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State of California—Health and Human Services Agency
Department of Health Care Services
LEA Medi-Cal Billing Option Program
Frequently Asked Questions (FAQs)



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****PLEASE REVIEW THE LEA MEDI-CAL BILLING OPTION PROVIDER MANUAL FOR COMPLETE LEA PROGRAM AND POLICY INFORMATION****

Q1. Can nurses bill for immunizations, administration of medications, glucose monitoring or tube feeding?

- A. Nursing services include preventive and [medically necessary](#) procedures provided at the school site that are authorized in the IEP/IFSP. School nurses may provide immunizations, administer medications, monitor glucose or tube feed. However, the service must be provided to a specific Medi-Cal beneficiary and take, at a minimum, at least seven or more continuous treatment minutes in order to be reimbursed by Medi-Cal as a nursing service. When these treatment services are provided to a non-IEP/IFSP student, the Free Care requirements must be met.

Q2. Under nursing services, a student is often observed and monitored to determine whether they need a treatment service. After the treatment is provided, the student continues to be observed to assess whether the treatment was successful. For example, a nurse provides suctioning as authorized in the IEP/IFSP, and continues to monitor the student after the treatment. Can the observation time prior to and after the treatment be billed as part of the direct service time to meet the seven minute minimum time period?

- A. Yes. Medically necessary observation of a student as part of a direct medical service may be billed. Refer to the [loc ed bil](#) section (page 1) in the LEA Provider Manual for the medical necessity definition.

Q3. Are toileting, diapering, and lifting reimbursable under the LEA Program if those services are documented as medically necessary in the student's IEP?

- A. Diapering, toileting and lifting are considered personal care services, which are not covered in California's Medicaid State Plan. Therefore, these services are not currently reimbursable under the LEA Program. Personal care services may not be billed as nursing treatment services under any circumstance, even if prescribed by a physician and included in an IEP.

Q4. Do nursing services have to be provided in continuous minutes?

- A. Nursing treatment services are billed in 15-minute increments. When seven or more [continuous](#) treatment minutes are rendered, a 15-minute increment can be billed. The minimum time (seven minutes) must be one continuous period and cannot be made up of shorter time periods provided throughout the day and added together.

Q5. Does rounding for treatment services only apply to nursing and school health aide treatments?

- A. The rounding policy applies to two treatment billing services increment scenarios:
- Treatments and TCM that are billed in 15-minute increments (nursing, school health aide, TCM services); and
 - Additional 15-minute treatment service increments beyond the initial 15-45 minutes (physical therapy, occupational therapy, group and individual speech therapy, audiology, and group and individual psychology and counseling). The rounding policy does not apply to any assessment services.

Additional information is located in the [loc ed bil](#) (page 9) and the [loc ed bil cd](#) [loc ed bil cd](#) sections in the LEA Provider Manual.

Q6. Under nursing services, do we need to have a frequency attached to the service in the IEP? Many times the nurses will provide services on an as-needed basis, which is reflected in the IEP. Is this acceptable?

- A. Nursing services may be authorized on an as-needed basis in the IEP/IFSP, as appropriate to the diagnosis. For certain medical conditions, physicians may authorize that services should be provided as required or needed. As long as the LEA maintains documentation that as-needed services are medically necessary, these services may be billed to Medi-Cal.

Q7. If we have an aide who is constantly accompanying an IEP/IFSP student and data collecting or monitoring their medical condition, can we bill for the time when the aide is not providing direct medical care? For example, if an aide accompanies a student who must be constantly monitored for suctioning, can this monitoring time be billed?

- A. Yes, an LEA can bill for an IEP/IFSP student to receive constant monitoring as part of direct medical service if it is medically necessary and authorized in the IEP/IFSP .

Q8. School Nurses are seeing an increase in the number of students with mental health disorders that require observation by Trained Health Care Aides in order to prevent harm to self and/or others. What requirements are necessary to receive reimbursement for these services when the student has an IEP and the team agrees these nursing services are needed?

- A. Behavioral monitoring of a child by a Trained Health Care Aide is not billable under the LEA Medi-Cal Billing Option Program. Behavioral services of a mental health disorder are not billable under the LEA Medi-Cal Billing Option Program.

Q9. Is “observation only” of an autistic student billable under the LEA Medi-Cal Program? The aide time is written into the student’s IEP.

- A. No. Observation of an autistic student is considered a behavioral service and is not billable under the LEA Medi-Cal Billing Option Program.

Q10. Q: Can a THCA bill for continuous monitoring of more than one student at a time, or while engaged in another task?

A. A: No, continuous monitoring is 1:1 monitoring and it is not acceptable to be engaged in another task in the context of continuous monitoring when ongoing continuous monitoring is necessary and planned by an ordering physician and IEP. If the THCA is monitoring more than one student or is engaged in another task, then only the time spent doing an actual monitoring act/procedure should be billed, which may include observation after a procedure or medical situation, to observe the student's reaction and further action taken by the THCA.

Q11. Can a LEA bill for a THCA delivering diabetes care tasks within the LEA Medi-CAL Billing Option Program, and if so, what are the tasks that are billable?

A. Yes, an LEA can bill for a THCA delivering diabetes care tasks. When seven or more continuous treatment minutes are rendered and documented, a 15-minute increment can be billed. Some examples of routine and emergency tasks that may be billed for are:

- Blood glucose monitoring
- Carbohydrate counting
- Ketone testing
- Glucagon administration
- Monitoring and treating hypoglycemia and reporting to school nurse/ MD
- Monitoring and treating hyperglycemia and reporting to school nurse/ MD

Supervision of the student to ensure correct techniques and/or steps are followed per the students' medical management plan when addressing routine and emergency diabetes management.