

## Notes for SMAA LEA Work group meeting- 8/4/14

**Next Call: Wednesday the 13<sup>th</sup> at 11:00am**

### RTC Update

Discussions by districts on redoing invoices:

- Request for times beyond 14 days have been granted
- There seems to be a discrepancy between what various (*volunteer*) analysts are approving. Some districts have done ALL the revisions and returned it but some volunteer analysts would return the revisions and give minor details about the *revision* without indicated needed change.
- There is a lack of consistency in the corrections given by analysts.
- Some districts are being told to lower their code 4 even though they have provided justifications. The justifications don't appear to be considered
- Suggestion is to submit letter with revisions if the district does not agree with doing what is being asked of them (see Mendocino letter attached)
- Legislators are being contacted to help districts resolve issues
- There is nothing in the federal guidelines that limit the amount of time a staff can spend on MAA activities. If a family resource center staff spends her time enrolling families and making sure that students are receiving services, the only qualification is it has to be reasonable.
- OMB 87 states that time should be what is necessary for the efficient implementation of the program
- Community colleges have had positions gutted and feel they will not be able to stay in the program. (letter from Fresno LGA is attached)
- CDE was asked to bring up issues with DHCS. They reported that they were asked about providing staff but nothing has happened.
- Reported by districts:
  - The analysts cannot even begin to understand what is going on at schools.
  - The analysts continually reduce their invoices
  - There is a lot of misunderstanding of the correct justification schools need to make-therefore, the revisions are never correct
  - Schools are spending valuable resources to do and redo these invoices. It is costing them time and expense
  - DHCS is spending time and resources on this review when they need the time to deal with the pending implementation of the RMTS.

- Benchmarks are unrealistic since they impact districts based upon size, other factors and justifications are not being considered which explain these differences
- One district reported they were being audited by their LEC. Confusion because ALL are confused about what the auditors will be looking for. On another note, everyone knows what the auditors are *looking* for but many schools do not have it. In order to pass, schools are required ‘certain’ things (unknown for now). Schools are frustrated because they are starting to feel pushed into a corner/ make up things for the auditor?

### **Issues to Raise at the DHCS Work group meeting August 7th**

Group asked if LEA representatives to the DHCS work group could ask to see copies of invoices that had been approved so districts would know what EXACTLY did they do in order to get approved.

Second request is to explore a negotiated settlement with CMS of the claims

Districts want to know who is getting paid and how much is being expended and at what rate are these invoices being reimbursed?

Group would like us to express concerns that some districts are being asked to certify numbers on their invoices that do not reflect their actual expenditures. They are concerned that they are certifying numbers that they cannot support and in essence are not telling the truth. They are submitting these false documents because they are being told they will not get reimbursed unless they do so. Their choice is between not telling the truth and getting reimbursed.

### **RMTS Update**

- DHCS submitted a plan to CMS on July 31<sup>st</sup>. LEA representatives have asked to review the training slides on the plan. The request has been granted by DHCS
- Below is the information from the cover memo on what was submitted by DHCS. The files are large so it is difficult to send. If you would like a copy, let us know and we will break them down and send them out

*I am attaching our response to the CMS conditional approval letter dated June 27, 2014 and the updated, redlined California SMAA Implementation Plan. Listed below are the changes to the plan:*

- *All technical changes requested in the CMS approval letter*
- *An option for LEC/LGA consortia*
- *Deletion of the requirement for submission of the Claiming Unit Universe Grid (CUUG), the Claiming Unit Functions Grid (CUFG) and the variance document*

*In addition, we are requesting a delay of the Random Moment Time Study (RMTS) methodology start date to FY 2014-15, quarter three, to allow adequate time to successfully transition LEAs, LECs and LGAs from a worker log system to an RMTS system. The change to an RMTS system represents a paradigm shift for the SMAA Program. And, because most California schools are closed for the summer and will not be back in session until after Labor Day, our ability to adequately train LEAs, LECs and LGAs prior to September 24<sup>th</sup>, the first day RMTS moment notifications need to occur, is greatly diminished. A delay until FY 2014-15 Q3 will allow time during the fall for quality training and systems testing and will enable us to lay the foundation for a successful RMTS implementation. We are also requesting that FY 2014-15 quarters one and two be an average of the RMTS results of FY 2014-15 quarters three and four.*

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