

LEA Medi-Cal Billing Option Program
RMTS Implementation Advisory Group (IAG)

Meeting #27 Summary
April 4, 2017

On Tuesday, April 4th, the twenty-seventh RMTS Implementation Advisory Group (IAG) meeting took place in Sacramento. The following was accomplished during this meeting:

- Review of stakeholder feedback from five groups on the following topics:
 - Alignment of activity codes and participant lists between the SMAA Program and the LEA Billing Option Program. Two stakeholders requested that DHCS move forward in aligning the RMTS details for the two programs now, in preparation for a combined RMTS. DHCS indicated that they must wait for SPA approval before moving forward with this task, but they are preparing documents now so that when the SPA is approved, they can immediately request CMS's approval of the new participant pool lists and the new activity code 2 definition.
 - Two stakeholders noted that they would like DHCS to consider moving to a statewide RMTS.
 - An LGA representative commented that LGAs would like more frequent meetings and communications with DHCS. The Department noted that LGA representatives are welcome to attend meetings and that they will reach out to the LGAs and invite them to relevant meetings, as appropriate.
 - A stakeholder asked specific questions regarding how substitutes, mid-quarter hires and employees that only work part of the quarter (and then go out on leave) will be handled when the LEA Program integrates into the RMTS. This information was added to scenarios that will be addressed in future LEA RMTS trainings.
 - A stakeholder noted a concern with Time Study Participants (TSP) that do not have access to email or phone to complete their moment(s). The stakeholder inquired about paper moments and commented about how those situations could impact the response rate.
 - A stakeholder inquired how LEA relationships with Non-Public Agencies (NPAs) will be impacted under RMTS and whether the NPA practitioners will be part of the cost pools that are used to generate random moments. DHCS noted that since NPAs are under contract with LEAs to provide services, they will not be included in RMTS (SPA 15-021 exempts contractors from participation in RMTS).
 - The IAG continues to review and discuss stakeholder feedback submitted via the [Stakeholder Feedback Tool](#), and encourages stakeholders to submit feedback. Stakeholder information submitted through the feedback tool is treated as confidential.
- DHCS mentioned that they informally responded to CMS's RAIs and discussed with the IAG potential scenarios for implementing RMTS and next steps; however, most next steps are dependent upon decisions made by CMS.

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- The IAG discussed a recent federal audit issued by the Office of the Inspector General (OIG), related to the State of Mississippi's school-based Medicaid Administrative Claiming Program.
 - Navigant summarized the OIG's findings, which included lack of an approved cost allocation plan, use of statistically invalid random moment sampling, and lack of adequate support to validate sample results.
 - OIG findings resulted in unallowable claimed costs from federal fiscal years 2010 through 2012 in excess of \$21 million (federal share).
- The IAG provided DHCS with suggestions on modifying the participant pool lists to combine or consolidate titles and refine titles for future TSP lists that will be effective once the LEA Program adopts RMTS.
- The IAG reviewed the group's historical discussion on Activity Code 2, including a revised version of a previous "decision tree" that may be useful to coders in determining how to code direct health services.
 - The IAG further discussed the possibility of adding an "up-front" question to the RMTS that would ask the TSP to indicate whether the activity was being performed pursuant to a service listed on a student's IEP, IFSP, or care plan.
 - The IAG reviewed the decision tree draft against three separate example moment responses and made suggestions to further clarify the draft document. The Department expects the decision tree to be part of future LEC/LGA training discussions.

The next RMTS IAG Meeting will be held on Tuesday, June 6, 2017.