care services, medication administration, skilled nursing interventions, and any other specific services provided</li> </ul>	-	-	-	-

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Operations/Tasks	Medicaid Coord	LEA Staff	Vendor	Comments
<ul style="list-style-type: none"> <li>• Create, review and maintain protocols, policies and procedures for Medicaid claiming process, including determining and documenting ICD-10 codes, procedure codes and RMTS moment documentation</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>• Develop and implement procedures for periodic internal auditing of required medical services documentation</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>• Ensure medical services documentation is organized and retrievable for the 7-year record retention period</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>• Train all participating providers on Medicaid program requirements and LEA protocols and procedures listed above</li> </ul>	-	-	-	-
<b>If LEA seeks reimbursement for Therapy services (OT, PT, SLP, Audiology)</b>	-	-	-	-
<ul style="list-style-type: none"> <li>• Identify LEA Therapy Services Coordinator(s) and define scope of responsibility for ensuring Medicaid program requirements are met for service type(s)</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>• Create, review and maintain written standards of practice for therapy services</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>• Create, review and maintain written documentation protocols for therapy services, including for: care plans/individualized health care plans/treatment plans, assessments, screenings, individual and group therapy sessions and any other specific services provided</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>• Create, review and maintain protocols, policies and procedures for Medicaid claiming process, including determining and documenting ICD-10 codes, procedure codes and RMTS moment documentation</li> </ul>	-	-	-	-

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<ul style="list-style-type: none"> <li>Develop and implement procedures for periodic internal auditing of required therapy services documentation</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>Ensure medical services documentation is organized and retrievable for the 7-year record retention period</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>Train all participating providers on Medicaid program requirements and LEA protocols and procedures listed above</li> </ul>	-	-	-	-
<b>If LEA seeks reimbursement for Mental/Behavioral Health services (psychology, social work, counseling, ABA, etc.)</b>	-	-	-	-
<ul style="list-style-type: none"> <li>Identify LEA Behavioral Health Services Coordinator(s) and define scope of responsibility for ensuring Medicaid program requirements are met for service type(s)</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>Create, review and maintain written documentation protocols for: care plans/ individualized health plans/ treatment plans, evaluations/assessments, screenings, individual and group counseling sessions and any other specific services provided</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>Create, review and maintain protocols, policies and procedures for Medicaid claiming process, including determining and documenting ICD-10 codes, procedure codes and RMTS moment documentation</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>Develop and implement procedures for periodic internal auditing of required behavioral health services documentation</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>Ensure behavioral health services documentation is organized and retrievable for the 7-year record retention period</li> </ul>	-	-	-	-

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Operations/Tasks	Medicaid Coord	LEA Staff	Vendor	Comments
<ul style="list-style-type: none"> <li>Train all participating providers on Medicaid program requirements and LEA protocols and procedures listed above</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>Ensure behavioral health service documentation is organized and retrievable for the 7-year record retention period</li> </ul>	-	-	-	-
<p><b>If LEA seeks reimbursement for services provided by Out-of-District programs for IEP students</b></p>	-	-	-	-
<ul style="list-style-type: none"> <li>Develop standard contract language and implement when placing students in out-of-district program related to compliance with Medicaid program participation requirements</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>Identify LEA Out of district coordinator and define scope of responsibility for ensuring Medicaid program requirements are met for seeking reimbursement for any out-of-district costs</li> </ul>	-	-	-	-
<ul style="list-style-type: none"> <li>Develop and implement procedures for gathering out of district documentation of delivered health related services- <a href="#">Massachusetts School Based Medicaid Service Documentation for Day/Residential Special Education Schools (28M/12)</a></li> </ul>	-	-	-	-
Identify the LEA's contact for audits/reviews/record requests using the <a href="#">School District Contact Information Form</a>	-	-	-	-



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### Direct Service Reimbursement – Interim Claims

Interim claims are required to demonstrate that reimbursable services were provided to an eligible member. Interim claims that are adjudicated in MMIS and determined to be “paid” (regardless of interim billing fee) are the basis for which costs can be included in the Annual Cost Report.

Operations/Tasks	Medicaid Coord	LEA Staff	Vendor	Comments
Develop and implement internal procedures on obtaining and tracking parental consent to bill Medicaid: <a href="#">DESE guidance</a>	-	-	-	-
Identify at least two (2) LEA staff to maintain access to the Provider Online Service Center (POSC) through the <a href="#">MassHealth Customer Service Center</a> virtual gateway	-	-	N/A	-
Train identified LEA staff on procedures using the Provider Online Service Center (POSC) for interim claims, how to check member eligibility, enter a claim, and review Remittance Advice (RA)	-	-	-	-
Develop and implement procedures for submission of service claims to MassHealth MMIS (interim claiming)	-	-	-	-
Develop and implement internal process for tracking interim claiming by service (individual service provider tracking)	-	-	-	-
Develop and implement internal process for tracking of out of district interim claiming	-	-	-	-
Develop and implement internal procedure for review, correction and resubmission of rejected or denied claims	-	-	-	-
Develop and implement internal process to monitor compliance with submission of all interim service claims within 90 days of date of service	-	-	-	-



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### Direct Service Reimbursement – Annual Cost Reporting

After the conclusion of each fiscal year, LEAs submit an annual DSC cost report that includes costs related to providing Medicaid-covered services and LEA specific Medicaid eligibility statistics used to calculate Medicaid penetration factors. These inputs are used to determine the Medicaid reimbursable amount and calculate the amount owed to the LEA or to be recouped from the LEA in a cost settlement process.

Operations/Tasks	Medicaid Coord	LEA Staff	Vendor	Comments
Identify the LEA’s authorized designee who will submit the annual cost report using the <a href="#">SBMP Authorized Designee Information Form</a>	-	-	-	-
Review of <a href="https://www.mass.gov/doc/lea-instruction-guide-for-administrative-activity-claiming-aac-0/download">LEA Instruction Guide for Direct Service Cost Report</a> provided on the SBMP Resource Center at least annually	-	-	-	-
Ensure compliance with cost report submission deadlines: <a href="#">Dates &amp; Deadlines FYXX</a>	-	-	-	-
Train LEA staff with access to the systems used for this part of the program on how to enter, review, and verify data within the system	-	-	-	-
Define and implement internal procedures and controls to ensure all expenditures and statistics reported in the cost report are accurate and allowable	-	-	-	-
Create internal procedure for confirming accuracy of all pre-populated quarterly salary and benefit expenditures	-	-	-	-
Create internal procedure for confirming accuracy of all pre-populated quarterly contracted staff expenditures	-	-	-	-
Create internal procedure for identifying accurate student lists used for Medicaid penetration factors of IEP and non-IEP students	-	-	-	-



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Create internal procedure for confirming accuracy and compliance for direct service reimbursement of pre-populated out-of-district tuition expenditures	-	-	-	-
Create internal procedure for tracking DCF/DMH/DYS “cost share” students in out-of-district placements and completing required annual cost share report	-	-	-	-
Create internal procedure for gathering and reporting allowable materials and supplies, purchased services & medical equipment expenses related to providing direct services	-	-	-	-
Identify LEA signatory and process for executing LEA Certification of Public Expenditures (CPE)	-	-	N/A	-
Determine internal process for maintaining supporting documentation for all expenditures and statistics reported in cost reports for 7-year record retention period	-	-	-	-
Identify and implement desired quarterly monitoring tools and reports to track AAC program trends	-	-	-	-
Identify the LEA’s contact for audits/reviews/record requests using the <a href="#">School District Contact Information Form</a>	-	-	-	-