



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF HUMAN SERVICES

**APRIL 20, 2020**

Dear Service Provider:

On December 4, 2019, the Office of Children, Youth and Families (OCYF) notified placement service providers of implementation of a statewide time study process for all placement services that are eligible for Title IV-E reimbursement. Some providers received an exception to the requirement, and many others attended/were scheduled to attend training on the standardized time study process during the early months of 2020. Initial time study periods were planned for April/May 2020. As a result of the COVID-19 pandemic and the efforts to stop the spread of this virus, trainings for the standardized time study process scheduled for late March/early April were cancelled.

We recognize the stress and operational challenges providers are facing and are expected to continue facing in the upcoming months. In response, OCYF is suspending the training and implementation of time study reporting periods for Title IV-E eligible placement services until 2021.

While the official standardized time study training and implementation of time study reporting periods is delayed until 2021, OCYF will continue to prepare for launch of the standardized statewide time study process. This includes working with individual Title IV-E eligible providers that have been identified as needing to participate in the identification and coordination of time study needs and revising the instructions for the upcoming budget packet submissions to incorporate the statewide time study process.

Please review the below and act accordingly:

1. Those providers participating in OCYF's pilot time study process will continue to participate. Consideration for any necessary delays in time study reporting periods should be communicated through the time study resource account:  
[RA-PWIVEPROVIDERTS@pa.gov](mailto:RA-PWIVEPROVIDERTS@pa.gov).
2. Those providers that suspended any methodology previously used by their agency for the determination of Title IV-E allowable costs due to the anticipation of participating in OCYF's standardized time study process have two options:
  - a. Continue to utilize previously developed methodology(ies) through 2020 for the FY 2021-22 budget documentation reporting period.
  - b. Request to participate in OCYF's pilot time study process. Those providers selecting this option will need to contact the time study resource account to schedule a date and time by May 15 for OCYF to conduct virtual time study training for all staff participating in the time study process. Additionally, providers will need to identify a two-week period within the months of June/July to conduct the first round of time study periods.

OFFICE OF CHILDREN, YOUTH AND FAMILIES

Be advised that all other changes to the budget documentation review process for FY 2021-22 will occur as planned.

If you have any questions regarding this notification, please contact the OCYF Bureau of Budget and Fiscal Support at [RA-PWIVEPROVIDERTS@pa.gov](mailto:RA-PWIVEPROVIDERTS@pa.gov).

Thank you,



Jonathan Rubin  
Deputy Secretary

Attachment



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF HUMAN SERVICES

DEC 04 2019

Dear Service Provider:

The Human Services Code, Section 704.3 (a) requires placement service providers to submit budget documentation to the Department of Human Services (DHS) to support claims for federal funding and state reimbursement. Act 40 of 2018 permits DHS to include recommendations of the Rate Methodology Task Force (RMTF), established under Act 55 of 2013, as part of the documentation to ensure federal reimbursement.

Following the passage of Act 40 of 2018, the Office of Children, Youth and Families (OCYF) reconvened the RMTF to determine which recommendations made in 2014 ensure federal reimbursement. One of the recommendations made in 2014 was implementation of a standardized time study process to ensure consistency across providers as well as eliminate challenges experienced by private providers whose own time study process or other quantifiable methodology is not accepted by OCYF during the review of the budget documentation, which ultimately reduces federal Title IV-E funding.

RMTF members were able to compare the resulting Title IV-E participation levels determined for providers who participate in OCYF's standardized time study pilot process, implemented in November 2014, from those who did not. Members evaluated the results of the process to determine whether statewide implementation would improve the amount of federal funding available to support placement services. Providers who participate in the pilot also shared the benefits of participating in the process with members of the RMTF. It was determined that implementation of a standardized time study process will greatly reduce/eliminate the rejection of a provider's time study (or other methodology) during the budget documentation review process. Furthermore, OCYF's administration of a standardized time study will reduce provider time and resources spent on developing, conducting, and analyzing methodologies to support the allocation of time spent on the Title IV-E program. Lastly, it will improve the efficiency of the budget documentation review process.

Based on the findings of the RMTF, OCYF is implementing a statewide standardized time study process for all placement services programs that are eligible for federal Title IV-E reimbursement. Recognizing that some providers may be conducting a time study process for multiple purposes (not just for placement services budget documentation) or utilizing another quantifiable methodology (non-time study) that has previously been approved without concerns, OCYF will be granting exceptions. Exceptions may be requested by providers who:

- Conduct a time study process for multiple purposes beyond the placement services budget documentation process; or
- Have another quantifiable methodology that has either been previously approved in prior budget documentation reviews or that will meet the standards for establishing accurate data for allowability of federal/state participation.

Over the next several weeks, providers will begin to receive communication from OCYF regarding their individual staff requirements for time study participation. Training on the standardized time study process will be provided January-March 2020. Initial time study periods will be conducted in April/May 2020. Time study data collected in 2020 will be used to support the budget documentation reviews for state fiscal year (SFY) 2021-22.

Providers who may be eligible for exception in SFY 2021-22 will be contacted directly by OCYF to work through the review and approval of the provider's methodology. For future SFYs, providers who wish to be considered for an exception will need to complete a "Time Study Exception Request" form no later than August 15<sup>th</sup> preceding each SFY budget documentation submission deadline.

We appreciate the efforts made by the RMTF in providing recommendations to further streamline the budget review process while also ensuring continued compliance with meeting state and federal funding requirements.

If you have any questions regarding this notification, please contact the OCYF Bureau of Budget and Fiscal Support at [ra-ocyfcontracts@pa.gov](mailto:ra-ocyfcontracts@pa.gov).

Thank you,



Jonathan Rubin  
Acting Deputy Secretary