



School-Based ACCESS Program (SBAP)

Random Moment Time Study Staff Pool List Jobs & Positions

Key Topics

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RMTS BASICS

Random Moment Time Study (RMTS) Basics

The RMTS is operated by PA's SBAP vendor, Sivic Solutions Group (SSG) and polls participants on an individual basis at random time intervals over a quarterly time period and totals the results. The RMTS method provides a statistically valid means of determining what portion of the selected group of participants' workloads is spent performing activities that are reimbursable by Medicaid.

The RMTS results are used in the calculation of the quarterly Medicaid Administrative Claim (MAC) and determine the Direct Medical Percentage, which is applied at Cost Settlement. It is important that appropriate staff are listed on both the Direct Service and Administrative cost pools for RMTS participation.

NOTE: All LEAs that participate in the SBAP are required to participate in the time study.

RMTS Cost Pool Lists – Existing Guidance

Direct Service	Administrative
<p>Only properly credentialed and qualified providers, as defined in Section 3 of the SBAP Handbook, are to be listed on this cost pool. You must be able to provide documentation of proper and current credentialing for these providers, as described in Section 3 of the SBAP Handbook.</p> <p>Previously entered with free-form text.</p>	<p>This cost pool includes LEA staff that do not provide allowable direct services, but who perform activities that support direct services, such as helping students/families get enrolled in MA.</p> <p>Previously entered with free-form text.</p>

NOTES:

- There is to be no duplication of staff in the two cost pools.
- A claim for a direct service can only be submitted for reimbursement when provided by an individual on the Direct Service Cost Pool.
- Staff that are 100% federally funded must not be included on either cost pool.



THE NEED FOR CHANGE

The Need for Change

- Previously, LEAs entered staff job and position titles in the RMTS system through free-form text.
- This has led to questions:
 - Questions LEAs have about who should or should not be included in the RMTS
 - Questions RMTS reviewers have about a respondent's actual credentials or relevant job responsibilities
- RMTS reviewers have noted non-qualified providers in the Direct Services cost pool, such as Guidance Counselors and Teachers of the Visually Impaired, which harms RMTS percentages used to calculate LEA reimbursement.
- Because this has been a common area of confusion over past years, DHS and SSG are working together closely to provide clarity and direction.

What is Changing?

- DHS has created an exhaustive list for each RMTS cost pool which will be the only available selections in the vendor's system.
 - 30 unique options in the Direct Service Cost Pool
 - 74 unique options in the Administrative Cost Pool
- DHS is updating the SBAP Handbook to replace existing information in Sections 8.4.a and 8.4.b.

NOTE:

You are not required to reassign 100% of existing staff's positions immediately. However, LEAs are highly encouraged to make these changes as soon as possible. Ensuring your LEA's cost pool lists contain appropriate staff helps not only your own LEA in the long-run, but every participating LEA statewide! The goal is to assign new positions to 100% of staff by the start of the April – June 2024 quarter, so that no old positions carry through into 2024-2025.

Summary of Changes

Direct Service

This list will now include only allowable direct service providers as included in Section 3 of the SBAP Handbook.

Any staff who are currently in this cost pool without allowable credentials (such as Guidance Counselors and Teachers of the Visually Impaired) are prohibited from inclusion in this cost pool.

Administrative

This list will now include only position titles which can be reasonably assumed to perform activities related to the SBAP.*

Any staff whose primary activities support the Unrestricted Indirect Cost Rate (UICR) calculation (such as Superintendents and Payroll staff) are prohibited from participation in the RMTS.

NOTE: If there is a specific position title you would like to have added to the Administrative Staff Pool list, email your request to DHS for review at RA-PWSBAP@pa.gov with a brief description of job responsibilities.

A Note on the Administrative Cost Pool List

- *When assigning staff to the Administrative Cost Pool, it is a good time to ask yourself: Is it reasonably expected that this individual will provide administrative support related to direct service access or delivery?
- *Changes to the Administrative Cost Pool list were made by reviewing previously used titles against reasonable expectations.

TIPS:

- Just because a staff person holds a certain title (such as Administrative Assistant), it does not necessarily mean that that staff person has relevant job responsibilities.
- It may sometimes be more appropriate to include a credentialed provider (such as a Speech Language Pathologist) on the Administrative Cost Pool than the Direct Service Cost Pool.
 - This could include when primary responsibilities are to supervise service delivery or to attend IEP meetings.

DIRECT SERVICE COST POOL

Direct Service Cost Pool – 30 options

- This list includes an exhaustive drop-down list of only properly credentialed direct service providers as included in the SBAP Handbook.
- If a staff person on your LEA's Direct Service Cost Pool does not meet one of these credentials, **they do not belong in this Cost Pool.**

Please note that this list does NOT include Guidance Counselors, Teachers of the Visually Impaired, Emotional Support Teachers, Instructional Aides, or other unallowable positions.

ADMINISTRATIVE COST POOL

Administrative Cost Pool – 74 options

- Reduced down from over 1000 unique entries to 74 drop-down options in the following categories:
 - School Administrators
 - Administrative Social Work and Counseling Services
 - Translation Services
 - Supervisors of Direct Service Providers
 - Program Specialists
 - Transportation Services
 - Administrative Physician Services
 - ACCESS Coordinators
 - SBAP Service-Specific Administrators
- DHS has created a crosswalk document LEAs may use to compare old positions to new positions. This will be available both on the DHS SBAP Website and the SSG Website.

BEST PRACTICES

Best Practices

- LEAs are highly encouraged to make these changes as soon as possible. It is almost time to certify staff pool lists, calendars, and work schedules for participation in the JFM24 time study: this is a great time to get started!
 - Any new staff for this quarter should be assigned the new positions. Do not use any obsolete assignments!
 - DHS suggests updating at least 50% of your staff during the certification period.
- Once the JFM24 certification is locked and the sample is generated by SSG, LEAs will have the ability to maintain participants for the following quarter prior to the certification timeframe.
 - This can be done a little at a time.
- The goal is to assign new positions to 100% of staff by the start of the AMJ24 quarter, so that no old positions carry through into 24-25.
 - 100% of your staff should have new position assignments by the end of this certification period!

How to Update

- LEAs can update staff pool lists in two ways:
 - Updating one-by-one using e-SivicMACS System Screens
 - Updating in bulk using the Upload Process
- SSG has provided instructions for both methods.
- SSG has provided a complete list of all new Jobs and Positions including the associated codes that are needed for the upload process.
- DHS has provided a crosswalk to aid in re-assigning staff in the Administrative Cost Pool.

Which New Position Should I Use?

Direct Service	Administrative
<ol style="list-style-type: none">1. Identify the credential allowing your staff person to provide reimbursable SBAP direct health-related services.2. Assign that staff person to their appropriate credential using SSG's instructions for updates. <p>If their credential is not on the list, evaluate for the Administrative Cost Pool List. Otherwise, remove from the time study.</p>	<ol style="list-style-type: none">1. Identify the responsibilities/ description that best fits your staff person in support of MA and/or SBAP direct health-related services.2. Assign that staff person to their appropriate Job and Position that best matches using SSG's instructions for updates. <p>If that staff person does not support MA or SBAP activities, remove from the time study.</p>

NOTE: If there is a specific position title you would like to have added to the Administrative Staff Pool list, email your request to DHS for review at RA-PWSBAP@pa.gov with a brief description of job responsibilities.

Additional Guidance

- Purely instructional staff should not be included in the RMTS.
 - Staff who primarily provide instructional and educational supports should not be included in the RMTS.
 - Gifted staff (although they regularly work with IEPs) should only ever be included in the Administrative cost pool if they are supervising PCA services included in the IEP. (Supervisors of Direct Service Providers – Teacher (PCA Supervisor))
- Be as specific as possible to differentiate programs and the kind of support a staff person is providing:
 - Life Skills
 - Emotional Support
 - Behavioral Support
 - ACCESS Administration
- Staff whose costs/activities are included in the UICR calculation (e.g., Superintendents, Payroll staff) are not allowed in the RMTS.

IMPACT OF CHANGES ON MAC & COST SETTLEMENT

Impact of Changes on MAC & Cost Settlement

- Because staff may have been assigned differing job and position descriptions within the same fiscal year as we move through this transition, all assigned descriptions will appear for Medicaid Administrative Claiming (MAC) and Cost Settlement reporting.
- By ensuring LEAs remove all obsolete assignments by the certification of April-June 24 (which carries into the July-September quarter), this will only affect cost reporting for FY23-24.

RMTS REMINDERS

Importance of Timely Responses

The RMTS must have a statewide response rate of at least 85%. If this rate is not met, the Direct Medical Percentage (which affects LEA reimbursement) will decrease.

Moments which are not answered timely will count against the statewide response rate **and** the individual LEA's response rate, which can affect the LEA's ability to participate in the SBAP.

Non-Compliance

To assist in reaching the statewide goal of 85% response rate, LEAs are monitored to ensure they are properly returning sample moments.

- If an LEA has non-returns greater than 15% and greater than five (5) moments for a quarter, the LEA may receive a warning letter.
- If the same LEA is in default in subsequent quarters, it may not be able to participate in administrative claiming for a period of one-year.
 - If such a penalty is imposed, the LEA is required to return any payments received for that fiscal year under the SBAP.

The RMTS and LEA Reimbursement

- RMTS percentages are determined by reviewing the results of the RMTS and calculating the percentage of time spent in support of the Medicaid program.
- The higher these percentages are, the higher your LEA's reimbursement can be.
 - By including only appropriate staff in the RMTS, these percentages will likely increase, and there is a lower chance of recoupment during reviews!

Remember: If your LEA does not answer moments, or does not answer moments in a timely manner, this can affect the statewide Direct Medical Percentage **AND** your LEA's ability to participate in the SBAP.

SBAP RESOURCES

LEA Contact Information Form

- Please use the LEA Contact Information Form to:
 - Inform us when LEA SBAP staff and/or their contact information changes.
 - Ensure that the appropriate LEA staff members receive the relevant communications from DHS, PDE, and the SBAP vendor.
- The form is located on the [SBAP website](#) and should be submitted to: RA-PWSBAP@pa.gov.
- The Contact Information Forms are used to update the Master Contact List, which is used by DHS, PDE, and the SBAP vendor.
- The Master Contact List is updated regularly, on or before the 15th of the month and on or before the last day of the month.

Resources

- **SBAP on the DHS website**
 - www.dhs.pa.gov/provider/School-BasedACCESS/
- **SBAP Handbook**
 - The SBAP Handbook is typically updated on an annual basis. The most current version of the SBAP Handbook is available on the SBAP Website (above).
- **PA SBAP on the SSG website**
 - pasbap.ssghosting.com

Questions?

Questions about these changes (and any other program questions) should be directed to the DHS resource account: RA-PWSBAP@pa.gov

Questions about system support for RMTS, MAC, Cost Settlement, or Direct Service Claiming should be directed to SSG's Help Desk at: 1-877-916-3222 OR PAsupport@sivicsolutionsgroup.com