



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



GAVIN NEWSOM
GOVERNOR

DATE: May 19, 2021

PPL No. 21-010

TO: Local Governmental Agency (LGA) Coordinators for the
County-Based Medi-Cal Administrative Activities (CMAA) Program

SUBJECT: CMAA Claiming Plan Submission Requirements

This Policy and Procedure Letter (PPL) notifies LGAs of revisions to the Comprehensive Claiming Units Grid (CCUG) and clarifies Claiming Plan documentation submission requirements. This PPL supersedes PPL 16-020, PPL 14-020, PPL 14-010, and PPL 97-024. This policy goes into effect upon the release of this PPL.

Background

LGAs must have a comprehensive Claiming Plan, which is the basis for determining allowable activities and the related costs for claiming federal financial participation (FFP). An LGA participating in the CMAA program for the first time must submit all Claiming Plan documents to Department of Health Care Services (DHCS) for review and approval prior to the quarter the LGA intends on performing CMAA and submitting invoices. An approved Claiming Plan serves as the ongoing agreement between the LGA, the claiming unit, and DHCS, and is the basis for claiming FFP. LGAs continuing their participation must submit specific portions of the Claiming Plan documents to DHCS on an ongoing basis for amendments.

Claiming Plan Requirements

Per the CMAA and Targeted Case Management Time Survey Methodology, pages 42 and 43, an LGA's comprehensive CMAA claiming plan must:

- Be signed and certified for accuracy and completeness by the LGA Coordinator
- Contain a memorandum indicating any changes made to the claiming plan
- Contain the most recent claiming unit descriptions and staff job classifications
- Identify if the claiming unit is a Community-Based Organization (CBO)
- Identify all claiming units participating in the CMAA program

- Identify all time survey or direct charge staff, including subcontractors, who will be included in the quarterly invoice by their employment classification
 - If payments to a subcontractor are made directly to a person, that person should be listed in the claiming plan; if not, then the agency name should be in the claiming plan.
- Indicate the activities each CMAA participant intends to perform regardless of whether the participant will time survey or direct charge
- Indicate the number of Skilled Professional Medical Personnel (SPMP) staff in each classification that will be included in the quarterly invoice
- Indicate which Medi-Cal percentage will be used for discounted activities
- Include timely signed and dated duty statements for all job classifications identified within the Claiming Plan
- Include activity sheets for all CMAA activities that the CMAA participants intend to perform
- Specify on each duty statement the corresponding activities code(s) within parentheses after each applicable duty.

Changes Requiring Amendments to a Claiming Plan

Each LGA must submit a Claiming Plan amendment to DHCS any time a claiming unit's structure changes. Changes necessitating an amendment include:

- Adding or removing a claiming unit
- Changing the name of a job classification or its duties
- Promoting an employee resulting in a job classification change
- Increasing or decreasing the number of activity codes that the claiming unit performs
- Adding or removing staff or subcontractors, regardless of the number of staff changing
- Changes to the claiming unit description
- Changes to a claiming unit's name due to:
 - Merging or Separating programs within the claiming unit, or
 - General updates
- Changes to the activity sheets
- Changes to duty statements

Unexpected changes within a claiming unit that occur during a claiming period that are not included on an approved Claiming Unit Functions Grid (CUFG) must be reported to DHCS immediately to avoid disallowances. Additionally, the LGA must submit an amended Claiming Plan including those changes prior to the beginning of the following claiming quarter in which the changes take effect. DHCS will deny invoices that conflict with the most current approved Claiming Plan.

Documentation Required for Claiming Plan Amendments

When a change occurs necessitating amendment to a claiming plan, an LGA need only submit the CCUG, CUFG, and SPMP documentation, as applicable, to DHCS. In addition, LGAs should submit supporting documentation including, but not limited to, duty statements and activity sheets.

The CMAA Claiming Plan Amendment Checklist is no longer applicable and should not be used for guidance. For guidance regarding CMAA claiming plans and amendments, please refer to this PPL, the CMAA Operational Plan, or contact your assigned analyst.

CCUG Changes

A Claiming Plan must contain several items, including an LGA CCUG. The CCUG is specific to each individual LGA, lists all of the LGAs active claiming units, and provides DHCS with a list of all claiming units authorized to submit claims through the CMAA program. The CCUG also identifies the time survey frequency assigned to each claiming unit or indicates that the entire claiming unit utilizes direct charging to account for participant time.

LGAs are required to identify whether a claiming unit is a CBO in its Claiming Plan or amendment documentation submitted to DHCS. A column has been added to the CCUG to indicate whether a claiming unit is a CBO.

Conclusion

DHCS, at its discretion, may require an LGA to submit Claiming Plan documents on a more frequent basis to ensure CMAA program compliance.

DHCS will issue a Claiming Plan approval letter to the LGA within 30 days of DHCS' approval of the Claiming Plan. Once the Claiming Plan or an amendment has been approved by DHCS, it will remain in effect unless and until further amendments are submitted and approved prior to the beginning of the claiming quarter.

For questions or assistance regarding this PPL, please contact your assigned CMAA analyst or e-mail the CMAA Unit at cmaa@dhcs.ca.gov.

Sincerely,

ORIGINAL SIGNED BY

Damitra Hawkins, Unit Chief
County-Based Medi-Cal Administrative Activities

Local Governmental Financial Division