

# Random Thoughts on Random Moment Time Studies (RMTS) and Medicaid.



# The Study

- Quantifies the work of a statewide group of health professionals and support staff involved in the delivery of medical and health related services provided through the school Medicaid program by sampling the work efforts of these individuals
- Yields a statistically valid means of determining which portion of the group's time is spent performing activities that are reimbursable by Medicaid:
  - In the Direct Services Claiming program; or the
  - Administrative Activity Claiming program
- The results are combined with provider-specific costs, submitted in an annual cost report to:
  - Determine provider reimbursement for Direct Service Claiming;
  - And will be submitted as part of the quarterly Administrative Activity Claims

# The Process

- Schools enter district-wide calendars and staff hours into the RMTS system on-line prior to the first Friday of the month preceding the start of each quarter.
- Quarters
  - October 1- December 31
  - January 1- March 31
  - April 1- End of School Year
- Schools upload the list of eligible RMTS participants into the system 30 days prior to the start of the quarter
- RMTS participants receive passwords via e-mail as needed
- Participants, moment dates and times are randomly selected from the statewide pool through the system
- Notification is received of the moment at the time of the moment

# The Process

- Participants respond to the moment within the 5 calendar day grace period
- Participants will be contacted as needed for clarification
- Follow-up e-mails are received a set number of hours after the moments if the moment is not accounted for.
- After 5 calendar days, the participant will not be able to complete or edit the moment
- Quarterly statewide time study results are calculated by UMMS and distributed to schools for:
  - Inclusion in the AAC claims
  - The Direct Service Cost report will also include statewide time study results for Direct Services Costs

# School District Responsibilities

- Designate an administrative time study contact and send the proper info to UMMS
- Identify the personnel who are eligible to participate in the time study
- The administrative time study contact for each District is required to monitor compliance and participation.
- 85% participation rate is required

# Direct Services Personnel Who Can Be Included in the Time Study

- Meet the credentialing requirements of Direct Service Practitioners- it is very important to pay attention to these credentialing requirements, and
- **Are reasonably expected as part of current job duties to provide Medicaid covered IEP related direct medical services to students** (Medicaid eligible and/or non—Medicaid eligible) in the quarter being requested; or
- Are reasonably expected as part of current job duties to **provide Medicaid related administrative activities** in the quarter to be requested and **will not provide Medicaid covered IEP related direct medical services to students** (Medicaid eligible and/or non—Medicaid eligible) in the quarter being requested;
- Medicaid Billing Personnel- Reasonably expected as part of their current job duties to perform School-based Medicaid billing functions in the quarter being requested
- **\*\*\* Important to Note: Staff whose salary costs are duplicative of costs reimbursed through the application of the Indirect Cost rate must be excluded from the RMTS**

# Direct Services Personnel Who Can Be Included in the Time Study

- Credentialing Requirements
  - Speech Language Therapist- 130 CMR 432.404(C) or 432.405
  - Speech Language Assistant- 260 CMR 10.02
  - Occupational Therapist 130 CMR 432.404(B) or 432.405
  - Occupational Therapy Assistant- 259 CMR 3.02(1) through (3)
  - Physical Therapist- 130 CMR 432.404(A) or 432.405
  - Physical Therapy Assistant- 259 CMR 5.02(1) through (3)
  - Nurse, Registered Nurse- 130 CMR 414.404(A)
  - Licensed Practical Nurse- 130 CMR 414.404(A)
  - Audiologist 130 CMR 426.404
  - Audiologist Assistant 260 CMR 10.02

# Direct Services Personnel Who Can Be Included in the Time Study

- Credentialing Requirements
  - Hearing Instrument Specialist- 130 CMR 416.404
  - Counselor- 130 CMR 429.424(E)(2)
  - Psychologist 1- 130 CMR 429.424(B)(1) or 429.424(B)(2)
  - Psychologist 2- 130 CMR 429.424(B)(1) or 429.424(B)(2)
  - Social Worker 1- 130 CMR 429.424(C)(1) or 429.424(C)(2)
  - Social Worker 2- 130 CMR 429.424(C)(1) or 429.424(C)(2)
  - Personal Care Service Provider- 42 CFR 440.167
  - Medicaid Billing Personnel
  - Psychiatrist- 130 CMR 429.424(A)(1) or 429.424(A)(2)



# Administrative Only Personnel Who Can Be Included in the Time Study

- Include health personnel **who do not meet the provider qualifications but will be reasonably expected as part of their current job duties to provide Medicaid-covered, IEP-related direct medical services to students** (Medicaid eligible and/or non-Medicaid eligible) in the quarter being requested.
- Include Health personnel who do not meet the provider qualifications but **who will be reasonably expected as part of their current job duties to perform Medicaid related administrative activities in the quarter** being requested.
- Include other personnel who will be reasonably expected as part of their current job duties to perform Medicaid –related activities in the quarter being requested.
- **\*\*\*\*Important to Note- Staff whose salary costs are duplicative of costs reimbursed through the application of the Indirect Cost rate must be excluded from the RMTS**

# Reimbursable Administrative Activities\*

- Medicaid outreach- Performing activities that inform eligible or potentially eligible individuals about Medicaid and how to access it
- Facilitating/Assisting in the MassHealth Application Process- Assisting individuals in applying for Medicaid
- Provider Networking/Program Planning/Interagency Coordination- Performing activities associated with the development of strategies to improve the coordination and delivery of Medicaid-covered services to school-age children and when performing collaborative activities with other agencies regarding Medicaid-covered services
- Individual Care Planning, Monitoring, Coordination and Referral- Making referrals for, coordinating, and/or monitoring the delivery of Medicaid-covered services
- Arrangement of Transportation and Translation Related to Medicaid Services- Assisting an individual to obtain Medicaid-covered transportation or translation services
- \* The questions on the time study relative to reimbursable Administrative Activities only seem to anticipate the last two activities listed above as being delivered in the school setting.

# Participation

- Participation is crucial
- If the statewide participation rate of 85% is not met, a statewide penalty will be applied. The penalty is that non-reimbursable time will be added to the time-study results for all non-responses.
- Each provider whose response rate is lower than 85% in either RMTS pool in a given quarter will receive a notification letter.
- If the statewide response rate for either RMTS pool does not reach 85% in a given quarter, providers who received a notification letter within the last two years and whose response rate was lower than 85% in that quarter will be unable to claim reimbursement for that quarter.
- If credentialing and documentation of direct services requirements are not met, the reimbursability of the moment could be called into question in an audit.