



STATE OF WASHINGTON  
**DEPARTMENT OF SOCIAL AND HEALTH SERVICES**  
HEALTH & RECOVERY SERVICES ADMINISTRATION  
*PO Box 45530*  
Olympia WA 98504-5530

April 19, 2010

Dear Tribal Leaders, Medicaid Administrative Match Coordinators and Contacts,

On March 18, 2010 staff from the Health and Recovery Services Administration (HRSA), Washington Tribes and the Centers for Medicare and Medicaid Services (CMS) met to discuss claiming options for the Tribal Medicaid Administrative Match (MAM) Program. During that meeting Tribes agreed to remove option one and three from the table. If you will recall, option one involved a random moment time study, while option three required each participating staff to complete a different random time study week each quarter.

With four options and two alternative options remaining, we would like to hear more from Tribes regarding the different claiming methodologies. Please review the enclosed summary of options and select the top two options in order of preference for your Tribe by writing them in the space provided. Please email your Tribe's response to me **no later than COB Monday, May 3<sup>rd</sup>**. You may also fax your response to me at 360-664-4371. Based on your feedback, HRSA will indentify one or two options to move forward.

Since CMS has afforded some flexibility with the options as long as certain requirements are met, I would like to use the workgroup to develop processes for the remaining options in order to submit a Cost Allocation Plan (CAP) to CMS. We are hopeful that CMS can review the proposals and provide information as needed to gain approval on a new CAP.

Please select your Tribe's top two options in order of preference.

Tribe Name: \_\_\_\_\_

Tribal Staff Completing Form: \_\_\_\_\_

First Choice: \_\_\_\_\_

Concerns/Questions: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Second Choice: \_\_\_\_\_

Concerns/Questions: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Additional Concerns/Questions/Suggestions: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Thank you for providing your feedback. We look forward to working with you and others on the Tribal MAM Cost Allocation Plan. If you have any questions, please feel free to contact me at 360-725-1738 or by email at [terrjn@dshs.wa.gov](mailto:terrjn@dshs.wa.gov).

Sincerely,



Jessica Terry  
Tribal MAM Program Manager  
Division of Healthcare Services

Enclosure

cc: Tribal Clinic Directors  
Health Administrators  
IPAC Delegates  
AIHC Delegates  
MaryAnne Lindeblad  
Roger Gantz  
Deb Sosa  
Colleen Cawston  
Alan Himsl

## **Options for Washington Tribal MAM Claiming Methodology**

**Option 2:** When the number of participating claiming entities is small, develop a non-statewide CMS-approved time study that is statistically valid when the results from individual claiming entities are aggregated, with FFP distributed in a way that each claiming entity's costs are fully recognized.

**Alternative Option A: (This option is a variation of Option 2 above):** Statewide aggregation of Tribal data, without averaging.

**Option 4:** Select one random week for all Tribal staff with each week considered as the observation unit. The total number of observations will equal the total number of staff persons participating in the time study in a given Tribe. The random week sampling method will likely fail to produce statistically reliable estimates of reimbursable activity for most individual Tribes. This method, however, may provide statistically reliable estimates if the data from a number of Tribes is combined.

**Option 5:** Develop an administrative fee for Tribes providing Medicaid administrative services to Medicaid beneficiaries in lieu of an ongoing time study.

**Option 6:** In lieu of time studies altogether, and when underlying costs are nominal and do not exceed a CMS-determined threshold of significance, execute a legal contract directly with the claiming entities that does not involve application of a proportion Medicaid eligibility ratio. California recently received CMS approval to move forward with this option.

**Alternative Option B: Ongoing Log, without sampling:** Staff keeps ongoing logs of their claimable activities throughout the quarter. In contrast to the 100% timekeeping requirement of the week-long time study, the log would document only their claimable Medicaid administrative activities. The record would describe the activity to validate its allowability for claiming by noting the applicable code from among the array of codes developed for the Washington Tribal Cost Allocation Plan.