

# Reasonableness Test Criteria (RTC)

## Position Justification

**Below are criteria and samples for position justifications that the Department of Health Care Services has developed in order to assist LEAs in developing their own position justifications. Please note that these are only samples and are not to be copied and used as formal submissions. Original justifications are required to be submitted in order to be considered for approval. Thank you.**

### **Common comments/issues that require additional information:**

- 1) “General Education Teachers should be approved as we are small and rural” – It would be helpful for additional information to be provided that shows specifically the challenges a small and rural LEA faces and what prompts the need for a GET to provide MAA services.
- 2) “These positions perform outreach on a regular basis” – The justification needs to be strengthened to define what regular basis means as the comment is too general.
- 3) “We have been doing MAA claiming like this for years” – The need for detailed justifications is so that claiming can be approved at various levels. In order for DHCS and CMS to approve justifications, we need specific information that will support the positions doing the work and the amount of hours being claimed. General statements and references do not provide sufficient information that will allow invoices/RTCs to be approved.

**Time survey (In a 36 to 40 hour work week) – The below are samples that we have received that appear to show MAA hours being claimed beyond what is reasonable and necessary for the proper and efficient administration of the Medi-Cal program:**

- 1) Psychiatrist: 33 hours of MAA (Code 8). If doing 33 hours of MAA, this leaves only 7 hours per week to do normal job duties. A justification would need to be submitted that would support the number of hours being claimed and why this was necessary and appropriate. The Department would still have to analyze the appropriateness of spending such a large percentage of time on SMAA.
- 2) Superintendent and Principals: 27 hours each of MAA code (4 and code 8).
  - As superintendents are typically at the district office, we would require a strong understanding of why this position would be doing outreach and on-going referrals when children are not normally seen at the district office and there are other positions available at the school site to perform these activities.

- Principals performing this level of MAA activity would leave only 13 hours per week to perform their general administrative responsibilities. The LEA would have to strongly demonstrate why this number of hours is necessary and appropriate.

The intent of the RTC is to ensure that claiming complies with OMB A-87. Therefore when writing a justification for a position not listed on the pre-approved list, the questions you should always consider are:

**How are the duties performed by this position reasonable and necessary for the proper and efficient administration of the Medi-Cal program?**

**Why is it necessary for this particular position and no other approved position to perform these activities?**

**Supporting information may include:**

- The duties the position performs on a regular basis that would qualify as MAA activities.
- The reason it is necessary for this particular position to perform these specific activities.
- Whether the position serves a specific student population, such as a special education population.
- How the students and families would be affected if this position did not perform MAA.
- If multiple positions for the same job classification are being justified, state the necessity for including each position.
- Data to support references to the socioeconomic conditions of the school.

### **Example 1: Director**

The Director position has similar duties and responsibilities to an Assistant Principal (Group 4A). The position acts as the lead administrator for the [SPECIALTY PROGRAM] and is solely responsible for ensuring that all of the [POPULATION] students receive Medi-Cal covered services. In addition, the Director is the only individual authorized to contact mental health providers due to the sensitive nature of the communication.

### **Example 2: Case Manager**

The Case Manager position functions in a similar capacity as a Health Care Advocate (Group 5C). We have a very diverse student population (10% white; 40 % Latino; 35% African-American; 15% Russian/Ukrainian) with a large percentage of English Language Learners; in addition, over 63% are enrolled in the free and reduced lunch program. The Case Manager is one of the only staff members that speak [FOREIGN LANGUAGE] that also has training in completing the Medi-Cal application. Our district has a very high percentage of low-income and Medi-Cal eligible students (Medi-Cal percentage is 65%). The case manager is primarily responsible for monitoring and coordinating Medi-Cal covered services for students.

**Example 3: Multiple Case Managers**

The Case Manager position functions in a similar capacity as a Health Care Advocate (Group 5C).

We have a very diverse student population (10% white; 40 % Latino; 35% African-American; 15% Russian/Ukrainian) with a large percentage of English Language Learners; in addition, over 63% are enrolled in the free and reduced lunch program. The Case Manager is one of the only staff members that speak [FOREIGN LANGUAGE] that also has training in completing the Medi-Cal application. Our district has a very high percentage of low-income and Medi-Cal eligible students (Medi-Cal percentage is 65%). The case manager is primarily responsible for monitoring and coordinating Medi-Cal covered services for students. XYZ Unified School District is a very large district with more than 40 individual campuses for the district with a total enrollment of 40,000 students. Individual case managers are responsible for covering four (4) school sites each with very diverse student populations which require a significant amount of coordination.