



FY25-26 SBAP Session: Random Moment Time Study (RMTS)

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Key Topics

- **Random Moment Time Study (RMTS) basics**
 - RMTS participation requirements
 - How the RMTS affects School-Based ACCESS Program (SBAP) reimbursements
 - RMTS theory – making the most of your participation
- **Changes to Pennsylvania's RMTS**
 - 2-day response window
 - Active summer quarter in 2026
- **How to be successful in your RMTS participation**
 - Ensuring cost pool lists are complete and accurate
 - Calendars and work schedules
 - Managing moments and following up on reminders
- **Resources**

Random Moment Time Study (RMTS) basics

- **The Pennsylvania School-Based ACCESS Program (SBAP) uses a cost-based reimbursement methodology:**
 - Direct Services: interim payments and annual cost settlement
 - Administrative: Medicaid Administrative Claiming (MAC)
- **Part of the cost-based reimbursement model is determining what costs are considered Medical Assistance (MA)-allowable.**
- **Statewide RMTS results are used in the calculations for both reimbursement types in the SBAP.**
- **To determine what percentage of time appropriate SBAP staff spend on MA-allowable activities (as opposed to activities that support educational objectives or other outside programs), Pennsylvania uses the RMTS.**

RMTS Participation Requirements

- Each participating Local Education Agency (LEA) is required to participate in the RMTS.
- The statewide response rate must meet 85%.
- To support that goal, each LEA must meet their own response rate of 85%, though DHS recommends always striving for a 100% response rate.
- Failure to participate in each of the program components (including the RMTS) may result in a lower or no reimbursement for your LEA. If you are at risk of this, DHS will reach out to request corrective action.
- It is important that results are **accurate**, because they apply to **everyone** in the state.

RMTS Participation Requirements

Human Resources and Fiscal Staff should be involved in your LEA's RMTS processes.

- **Are participants paid using federal funding? What portion?**
- **Are participants included in the calculation of the Unrestricted Indirect Cost Rate (UICR)?**
- **When a participant is on leave – is that absence paid or unpaid?**
 - When requested, this information must be disclosed. We are not asking how much someone is being paid, or why they are not being paid. This information is key for accurate coding, which directly impacts the calculations for federal reimbursements.
- **What dates affect this participant's absence? When did they leave employment?**

RMTS Theory – Making the Most of Participation

- **This is a group project and every response counts. When everyone does their part, it is good for the entire Commonwealth.**
- **Only include appropriate staff, appropriate dates, appropriate times.**
 - Work schedules and calendars: Include only time staff are working.
 - Exclude staff who are 100% federally funded or are included in your Unrestricted Indirect Cost Rate (UICR).
 - Exclude anyone who does not support MA Program activities.
- **The quality of your staff pool lists is much more important than the quantity.**
 - Loading up on staff that do not support MA Program activities just so you can report their costs *hurts* percentages. Consider how each staff person supports MA Program activities before including them in the RMTS.

RMTS Theory – Making the Most of Participation

Someone once asked... do I need to include *all* my PCAs?

No, but...

- **Any staff person your LEA intends to have submitting services for MA claims (and intends to include in annual cost settlement) MUST be included in the Direct Service Cost Pool.**
 - Some contracted costs can be reported at cost settlement without inclusion in the RMTS. See Section 7.5 of the SBAP Handbook.
- **Any staff person your LEA intends to include in quarterly cost reports MUST be included in the RMTS (either cost pool).**

If you would rather have more time to train your staff before billing and claiming their costs, do not include them.

Changes to Pennsylvania's RMTS

- **The Centers for Medicare & Medicaid Services (CMS) published updated guidance in 2023, which requires all states to come into compliance by July 1, 2026.**
- **The most notable changes for Pennsylvania's RMTS are with relation to:**
 1. the response window, and
 2. the July – September quarter.
- **The 2023 guidance additionally provided optional flexibilities for states, which could help us gather more information about the services provided in schools and more accurately disburse reimbursements. Any changes to the RMTS questions used in Pennsylvania's time study will be announced in advance of the changes being in effect.**

2-day Response Window

- **What is changing?**

Currently, participants have 5 working days to respond to their sampled moment. The updated 2023 guidance requires all states to shorten this window to a maximum of 2 days.

- **When?**

DHS does not yet have an updated Time Study Implementation Plan approved by CMS. Pennsylvania is still moving toward a 2-day response window.

Effective with the start of the October – December 2025 quarter, the notification schedule will be updated to support the transition, but moments will not expire until after 5 days.

Notification Timeframes – 2 Day Response Goal

Notification type	Timing related to the moment date and time	Who is notified?
Pre-notification	Sometime in the working day prior to the moment	Participant only
Moment Notification	At the exact moment and time of the moment	Participant only
Reminder 1	Four (4) hours after the moment	Participant and Contact 1
Reminder 2	Twenty-four (24) hours after the moment	Participant and Contacts 1 and 2 (if listed)
Reminder 3	Thirty-six (36) hours after the moment	Participant and Contacts 1, 2 and 3 (if listed)
Reminder 4 (Final)	Ninety-six (96) hours after the moment (24 hours before it is marked as a non-response)	Participant and Contacts 1, 2, 3 and 4 (if listed)

Active Summer Quarter in 2026

- **What is changing?**

Previously, the July – September quarter was not sampled, meaning LEAs did not need to certify cost pool lists (these carried over from April – June) and there were no random moments issued.

The updated 2023 guidance requires all states to capture all working days within their RMTS, including days in the summer months.

- **When?**

DHS is working with CMS now to ensure requirements are met.

This change will need to be implemented for the July – September 2026 quarter.

How to be Successful in your RMTS Participation

- **The SBAP vendor, Sivic Solutions Group (SSG) has many system reports to support each LEA in their RMTS responsibilities.**
- **Knowing how to use SSG's e-SivicMACS system and who to reach out to for support is critical to your success**
 - Use the “Resources” section within e-SivicMACS
 - Emails come FROM pasbap@sivicsolutionsgroup.com
 - Emails go TO pasupport@sivicsolutionsgroup.com
 - For system support: pasupport@sivicsolutionsgroup.com
 - For help understanding reports and data: your regional LEA liaison.
 - For policy support: RA-PWSBAP@pa.gov

Cost Pool Lists – Complete and Accurate

- **If your LEA plans to report a staff person's costs for MAC *or* for the annual cost settlement, that staff person must be included in your LEA's RMTS cost pool lists.**
- **Any staff who are paid with 100% federal funding must be excluded from the RMTS as their costs are ineligible for reimbursement (this would be double dipping).**
- **Any staff whose costs are included in your LEA's Unrestricted Indirect Cost Rate (UICR) must be excluded from the RMTS as their costs are ineligible for reimbursement (this would be double dipping).**

Calendars and Work Schedules

- **It is important to include only the time staff are expected to be working when certifying calendars and assigning work schedules.**
 - Accurate calendars and work schedules can cut down on staff being assigned a moment when they aren't working, resulting in unanswered or "not working/not paid" moments.
- **When you see a large number of moments that fell into code 11 on your RR420 report, this is a good time to review your LEA's work schedules. Are you including days and hours that staff are not scheduled to work?**
 - "I do not work on Fridays"
 - "I don't start work until 8:30"
 - "School ends at 3:30"

Managing Moments, Following Up on Reminders

- **RMTS Coordinators are encouraged to list themselves as "Contact 1" for each participant.**
- **Each backup contact listed will be notified when a moment remains unanswered... until the moment expires as a non-response.**
 - When the participant is no longer working in the listed position, and cannot complete their moment, the LEA must notify SSG at pasupport@sivicsolutionsgroup.com within the response window to avoid a non-response. Remember to include the date that person left their position.
 - When the participant is working and can respond to their own moment, the LEA can follow up on the moment either from the emailed reminder or from review of the RR440 report within e-SivicMACS.

Resources

Resources and References

- **2023 CMS Guidance:**

<https://www.medicaid.gov/sites/default/files/2023-07/sbs-guide-medicaid-services-administrative-claiming-ud.pdf>

- **DHS SBAP Website:**

<https://www.pa.gov/agencies/dhs/resources/for-providers/ma-for-providers/sbap.html>

- Includes the current SBAP Handbook

- **SSG SBAP Website:**

<https://pasbap.ssghosting.com/MAIN/Home.aspx?m=0>

- Includes live system training opportunities under “Basic Info”
- Includes recorded RMTS training materials and other resources under “Resources” within e-SivicMACS

Thank you for participating!

DHS SBAP Policy Resource Account

RA-PWSBAP@pa.gov

