Site Review/Audit file

Module 5

CMAA Program Claims Oversight

- DHCS is responsible for the oversight of the CMAA program.
- DHCS processes LGA claims for the reimbursement of costs related to performing MAA.
- DHCS provides payment to LGA contractors based on their CMAA invoices and subsequently submits claims for the reimbursement of these LGA payments to CMS.
- In submitting these claims, DHCS certifies to CMS that DHCS and its LGA contractors have complied with federal law while performing MAA.
- If CMS (or its auditing agency, the Office of the Inspector General) determine that DHCS and/or its subcontractors have not complied with federal law, CMS may defer or disallow payments to DHCS for its MAA claims.

CMAA Program Site Review

- DHCS will conduct reviews of each LGA participating in the CMAA program at least once every four years.
- A desk review will be conducted every two years.

DHCS will analyze the following:

- Time Survey and/or Direct Charge Documentation.
- Invoice Documentation.
- Claiming Plan Documentation.
- SPMP Designation Documentation.

CMAA Program Site Review

DHCS will also conduct periodic on-site technical assistance reviews on an as needed or requested basis in the interim between site reviews.

Once DHCS completes the review, a Summary of Findings report will be provided to the LGA which will include any identified corrective action items, contractor requirements, and deadlines to address all findings. DHCS will maintain copies of any monitoring tools, the Summary of Findings, all corrective action plan responses, and technical assistance documents.

The Audit File

- Pursuant to OMB Circular A-87, each CMAA claiming unit must maintain an audit file of comprehensive documents in support of MAA claiming prior to the submission of an invoice to DHCS.
- The certification signatures on the CCUG and CUFG indicate that the LGA has prepared, collected, and filed all appropriate claiming plan supporting documents.
- LGAs must also prepare, collect, and file documentation regarding all MAA costs claimed; including those associated with personnel time.

The Audit File

- The nature and amount of all activities time studied must be supported by sufficient documentation.
- LGAs are advised that in the event of a program review or audit, time survey samples do not constitute sufficient source documentation to substantiate all activities, time, or costs for MAA claiming.

The Audit File (Cont.)

The audit file must include, but is not limited to:

- Contract/Memorandum of Understanding Documents.
- Claiming Plan Documents.
- CPE Documents
- The CMAA Detail Invoice

CMAA Audit File Retention Guidelines:

- Federal regulations require that all records in support of allowable CMAA claims must be maintained for a minimum of three fiscal years after the end of the quarter in which the LGA receives reimbursement from DHCS for the incurred expenditures.

CMAA Program Compliance Responsibilities

- Each entity within the CMAA program claiming process has a responsibility to ensure CMAA program claiming compliance.
- The first level of review is done at the claiming unit or 'local' level.
- The local level review includes a review of the CMAA claiming plan documents, the time survey and/or direct charge documents, and the quarterly invoice documents to ensure they are accurate and complete.
- The local level review must also ensure that all training guidelines are met.

CMAA Program Compliance Responsibilities

- The second level of review is done at the LGA MAA Coordinator level.
- Review at this level includes a secondary review of all local level responsibilities; however, the LGA MAA Coordinator is also has primary responsibility to comply with all training, site visit, desk review, and claiming plan requirements to ensure accuracy and completeness regarding CMAA claiming.
- The third and final level of review is performed by DHCS.
- Review at this level includes a final review of all local and LGA level responsibilities.

CMAA Program Compliance Responsibilities

- DHCS will conduct ongoing reviews of all CMAA claiming documents, processes, procedures, and guidelines.
- In the even deficiencies are discovered, DHCS will take whatever steps necessary to ensure the integrity of the CMAA program and its funding.
- If a review identifies an invoice overpayment, DHCS will recover the overpayment amount from the LGA.
- In the even an audit or review is necessary, DHCS will, upon conclusion of the audit or review, issue a final written report reflecting findings and required corrective actions and identify any required recovery amounts if applicable.

Contact Resources

Department of Health Care Services website -
www.dhcs.ca.gov

CMAA website –
http://www.dhcs.ca.gov/ProvGovPart/Pages/CMAA.aspx

TCM website –
http://www.dhcs.ca.gov/provgovpart/Pages/TCM.aspx

LGA Consortium website –
www.maa-tcm.com

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