

CMAA Invoice Training - 2015

TRAINING GOALS

- Promote CMAA program compliance
- Explain Roles & Responsibilities
- Recognize the claiming connection of the invoice
- Outline CMAA CPE Requirements
- Understand the CMAA Invoice
- Ensure accurate CMAA invoicing
- Assure timely processing/payment of invoices
- Avoid disallowances

ROLES & RESPONSIBILITIES

The Centers for Medicare & Medicaid Services (CMS)

- Auditing

Department of Health Care Services (DHCS)

- Oversight
- Claims Processing

Local Governmental Agency (LGA)

- Oversight
- Claims Processing

THE CONTRACT, CLAIMING PLAN, & TIME SURVEY CONNECTION

- Memoranda of Understanding/Contracts
- The CMAA Claiming Plan
- The Time Survey
- Direct Charging
- The Invoice

CMAA CPE Requirements

To verify acceptable Certified Public Expenditure (CPEs)

- Must identify the relevant category of expenditure under the State plan.
- Must certify actual expenditures were incurred by the LGA or Local Public Entity (LPE)
- Payments must be made by the LGA or LPE to a CBO for Medi-Cal administrative activities identified in the CMAA claiming plan.

CMAA CPE Requirements (cont.)

- The LGA or LPE must make payments to CBOs for expenditures specific to CMAA *prior* to invoicing DHCS.
- CPE cannot be used to claim reimbursement or funding for any other programs.

CMAA Invoicing Basics

Who?

- The LGA/Claiming Unit

What?

- Account for LGA/Claiming Unit revenue
- Account for LGA/Claiming Unit costs
- Determine the actual costs of providing MAA
- Determine the FFP amount

CMAA Invoicing Basics (cont.)

When?

- Each quarter
- After the expense is incurred
- Within 15 months of the service quarter

Why?

- Ensure the requirements of 42 CFR 433.51 are met (No FFP duplication)
- Ensure compliance with Federal/State Laws & Regulations and OMB Circular A-87
- Avoid violations of the Federal False Claims Act
- Receive FFP reimbursement

How?

- In accordance with the CMAA Operational Plan requirements

Computation of Federal Claim

- **A** = Total Adjusted Costs
- **B** = Adjusted Time Survey Activity Results
- **C** = Medi-Cal Percentage
- **D** = Federal Financial Participation (FFP) Rate
- **E** = Federal Share

$$(A \times B \times C \times D = E)$$

Summary of Steps

1. Read [CMAA Invoice instructions](#)
2. Gather the required data and documents
3. Analyze costs and funding sources
4. Develop supporting documentation
5. Enter data in invoice template

Check CMAA website for current templates

DATA TO GATHER

- Claiming Unit Functions Grid
- Time survey results percentages
- Labor, services and supplies costs
- Indirect/overhead expenses

DATA TO GATHER (CONT.)

- Discount methodology Percentages
- Direct charged expenses
- Funding sources
- Prior year and prior quarter's claiming amount

CATEGORIZING EXPENSES

7 Cost Pool categories:

- CP 1 - SPMP
- CP 2 - Non-SPMP
- CP 3a - Non-Claimable
- CP 3b - Non-Claimable (direct charge)
- CP 4 - Direct charges Enhanced (SPMP)
- CP 5 - Direct charges Non-Enhanced (Non-SPMP)
- CP 6 - Allocated costs

COST POOL 1

- Skilled Professional Medical Personnel (SPMP) who participated in the time survey (LGA or LPE only)
- Clerical staff who are directly supervised by SPMP and who provide direct support to the SPMP
- Direct supervisors of the SPMP

COST POOL 2

- All Non-SPMP staff who participated in the time survey
- Clerical staff who work for Non-SPMPs
- Direct supervisors of the Non-SPMPs
- Personal services contractors who participated in the time survey
- All CBO staff who time survey

COST POOL 3A

- Staff who do not perform CMAA and did not time survey and are not included in other cost pools or direct charged
- Staff who exclusively provide treatment, counseling, clinical services, lab services or other non-claimable activities of the claiming unit

COST POOL 3B

- Automatically Calculated:
- Non-claimable Direct Charges

COST POOL 4

- Direct charge for SPMP staff for Program Planning and Policy Development Enhanced Activities (codes 16 & 18)
- Cannot be for CBOs

COST POOL 5

- For Non-SPMP staff who direct charge
- Costs may be discounted

COST POOL 6

General or administrative staff who:

- Did not participate in the time survey
- Costs have not been direct charged
- Support the staff in the other cost pools
- Costs are not included in any indirect rate computation already claimed elsewhere

Questions?



Developing Supporting Documentation

TIME SURVEY RESULTS

- Analyze time surveys (prior to invoice)
- Separate time survey aggregates by SPMP and non-SPMP
- Total the hours by activity code

LABOR DETAIL

Separate the amount for salaries and benefits

- SPMP staff from time survey percentages (and supervisors and support)
- Non-SPMP staff from time survey percentages (and supervisors and support)
- Non-claimable
- Direct Charge
- Allocated general and admin support staff

OTHER COSTS

- Non-salary and non-benefit costs
- Normal day-to-day operating expenses necessary to run the claiming unit
- See PPL 09-003: definition of other costs
- Indirect costs, external and/or internal

NOTE : Any costs included in indirect rate must not be included as a direct cost in other cost pools

OTHER COSTS (cont.)

- Identify other costs and develop backup document showing detail and amount to be claimed
- For costs labeled, “Special,” “Other,” “Departmental,” provide description

OTHER COSTS

CP 1 - SPMP

1. Expenses that can be attributed to SPMP staff
2. Overhead/Indirect expenses

CP 2 - Non-SPMP

1. Expenses that can be attributed to Non-SPMP staff
2. Overhead/Indirect expenses

OTHER COSTS

Cost Pool 3

- Costs that can be attributed to non-claimable staff
- Unallowable costs associated with direct service
- Overhead/Indirect expenses

OTHER COSTS

Cost Pool 4

- Expenses that can be directly charged to CMAA at enhanced rate
- Overhead/Indirect expenses

OTHER COSTS

Cost Pool 5

- Expenses that can be directly charged to CMAA
- CMAA specific contracted costs
- Overhead/Indirect expenses

OTHER COSTS

Cost Pool 6

- Expenses that can be attributed to allocated CP 6 staff
- General office expenses
- Building maintenance expenses
- Utilities
- Overhead/Indirect expenses

DIRECT CHARGED EXPENSES

- CMAA Coordination and claim admin
- LGA consortium participation fee
- Direct CMAA expenses:
 - Travel and transportation
 - Flyers and brochures
 - Subcontractors/consultants

DIRECT CHARGED EXPENSES

Direct Charge Costs can be included:

- Direct Charge Worksheet or
- Cost Worksheet

SAME COSTS CANNOT BE INCLUDED ON BOTH SHEETS!

Questions?



REVENUES WORKSHEET

Purpose:

- To offset funding against costs
- Will reduce total LGA eligible costs
- Will determine the net cost for federal reimbursement.

WHAT TO OFFSET?

- All federal funds (including Maintenance of Effort - MOE)
- Local match for federal funds
- State match for federal funds (including Medi-Cal fee for service funds)
- Payments collected from non-governmental sources for the delivery of direct client services

WHAT NOT TO OFFSET?

Included but not limited to:

- County General Funds
- Realignment Funds
- Other LPE Funds (First 5)
- MAA Reimbursements

REVENUES WORKSHEET

- 1) Medi-Cal Fees and Match
- 2) Federal Grants and Match
- 3) State General Funds
- 4) Medicare
- 5) Insurance
- 6) Fees
- 7) Other Revenue

REVENUE SOURCES

- Summarize your revenues quarterly
- Annual revenues may be divided into each of the 4 quarters

REVENUES WORKSHEET

Revenues are categorized as follows:

- Not Offset Funds
- CP 1 - SPMP
- CP 2 - Non-SPMP
- CP 3a&b - Non-Claimable
- CP 4 - Direct-Enhanced
- CP 5 - Direct-Non-Enhanced
- CP 6 - Allocated

MEDI-CAL DISCOUNT PERCENTAGE

- Actual Client Count (ACC) or Countywide Average
- ACC - calculate percentage and compile documentation showing the percentage for that quarter
- Compile the eligibility verification used in the ACC
- **Must request CWA annually on LGA letterhead prior to submission of invoice**

THE CMAA INVOICE TEMPLATE

1. Summary page
2. Time survey results
3. Revenue worksheet
4. Invoice cost worksheet
5. Direct charges worksheet
6. Invoice claim calculation worksheet
7. Variance worksheet

Sign and submit all pages even if blank!

INVOICE SUBMITTAL SUPPORT DOCUMENTS FOR CP6 EMPLOYEES

All invoices require the submittal of supporting documents for CP6 S&B costs every quarter:

- Include support showing S&B costs, list of classifications and number of staff for the reported salaries and benefits claimed for CP6 (Checklist will be amended)

CMAA CHECKLISTS

- Submit signed checklist For Preparing the CMAA Detail Invoice
- Submit signed checklist For Preparing the CMAA Summary Invoice

PACKAGING YOUR INVOICE

1. Cover Letter (on LGA letterhead)
2. MAA Invoice template
3. Include checklists
 - For CMAA Detail Invoice
 - For CMAA Summary
4. CP6 support- S&B costs and Staff classifications
5. Other documentation when requested

MAILING YOUR INVOICE TO DHCS

- **Please address all Regular Delivery mail to:**

Department of Health Care Services
Medi-Cal Administrative Claiming Section
County-Based Medi-Cal Administrative Activities Unit
Attn: (Program Analyst)
P.O. Box 997436, MS 4603
Sacramento, CA 95899-7436

- **Please address all Overnight Express Delivery mail to:**

Department of Health Care Services
Medi-Cal Administrative Claiming Section
County-Based Medi-Cal Administrative Activities Unit
Attn: (Program Analyst)
1501 Capitol Avenue, Suite 71.3024 MS 4603
Sacramento, CA 95814

References

- 42 CFR 433.51 for FFP - CPE Definition
Department of Health Care Services website
www.dhcs.ca.gov/ProvGovPart/Pages/CMAA.aspx
- LGA Consortium website
www.MAA-tcm.com
- Department of Health Care Services Website
www.dhcs.ca.gov

Questions?



**Thank you for attending the
CMAA Invoice Training**