

# Random Moment Time Study (RMTS) and School-Based Medi-Cal Administrative Activities (SMAA) Quarterly Call

**Welcome**



# Important Disclaimer!

- » The information presented today reflects **proposed** policy and is subject to change pending CMS approval.
- » DHCS remains committed to ongoing communication and technical assistance with all program partners.
- » Policy changes that are required, upon approval, will be provided to LEAs through their Local Education Consortia (LEC).

# Agenda

- » New Time Study Participant (TSP) Calendar Requirement
- » Developing Quality Time Study Participant (TSP) Lists
- » Q&A (time permitting)
- » Closing Remarks

# Meeting Goals

- » Clarify new TSP calendar requirements to ensure all paid and working days are accurately captured in compliance with federal guidance.
- » Outline best practices for developing accurate TSP lists, including proper classification of Pool 1 and Pool 2 participants, credential verification, and quarterly updates.
- » Highlight strategies to enhance RMTS accuracy and reimbursement integrity, emphasizing quality over quantity and prudent use of vacancy planning.

# Commonly Used Terms

- » Centers for Medicare and Medicaid Services (CMS)
- » Department of Health Care Services (DHCS)
- » Extended School Year (ESY)
- » Local Educational Agency (LEA)
- » Local Education Consortia (LEC)
- » Random Moment Time Study (RMTS)
- » School-Based Medi-Cal Administrative Activities (SMAA) Program
- » Time Study Implementation Plan (TSIP)
- » Time Study Participant (TSP)

# **New TSP Calendar Requirement**



# Main Differences Between Current and Proposed Policy

## » Current:

- Each quarter, district calendars will be reviewed by the LEC/LGA to determine the dates that the students are in attendance and those dates will be included in the RMTS sample. School calendars will be evaluated annually and the sample dates will be determined and documented by the LGA/LEC, who is required to notify the SSP vendor of these dates.

## » Proposed\*:

- ... Accurately capture 100 percent of paid work time for the entire TSP Universe. When the LEA has TSPs in both participant pools, **a minimum of two calendars per LEA are required to differentiate start and end dates per participant pool.** When applicable, another categorization may be used to achieve the same purpose.

# New Calendar Requirement

- » Submit multiple calendars (minimum of two) when there are different start dates and end dates.
- » A minimum of two calendars are needed to reflect earliest and latest working day of the Quarter for each pool of participants.
- » One calendar is permitted if there are no variations in start or end dates, specifically in Quarters 2 and 3.

# Participant Calendars – Paid Working Days

- » Quarterly calendars should be limited to paid and working days when staff are paid to work.
  - Calendars are no longer based on student attendance days.
  - Includes in-service days when students are not in attendance.
  - Excludes days when the employees are not paid to work (e.g., days before the start of the school year when staff are not working).
  - Depending on the LEA, Extended School Year (ESY) may be part of Quarter 1 and/or Quarter 4 and should be captured in a participant's calendar.
- » RMTS moments should be based on participant's paid working hours and days.

\* Pending CMS approval

# Multiple Start Dates

**Pool 2: Start Date August 1**

**Pool 1: Start Date August 15**

Month: August						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
			[Blue Bar]			
5	6	7	8	9	10	11
	Pool 2 Administrative Staff					
12	13	14	15	16	17	18
	Start Date August 1					
19	20	21	22	23	24	25
	[Blue Bar]					
26	27	28	29	30	31	
	[Blue Arrow]					

Month: August						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
			[Orange Bar]			
19	20	21	22	23	24	25
	Pool 1 Direct Service Practitioners					
26	27	28	29	30	31	
	Start Date August 15					

\*Pending CMS approval

# Participant Work Schedule (Shift)

- » Participant work schedules (shifts) should account for the following:
  - A participant's work schedule (shift) is inclusive of all the time that the participant spends during the workday, including lunch and breaks.
  - Full-time participants:
    - May be grouped into one or more similar shifts that captures total paid *and* working time for each working day.
    - Shifts are based on the start and end times that these participants are required to be at work.
      - Ex: Full time employee shift 7:45 a.m. to 3:45 p.m.
  - Part-time participants:
    - May be grouped into one or more similar shifts, based on individual participant scheduled working days and hours.
- » In all cases, 100 percent of a shift should be captured. This means recording all time that a TSP is scheduled to work.

# Full Time vs Part Time Shift

	Full Time Participant	Part Time A Participant	Part Time B Participant
8:00 a.m.	Start Time	Start Time	
9:00 a.m.			
10:00 a.m.			
11:00 a.m.			
12:00 p.m.		End Time*	Start Time
1:00 p.m.			
2:00 p.m.			
3:00 p.m.			
4:00 p.m.	End Time*		End Time*

*\*Since a "moment" in the RMTS methodology is defined as one minute in time, no moments shall be issued at the final minute of a TSP's assigned work schedule because that moment goes past the scheduled time (shift).*

**\*Pending CMS approval**

# Why the New Calendar Requirement Matters

- » Identifies direct service practitioner and administrative service personnel schedules.
  - Ensures alignment with the CMS guidance to capture all paid *and* working days.
- » Helps ensure an accurate RMTS sample.
  - Minimizes non-responses from participants which relates to amount of reimbursement.

# Key Takeaways

- » Submit a *minimum* of two calendars when an LEA participates in both LEA BOP and SMAA.
- » Submit a *minimum* of two calendars when TSP start/end dates differ.
- » Calendars must capture 100 percent of paid and working time, including in-service days when students are not in attendance.
- » A single calendar is acceptable only if all participants share the same start and end dates (specific to quarters two and three) or when participating in only one School-Based program.
- » Upon DHCS and CMS approval, regional LECs can provide more detailed information.

**\*Pending CMS approval**

# Developing Quality TSP Lists



# What is the Time Study Participant (TSP) List?

- » The TSP List includes all eligible staff that are expected to deliver Medicaid covered services to students in the upcoming quarter and whose costs will be claimed through one of the two school-based programs.
  - TSPs listed in Pool 1 are direct medical service staff and must meet the practitioner qualifications necessary for reimbursement through the LEA BOP (See [LEA BOP Provider Manual: Rendering Practitioner Qualifications](#)).
  - TSPs listed in Pool 2 are administrative activity claiming staff and perform allowable Medicaid administrative activities.
    - Pool 2 also includes direct medical service staff who perform administrative activities, such as a supervising clinician, and will NOT be claiming any direct services during the quarter.
- » A TSP **cannot** be listed in both Participant Pools.



# Who Should be on the TSP List?

- » State or Non-Federally Funded staff – they belong on the list if your LEA plans to claim their costs through the LEA BOP or SMAA. If someone is 100 percent federally funded, they're out.



## **Pool 1**

Employed practitioners only  
(if your LEA has both employed and  
contracted non-federally funded staff)



## **Pool 2**

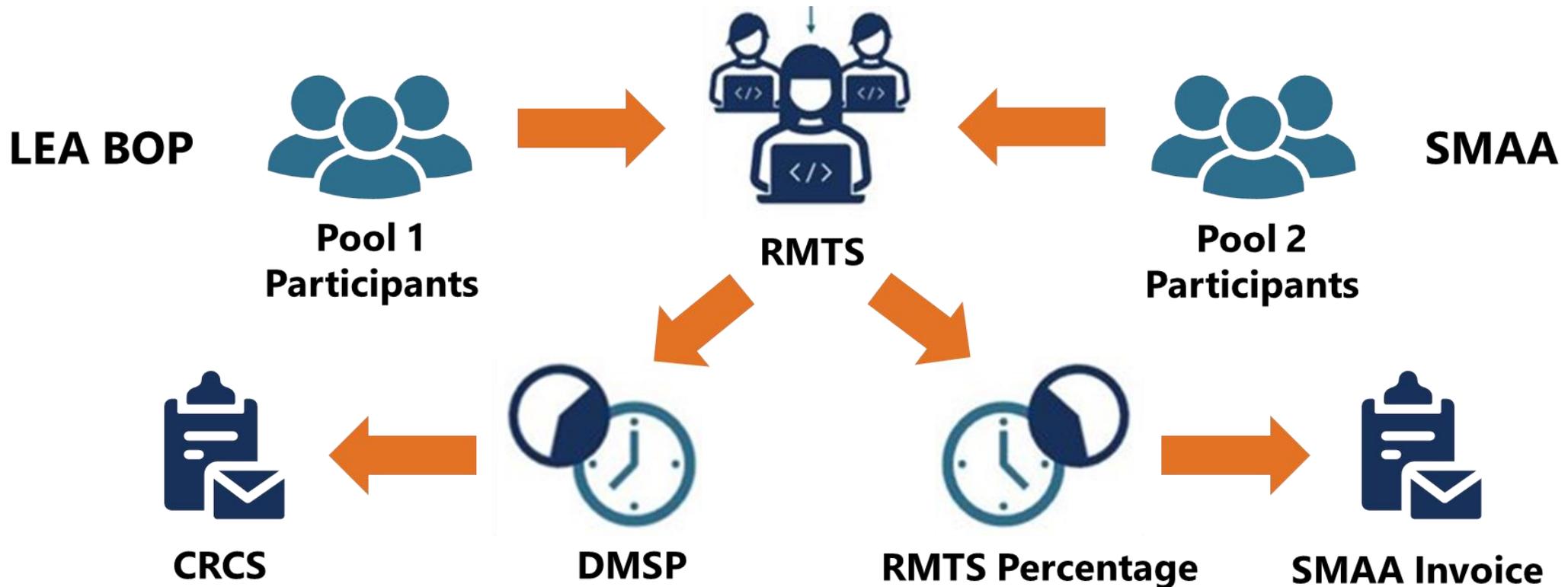
Employed staff or contractors  
(SMAA only) and they perform  
administrative activities

## **Which pool does your TSP fall into?**

- » LEAs who are only enrolled in LEA BOP (not SMAA) and are Model 2 – 100 percent contracted practitioners – do not need to participate in RMTS.

# How does the TSP list impact LEA BOP/SMAA?\*

- » The TSP list is used to identify the universe of personnel that may receive a moment during the quarter.



\*Please note that this graphic is an oversimplified overview of the process.

# Why an Accurate TSP List is Important

- » For the LEA BOP, employed practitioners' costs can only be included on the CRCS if they're on the Pool 1 TSP list.
- » For SMAA, costs can only be claimed for eligible staff that were included in the Pool 2 TSP list.

LEAs wanting to claim costs for any quarter in LEA BOP and/or SMAA must ensure they include eligible staff who will be providing Medicaid covered services (per program guidelines) during that quarter to their TSP Pool lists.

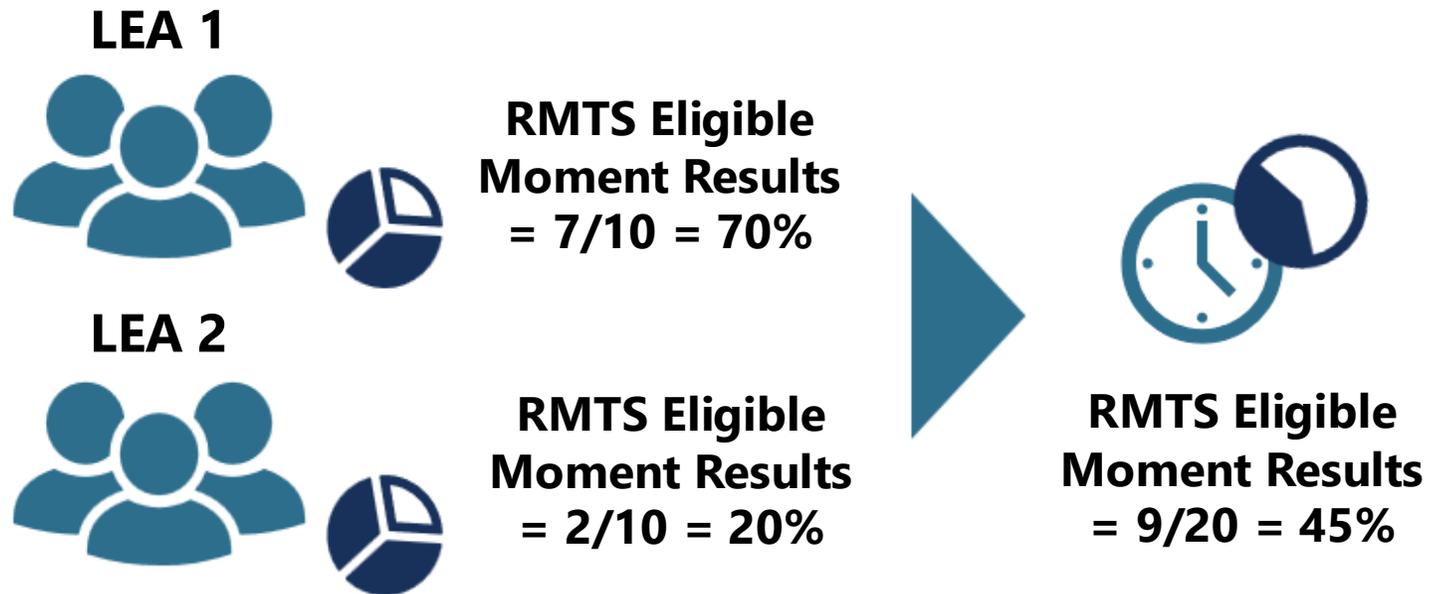


# Quality Vs. Quantity TSP Lists

- » Remember, everyone on the TSP list may receive random moments asking what type of activity they're doing at that moment, which are coded as either allowable or unallowable under both programs.

## Example:

- » Consider how much time staff on the TSP lists spend on Medicaid-covered services for students.



- » If an LEA is increasing the number of eligible staff on their TSP lists, but most of these staff's time is not being spent on program-covered services, then many of their moments will be coded as non-reimbursable. This will dilute the RMTS result percentages, lowering the costs an LEA can claim.

# LEA Requirements for an Accurate TSP List

- » Review and update the Pool 1 and Pool 2 TSP lists quarterly.
- » Verify credentials and licensing requirements for Pool 1.
- » Make sure job titles on the TSP list match the approved job classifications that are identified in [Section 6 of the SMAA manual](#) and/or the [LEA BOP Provider Manual: Rendering Practitioner Qualifications](#).
  - If they do not match, they can be rejected or dropped from the TSP list unless there is an Equivalency Request Form on file.
  - Completed [Pool 1 EQ Form](#) or [Pool 2 EQ Form](#) TSP Equivalency Request Form for either Pool 1 or Pool 2 TSPs with different job titles are submitted to RMTS Unit, who will then submit it to DHCS for consideration.

# Use of Vacancies

- » Using the vacancy strategy can help your LEA:
  - Plan ahead for anticipated hires and avoid losing RMTS moments due to unfilled positions.
  - Protect federal reimbursement opportunities by ensuring that once positions are filled, prorated costs for time worked can be claimed on the LEA BOP cost report and SMAA invoice.

# Use the Vacancy Strategy Wisely

- » Vacant positions = lost moments, so it is important to be careful when utilizing the vacancy option.
  - Vacancies should be used when the LEA is confident that positions will be filled during the quarter.
  - Unfilled vacancies can lead to missed RMTS moments which impacts federal reimbursement opportunities.
    - **Example:** If there were 20 vacancies planned for the quarter but only 10 were filled, there may be a greater potential for missed moments.

# Key Takeaways

- » The TSP list includes all eligible staff expected to deliver Medicaid covered services during the quarter.
- » Pool 1 staff perform direct medical services, while Pool 2 staff perform Medicaid administrative services. A TSP cannot be on both lists.
- » TSP lists directly affect LEA BOP cost reports and SMAA invoices. Review and update lists quarterly to ensure accuracy.
- » Quality over quantity when adding staff to TSP lists.
- » Use vacancies to plan for hires and protect reimbursement opportunities.

# QUESTIONS

**Please submit additional questions to the RMTS**

**Inbox:**

**[RMTS@dhcs.ca.gov](mailto:RMTS@dhcs.ca.gov)**