

Colorado Department of Health Care Policy and Financing

School Health Services Program Random Moment Time Study (RMTS) Training – Summer 2014





Agenda

- Random Moment Time Study (RMTS) Overview
- RMTS Roles and Responsibilities
- Staff Pool List
- RMTS Compliance
- RMTS Results

RMTS BINGO



- How to play:
 - Fill in each square of the BINGO board with an option from the word bank
 - Each option is only used once
 - You can use the associated number to fill in the BINGO board instead of writing out the word(s)
 - RMTS BINGO questions will be asked throughout the presentation, the answers to the questions will be one of the options in the word bank
 - If that option is on your BINGO board you can mark that square

Completed BINGO Board Example



SHS
SCHOOL HEALTH SERVICES

School Health Services Program
Random Moment Time Study (RMTS) Training
Summer 2014
Exercise

RMTS BINGO

Fill in each square of the BINGO board with an option from the word bank. Each option is only used once. You can use the associated number to fill in the BINGO Board instead of writing out the word(s).

Word Bank

1. Direct Service Providers	2. Administrative Service Providers	3. Medicaid Administrative Claiming (MAC)	4. Provider Qualification Review
5. RMTS Coordinator	6. Annual Cost Reconciliation	7. 100% Federally Funded	8. Minimum 85%
9. One Minute	10. 5 Questions	11. 5 School Days	12. Participant
13. Delegating Nursing Services	14. 100% Compliance	15. Corrective Action Plan	16. OIG Exclusion Database

BINGO Board

13	9	5	1
15	11	7	3
2	6	10	14
16	12	8	4

RMTS Overview

- What is a RMTS?
 - Random moment sampling is a federally accepted method for documenting time
 - Required mechanism to determine the amount of time and effort participants spend performing Medicaid school health services and administrative activities
 - Randomly generated ‘moments’ are equal to **one minute**
 - Required as part of the annual cost reconciliation process and the Medicaid Administrative Claiming (MAC) calculation

RMTS Overview

- How it works
 - Each moment is randomly assigned
 - Participants have equal opportunity to be selected multiple times throughout a quarter due to the randomness of the sample generator. Therefore, some participants are selected multiple times and others are not selected at all
 - Participants document their activity during that assigned moment(s) in the web-based RMTS system
 - Accurate and candid responses from participants are critical to a successful and valid time study

RMTS Overview

- Who participates in the RMTS?
 - Staff pool rosters are updated quarterly in the web-based RMTS system
 - Staff pool rosters include participants that are routinely performing Medicaid school health services prescribed in an Individualized Education Program (IEP) or Individualized Family Services Plan (IFSP) and administrative activities that support Medicaid school health services
 - Participants cannot be 100% federally funded
- Staff pool rosters are made up of three cost pools
 - Cost Pool 1 – Direct Service Providers
 - Cost Pool 2 – Targeted Case Management (TCM) Providers
 - Cost Pool 3 – Administrative Service Providers

RMTS Overview

- Direct Service Providers
 - Direct service providers who render school health services as prescribed in an IEP or IFSP should be included in the quarterly RMTS staff roster
 - Provider Qualifications:
 - Qualified personnel who meet the Colorado Department of Education (CDE) recognized certification, licensing, registration or other comparable requirements of the profession in which they practice
 - A Qualified Health Care Professional (QHCP) who is registered, certified or licensed by the Colorado Department of Regulatory Agencies (DORA) as a health care professional and who acts within the profession's scope of practice
 - Reference Section 2 and Appendix 2 of the School Health Services (SHS) Program Manual for a detailed list
 - School health services include the following services:
 - Physician, Nursing, Personal Care, Psychology, Counseling and Social Work, Orientation and Mobility, Speech, Language and Hearing, Occupational Therapy, Physical Therapy, TCM, Transportation (providers not included on staff rosters)

RMTS Overview

- TCM Providers
 - Staff qualified to bill Medicaid for TCM services only should be included on the TCM roster
 - Provider Qualifications:
 - A Qualified Health Care Professional
 - An individual who meets the qualifications established by CDE to develop and/or implement an IEP, IFSP or services under the federal provisions of the Individuals with Disabilities Education Act (IDEA)
 - TCM services include the following:
 - TCM identifies special health problems and addresses needs that affect a student's ability to learn, assists the student to gain and coordinate access to a broad range of medically necessary services covered under the Medicaid program and ensures that the student receives effective and timely services appropriate to their needs

RMTS Overview

- Administrative Service Providers
 - Staff that perform Medicaid administrative and outreach activities to students and/or their families on a routine basis
 - Providers that do not provide school health services nor bill for Medicaid reimbursement
 - Administrative services include the following:
 - Facilitating Medicaid outreach, facilitating Medicaid enrollment or eligibility determination, translation to facilitate access to Medicaid services, medical/Medicaid related training and professional development
 - Referral, coordination and monitoring of Medicaid services
 - Activities associated with the development of strategies to improve the coordination and delivery of Medicaid covered medical/dental/mental health services to school age children, and when performing collaborative activities with other agencies and/or providers

RMTS Overview

- Three staff cost pools:

Direct Service Providers

- Those qualified to bill direct services to Medicaid (can also bill TCM, if qualified)
- Time study results for Direct Services are applied to annual cost settlement
- Time study results for Administrative Services are applied to the quarterly MAC claim

Targeted Case Management Providers

- Those qualified to bill Medicaid for TCM services only
- Time study results for Direct Services are applied to annual cost settlement
- Time study results for Administrative Services are applied to the quarterly MAC claim

Administrative Service Providers

- Participants that routinely provide administrative, outreach, and program planning activities, and do not bill Medicaid for direct service or TCM
- Time study results for Administrative Services are applied to the quarterly MAC claim

Participants cannot be in more than one cost pool

RMTS BINGO

- Question 1: A Qualified Health Care Professional providing medical services as prescribed in an IEP/IFSP should be included in which cost pool?
 - ***Direct Service Providers***
- Question 2: Randomly generated 'moments' are equal to?
 - ***One Minute***
- Question 3: A participant that routinely provides referrals, coordination, and monitoring of Medicaid services should be in which cost pool?
 - ***Administrative Service Providers***
- Question 4: Time study results from the Administrative Providers Services cost pool are applied to what claim?
 - ***Medicaid Administrative Claiming (MAC)***



RMTS Roles and Responsibilities

- Role of the RMTS Coordinator
 - Assign an alternate/assistant RMTS Coordinator to fill in when you are unavailable
 - Update staff pool lists (rosters), district calendar, and hours
 - Inform all district participants included on the roster they may be selected for the RMTS and why they are required to respond to their moment
 - Send general reminders about what the SHS Program is, what to do if selected, e-mail address that sample information comes from, importance of their role
 - Train relevant district participants about the time study and how to respond timely and accurately
 - Provide a copy of the participant screen shots from the RMTS Coordinator's Guide to participants that are included on a staff pool list

RMTS Roles and Responsibilities

- Role of the RMTS Coordinator
 - Submit the Provider Leave Status Template at the end of each month
 - Monitor follow-up e-mails from RMTS Help Desk regarding requests for additional information on participant moments, rosters, etc
 - Review compliance reports and encourage participation in time study
 - Follow-up with participants to encourage them to respond
 - Maintain a minimum 85% response rate (strive for 100%) to meet compliance requirements
 - Administer time study training to participants with paper moments prior to them responding to sampled moment

RMTS Roles and Responsibilities

- Role of the Participant
 - Thorough responses to moment(s)
 - Providing detailed responses to all questions describing the activity at the sampled moment (minute) in time
 - Do not include conflicting information in response(s) (i.e. Work with a student on IEP goals and selecting “No, the student does not have an IEP”)
 - Respond to follow-up from PCG requesting additional information
 - Do not delete time study notification e-mails until moment has been completed
 - Seek assistance from the RMTS Coordinator or RMTS Help Desk

RMTS Roles and Responsibilities

- Participants selected for a “moment” must log onto the website and answer the following 5 questions:
 1. Were you working during your sampled moment?
 2. Describe in detail the activity you were performing during your sampled moment.
 3. Describe in detail why were you doing this activity during the sampled moment.
 4. Were you working with a student during this sampled moment?
 5. Was the service you performed listed on the child’s IEP/IFSP?

RMTS Roles and Responsibilities

- Time study response exercise

Example Video

1. Were you working during your sampled moment?
2. Describe in detail the activity you were performing during your sampled moment.
3. Describe in detail why were you doing this activity during the sampled moment.
4. Were you working with a student during this sampled moment?
5. Was the service you performed listed on the child's IEP/IFSP?



RMTS Roles and Responsibilities

- Role of the Department/PCG
 - Facilitate the RMTS process
 - Provide training materials and instructions
 - Provide phone and e-mail support for RMTS Coordinator questions
 - Review district/Board of Cooperative Education Services (BOCES) compliance and work with the RMTS Coordinators to improve performance
 - Validate quarterly RMTS sub-sample – review 5% of coded moments for each cost pool to validate accuracy
 - Determine financial penalty or suspension - for district/BOCES that do not meet 85% response rate
 - Identify low compliance rate and offer assistance and/or training as needed

RMTS BINGO

- Question 5: Who is responsible for providing detailed responses to all questions describing the activity at their sampled moment in time?
 - *Participant*
- Question 6: Who is responsible for training relevant district participants about the time study and how to respond timely and accurately?
 - *RMTS Coordinator*
- Question 7: Participants selected for a “moment” must log onto the website and answer how many questions?
 - *5 Questions*



Staff Pool List

- Collaborate with your Human Resource Department and Business Office to accurately identify participants for the staff pool list
- All changes such as adding a new participant, updating participant information, inactivate/activating participants **must** be made directly in the system
- Staff pool list (roster) must be certified after all updates are completed in the system
- Once the new quarterly sample has been generated updates to participant e-mail addresses can be made
 - Any changes in status or addition of new participants will not affect the sample for the current quarter once it has been generated

Staff Pool List

- Office of Inspector General (OIG) Exclusion Database
 - Coordinators should review active participant lists against the OIG database at <http://exclusions.oig.hhs.gov> to determine if active participants are identified in exclusion database
 - If a participant is identified during an active RMTS quarter that is listed in the exclusion database, please contact PCG at 866-766-9015 or cormts@pcgus.com for next steps

“As defined online in OIG’s Special Advisory Bulletin, “The effect of an OIG exclusion from Federal health care programs is that no Federal health care program payment may be made for any items or services (1) furnished by an excluded individual or entity, or (2) directed or prescribed by an excluded physician (42 CFR 1001.1901)”

Staff Pool List

- Delegating Nursing Services
 - Participants that are delegated nursing services must be a current Colorado-qualified Nurse Aide or Health Technician
 - If a personal care aide is delegated by and under the supervision of a Registered Nurse, they must be re-categorized as a Nurse Aide or Health Technician on a districts staff roster

According to the School Health Services Benefits and Eligible Provider section of the Colorado State Plan 3.1-A, “Nursing services may be delegated in accordance with 42 CFR § 440.130(d) and according to the delegation clause in Section 12-38-132, C.R.S. of the Colorado Nurse Practice Act to the following:

- A currently Colorado-qualified Nurse Aide or Health Technician.

The delegating nurse shall provide all training to the delegate for delegated activities and is solely responsible for determining required degree of supervision the delegate will need

Staff Pool List

- Provider Qualification Review
 - SHS Program requires that districts undergo periodic reviews to validate staff included in direct service and targeted case management cost pools are qualified health care professionals or qualified personnel and that all licensures, registrations or certifications for staff providing school health services are current for the entire period they are included on a staff roster
 - Conducted on all participating districts at least once every three years
 - Reviews will be conducted on the October – December (OD), January – March (JM), and April – June (AJ) RMTS quarters
 - PCG will conduct an engagement call with selected district two weeks prior to the Provider Qualification Review
 - Confirmation letter will follow along with a list of providers being reviewed
 - All requested documentation must be submitted to PCG within nine business days from the date of the confirmation letter

Staff Pool List

- Provider Qualification Review
 - Provider Licensures
 - Licensures/certifications must be valid during the entire review quarter in which the providers are listed on the staff roster
 - Districts must provide requested documentation prior to quarterly RMTS sample generation or the sampled providers will be removed from the district staff roster
 - Key to success
 - Review licensure against your Direct Service & TCM staff pool list quarterly during staff roster updates
 - Consider keeping all documentation in one central location (binder, file cabinet, scan to desktop – paperless)
 - Know when licensure expires so active and inactive licensure is maintained
 - Communicate with your participants regularly to obtain updated licensure
 - Network with other colleagues and district coordinators to identify best practices so that your provider licensure files are always maintained and easily accessible

RMTS BINGO

- Question 8: Colorado-qualified Nurse Aide or Health Technician are eligible to provide?
 - *Delegating Nursing Services*
- Question 9: Districts must provide requested licensures, registrations or certifications for what type of review?
 - *Provider Qualification Review*
- Question 10: It is strongly encouraged that coordinators review active participant lists against what federal database prior to certifying?
 - *OIG Exclusion Database*



Exercise

Staff Rosters

RMTS Compliance

- 9 districts achieved 100% compliance for the entire 2013 -14 school year!

District	Total Number of Moments in 2013-14
Buena Vista School District R-31	68
Counties of Adams & Weld School District 27J	364
Counties of Archuleta & Hinsdale District JT	23
Falcon School District 49	789
Gunnison Watershed School District	25
Ignacio School District 11JT	15
Pueblo County School District #70	500
Salida School District R-32-J	77
Teller County School District RE-1	22

RMTS Compliance

- RMTS compliance means that at minimum 85% of all district moments, state-wide, in each cost pool are completed and submitted timely, thus ‘valid’ moments
 - Valid moments include the following:
 - Submitted within the allowable 5 school day window
 - Moments are completed accurately

District Name	Invalid Moments	No Response		Valid Moments	Total Number of Valid Moments	Compliance %
		Moments Not Submitted	Moments Submitted After 5 Days			
School District A	0	0	2	6	8	75.00%
School District B	2	0	0	145	145	100.00%
School District C	0	6	3	45	54	83.33%



- Districts have control of managing that moments are completed within the allowable five school day window

RMTS Compliance

- Not meeting 85% return rate compliance
 - Potential decrease in state-wide RMTS results
 - All moments coded as 'No Response' must be included in the RMTS percentage calculation
 - This reduces the percentage of reimbursable moments for the cost pool and dilutes actual results
- Districts that do not meet the minimum 85% return rate compliance could jeopardize the entire state from meeting the number of moments required to achieve statistical validity
 - Puts the MAC claim and direct service costs for that quarter at risk
 - Reduces reimbursement

All districts should strive to meet 100% compliance

RMTS Compliance

- RMTS non-compliance process
 - **Step 1:** After the first quarter of non-compliance
 - Receipt of warning letter outlining the consequences for non-compliance
 - District required to submit Corrective Action Plan (CAP)
 - Outlines plan to meet compliance
 - **Step 2:** After two consecutive quarters of non-compliance
 - District may be removed from participation in the SHS program for failure to comply with the program requirement

RMTS BINGO

- Question 11: What is the required return rate compliance percentage?
 - **Minimum 85%**
- Question 12: A moment must be submitted within how many days to be valid?
 - **5 School Days**
- Question 13: What return rate compliance percentage should a district strive for?
 - **100% Compliance**

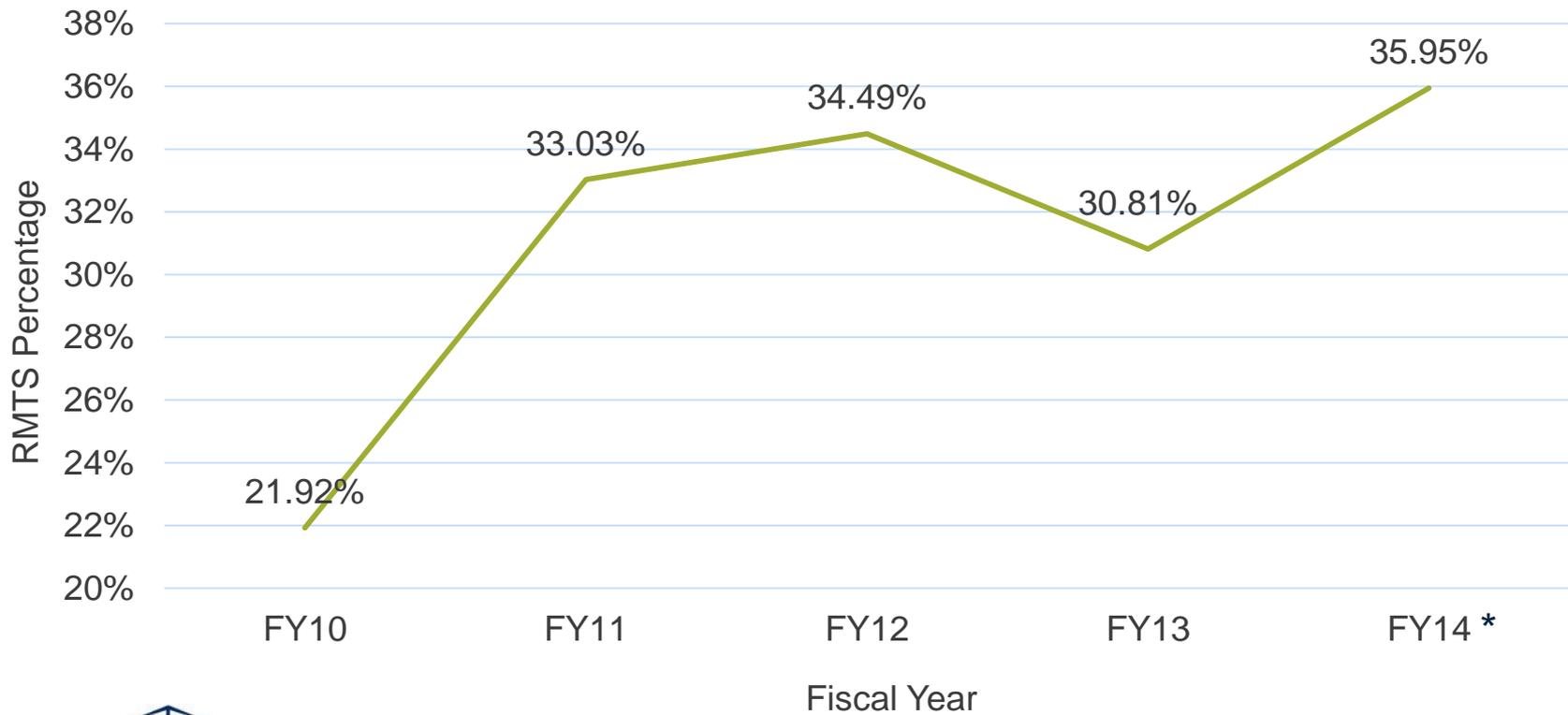


RMTS Results

- What factors can impact the RMTS percentage?
 - Participants included on your direct service staff pool list
 - Participants understanding why they are being selected
 - Participants understanding the appropriate level of detail to include in their sample moment
 - Activities participants are routinely performing
 - Routinely performing activities that are on a student's IEP/IFSP
 - All participants should know when they are performing activities that are on the student's IEP/IFSP (i.e. personal care aides, health techs, nurses aides)

RMTS

Annual Direct Service RMTS Results



Preliminary results*



RMTS

- RMTS Quarterly Comparison
 - Preliminary results*

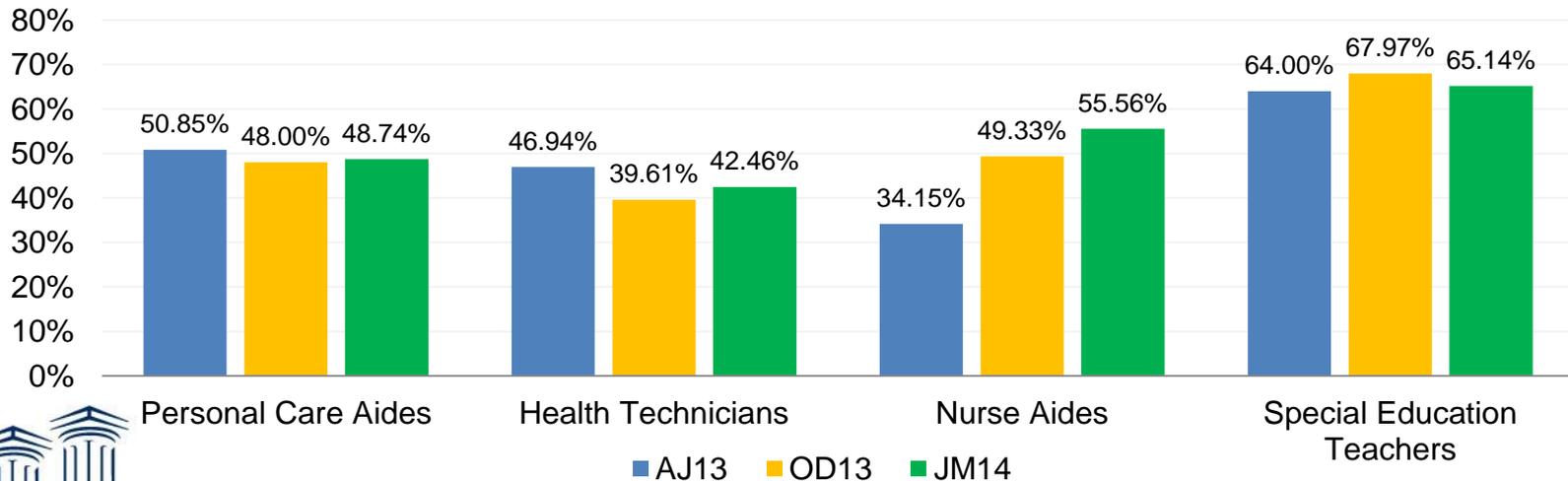
Percentage	Cost Pool	AJ13	OD13	JM14	AJ14*
Direct Service	Direct Service	28.08%	35.56%	35.94%	36.35%
MAC	Direct Service	1.76%	2.49%	2.01%	1.82%
	Administrative	10.30%	12.39%	13.03%	14.62%



RMTS

- Percentage of moments by job category in the Direct Service cost pool spent conducting educational activities
 - Educational activities include general school-related activities that are not for the purposes of Medicaid such as: educational services, general supervision of students, administering achievement tests, attendance, enrollment, and discipline

Educational

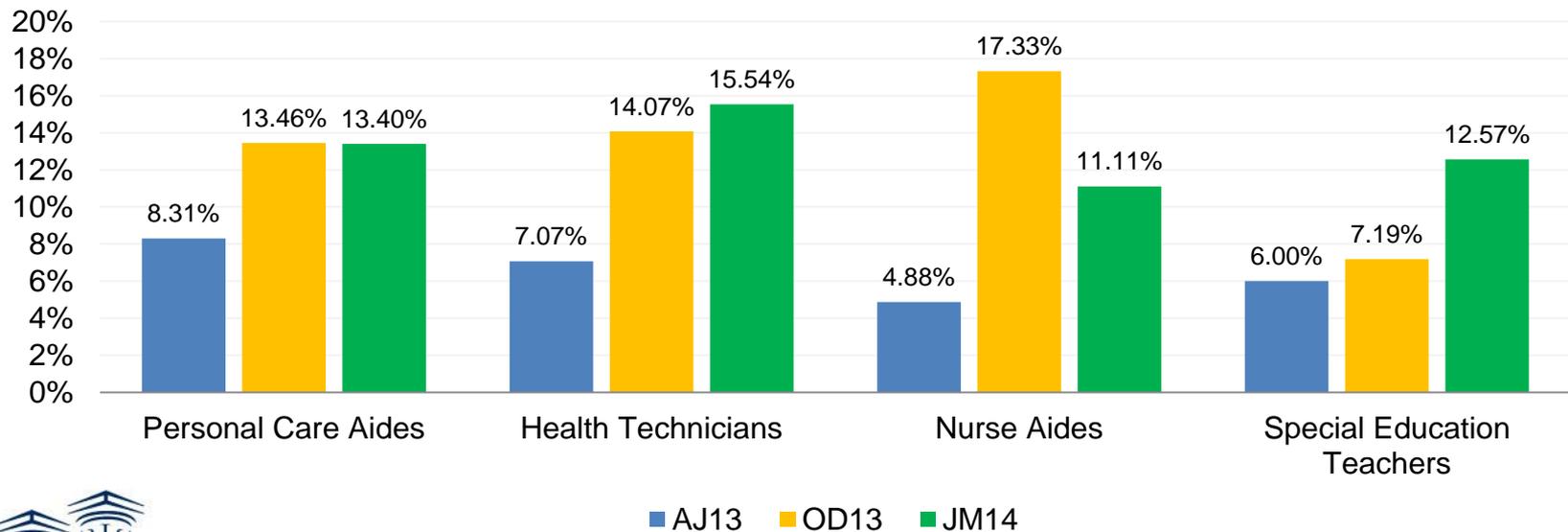




RMTS

- Percentage of moments by job category in the Direct Service cost pool spent conducting direct medical services on an IEP

Direct Medical Services

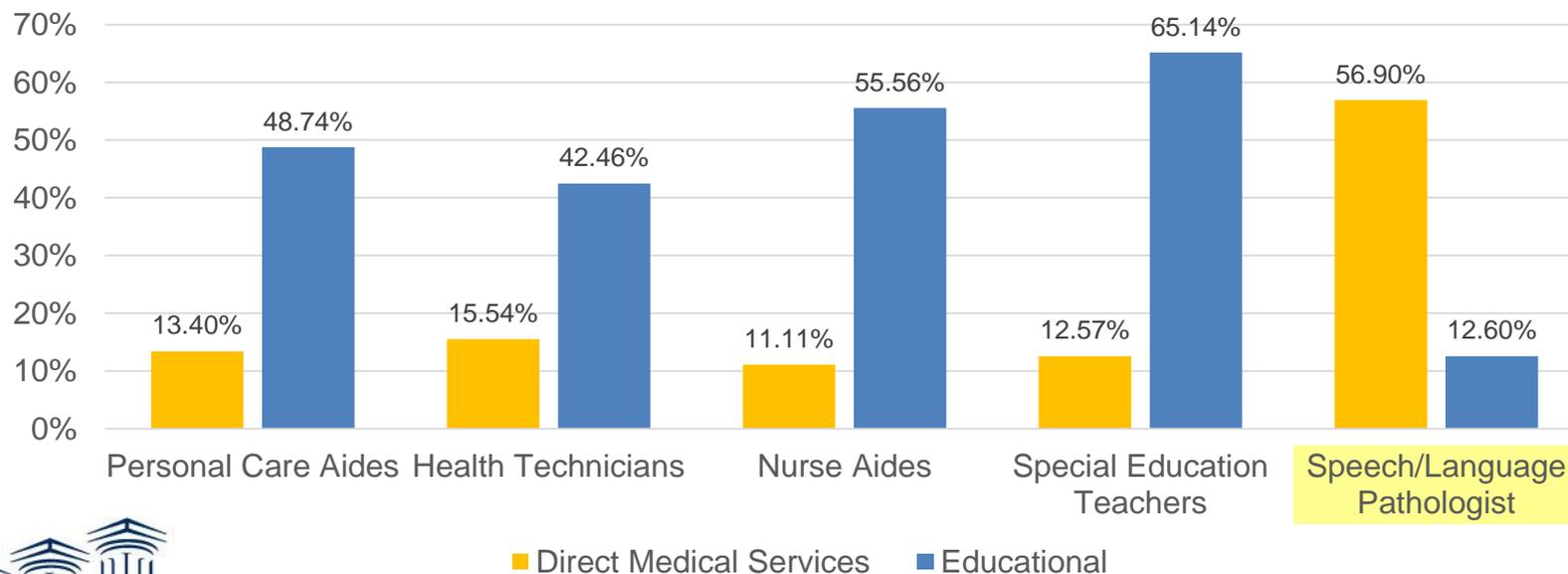




RMTS

- Percentage of moments by job category in the Direct Service cost pool spent conducting direct medical and educational services in JM14

Direct Medical And Educational Services





RMTS

- Percentage of moments by job category in the Direct Service cost pool spent conducting direct medical services on an IEP/IFSP for the JM14 quarter

Job Category	%	Job Category	%
Audiologist	30.8%	Physical Therapist	54.1%
Health Technician	15.5%	Physical Therapy Assistant (Tech)	54.5%
Licensed Counselor	11.1%	Psychologist	18.2%
Nurse Aide	11.1%	Social Worker	25.7%
Nurse, LPN	22.2%	Special Education Teacher	12.6%
Occupational Therapist	57.0%	Speech/Language Impairment Teacher	0.0%
Occupational Therapy Assistant (Tech)	63.6%	Speech/Language Pathologist	56.9%
Orientation Mobility Specialist	33.3%	Speech/Language Pathologist candidate	64.5%
Personal Care Aide/Teacher's Aide	13.5%		



RMTS

- Percentage of moments by job category in the Administrative cost pool spent conducting Medicaid administrative activities for the JM14 quarter

Job Category	%	Job Category	%
Administrator	13.4%	Pupil Support - Technician	8.2%
Interpreter	0.0%	Pupil Support Services Administrator	28.6%
Non-licensed Orientation & Mobility Specialist	0.0%	School Bilingual Assistant	9.8%
Non-licensed Psychologist	11.5%	School Counselor	0.3%
Non-licensed Social Worker	11.7%	Special Education - Support Teacher	0.0%
Nurse Aide - Non DSC or TCM	38.6%	Special Education Administrator	12.7%
Program Specialist	15.3%	Special Education Teacher Aide - non DS or TCM	0.0%
Psychologist Intern	14.3%	Special Education Teacher - non DS or TCM	2.0%

RMTS BINGO

- Question 14: After the first quarter of non-compliance a district will be asked to submit what?
 - ***Corrective Action Plan***
- Question 15: The direct service time study percentages are used for what annual process?
 - ***Annual Cost Reconciliation***
- Question 16: What information from a payroll journal may tell you that a participant should not be included on the roster?
 - ***100% Federally Funded***



Contact Information

- For any questions or concerns, please contact:
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