Backcasting Proposal #2

Proposal for alternative backcasting methodology:

- Use RMTS-generated percentages from last four quarters (FY 2011/2012 Q4, FY 2012/2013 Q2 Q4) of LAUSD as the backcast percentages
- Do not remove any participants

Benefits:

- Allows backcasting to proceed now and backcasting process could be complete by June 30, 2015
- LEAs with large number of participants not penalized retroactively
- LEAs gain the two year time value of reimbursement monies
- LEAs and their vendors do not have to expend large amount of effort culling participants and the LECs and DHCS do not have to expend large amount of effort reviewing participant lists for eligibility
- Diffuses the clamor from stakeholder groups for immediate reimbursements greater than CMS has granted
- Overreaching LEA invoices are globally resolved

Risks:

- Some ineligible participants salaries and benefits would remain on the invoices
- Overreaching LEAs will object to lower percentages