

Los Angeles Unified School District
(LAUSD)
Random Moment Time Survey (RMTS)
Implementation Plan

Approved by CMS October 2010

CA LAUSD RMTS Implementation Plan

Table of Contents

I.	Introduction to the Los Angeles Unified School District (LAUSD)	1
II.	Medicaid in the School Setting in California	1
III.	School Medi-Cal Administrative Activities (SMAA) Program in the LAUSD	2
IV.	Interagency Agreements	2
V.	Principals of Administrative Claiming	3
	<i>A. Activity Codes</i>	3
	<i>B. Avoiding Duplication of Payment</i>	4
VI.	Transition of RMTS Methodology into LAUSD	5
VII.	RMTS Process and Procedures in the LAUSD	7
	<i>A. Training</i>	7
	1. LAUSD RMTS Administrators	7
	2. LAUSD Central Coders	7
	3. RMTS Participants	7
	<i>B. Eligible Moments</i>	8
	<i>C. Eligible Job Classifications</i>	8
	<i>D. Eligible Participants</i>	10
	<i>E. Generating the Random Moments</i>	10
	<i>F. RMTS Notification Documentation</i>	12
	1. Participant Notification of Random Moment Selection	12
	2. Participant Compliance	12
	3. Documentation of Moments	13
	<i>G. Coding of Random Moments</i>	14
	<i>H. Quality Assurance</i>	15
VIII.	RMTS Claiming Issues	16
	<i>A. Periodicity</i>	16
	<i>B. Financial Data Source</i>	17
	<i>C. Detail Invoice Categories</i>	17

CA LAUSD RMTS Implementation Plan

Table of Contents

1.	Cost Pools	18
a)	Time Survey Cost Pool	18
b)	Direct Charge Cost Pool	18
c)	Non-MAA Cost Pool	19
d)	Allocated Cost Pool	19
2.	Invoice Offsets & Expenditures	20
e)	Indirect Cost Rate	20
f)	Offset of Federally Funded Revenues	20
g)	Certification of Expenditures	21
IX.	Calculation of the Medi-Cal Percentage.....	22
<i>A.</i>	<i>Applying the Medi-Cal Percentage Rate</i>	22
X.	Claim Calculation	22
<i>A.</i>	<i>Data Elements of the Claim</i>	23
1.	Allocation of Time Study Results	24
2.	Medicaid Eligibility Rate.....	24
3.	Direct Charges	25
4.	Indirect Cost Rate	25
5.	FFP Rate (50%)	26
6.	Allocation of General Administration	26
7.	Offsets	26
XI.	Use of Federal Financial Participation (FFP)	26
XII.	Auditing	26
<i>A.</i>	<i>Supporting Documentation</i>	26
<i>B.</i>	<i>Program Monitoring</i>	27
1.	Internal	27
2.	External	27

Appendix A -- Audit File/Operational Plan Checklist for LAUSD using RMTS
Appendix B -- Claiming Unit Function Grid

CA LAUSD RMTS Implementation Plan

Revision date 10/6/10

I. Introduction to the Los Angeles Unified School District (LAUSD)

The Los Angeles Unified School District (LAUSD) is the nation's second largest district, with a Kindergarten through grade twelve (K-12) student enrollment of more than 678,000. Geographically, it encompasses 710 square miles, an area that includes the City of Los Angeles and all or parts of 28 other cities, as well as some unincorporated areas of Los Angeles County. The district operates 1044 schools (K-12), and 208 Adult, Childcare, and Skill centers throughout the region with a full-time staff of 71,851 employees. For more information about the district, see <http://www.lausd.net>.

II. Medicaid in the School Setting in California

Medicaid is a state/federal partnership under which the Federal Government establishes basic program rules. In California, it is referred to as Medi-Cal. Administrative activities not associated with a covered Medicaid medical service may be covered in schools. These include conducting Medicaid outreach; facilitating Medicaid eligibility determinations; providing medical/Medicaid-related training, translation, and general administration. Schools can provide their students a wide range of health care and related services, which may or may not be reimbursable under the Medicaid program. California covers all mandatory groups and the vast majority of optional groups.

Federal reimbursement is available for the cost of administrative activities performed by school employees that directly support efforts to identify and enroll potential eligible individuals into Medicaid and that directly support the provision of medical services covered under the state Medicaid plan. The California Department of Health Care Services (DHCS) and individual school claiming units promote access to health care for students in the public school system, preventing costly or long-term health care problems for at risk students, and coordinating students' health care needs with other providers through the School Medi-Cal Administrative Activities (SMAA) program.

In California, the SMAA manual defines a "school claiming unit" as a school-sponsored program administered by a Local Educational Agency (LEA), which is a school district, County Office of Education (COE), Special Education Local Plan Area (SELPA), or state-funded college or university providing Medi-Cal covered health services. Some of the activities performed by school staff meet the criteria for MAA claiming. The primary purpose of the SMAA program is to reimburse school claiming units for these activities, in accordance with the provisions of the SMAA manual.

CA LAUSD RMTS Implementation Plan

III. School Medi-Cal Administrative Activities (SMAA) Program in the LAUSD

The LAUSD established the Medi-Cal Administrative Activities (MAA) Program in 1994. The current MAA work day log time survey functions in an all electronic, web-based environment with an in-house billing operation. The MAA invoice is prepared quarterly by LAUSD staff using multiple data bases (Internal Financial System (IFS) and Business Tools for Schools (BTS)) to collect needed fiscal information.

This Implementation Plan describes a proposal to change to a new time survey methodology called Random Moment Time Survey (RMTS) for the purpose of calculating the costs of the School Medi-Cal Administrative Activities performed by LAUSD. RMTS is considered to be the most accurate and efficient time survey methodology to use for the SMAA program in a district as large as LAUSD, at the participant, management, and oversight levels. The following proposal includes in full detail the concepts of RMTS and the benefits it will have for all parties: LAUSD, DHCS, and the Centers for Medicaid and Medicare Services (CMS) for the purpose of Medicaid administrative claiming.

IV. Interagency Agreements

Pursuant to California Welfare and Institutions (W&I) Code 14132.47 (s)(1), "each LEA that elects to participate in the Administrative Claiming process shall submit claims through its Local Educational Consortium (LEC) or through the Local Governmental Agency (LGA), but not both." LAUSD has elected to claim through their LEC, the Los Angeles County Office of Education (LACOE).

LAUSD will submit their claims to LACOE, and LACOE will subsequently submit their claims to DHCS for payment. Therefore, there is only one avenue for LAUSD to do SMAA claiming.

LAUSD and LACOE provide DHCS assurance that if an activity is provided as part of, or an extension of, a direct medical service, it may not be claimed as a Medi-Cal administrative activity for the purposes of SMAA.

CA LAUSD RMTS Implementation Plan

V. Principals of Administrative Claiming

A. Activity Codes

The California SMAA program captures 100 percent of the activities performed by selected participants. The activities are allocated into sixteen (16) activity codes; both reimbursable and non-reimbursable codes are included as provided in the table below.

RMTS will utilize these same activity codes.

Activity Code	Reimbursable	Discounted Rate	FFP Rate
1. School-Related, Educational, and Other Activities specific to education and that are not health related	NO		
2. Direct Medical Services is providing medical care, treatment and/or counseling services within their primary job descriptions	NO		
3. Non-Medi-Cal Outreach is informing individuals about non-Medi-Cal programs or services	NO		
4. Initial Medi-Cal Outreach is informing potential eligible's how to access Medi-Cal services and benefits.	YES	NO	50%
5. Facilitating Application for Non-Medi-Cal Programs is informing individuals about non-Medi-Cal program applications	NO		
6. Facilitating Medi-Cal Application is assisting individuals in becoming eligible for Medi-Cal programs	YES	NO	50%
7. Referral, Coordination, and Monitoring of Non-Medi-Cal Services like accessing social or educational services, state mandated screenings and immunizations	NO		
8. Ongoing Referral, Coordination, and Monitoring of Medi-Cal Services that are not part of a direct service, or an integral part or extension of a medical service	YES	YES	50%
9. Transportation for Non-Medi-Cal Services such as assisting an individual obtain transportation to non-Medi-Cal covered services	NO		

CA LAUSD RMTS Implementation Plan

Activity Code	Reimbursable	Discounted Rate	FFP Rate
10. Arranging Transportation in Support of Medi-Cal Services, including scheduling or coordinating transportation	YES	YES	50%
11. Non-Medi-Cal Translation is when school employees provide translation services for non-Medi-Cal activities	NO		
12. Translation functions to facilitate access to Medi-Cal covered services	YES	YES	50%
13. Program Planning, Policy Development, and Interagency Coordination Related to Non-Medi-Cal Services by school staff in collaboration with other agencies associated with the development of strategies for improvement of non-Medi-Cal services	NO		
14. Program Planning, Policy Development, and Interagency Coordination Related to Medi-Cal Services by school staff in collaboration with other agencies associated with the development of strategies for improvement of Medi-Cal services	YES	YES	50%
15. Medi-Cal Claims Administration, Coordination and Training activities including documenting relevant MAA time through the time survey process * For use for RMTS methodology	YES	* YES	50%
15. Medi-Cal Claims Administration, Coordination and Training activities including documenting relevant MAA time through the time survey process *For Districts, Counties, or Regions using Worker Log methodology	YES	* NO	
16. General Administration/Paid Time Off	Reallocated	Reallocated	

B. Avoiding Duplication of Payment

As a quality assurance, activity codes are paired to capture 100 percent of time sampled for both reimbursable and non-reimbursable activities. (See table below).

CA LAUSD RMTS Implementation Plan

Parallel Codes	
Non-Reimbursable	Reimbursable
<u>Code 3</u> Non-Medi-Cal Outreach	<u>Code 4</u> Initial Medi-Cal Outreach
<u>Code 5</u> Facilitating Application for non-Medi-Cal Programs	<u>Code 6</u> Facilitating Medi-Cal Application
<u>Code 7</u> Referral, Coordination, and Monitoring of non-Medi-Cal Services	<u>Code 8</u> Ongoing Referral, Coordination, and Monitoring of Medi-Cal Services
<u>Code 9</u> Transportation for non-Medi-Cal Services	<u>Code 10</u> Arranging Transportation in Support of Medi-Cal Services
<u>Code 11</u> Non-Medi-Cal Translation	<u>Code 12</u> Translation Related to Medi-Cal Services
<u>Code 13</u> Program Planning, Policy Development, and Interagency Coordination Related to non-Medi-Cal Services	<u>Code 14</u> Program Planning, Policy Development, and Interagency Coordination Related to Medi-Cal Services
Non-Parallel Codes	
<u>Code 1</u> School-Related, Educational, and Other Activities	<u>Code 15</u> Medi-Cal Claims Administration, Coordination and Training
<u>Code 2</u> Direct Medical Services	<u>Code 16</u> General Administration/Paid Time Off

All LECs/LGAs are required to provide assurances of non-duplication to DHCS that they do not claim Federal Financial Participation (FFP) for the costs of allowable administrative activities that have been or should have been reimbursed through an alternative mechanism or funding source.

CA LAUSD RMTS Implementation Plan

VI. Transition to RMTS Methodology in the Los Angeles Unified School District

LAUSD will staff the RMTS program with coders employed by LAUSD, including at a minimum, two administrators (Coordinator, Medi-Cal Reimbursement Programs and Coordinator, Medi-Cal Administrative Activities) and two Central Coders.

LAUSD has hired a consulting firm, Hansine Fisher and Associates, to assist with the development and implementation of RMTS in the following ways:

- Establish a compliant web-based random moment generation and sampling system;
- Assist in developing an online participant tutorial that will be fully operational prior to the first quarter of implementation;
- Develop, implement, and complete a training plan for the Central Coders regarding the mechanics of coding.
- Establish efficient and effective RMTS office operations, including inter-coder reliability and quality assurance procedures.

During the first quarter of RMTS implementation, the District's contractor will use its own RMTS system. The purpose of using the contractor's RMTS system is to provide an operational model for LAUSD staff. This RMTS system is designed to select random moments, notify participants of their upcoming moment, provide the web-based response system, and generate required reports.

LAUSD RMTS staff will be trained on the central coding process prior to the first quarter of RMTS implementation as the result of ongoing, concurrent review and discussion with the contractor's staff. LAUSD Central Coders will be responsible for coding all random moments beginning with the first quarter of RMTS implementation. The contractors will do a 100% review of coded moments to check for coding accuracy and inter-coder reliability. They will meet regularly (either in person or by conference call) with the Central Coders to discuss coding issues and coding discrepancies, and to identify additional scenarios for the coding manual and for the decision tree to be used in resolving coding discrepancies between the coders.

During the second quarter of implementation, LAUSD will operate its own web-based random moment generation and sampling system. LAUSD RMTS staff will be entirely responsible for the full operation of the RMTS program from this point forward. The contractor will continue to provide training, technical support, and consultation.

In the third quarter of RMTS implementation, LAUSD's RMTS staff and operations will be fully established as an in-house system. At this time, LAUSD will be operating independent of a contractor for RMTS operation purposes with fully trained district employees.

CA LAUSD RMTS Implementation Plan

VII. RMTS Process and Procedures in the Los Angeles Unified School District

A. Training

The responsibility for training related to the MAA program and the RMTS will be shared by the LAUSD Coordinator for Medi-Cal Reimbursement Programs, the LAUSD RMTS/MAA Coordinator, the LAUSD Central Coders, the LEC (LACOE) MAA Coordinator, and DHCS.

1. LAUSD RMTS Administrators

DHCS, in conjunction with the LEC/LGA Committee, annually develops a SMAA Training of Trainers presentation. DHCS then conducts the training session for LECs and LGAs and their designated agents. Trainings include detailed instruction regarding activity codes. This training will be modified to include RMTS requirements as needed. The LAUSD RMTS/MAA Coordinator and the LAUSD Coordinator for Medi-Cal Reimbursement Programs will participate in the training required by DHCS and its designated LEC (LACOE).

2. LAUSD Central Coders

The LAUSD Central Coders may receive training by either participating in the training provided by the LEC, or by the LAUSD administrators who have attended the LEC (LACOE) annual trainings. It will be at the discretion of LACOE and LAUSD administrators to decide which training the LAUSD Central Coders will attend.

3. RMTS Participants

Although RMTS participants will not be required to attend annual SMAA trainings, they will be required to complete an online orientation to the MAA program and the RMTS. It is essential that they have an understanding of the MAA program and how to use the RMTS web-based system. The training will also explain the purpose of the time survey- that time is of the essence related to completing their random moment documentation, and that their role is crucial in the District's MAA program. All staff in the universe of eligible RMTS participants will be required to complete this on-line orientation.

In addition, as a condition of participation in the SMAA program, all LAUSD employees are required to complete annual on-line training regarding the Federal False Claims Act.

CA LAUSD RMTS Implementation Plan

B. Eligible Moments

Every minute of a work day that students are in session and every minute of a work day considered paid time for staff participants will be included in the sample universe of eligible moments. Only days that are designated federal, state or local holidays or days in which students and district staff will not be in attendance will be excluded from the sample universe.

Due to the timing of the summer quarter (July-September), many school staff members are not working and nearly all schools are closed. Subsequent to the first year of RMTS implementation, LAUSD will average the summer quarter using results from the previous three quarters.

C. Eligible Job Classifications

All requirements and guidelines established by DHCS for determining the eligibility of staff to participate in the MAA time survey process will be followed for the RMTS. The universe of eligible participants in the initial RMTS will be staff in job classifications that have been participating in the District's current SMAA program. Their performance of SMAA activities in past time surveys validates their inclusion in RMTS.

The inclusion of any new job classifications in the RMTS will be based on a review of employee job responsibilities and day-to-day duties. A duty statement will be developed that describes the overall responsibilities, for both MAA and non-MAA activities. This duty statement will become part of the District's audit file.

The following guidelines will also be used in determining eligible participants for the RMTS:

- Time study participants may be any direct employees of the school district, contract employees, part time employees, temporary employees and any other category of individuals receiving compensation from the school district. This does not include individuals such as parents or other volunteers who receive no compensation for their work or in-kind contributions.
- Staff positions that are funded 100 percent by federal dollars may not participate in the MAA program, because the Federal Government is already paying its share of costs. Staff may not participate in the SMAA program in the proportion of which their positions are federally funded. (Reference: SMAA 09/10 manual Section 6, page 6-1)

CA LAUSD RMTS Implementation Plan

- Only staff that routinely performs any of the following activities as part of their routine work tasks (as defined in the California SMAA manual Section 5) will be included in the RMTS/time survey cost pool:
 - Initial Medi-Cal Outreach
 - Facilitating Medi-Cal Application
 - Ongoing Referral, Coordination, and Monitoring of Medi-Cal Services
 - Arranging Transportation in Support of Medi-Cal Services
 - Translation
 - Program Planning, Policy Development, and Interagency Coordination Related to Medi-Cal Services
 - Medi-Cal Claims Administration, Coordination, and Training
 - General Administration/Paid Time Off

The following job classifications have been evaluated using the above criteria and are currently participating in SMAA. This list includes, but is not limited to, the job classifications LAUSD proposes for RMTS.

Assistant Superintendent, Student Health and Human Services
Audiologist
Audiometrist
Bus Supervisor
Coordinator- various selected positions (Medi-Cal, Mental Health, Speech, Nursing, etc.)
Counselor
Director- various selected positions (Mental Health, Speech, Nursing, etc.)
Education Aides
Health Care Advocate
Health Center Manager
Instructor, Orientation and Mobility (visually handicapped)
Medical Administrative Assistant; Sr. Medical Administrative Assistant
Medical Assistant
Nurse
Occupational Therapist
Office Technician, Sr. Office Technician
Organization Facilitator
Parent Community Facilitator
Parent Network Liaison
Physical Therapist
Physician
Placement Assistant
Principal at Special Education Schools
Principal, Assistant (at elementary schools)
Professional Expert
Psychologist

CA LAUSD RMTS Implementation Plan

Secretary, Sr. Secretary
Sign Language Interpreter
Social Worker
Special Education Assistant; Special Education Trainee
Speech Language Pathologist
Speech Therapist
Specialist- various selected positions (psychology, speech, occupational therapy, etc.)
Teacher- various selected positions (special ed, resource, etc.)
Translator; Sr. Translator
Student Support Services Case Manager
Student Support Services Coordinator
Transportation Planner
Transportation Router

D. Eligible Participants

Prior to the beginning of a quarter, the staff employed within each job classification will be reviewed. Those who, have retired, left the district, etc. will be eliminated from the universe of eligible RMTS participants for the quarter. Any staff in these job classifications that are on paid leave for the quarter will be excluded from the universe of eligible participants, but their non-federal costs will be reported in the RMTS/time survey cost pool. An updated list of eligible participants will be established to form the staff pool prior to each quarter.

E. Generating the Random Moments

Prior to the beginning of each RMTS period, the sampling system used by LAUSD will randomly select the required number of moments that will occur in the quarter from the universe of eligible moments. Once a moment is selected, the moment will be randomly matched with an individual on the updated list of eligible participants.

A web-based random moment generator and assignment program will be used to support the RMTS sampling process. Sampling will occur with replacement so that after a staff person and a moment are selected, the staff person and moment will be returned to the potential sampling universe. Therefore, each staff person will have the same chance as any other person to be selected for each moment, which ensures true independence of sample moments. Since the sample is random across all job categories, each job category will have the same proportional opportunity to be selected as their proportional make up of the total sample pool.

Once the random moments for the quarter have been generated, the sample will be consolidated in the form of a master control list for sample administration

CA LAUSD RMTS Implementation Plan

purposes; each sampled moment on the list will be accounted for at the end of the quarter.

The RMTS system utilized by LAUSD will meet federal reporting and documentation requirements, and will be designed to permit a level of precision of +/- 2% (two percent) with a 95% (ninety-five percent) confidence level for activities. Calculations show that a minimum sample of 2401 completed moments each quarter is adequate to obtain statistical validity. Additional moments will be selected each quarter to meet the statistical requirement and to allow for the potential of invalid moments. Oversampling will be at 15% (2401+360=2761) to ensure LAUSD achieves statistically valid samples.

To maintain the integrity of the RMTS, completed responses to moments occurring when the participant was on unpaid time off (such as a furlough day) will not be counted in the RMTS results because they are not attached to an employee's costs.

A response completed within the required time frame and that is linked to the participant's paid time is considered a valid moment. All valid moments will be used to calculate the time survey results for the quarter. When the District is calculating the quarterly RMTS results, the denominator for determining the percentage of time reported to each code will be all valid responses linked to paid employee time. The numerator for each of the 16 codes below will be the number of valid random moments reported to each.

Invalid moments are moments not received within the required time frame (5 school days) with the exception of moments occurring while a participant was on paid or unpaid leave. The RMTS system does not allow participants to describe they were doing after the deadline has passed. They see a screen with three boxes: 1) I was working, 2) I was on paid time off, or 3) I was on unpaid time off. If the participant checks #2, their absence will be verified in the payroll system before the Central Coder assigns Code 16 (General Administration). Moments reported to #3 will also be checked against the payroll system to make sure the participant was on unpaid leave, and there was no associated cost to the District for this moment. These will not be counted in the RMTS results. If the responses are not valid, they will be changed to the first answer (I was working) and become non-valid responses. If the 85% compliance rate is not met, they will be coded as non-reimbursable.

F. RMTS Notification and Documentation

1. Participant Notification of Random Moment Selection

Once a staff member has been selected to complete an RMTS moment, notification will be automatically sent to the RMTS participant, via email, 5 days prior to the selected moment. This notification will include notice of the sampled date and time. Participants will be notified at least one more time,

CA LAUSD RMTS Implementation Plan

within 24 hours of their random moment, and possibly more frequently, if it determined this increases the response rate. Completion of the moment will not be possible until after the specific moment has occurred as the RMTS notification does not allow access to the web-based link for completing the random moment survey until after the moment has occurred.

All RMTS communication with participants will be via the LAUSD email System. LAUSD mandates that all staff, including RMTS participants, have a District email account. All employees have access to District computers on a daily basis.

The notification sent to RMTS participants will contain bullets that remind them of critical elements of the RMTS process, such as:

- 1) Mark your calendar so you remember the time of your random moment.
- 2) Remember to write about only one minute of your time when completing your random moment.
- 3) Write the description of what you were doing in the “who”, “what”, and “why/how come” format.
- 4) Write your descriptions as simply and clearly as possible. Be specific.
- 5) Remember that you must respond to your random moment within 5 school days after the moment occurs. The day your moment occurs counts as the first day of the five days.

2. Participant Compliance

Completion of the moment is not possible until after the specific moment has occurred. If the moment is not submitted within 24 hours (1 working day) after it occurred, the participant will receive a minimum of one email reminder to complete it. The participant's supervisor will be notified within 24 hours after the participant's moment has occurred if the participant has not completed the response. The supervisor will be asked to remind the participant to submit his/her response before the 5 school day/7calendar day deadline. The supervisor will receive this notification by email, but the Central Coders may also follow up with a phone call to the supervisor to encourage participant completion of outstanding moments.

All sampled moments must be returned within five school days or seven calendar days when school is in session after the occurrence of the moment. Moments not received within the required time frame will not be used in the calculation of the necessary number of moments needed to satisfy the level of precision of +/- 2% with a 95% confidence interval for activities or in the final

CA LAUSD RMTS Implementation Plan

time survey results percentage calculation as long as an 85% compliance rate is met.

3. Documentation of Moments

RMTS participants that receive random moments during a quarter will complete them electronically. Participants will log into a secure RMTS web site to document their moment.

The RMTS training tutorial informs participants that they cannot complete their random moment before the moment occurs. It also lets them know that if they are away from their desk or out of the office at the actual time of the random moment, they can simply note what they were doing, and then access the web-based RMTS form to complete their random moment when they return, knowing that they must respond within the 5 school day/7 calendar day period.

A screen shot of the web-based form that each participant accesses through the email notifying him/her of his random moment is shown in Figure 1. The form is unique to the specific random moment, and can only be completed by the participant.

When participants access the web-based form to complete their random moment, they will be asked to write three statements:

- Who was with you?
- What were you doing?
- Why/how come you were doing this activity?

Prior to submitting the moment, participants will be prompted to review and “certify” their moment by indicating that they read the instructions on the web site, and that they understand: a) the MAA program, b) their role in MAA, and c) how to complete the RMTS.

CA LAUSD RMTS Implementation Plan

Hi, Graciela_55555! You have 1 Open Survey Need help? Supervisor: Graciela Sanchez 2010q1 LOGOUT

CalMAA · Random Moment Time Survey · 09/10-3

CalMAA Home
My Moments
My Weekly Reports

Your Moment: Jan 18, 2:13 PM
Staff Name: Graciela Sanchez
Staff Title: Nurse
Claiming Unit: LAUSD-DEMO
County: LAUSD-Demo

Step 1: Describe WHO you were with (Jan 18, 2:13 PM)

describe here

Step 1 Reminder
Remember not to use actual names, just categories – a student, a classroom teacher, a parent, an IEP team, just myself, etc.
Example:

Step 2: Describe WHAT you were doing

describe here

Step 2 Reminder
Describe what you were doing at the moment of: (Jan 18, 2:13 PM). Write a clear and succinct description of your activity.
Example:

Step 3: Describe WHY or HOW COME you were doing the activity

describe here

Step 3 Reminder
Describe the purpose of the activity.
Example:

Step 4: Random moment certification

I certify that in writing the above description, I have completed the District's training on the Random Moment Time Survey and know how to complete it accurately. I also certify that I understand the purpose of the School-Based Medi-Cal Administrative Activities program, and how it applies to my job.

Step 4 Reminder
Need a review? Feel free to open the [training material](#), or [ask your supervisor a question](#).

Step 5: Review your selections

Verify that you entered a response for each field, and that your descriptions match your activity.

Step 6: Submit this survey

You will not be allowed to make edits once this survey is submitted. When you are sure everything is complete, submit your responses with the button below.

Submit Time Survey

© 2010 Hansine Fisher & Associates

Figure 1. Screenshot of proposed web-based documentation for RMTS.

G. Coding of Random Moments

Once a RMTS moment has been certified and submitted by a participant, the Central Coders will access the completed moment through the web-based RMTS system and assign the appropriate code.

A distinguishing feature of RMTS (as compared to the worker day log) is that all random moments will be coded centrally by a limited number of school staff members. LAUSD proposes to establish a RMTS team consisting of a minimum of two LAUSD employees who will function as Central Coders.

CA LAUSD RMTS Implementation Plan

LAUSD Central Coders will have the following roles and responsibilities:

- Participate in annual and on-going training regarding policies and procedures related to MAA (see previous section “Training”);
- Function as District experts on Medi-Cal administrative claiming codes;
- Code completed random moment responses;
- Adhere to the following coding processes:
 - All coding will be consistent with the California SMAA manual and adhere to all state approved activity codes.
 - All Central Coders will review the information provided in the responses to the questions by the sampled RMTS participant and determine the appropriate activity code.
 - For the purpose of quality control, all completed random moments will be dual coded by two Central Coders. Discrepancies in coding will be identified, reviewed, and resolved by the RMTS/MAA Coordinator.
 - If not enough information is provided to determine the appropriate activity code, one Central Coder will contact the participant via email for clarification about the moment.
 - If code 15 is reported, Central Coders will verify that the participant was responding to a prior random moment at the time of the second random moment. (The probability of this occurring is highly unlikely).
 - Central Coders will ensure they do not lead participant responses when asking clarifying questions.
 - Central Coders will maintain an electronic record of contacts with participants regarding clarifying questions and responses.
 - Once the clarification is received, the moment will be coded and included in the final time survey percentage calculation.

H. Quality Assurance (QA)

The RMTS system will be programmed to select 10% of all coded moments each quarter for a quality assurance review. (The exception is the first quarter of implementation, when the District’s contractor will review 100% of all coded moments for consistency and adherence to the definitions of the federally approved time survey activity codes). The 10% sample will be reviewed each quarter by the Medi-Cal Reimbursement Program Coordinator and the RMTS/MAA Coordinator. The review will be completed before the invoice for that quarter is calculated so corrections can be made if there are coding errors.

The District will also conduct quarterly quality assurance reviews of the clarifying questions asked by Central Coders, to ensure participants are not asked leading questions. A 10% sample will be pulled randomly for review. Results of the quality assurance review will be discussed with the Central Coders, as part of a continuing process to improve coding accuracy and the

CA LAUSD RMTS Implementation Plan

quality of the clarifying questions. Additional training will be provided as needed.

A summary report of each quality assurance quarterly review will be prepared and placed in the District's audit file, where it may be reviewed by the LEC, DHCS, and CMS. CMS, DHCS and/or the LEC may also review the electronic RMTS record and participants' descriptions, any clarifying questions and responses, and the assigned code for any or all random moments at any time throughout the quarterly time survey process or as needed for further review or audit purposes.

VIII. RMTS Claiming Issues

A. Periodicity

As per the California SMAA Manual (July 2009), Section 11, the LAUSD will submit quarterly invoices to LACOE for review, approval, and certification. LACOE then submits the invoices to DHCS within 15 months of the end of the quarter claimed. The invoice timeline table (see page 17) depicts the time for submitting quarterly invoices from LAUSD to LACOE, and from LACOE to DHCS.

Every working day that students are in session and considered a paid day for staff will be included in the sample universe for potential sampling. The chart below is a visual component displayed by calendar months for the purpose of example, and does not indicate the exact days that will be included in the eligible sample universe. Averaged quarters will be calculated as described in Section 11 of the California SMAA Manual (2010/11 SMAA Provider Manual).

Upon RMTS implementation, LAUSD proposes to average the summer quarter because most schools are closed in July and August and are typically only in session for three weeks in September. The rationale for this is that the district books do not typically close until September or October for the previous year; therefore, averaging quarters after the summer quarter during the same fiscal year would result in a processing delay to LACOE and DHCS which would extend beyond the 15 month limit. Beginning the first Fiscal Year that RMTS is implemented and continuing indefinitely, the summer quarter will be averaged using the prior three quarters of RMTS methodology. If RMTS is implemented mid-year during FY 2011, LAUSD will time survey in all quarters. Quarter 1 of FY 2012, will be an average of the prior three quarters and may include a combination of worker day log and RMTS methodologies.

CA LAUSD RMTS Implementation Plan

Months	Summer Q Jul-Sep 2010	Oct-Dec 2010	Jan-Mar 2011	Apr-Jun 2011	*Summer Q Jul-Sep 2011	Oct-Dec 2011	Jan-Mar 2012	Apr-Jun 2012	*Summer Q Jul-Sep 2012	Oct-Dec 2012	Jan-Mar 2013	Apr-Jun 2013
Invoice to LACOE	Sept 2011	Dec 2011	Mar 2012	Jun 2012	Sept 2012	Dec 2012	Mar 2013	Jun 2013	Sept 2013	Dec 2013	Mar 2014	Jun 2014
Invoice to DHCS	Dec 2011	Mar 2012	Jun 2012	Sept 2012	Dec 2012	Mar 2013	Jun 2013	Sept 2013	Dec 2013	Mar 2014	Jun 2014	Sept 2014
Notation					Financial books close for previous year *Summer Q = avg. of prior three Qs				*Financial books close for previous year *Summer Q = avg. of prior three Qs			

Invoice Timeline Table

B. Financial Data Source

There is no change in the financial data sources used to prepare the SMAA invoice with the adoption of an RMTS, rather than a worker day log, as the time survey methodology. LAUSD will continue to prepare quarterly SMAA invoices in accordance with the requirements laid out in the SMAA Manual, and will submit its invoices using the SMAA Detail Invoice and any other forms required by DHCS. When the District submits its quarterly SMAA invoice to LACOE for review and approval, it will include all supporting documentation required by LACOE and/or DHCS. LACOE will also include all required supporting documentation when submitting the LAUSD invoice to DHCS.

C. Detail Invoice Categories

The SMAA Detail Invoice is used by all LEAs in California who participate in the SMAA program. Costs of each claiming unit are assigned to one of four cost pools - a time survey cost pool, a direct charge cost pool, a non-MAA cost pool, and an allocated cost pool. The cost pool categories are summarized below:

CA LAUSD RMTS Implementation Plan

1. Cost Pools

a) Time Survey Cost Pool

This consists of one-hundred percent of the non-federally funded costs of staff included in the universe of eligible RMTS participants. The Time Survey Cost Pool may also include the cost of Personal Service Contractors. These contractors will be identified prior to the quarterly RMTS sample being drawn, so they can be included in the universe of eligible participants. This inclusion becomes the means of determining the percentage of time and cost that may be claimed to MAA because their contract language is non-specific as to the MAA being performed.

Staff positions whose costs are included in the numerator of the Indirect Cost Rate (ICR) MUST not be included in the Time Survey Cost Pool. This includes the costs of salaries and benefits coded per our Standardized Account Code Structure (SACS) in relation to Function Codes described as 7120 Board and Superintendent, 7190 General Administration, 7200-7600 Other General Administration, 7700 Centralized Data Processing, 8100-8400 Plant Maintenance and Operations and 8700 Facilities Rents and Leases-Central Administrative Portion.

b) Direct Charge Cost Pool

This includes the non-federally funded costs associated with staff that did NOT participate in the time survey but who performed MAA activities, and are NOT included in the time survey cost pool. Direct charge costs will be entered on the Direct Charge Worksheet and included in the Claiming Unit's Operational Plan. Expenditures that are direct charged are associated with personnel or other costs that are 100% attributable to a single MAA activity. They will be documented in accordance with the requirements of OMB Circular A87, Attachment B(8)(h). Examples of costs to be direct charged in LAUSD would be the time district employees designated as central coders spend on this task, the work of the District RMTS/MAA Coordinator, or the time fiscal staff such as the Senior Financial Analyst spend preparing the quarterly MAA invoice. All these activities would be reported as Code 15 (Medi-Cal Claims Administration, Coordination and Training) on the Direct Charge Worksheet of the MAA invoice.

Other costs may be direct charged in the future, if it is determined that they are 100% attributable to a single MAA activity. This may

CA LAUSD RMTS Implementation Plan

include the cost of the RMTS software owned by the district and MAA-related activities of any consultants that are furnished on a fee-for-service basis. This may include the professional services or consultant costs of technical support provided to the District in the development and implementation of its RMTS system, in accordance with the requirements of Section 32 of OMB Circular A-87. Documentation of all direct charged costs will be consistent with the requirements described in OMB Circular A-87, Attachment B (8)(h).

c) Non-MAA Cost Pool

The Non-MAA Cost Pool includes the costs of all staff that are not in the universe of eligible RMTS participants (all the other job classifications in the District), except for staff who provide administrative support to the staff in the first three cost pools. The employees in the Non-MAA Cost Pool are most generally instructional staff (classroom teachers, for example) and staff that provide other institutional support to the district (such as food service). The Non-MAA Cost Pool includes all SACS (refers to the CDE standardized account code structure) function codes not assigned to the Allocated Cost Pool or the indirect rate, and excludes the costs of any staff in the RMTS Cost Pool. The Non-MAA Cost Pool also includes the residual costs of staff in this group who may have some of their costs included in the indirect cost rate approved by CDE. The Non-MAA Cost Pool does not include any MAA-related costs that are direct charged.

d) Allocated Cost Pool

Staff in the Allocated Cost Pool includes principals and other staff that provide administrative support at the building or site level as well as the cost of the superintendent's office and other "general administrative costs". The Allocated Cost Pool includes all SACS function codes not assigned to the Non-MAA Cost Pool or the indirect rate, and excludes the costs of any staff in the RMTS Cost Pool. The Allocated Cost Pool also includes the residual costs of staff in this group who may have some of their costs included in the indirect cost rate approved by CDE. The Allocated Cost Pool does not include any MAA-related costs that are direct charged. Per the CMS 2003 School Based Medicaid Administrative Claiming Guide, random moments defined as General Administration by the centralized coders will be reallocated across the other activity codes on a

CA LAUSD RMTS Implementation Plan

pro rata basis. These reallocated activities are reported under Code 16.

2. Invoice Offsets & Expenditures

e) Indirect Cost Rate

Indirect costs may only be claimed if there is an indirect cost rate approved by the cognizant agency responsible for approving such rates. With respect to school-based administrative costs, the cognizant agency is the U.S. Department of Education or its delegate. The United States Department of Education (ED) has approved a delegation agreement with the California Department of Education (CDE) that authorizes the CDE, as the cognizant agency, to establish indirect cost rates for California's local educational agencies (LEAs). These rates are established annually after Local Educational Agencies submit their year-end financial data. The rates for each LEA are published on the CDE website (<http://www.cde.ca.gov/fg/ac/ic/>).

The invoice used by all LEAs in California to claim federal reimbursement for their MAA activities limits the amount of indirect costs that may be claimed to the percentage approved annually by the CDE. There are no other indirect cost rates applied to the invoice, and no other indirect costs are claimed except for what is captured through the application of the indirect cost rate.

f) Offset of Federally Funded Revenues

Revenue offsets are federal funds and state/local matches of federal funds that have already directly or indirectly funded costs that may not be claimed for reimbursement. If a participant's direct costs are completely federally funded, they will not participate in the RMTS. The SMAA invoice was set up to exclude all federal expenditures. When costs are collected for the invoice, any federal funds supporting staff in any of the cost pools are removed, so that the starting basis of the invoice is only non-federal funds. If a participant's direct costs are partially federally-funded, the expenditures that are federally funded are excluded from the invoice. An example would be a speech therapist whose costs are paid 20% by federal IDEA funds and 80% by local general funds. Only 80% of the cost supported with general funds is included in the invoice. Any state and local funds supporting the direct costs of the participant will be included in the RMTS/time survey cost pool.

CA LAUSD RMTS Implementation Plan

g) Certification of Expenditures

DHCS requires LEAs to certify the availability and expenditure of 100 percent of the total actual expenditures incurred in performing SMAA. In addition, the LEC/LGA must provide assurances that the funds expended for this purpose are from the LEA claiming unit funds allowed and allocable under State and federal law and regulations (per Title 42, Code of Federal Regulations [CFR], Section 433.51). The LEC/LGA must distinguish between allowable costs and duplicate payments for the same activity and/or the inefficient use of resources. LECs/LGAs may not claim FFP for the costs of allowable administrative activities that have been or should have been reimbursed through an alternative mechanism or funding source.

The invoiced amount satisfies the requirements of 42 CFR 433.51 for allowable administrative activities and that the claimed expenditures have not previously been or shall not subsequently be used for federal match in this or any other program. The expenditures shall not duplicate, in whole or part, claims made for the costs of direct patient care. Any misrepresentation relating to the filing of claims for federal funds constitutes a violation of the Federal False Claims Act.

It is the responsibility of the LAUSD MAA coordinators, as well as LACOE to review all invoices for completeness and accuracy prior to submitting them to DHCS. By signing the required documents, both the LAUSD and LACOE certify that the financial data and resource documents provided in the invoice package are accurate and comply with State and federal law and regulations and OMB Circular A-87 standards. Invoices must be submitted to DHCS for each quarter billed. DHCS, in turn, reviews, approves and certifies the invoices.

IX. Calculation of the Medi-Cal Percentage

As defined in the SMAA manual, Section 10-1, the Medi-Cal percentage is the fraction of a total population (target population) that consists of Medi-Cal beneficiaries, as identified on the DHCS tape match. The numerator is the number of students that are Medi-Cal beneficiaries, and the denominator is the total number of students.

To establish the Medi-Cal percentage, the District must first define the population “served” and identify the Medi-Cal eligibility status of each student. The District

CA LAUSD RMTS Implementation Plan

must determine this percentage twice per year, once in the 1st or 2nd quarter and once in the 3rd or 4th quarters; this percentage must be reflected in the invoices for those quarters.

A. Applying the Medi-Cal Percentage Rate

For activity codes that require the Medi-Cal Percentage Rate as listed above are calculated as follows:

$$\text{Medicaid Costs} = \left[\frac{\text{Total Number of MediCal Students}}{\text{Total Number of Students}} \right] \times \text{Costs to be Allocated}$$

X. Claim Calculation

Each claim submitted will incorporate the elements required to create an invoice for submission to DHCS. The calculation of the MAA claim is no different than when worker day logs were used, with three exceptions.

- The first is that all invalid moments must be counted as non-reimbursable activities in the time survey results if the District does not achieve a compliance rate of at least 85%.
- The second is that all staff in the universe of eligible RMTS participants will be included in the time survey cost pool.
- The third exception is that, per CMS guidance, Code 15 (Medi-Cal Claims Administration, Coordination, and Training) will be discounted in the District's MAA invoice.

A revised invoice will be developed for the District; the only changes will be to apply the discounted Medi-Cal percentage rate to Code 15. The revisions will be applied on the effected California LEC SMAA Detail Invoice Worksheets within the invoice packet.

The amount of Federal Financial Participation (FFP) in the District's quarterly SMAA invoice is calculated by applying the data elements described below to the personnel costs of the RMTS/time survey cost pool and the direct charge cost pool.

The formula for this calculation may be described as follows:

The total non-federal personnel costs of the staff in the RMTS/time survey cost pool. Non-federal funds are state and local funds identified as such in the SACS accounting system

X (multiplied by)

The percentage of time in MAA activities, after a proportional share of the time reported to Code 16 (General Administration/Paid Time Off) has been

CA LAUSD RMTS Implementation Plan

added to each and after the percentage of time in each MAA activity code is adjusted by either the 100% Medi-Cal percentage or the discounted Medi-Cal percentage

+ (*plus*)

The MAA costs of any personal services contracts

+ (*plus*)

Direct charges personnel and other costs

+ (*plus*)

A proportional share of the allocated cost pool and allowable other costs (the proportional allocation is based on the percentage of personnel costs in the time survey cost pool, the direct charges cost pool, and the non-MAA cost pool)

X (*multiplied by*)

The CDE approved indirect cost rate

= (*equals*)

MAA Claimable Costs

X (*multiplied by*)

The FFP %

= (*equals*)

The total federal share

A. Data Elements of the Claim

The SMAA Detail invoice consists of four cost pools which are described in Section VIII(C)(1) of this Implementation Plan. All costs of the claiming unit are assigned to one of the following cost pools: (1) the time survey cost pool, (2) the direct charge cost pool, (3) the non-MAA cost pool, and (4) the allocated cost pool.

The Time Survey Cost Pool includes the non-federal costs of staff included in the universe of eligible RMTS participants.

The Non-MAA Cost Pool includes the cost associated with staff who did not time survey and who are not in the allocated cost pool.

The Allocated Cost Pool includes the cost of administrative and support staff such as managerial, secretarial, fiscal, supervisory and clerical personnel who are not included in any other cost pools. Any costs associated with this staff that are included in the Indirect Cost Rate would be excluded from the Allocated Cost Pool. As part of the claim calculation, the costs in the Allocated Cost Pool are reallocated to the three other cost pools based on each cost pool's ratio of personnel costs to the total personnel costs of the three cost pools.

CA LAUSD RMTS Implementation Plan

1. Allocation of Time Study Results

The Random Moment Time Survey is the basis for allocating the time and costs of a distinct claiming unit between different MAA and non-MAA activities. The RMTS results serve as the basis for allocating salary and benefit costs of the staff in the RMTS/Time Survey Cost Pool. The RMTS is linked to a distinct claiming unit. If there is more than one claiming unit, each must have its own statistically valid RMTS. Results of one RMTS will not be applied to multiple claiming units. Once the RMTS responses have been coded, the results are aggregated to determine the percentage of time in each code, and separated into reimbursable activities (Codes 4,6,8, 10,12,14, and 15), non-reimbursable (Codes 1,2,3,5,7,9,11, and 13) and re-allocable (Code 16).

2. Medicaid Eligibility Rate

A Medicaid Eligibility Rate (the "Medi-Cal percentage") is automatically applied to all MAA activity codes (Codes 4,6,8,10,12,14, and 15) on the Activities and Medi-Cal Percentages Worksheet of the SMAA invoice used by all Local Educational Agencies, as instructed in the 2003 Medicaid School Based Administrative Claiming Manual. Based on guidance from CMS, either a 100% or a discounted Medi-Cal percentage is applied.

The 100% Medi-Cal percentage (per instructions in the 2003 Medicaid School-Based Medicaid Administrative Claiming Guide) is applied to MAA activities that are solely attributable to the Medicaid program and as such not subject to the application of the Medicaid share percentage. This 100% Medi-Cal percentage is applied to Code 4 (Medi-Cal Outreach) and Code 6 (Facilitating Med-Cal Application).

A discounted Medi-Cal percentage is applied to the cost of MAA activities that must be discounted by the percentage of the Medi-Cal eligible population in the District, in accordance with the 2003 Medicaid School Based Administrative Claiming Manual. The discounted Medi-Cal percentage will apply to Code 8 (Ongoing Referral, Coordination and Monitoring of Medi-Cal Services), Code 10 (Arranging Transportation in Support of Medi-Cal Services), Code 12 (Translation), Code 14 (Program Planning, Policy Development, Interagency Coordination Related to Medi-Cal Services), and Code 15 (Medi-Cal Claims Administration, Coordination, and Training).

When Central Coders assign a code to the participant's written description, they will use one of the 16 codes approved by CMS for use in California. Some are MAA-reimbursable; others are not.

CA LAUSD RMTS Implementation Plan

Thus, the assignment of an activity code to the specific random moment determines whether or not it is a reimbursable MAA activity, and whether 100% or a discounted Medi-Cal percentage will apply.

3. Direct Charges

All costs to be direct charged are entered on the Direct Charges Worksheet. Costs are entered in the appropriate columns that have been provided to record the costs of salaries, benefits, personal services, contracts, and other costs. Data from this worksheet automatically transfers to the Direct Charge Cost Pool on the Costs and Revenues Worksheet. The Medicaid Percentage is automatically applied to the appropriate costs entered on this work sheet based on the activity for which the costs apply.

4. Indirect Cost Rate

The only indirect cost rate that may be used in the MAA invoice is the restricted rate that has been approved by the California Department of Education for the period covered by the invoice, and posted on its website. The Indirect Cost Rate is reported to a unique cell in the SMAA invoice used by all Local Educational Agencies.

The Indirect Cost Rate is the last cost to be added to SMAA reimbursable costs before the amount of Federal Financial Participation is established. If, for example, the calculations on the SMAA invoice had determined that total MAA costs were \$2 million, and the District's CDE-approved indirect rate was 5%, then \$100,000 would be added to total MAA-reimbursable costs, making the total \$2.1 million.

5. FFP Rate (50%)

The FFP rate is applied to the total claimable MAA costs to determine the claim amount. It's the last step of the claim calculation.

6. Allocation of General Administration

The time reported to Code 16 (General Administration/Paid Time Off) is reallocated to the other 15 time survey activity codes proportionately.

7. Offsets

The invoice is set up to offset non-allowable revenue automatically. Non-allowable revenues, that must be reported in the Revenue Offset section of the Cost and Revenues Worksheet (Tab 4) of the

CA LAUSD RMTS Implementation Plan

SMAA Detail Invoice, include all federal revenues and any state or local funds required as match for these revenues, including Title XIX, Title I, Title IV, and any discretionary federal grants supporting costs reported on the Direct Charge Worksheet of the SMAA invoice. Because federal funds must be excluded from the personnel costs in the time survey cost pool, direct charges are the only costs where an offset may be required. Once the offsets have been identified, the invoice then deducts the amount that must be offset from claimable and non-claimable direct charges.

Offsets are applied to MAA and non-MAA costs, as applicable. An example of an offset category that must be offset would be state or local revenue used to match a federal grant that is supporting the cost of personnel whose costs are direct charged.

XI. Use of Federal Financial Participation (FFP)

Expenditures of 100 percent of the cost of performing Administrative Claiming process activities shall be from the general funds of LEAs, or from any other funds allowed under federal law and regulation. The FFP, of 50 percent, is reimbursable and therefore is not restricted funds.

XII. Auditing

A. Supporting Documentation

The foundation of the SMAA invoice is the time survey. Federal regulations require that all records in support of allowable SMAA invoice must be maintained for a minimum of three fiscal years after the end of the quarter in which the LEC or LGA receives reimbursement from DHCS for the expenditures incurred. Documentation includes all original time survey documentation, secondary documentation, and direct charge certification. Similarly, the documents that support the construction of a SMAA invoice must be kept three years after the last claim revision. These documents include the documentation that supports the Medi-Cal percentage, the basis of the cost pools, and position descriptions and/or duty statements for all staff performing MAA.

B. Program Monitoring

1. Internal

The LAUSD RMTS Coordinator will maintain all source documentation in electronic spreadsheets and audit file via the web-based system as required by DHCS and the LEC.

CA LAUSD RMTS Implementation Plan

The web-based RMTS system used by LAUSD will generate reports with the following data elements associated with each moment selected:

- Date and time of each moment in the quarterly sample;
- The participant assigned to the moment, including the participant's job class;
- The narrative responses to the questions and the code assigned;
- The exact date and time indicating when the participant completed the moment;
- Any notes from the centralized coders' follow up with the participant.

2. External

Pursuant to OMB Circular A-87, each claiming unit must develop and maintain an audit file of comprehensive documents in support of the invoice prior to its submission to DHCS. The certification signature on the Claiming Unit Functions Grid(s) (the Grid) indicates such preparation has occurred. The Operational Plan (OP), which becomes the audit file, includes all documents that support the requirements defined in the contract between the LEC/LGA and DHCS and forms the basis for Medi-Cal administrative claiming using RMTS methodology. The OP components are subject to review by the LEC/LGA, DHCS, and/or CMS upon submission of the invoice.

The LEA Coordinator is the first level of review to ensure that the OP is complete and accurate. This includes a review of random moment responses to ensure they are complete and accurately coded, a review of the invoice for accuracy and completeness, and a review of all documentation supporting the Operational Plan, as outlined in the Operational Plan Checklist.

The LEC Coordinator is the second level of review. Review at this level should include continuous training, site visits, desk reviews, and review of the LEA OP to ensure accuracy and completeness. The LEC Coordinator is also responsible for receiving all invoices in his or her region, checking to ensure accuracy and completeness, and submitting them to DHCS. It is the responsibility of the LEC Coordinators to conduct reviews every 3 years of all participating claiming units within their region who submit invoices for reimbursement of performed MAA.

CA LAUSD RMTS Implementation Plan

DHCS is the third and final level of the review process. For compliance assurance for the RMTS process, the LEC or DHCS, or both, will conduct random overviews of 5% of the time survey samples as part of the monitoring and validation protocol during LAUSDs initial year of RMTS. Overviews will continue until the RMTS program has matured, and both the LEC and DHCS are in agreement that LAUSDs time survey coding is in consistent compliance. At that time, they will be integrated with all other claiming units under the normal review process. If a review results in an invoice overpayment, DHCS will require a check from the claiming unit in the amount of the overpayment. Additional steps may be required, such as additional training, procedure changes, and internal audits. Upon timely conclusion of the review a final written report reflecting positive and negative findings and recommendations for improved performance will be issued to the LEA Coordinators. If DHCS finds the district in repeated non-compliance, sanctions the State may impose include more frequent reviews, recoupment of disallowed funds, and possibly holding claims in abeyance until federal disallowances are resolved.

Audit File/Operational Plan Checklist for LAUSD Using RMTS

The following list is provided as a guide to determine what to include in the quarterly Audit File/Operational Plan when claiming for Medi-Cal Administrative Activities (MAA) using an RMTS methodology. The list is general in nature and is not intended to be all inclusive. Electronic or paper copies are acceptable.

RMTS Training Materials	
	Evidence of attendance at MAA training for LAUSD MAA Coordinators including training materials
	Evidence of annual MAA training for LAUSD Central Coders indicating the date, location, and trainers
	Copy of online tutorial for RMTS participants
RMTS Time Survey Data	
	Participant list, by job class, included in the RMTS and time survey cost pool of the invoice (i.e., sample universe of employees)
	List of centralized coders used in the RMTS
	RMTS master list identifying each moment by participant name and job class
	Documentation of completed random moments
	Calculation of RMTS response rate
	RMTS results data
	Quarterly report on quality assurance review of 10% sample
Duty Statements	
	A duty statement describing the current duties and responsibilities for each job class in the RMTS sample universe that describes their approved scope of work, including MAA and non-MAA activities
Invoice Documents	
	MAA Summary Invoice
	Invoice Variance Form
	Activities and Medi-Cal Percentages Worksheet
	Time Survey Summary Report
	Copy of the Indirect Cost Rate from the CDE website
	Direct Charges Worksheet
	Documentation of direct charges
	Payroll Data Collection Worksheet
	Payroll Data Collection & Other Summary Sheet (maintain actual staff ledger reports for audit purposes)
	Costs and Revenues Worksheet
	Supporting documentation
	Claiming Unit Functions Grid
	Checklist for Preparing the MAA Detail Invoice
	Checklist for Preparing the MAA Summary Invoice
	Tape match calculations
Contracts	
	Contract or Memorandum of Understanding (MOU) between the LEA and the LEC/LGA for MAA participation
	Contract or Memorandums of Understanding (MOUs) with contracting agencies and providers, including personal service contracts
Agency Documents	
	Charts that show the supervision responsibility of staff in MAA claiming down to the level of the clerical staff whose costs are included in the invoice
	School calendar(s)
Resource Directories	
	Documents used to promote Medi-Cal that directly relate to surveyed time for such activities. Should include flyers, announcements & other materials pertaining to Medi-Cal. Provide a statement that gives the locations where these materials will be maintained for future DHCS and CMS review

CLAIMING UNIT FUNCTIONS GRID

(1) LEC/LGA: Washington COE, LEC Region 20	(2) INVOICE NUMBER (from Summary Invoice): 10/11-3
(3) NAME OF CLAIMING UNIT: Sunny Unified School District	(4) NO. OF CLAIMING STAFF:(sum of item 12, No. of Staff): 300
(5) COUNTY- DISTRICT-SCHOOL (CDS) CODE: 99-12345	(6) LEC/LGA CONTRACT # 10-56789
(7) CLAIMING UNIT ADDRESS: 14 Main Street Sunny, CA	
(8) CLAIMING UNIT COORDINATOR: Jane Smith	
(9) TELEPHONE: 444-655-9339	(10) E-MAIL: janes@sunnyed.net
(11) AUDIT FILE LOCATION (ADDRESS): 14 Main Street Sunny, CA	

(12) STAFF JOB CLASSIFICATIONS: (Identified by duty statement/job description – <i>please indicate if the staff is the MAA Coordinator or MAA assistant.</i>)	(13) NUMBER OF STAFF:	(14) MEDI-CAL ADMINISTRATIVE ACTIVITIES (ENTER “X” OR “D” (DIRECT CHARGE) UNDER EACH ACTIVITY):							
		Code 4	Code 6	Code 8	Code 10	Code 12	Code 14	Code 15	Code 16
Assistant Principal	26	x	x	x			x		x
Director, Health Services	1			x			x		x
Director, Student Support	1	x		x			x		x
Elementary Counselor	44	x	x	x	x	x			
Health Assistant	25	x	x						x
MAA Program Coordinator	1							D	
Resource Teacher	47	x		x	x				
School Nurse	31	x	x	x	x	x	x		x
School Psychologist	16	x		x			x		x
Secondary Counselor	35	x	x	x	x				
Speech Language Pathologist	36	x		x					x
Special Education Teacher	25	x		x		x			
Social Worker	8	x	x	x	x	x			x
Translator	3					x			
Transportation Coordinator	1				x				

- Code 4 = Initial Medi-Cal Outreach
- Code 6 = Facilitating Medi-Cal Application
- Code 8 = Ongoing Referral, Coordination, and Monitoring
- Code 10 = Arranging Transportation in Support of Medi-Cal Covered Services

- Code 12 = Translation Related to Medi-Cal Covered Services
- Code 14 = Program Planning, Policy Development, and Interagency Coordination
- Code 15 = Medi-Cal Claims Administration, Coordination and Training
- Code 16 = General Administration/Paid Time Off

CERTIFICATION STATEMENT

My signature below certifies that the information provided herein is true and correct and accurately reflects the performance of the MAA OP described in the invoices and time surveys related to this grid.

I hereby certify that, to the best of my knowledge and belief, this report is true and correct and all data have been compiled and reported in accordance with state and federal laws and regulations and the instructions for this report.

LEC/LGA Coordinator

Date

LEA Coordinator

Date

DHCS USE ONLY

Date of Site Review _____