



DATE: Wednesday April 17, 2019  
TIME: 9:00 a.m. - 10:00 a.m.  
Conference Call #: 866-769-5915  
Participant: 9298750



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## SUMMARY NOTES: APRIL 17, 2019 SMAA WORKGROUP MEETING

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### Agenda Items

1. Draft PPL 19-XXX, RMTS Sample Period
  - a. DHCS provided a draft PPL to all stakeholders on Tuesday, April 9, 2019, with comments due to the SMAA Mailbox by COB Tuesday, April 16, 2019.
  - b. Comments received include:
    - I. Last minute of a shift:
      - Comment 1: It will be overly burdensome to adjust schedules to ensure no moments are issued during final minute of a shift.
      - Comment 2: This is tied to system limitations. The system needs to assign moments appropriately and coordinators should not have to adjust shifts.
      - DHCS Response: The PPL does not require work schedules to be adjusted. The PPL only requires that if a moment is issued at the final minute of a shift, that moment must receive a Code 17: Not Working/Not Paid regardless of the moment response. This is a coder training issue.
    - Stakeholders commented that coders do not have access to view a TSP's shift; therefore it is not a coder training issue, but a software issue.
    - PCG commented that it is not a system issue, but a matter of LECs/LGAs/LEAs adjusting shift end times.
    - A stakeholder asked why the system creates moments that begin at the minute a shift ends. Due to this, TSPs with shifts ending at 5:00 p.m. may receive moments from 5:00 to 5:01 p.m.
    - PCG noted they have not had this issue with other states so far.
    - Fairbanks and Hansine Fischer and Associates both noted that their software does not generate moments during the last minute of a shift.
    - DHCS will schedule a meeting with the SMAA Workgroup co-chairs and PCG next week.

- II. Adjusting quarter four to accommodate the four day response period:
- Comment 1: Excluding student attendance days to accommodate the four day response period may impact the statistical validity of the sample.
  - DHCS Response: CMS allows specific exceptions for determining the total sample pool of moments, including weekends, holidays, and non-scheduled work hours. Additionally, the moment response period is considered an integral component of the moment itself.
  - Section 6-12 of the 2015 SMAA Manual states that “moments close after 5 student attendance days.” Therefore, this policy is considered a reasonable exception to the calculations to determine the total pool of moments eligible for a given sample. This will not impact the statistical validity of the sample when applied consistently.

- Stakeholders requested a copy of the CMS email response to DHCS’ request to accommodate the four day response period.
- DHCS considers email communication with CMS regarding policy considerations to be informational only and does not share those communications as a matter of policy.
- Once a Policy and Procedure Letter (PPL) is issued, it becomes program policy and LECs/LGAs/LEAs should keep copies of PPLs in audit folders as backup documentation.
- DHCS will add PPL 19-XXX RMTS Sample Period to the Action Items list and ensure that stakeholders have the chance to submit comments before the PPL is posted.

2. SPA 15-021 Implementation Delay

- a. DHCS will request that CMS allow LEA BOP to delay its integration into RMTS until July 1, 2020.
- b. DHCS will also ask that CMS allow LEA BOP to move forward with SPA-related items on July 1, 2019, including adding the additional practitioners and services, and removing the cap on the 24 services in 12 months requirement.

- On April 11, 2019, DHCS requested that CMS delay the LEA BOP integration into the RMTS process until July 1, 2020, while at the same time requesting CMS approval of the main components of SPA 15-021 in order to allow implementation of the new services and practitioners, as well as the removal of the existing limitation of 24 services in a 12 month period for non-IEP students.
- DHCS held a call with CMS on April 18, 2019, to discuss the request. CMS did not approve the DHCS request on the call and requested more time to review.

3. SMAA Invoice Submission Due Dates

- a. DHCS will maintain the 15-month submission timeline until further notice.
- b. The SMAA website was updated on April 16, 2019, with the current SMAA Invoice Due Dates.
  - No stakeholder comments.

#### 4. Action Items – Review Items

- #1 – LEA Coding Report Real-Time Access:
  - No update at this time.
- #2 – SPA 15-021 LEA BOP New Services and Practitioners:
  - No update at this time.
- #3 – OIG Report A-07-18-04107 December 2018:
  - The OIG Report Review Workgroup met to discuss documentation requirements and is developing a list of documentation examples.
- #4 – SPA Implementation Timeline:
  - DHCS has requested that CMS approve a July 1, 2020, implementation date for LEA BOP integrations into RMTS.

#### 5. Future Topics

#### 6. Open Discussion

Next meeting: May 1, 2019, 9:00 a.m. - 10:00 a.m.

- Agenda items due Friday, April 26, 2019, COB to the SMAA mailbox:  
[smaa@dhcs.ca.gov](mailto:smaa@dhcs.ca.gov)