

Medicaid Administrative Claiming Cost Allocation Plan Update

January 24, 2019
Vol. 3

Administrators and Fiscal Officers:

Greetings! My name is Bob Deatherage and I am the new DHS RMTS Coordinator. Michele Minter has taken a new position leading the Division of Hospital and Outpatient Rate-Setting. I look forward to working with you on successful implementation of this new system.

Although we are still awaiting CMS approval of the new cost allocation plan (CAP), CMS has indicated that we should expect to hear something soon.

In the meantime, DHS has decided to move forward with preparations for a pilot of the RMTS system (April-May), and **full implementation of the RMTS and cost allocation plan on July 1, 2019** (provided CMS approval is received in time.)

Please see the remainder of this newsletter for more information. The following sections are included for your review and action:

- **RMTS Pilot Program**
- **Administrative Entity Actions**
- **Policy and Guidance Updates**
- **What's Coming . . .**

Thank you in advance for your efforts to support the implementation of this new system to determine each AE's Medicaid administrative claim.

Sincerely,

Robert Deatherage
DHS RMTS Coordinator

RMTS Pilot Program

DHS will run a pilot of the RMTS system in April and May (2019) with approximately a dozen AEs. To ensure that a good cross-section of AEs is represented, DHS and the County Commissioners Association of Pennsylvania (CCAP) have selected several from each region of the state and invited their participation. If your AE has not received an invitation, but you would like to participate, please contact the resource account at rapwcountycostaloc@pa.gov by January 25, 2019.

The primary purpose of the pilot will be to:

- test the web-based time study software system,
- test the random moment survey tool to ensure it is capturing and properly coding all activities reported by time study participants, and
- test the procedural components of the RMTS system (i.e. development and submission of participant rosters by AE coordinators and communication flow between AE coordinators, DHS, and HZA, etc.)

Administrative Entity Actions

AE Coordinator and Assistant Coordinator Designations

In previous newsletters, we announced that each AE must designate an employee as the Coordinator to provide oversight for the implementation of the RMTS, to act as a liaison between DHS and the RMTS participants, and to ensure that policy decisions are implemented appropriately. Each AE must also designate an Assistant Coordinator to provide back-up support for RMTS responsibilities. No contractor, or employee of a contractor, may serve as an AE Coordinator or Assistant Coordinator.

AE Coordinators and Assistant Coordinators **must be designated by April 5, 2019**. If an AE Coordinator is not identified, the Fiscal Officer will be assigned as the AE Coordinator. **(AEs participating in the RMTS pilot will need to designate their coordinators by February 1, 2019.)**

To assist with identifying an appropriate AE Coordinator and Assistant Coordinator for the RMTS, the following is a list of their primary responsibilities:

- Evaluate and determine appropriateness of each worker's participation in the RMTS
- Assist with survey responses if participants are unable to categorize the activity being performed for the RMTS
- Monitor survey participation rates for AE staff
- Identify and certify individuals who provide Medicaid administrative services as the entirety of their job
- Certify AE data submission

County IT Considerations

The online RMTS software system provided by HZA is called the "Automated Random Moment and Reporting System" (ARMARS). ARMARS will automatically send an email to each of the RMTS participants at the time of their random moment(s). Coordinators should

talk with their IT administrators to ensure that these emails containing the survey link will be delivered to recipients' inboxes without delay so that they can be answered in a timely fashion. Please consult with your local IT administrator now so that any concerns can be addressed before the system becomes functional. As an initial step, HZA recommends that you arrange with your IT department to whitelist the email address from which all automated RMTS emails will be sent, which is pamac@armars.net.

Policy and Guidance Updates

As the RMTS process continues to move forward we will include any policy and guidance updates in this section. Here are a few of the frequently asked questions:

How do we know which of our staff should participate in the RMTS?

DHS will review RMTS participant lists submitted by the AE Coordinators and will support the AE Coordinators in the list development prior to the RMTS implementation. To participate in the RMTS, the following conditions must be met:

- The individual must be an employee of the AE, a contractor serving the AE in a staff augmentation capacity, or other contracted staff that DHS has determined must participate in the RMTS to be claimable under the MAC program.
- The individual must provide administrative services for one or more of the RMTS Medicaid program areas as part (but not the entirety) of the individual's job duties or time.
 - (Staff members whose jobs are comprised *solely* of providing eligible MAC services may be certified as "100% MAC-eligible." All of their compensation will be included in the MAC claim, and they will not be subject to the time study.)
- The individual must provide administrative services identifiable with one or more specific RMTS Medicaid programs areas, rather than be provided as part of a general supervisory or support (fiscal, IT, clerical) role for Medicaid and non-Medicaid programs/services.
- Generally speaking, the following categories of staff have been identified as appropriate participants for the RMTS:
 - Coordinators and Service Coordinators (various types)
 - Program Specialists (various types)
 - Other groups/individuals that may be identified by the AE

Are AE Coordinators and Assistant Coordinators included as participants?

Yes, AE Coordinators and assistant coordinators should participate in the RMTS. By participating, their time spent on RMTS activities will be captured as reimbursable activity.

Is it permissible for the AE Coordinator or Assistant Coordinator to respond to Random Moment Activity Surveys (RMAS) on behalf of participants?

Under normal circumstances, the recipient of an RMAS must respond to it. However, there may be extenuating circumstances. For example, if an employee is on vacation during the

sampled moment, the AE Coordinator has two options. For planned absences such as vacation, the AE Coordinator may record in ARMARS the dates the worker will be out of the office. Then, any surveys that come due for the absent worker during those dates will be recoded automatically to a "Time Off" activity code. For unplanned absences (such as a sick day), or if the AE Coordinator does not record the dates the workers will be out of the office, the AE Coordinator may respond to the survey on behalf of the worker, indicating that the employee was taking paid time off during the sampled moment.

What's Coming...

For AEs **not** participating in the RMTS pilot, here is a high-level view of pre-implementation activities:

- **January – March: Select your AE Coordinator and Assistant Coordinator**
- **May/June: Participate in a training session (applies to all RMTS participants, AE Coordinators, and Assistant Coordinators)**
- **June: Identify your RMTS participants and enter their information into ARMARS**
- **July 1: Full operation of the RMTS begins statewide**

Questions, concerns, comments or other feedback may be addressed to the resource account at:
RA - PWCountyCostAlloc@pa.gov