



State of California—Health and Human Services Agency  
Department of Health Care Services



DATE: July 28, 2020

**PPL No. 20-034**

TO: Local Governmental Agency (LGA),  
Local Educational Consortia (LEC), and  
Local Educational Agency (LEA) Coordinators for the  
School-Based Medi-Cal Administrative Activities (SMAA) Program

SUBJECT: Alternative RMTS Methodology for School-Based Medi-Cal Administrative  
Activity Claiming Due to State of Emergency

This Policy and Procedure Letter (PPL) provides guidance to LEC, LGA, and LEA coordinators regarding changes in claiming procedures for School-Based Medi-Cal Administrative Activities program due to the State of Emergency caused by the outbreak of the Novel Coronavirus known as COVID-19 (State of Emergency).

Medi-Cal administrative activities for treating COVID-19 may be reimbursable through the SMAA program.

### **Background**

The SMAA program is authorized under Welfare and Institutions Code section 14132.47 to reimburse LEAs for providing certain administrative activities approved by the Centers for Medicare and Medicaid Services (CMS). These activities include:

- Medi-Cal Outreach (Code 4)
- Facilitating the Medi-Cal Application (Code 6)
- Referral, Coordination, and Monitoring of Medi-Cal Services (Code 8)
- Arranging Transportation in Support of Medi-Cal Services (Code 10)
- Providing Translation Related to Medi-Cal Services (Code 12)
- Program Planning, Policy Development, and Interagency Coordination Related to Medi-Cal Services (Code 14)
- Medi-Cal Claim Administration, Coordination and Training (Code 15)
- General Administration/ Paid Time Off (Code 16)

(See, SMAA Manual, Section 5.)

The SMAA program uses a Random Moment Time Survey (RMTS) process to determine the percentage of time that Time Survey Participants (TSPs) spend conducting the Medi-Cal administrative activities listed above. These percentages factor into the reimbursements that each LEA receives from CMS for participating in the SMAA program.

### **Alternative RMTS Methodology Due to the State of Emergency**

The State of Emergency forced school closures throughout California, resulting in some schools moving to an online learning environment and others ceasing instruction all together. These school closures have caused foreseeable reductions in reimbursement for SMAA and difficulty for TSPs to respond to their RMTS moments, potentially impacting the statistical validity of the sample for the RMTS. As such, DHCS has received approval from CMS to implement the following alternative RMTS Methodology, as stated in the 2019 SMAA Manual, effective immediately:

In the event that there is a “state of emergency” or other disaster declared in the State of California that results in prolonged statewide school closures that impact the statistical validity of the RMTS as defined in Section 6 of this manual under “RMTS Sampling Requirements,” DHCS will determine which affected quarter(s) are statistically invalid. In this case, no RMTS will be applied during the statistically invalid quarter(s), and claiming will instead be based upon an average of the RMTS activity code percentages for the two most recent statistically valid RMTS quarters for which finalized percentages are available to DHCS.

This claiming methodology will apply to quarters occurring during the “state of emergency,” beginning with the quarter in which the state of emergency is declared and ending with the quarter in which the “state of emergency” ends. California will notify CMS within 15 days of determining that a quarter is statistically invalid, including the reason for the determination, along with details and dates of the declaration of emergency.

### **Statistically Invalid RMTS Quarters**

Due to the State of Emergency, DHCS has declared State Fiscal Year (SFY) 2019-20 Quarter (Q) 4 (the period of April through June 2020) a statistically invalid quarter. In accordance with the above alternative RMTS Methodology approved by CMS, DHCS will implement the following:

- In collaboration with LECs and LGAs, DHCS will forgo the administration of the RMTS during SFY 2019-20 Q4 (April through June 2020);
- In lieu of the SFY 2019-20 Q4 RMTS, DHCS will utilize an average of the RMTS percentages for the two most recent RMTS fiscal quarters with statistically valid RMTS percentages available to DHCS (SFY 2019-20 Q2, and SFY 2019-20 Q3).
- In the event that the State of Emergency extends beyond the period of SFY

2019-20 Q4, this same alternative RMTS methodology will continue until the State of Emergency has been terminated.

The deadlines for submitting quarterly invoice claims have not changed. (See, SMAA Manual, Section 10.) To request an extension, LEC and LGA Coordinators must submit a completed Invoice Extension Request to DHCS prior to the invoice due date. Extensions for the submission of quarterly invoice claims will be approved on a case-by-case basis. Invoice extensions can only be approved in 30 day increments. If additional extensions are needed, LEC and LGA Coordinators must submit additional Invoice Extension Requests as required.

If you have any questions regarding this PPL or any other SMAA related issues and how they are affected by the State of Emergency, please reach out directly to your SMAA analyst and copy the SMAA Mailbox at [SMAA@dhcs.ca.gov](mailto:SMAA@dhcs.ca.gov).

Sincerely,

**ORIGINAL SIGNED BY JACOB MILLS**

Jacob Mills, Chief  
School-Based Claiming Services Section