



TOBY DOUGLAS  
DIRECTOR

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



EDMUND G. BROWN JR.  
GOVERNOR

DATE: November 13, 2013

PPL No. 13-015

TO: Local Educational Consortia (LEC) and  
Local Governmental Agency Coordinators (LGA) for  
School-Based Medi-Cal Administrative Activities (SMAA)

SUBJECT: **Interim Claiming Plan Procedure Changes for Local Educational  
Agencies (LEAs) for SFY 2013-2014**

The purpose of this Policy and Procedure Letter (PPL) is to modify the 2013-2014 Interim Claiming procedures listed in PPL 13-008. PPL 13-015 supersedes PPL 13-008. The 2013-2014 Interim Claiming process is based on the 2012-2013 SMAA Manual.

The Centers for Medicare and Medicaid (CMS) approved an Interim Claiming process for the SMAA program on November 1, 2013. Each LEA must identify their Time Survey Participant Universe prior to any LEA participation in the Interim Claiming process for SFY 2013-2014. The Time Survey Participant Universe must be clearly identified for each LEA and must correspond to the list of approved job classifications included in Attachment A of this PPL. For the 2013-2014 Interim Claiming process, each LEA must submit to their LEC/LGA an SMAA Participant Universe form listing all of the LEA job classifications that will participate in the time survey process for SFY 2013-2014, as well as all of the corresponding billable codes that each job classification will perform during the Interim Claiming period. The job classifications must conform to the Time Survey Participant Universe Authorized Positions list and the billable codes assigned to each job classification must correspond to the billable codes identified for each job classification (Attachment A).

For any job classifications that perform activities related to a specific billable code that is not listed for that job classification in Attachment A, a Description of Activity Code Duties form must be submitted only for that job classification identifying the specific billable code and the reasons for claiming that code. The previous requirement to submit additional paperwork for each job classification listed on the SMAA Participant Universe form no longer applies to the 2013-2014 Interim Claiming process. If an LEA requires a classification not listed on the approved classification list, then the LEA must submit a justification using the Supplemental Description of Activity Code Duties form along with the SMAA Participant Universe list.

The SMAA Participant Universe forms from each LEA will be conditionally approved by the Department of Health Care Services (DHCS) upon receipt from the appropriate LEC/LGA. However, DHCS reserves the right to seek additional information, documentation, or clarification of all documents submitted as part of the Interim Claiming process. The conditional approval does not represent a final determination of allowability since the documents included in this process are still subject to further review by DHCS, CMS and other cognizant federal agencies.

*Note: The 2012-1013 SMAA Manual lists "Initial Referral" as part of allowable Code 4 activities. Although the 2013-2014 Interim Claiming process is based on the 2012-2013 SMAA Manual, and the definition of Code 4 remains unchanged from previous versions of the manual, recent audit findings from the Office of the Inspector General (OIG) have identified the "Initial Referral" portion of Code 4 as inconsistent with Office of Management and Budget (OMB) Circular A-87. Recent OIG audits of some school districts have disallowed claiming for MAA under Code 4 for Initial Referral. LEAs should consider the OIG findings when claiming Code 4 activities for Initial Referral as all claims for Code 4 are subject to strict scrutiny.*

All of the necessary forms can be found on the SMAA web site and at:

- **SMAA Participant Universe**  
Available at <http://www.dhcs.ca.gov/provgovpart/Pages/ParticipantUniverse.aspx>
- **Description of Activity Code Duties**  
Available at <http://www.dhcs.ca.gov/provgovpart/Pages/ParticipantUniverse.aspx>
- **Supplemental Description of Activity Code Duties\***  
Available at <http://www.dhcs.ca.gov/provgovpart/Pages/ParticipantUniverse.aspx>

The SMAA web site is at <http://www.dhcs.ca.gov/provgovpart/Pages/SMAA.aspx>

All forms must be received by DHCS no later than Monday, **December 2, 2013**. Additionally, LECs and LGAs must ensure LEAs use the FY 2013-2014 official Time Survey Template that is available for download at:

<http://www.dhcs.ca.gov/provgovpart/Pages/SMAATimeSurveyForms.aspx>

If you have any questions or require further assistance regarding this PPL, please contact Mr. Tony Teresi, Acting Chief, School-Based MAA Unit at (916) 552-9084, [Tony.Teresi@dhcs.ca.gov](mailto:Tony.Teresi@dhcs.ca.gov)

Sincerely,

**ORIGINAL SIGNED BY BECKY SWOL ON BEHALF OF JENNIFER BROOKS**

Jennifer Brooks  
Acting Division Chief  
Safety Net Financing Division