



MICHELLE BAASS  
DIRECTOR

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



GAVIN NEWSOM  
GOVERNOR

DATE: October 13, 2021 **PPL NO. 21-028**

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

SUBJECT: Inclusion of Long-Term Direct Service Practitioner Substitutes and  
Administrative Service Personnel Substitutes in the Random  
Moment Time Survey (RMTS) Process

PURPOSE: This Policy and Procedure Letter (PPL) provides guidance to LEA,  
LEC, and LGA Coordinators participating in the LEA BOP and  
SMAA Programs regarding the inclusion of long-term substitutes for  
direct service practitioners in Participant Pool 1 and administrative  
service personnel in Participant Pool 2 in the RMTS process.

**Background:**

RMTS is a time survey methodology used to accurately assess a Time Survey Participant's (TSP) work time for the purpose of billing school-based Medi-Cal services and administration. The RMTS samples the TSP's activities during the full workday when students are in session. This PPL provides guidance regarding the inclusion of long-term substitutes for direct service practitioners in Participant Pool 1 and administrative service personnel in Participant Pool 2 in the RMTS process.

**Policy:**

A long-term substitute replacing permanent staff on extended leave must be identified prior to the start of the quarter and included in the quarterly certified TSP list as long as the long-term substitute meets the same qualifications<sup>1</sup> of the TSP being substituted on the TSP list. The long-term substitute must be employed by the LEA for at least 30 calendar days within a quarter. Long-term substitutes that are included on the TSP list

---

<sup>1</sup> The substitute must match job title, and description, and work hours of the TSP they are replacing. In addition, the substitute must meet and the practitioner/personnel qualifications as stated in the manual for that quarter.

must complete any time study moments assigned. LEAs must maintain supporting documentation of any direct substitutions made on the TSP list.

Additionally, a long-term substitute for Participant Pool 1 must meet the rendering provider qualifications identified in the Rendering Practitioner Qualifications (*loc ed rend*) of the LEA BOP Provider Manual, as well as appear on the approved job classification list identified in Section 6 of the SMAA Manual. A long-term substitute for Participant Pool 2 must meet the qualifications identified in Section 6 of the SMAA Manual.

If a position becomes vacant during the quarter, the vacancy must be treated as a direct replacement (per SMAA Manual Section 6). It is the responsibility of the LEA Coordinator to ensure that substitutes are appropriately trained on the RMTS process. A long-term substitute whose contract does not extend past each quarter must be removed from future TSP lists.

If you have questions concerning this PPL, please contact the Department of Health Care Services by e-mail at [RMTS@dhcs.ca.gov](mailto:RMTS@dhcs.ca.gov).

Sincerely,

**ORIGINALLY SIGNED BY BRIAN FITZGERALD**

Brian Fitzgerald, Chief  
Local Governmental Financing Division  
Department of Health Care Services