



State of California—Health and Human Services Agency  
Department of Health Care Services



GAVIN NEWSOM  
GOVERNOR

Date: November 4, 2020

**PPL No. 20-050**

To: Local Governmental Agency (LGA) Coordinators for the  
County-Based Medi-Cal Administrative Activities (CMAA) and  
Targeted Case Management (TCM) Programs

**SUBJECT: CMAA/TCM Perpetual Time Survey Frequency Requirement**

This Policy and Procedure Letter (PPL) informs LGAs participating in the CMAA and/or TCM programs that all time survey participants are required to time survey on a perpetual basis starting July 1, 2021. As such, the Department of Health Care Services (DHCS) is eliminating the option for LGAs to select their time survey frequency based on the number of staff within a budget/claiming unit. This policy does not apply to CMAA's direct charge participants as they do not time survey.

### **Background**

A perpetual time survey frequency is when a participant time surveys on a daily basis allowing the participant to track their time each workday while performing CMAA and/or TCM services.

Currently, LGAs participating in the CMAA and TCM programs select their time survey frequency based on the number of staff within a budget/claiming unit or time survey on a perpetual basis. Time survey frequencies are currently based on the following:

- 5 days for 400 or more budget/claiming unit participants
- 10 days for 200 to 399 budget/claiming unit participants
- 20 days for 100 to 199 budget/claiming unit participants
- Each day (perpetual) for 1 to 99 budget/claiming unit participants

Presently, CMAA and TCM program participants are predominantly conducting perpetual time surveys. All TCM budget units perpetually time survey and all but four CMAA claiming units perpetually time survey.

### **Perpetual Time Survey Frequency**

Budget/claiming units that perpetually time survey provide a complete record of all CMAA and TCM services performed daily in a quarter. DHCS is eliminating the option for LGAs to conduct their time survey frequency based on the number of staff within a budget/claiming unit because the 5, 10, and 20 consecutive workday time survey frequencies do not reflect all activities performed for an entire quarter. Thus they are not as accurate as perpetual time surveys. For example, if a budget/claiming unit utilizing the 5 consecutive workday frequency in Quarter two of State Fiscal Year (SFY) 2020-21 (October 1, 2020–December 31, 2020) performed code 6 activity during October, code 18 activities during November, and code 28 activities during December, the time survey would only reflect code 6 activities conducted in October and the other activities would not be eligible for reimbursement. However, a time survey for a claiming/budget unit utilizing a perpetual time survey frequency would reflect all reimbursable activities performed by that claiming/budget unit for the entire quarter, October through December.

Conducting perpetual time surveys for each quarter allows:

1. LGAs and DHCS to maintain a uniform time survey process in the CMAA and TCM programs.
2. A more accurate method to track time spent performing CMAA and TCM services daily via time surveys, unlike the 5, 10, or 20 consecutive workday frequencies.
3. More accurate reimbursement for time survey participants since a budget/claiming unit will be receiving reimbursement for activities performed for the entire quarter instead of 5, 10, or 20 consecutive days only.

### **Documents to be Updated**

DHCS will revise and issue an updated CMAA/TCM Time Survey Methodology and CMAA Operational Plan inclusive of this new policy. The following documents and/or processes will also change to reflect the new time survey frequency policy starting July 1, 2021:

1. An annual PPL regarding the Time Survey start date will no longer be needed.
2. DHCS staff will update the Time Survey “Train the Trainers” Training documents to reflect perpetual time survey requirement.
3. The “Statistical Validity” box, which confirmed the number of staff that did not time survey perpetually, did so at the correct frequency will be removed from the “Quarterly Summary of Time Survey Results” worksheet of the CMAA invoice template.
4. References to statistical validity will be removed from the CMAA Invoice Checklist and CMAA/TCM Time Survey Methodology.
5. The “T.S Frequency or Direct Charge” header within CMAA’s “Comprehensive Claiming Unit Grid”, will change to “Perpetual or Direct Charge.”

**LGA Responsibility**

LGA Coordinators must ensure that all time survey participants conduct perpetual time surveys starting July 1, 2021. CMAA invoices that do not comply with this policy will not be processed by DHCS for payment. Non-compliant invoices will require correction and resubmission. With regard to TCM, LGA Coordinators must ensure that time survey results included in SFY 2021-22 cost reports reflect perpetual time surveys. TCM cost reports that do not comply with this policy will be disallowed and associated costs will be recouped.

In addition, it is the LGA Coordinators' responsibility to ensure that CMAA and TCM time survey participants are trained and understand the CMAA/TCM Time Survey Methodology, including perpetual time survey requirements, before they conduct time surveys.

For questions regarding this PPL, please contact DHCS's CMAA or TCM programs at [cmaa@dhcs.ca.gov](mailto:cmaa@dhcs.ca.gov), or [tcm-dhcs@dhcs.ca.gov](mailto:tcm-dhcs@dhcs.ca.gov).

Sincerely,

**ORIGINAL SIGNED BY**

Shelly Taunk, Chief  
County-Based Claiming and Inmate Services Section  
Local Governmental Financing Division