



California  
Department of  
Health Services

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*Director*

State of California-Health and Human Services Agency  
**Department of Health Services**



**ARNOLD SCHWARZENEGGER**  
Governor

January 27, 2006

CCS Information Notice No.: 06-03

**TO: ALL CALIFORNIA CHILDREN'S SERVICES (CCS) COUNTY PROGRAM ADMINISTRATORS, MEDICAL CONSULTANTS, INDEPENDENT COUNTY CHIEF/SUPERVISING THERAPISTS, DEPENDENT COUNTY LEAD THERAPISTS, MEDICAL THERAPY UNIT STAFF, CHILDREN'S MEDICAL SERVICES (CMS) BRANCH REGIONAL OFFICE ADMINISTRATORS, MEDICAL CONSULTANTS AND THERAPY CONSULTANTS**

**SUBJECT: PILOT QUARTERLY TIME STUDY FOR THE CCS MEDICAL THERAPY PROGRAM**

The interagency regulations (Title 2 California Code of Regulations, Sections 60000-60610) adopted to implement AB 3632 (Government Code Section 7575) identify interagency responsibilities that require each county CCS program to provide a liaison to coordinate interagency activities with Local Education Agencies (LEAs), and for CCS therapists to attend Individualized Education Plan (IEP) team meetings when requested by the LEA. Positions to complete this workload have been funded by 100 percent state general funding (SGF). As a result of an audit by the Bureau of State Audits, the methodology used to determine the number of positions necessary to meet this mandate is being changed. To accomplish this, a quarterly time study for Medical Therapy Program (MTP) staff to use in order to determine actual staff time spent on interagency activities, support and reimbursement of counties is being implemented. Funding for these positions will be based on the actual time spent on interagency activities. This process is similar to the Skilled Professional Medical Personnel (SPMP) time study that CMS Branch state staff complete on a quarterly basis. The process described in this Information Notice will supersede the current method of establishing AB 3632 staffing levels by annually collecting caseload data.

The initial pilot time study presented in this notice is necessary to gather baseline data for the implementation of an ongoing quarterly time study. The final version of the time study and instructions for its completion will be distributed in a future numbered letter.

**I. Reimbursement for county therapy staff activities**

- A. The CMS Branch will fund interagency liaison and IEP activities with special education with 100 percent SGF when performed by a licensed physical therapist (PT) or occupational therapist (OT). This activity may also be performed by a public health nurse (PHN) in counties that do not have a medical therapy unit (MTU) or therapy staff. All 100 percent SGF liaison and IEP activities must be performed by county employed staff, not contract staff. Clerical staff will be allocated using the existing formula with allocation established by the quarterly time study for the county special education liaison.
- B. The CMS Branch will fund all other non-liaison or non-IEP related activities at 50 percent general funds when performed by a licensed PT or OT. Therapy assistants, aides, and MTU clerks are not required to complete the time study.

**II. County Staff Required to Complete the Quarterly Time Study for MTP Activities**

Any county employed PT, OT or PHN who participates in special education liaison or IEP activities is required to complete the time study.

Liaison activities include, but are not limited to:

- Participation in interagency meetings
- Participation in workgroups
- Planning and implementation of interagency activities that are related to the program as a whole, and not to a specific child

IEP activities include, but are not limited to:

- Preparation for IEP team meetings
- Participation in IEP team meetings
- Travel
- Follow-up of an individual child's IEP

Clerical staff supporting the county special education liaison activities will not participate in the time study. It is the responsibility of the county CCS program to determine which employees have performed interagency activities and must complete the time study.

### **III. Time Study Completion Timeline**

The county CCS programs will be required to complete the attached pilot time study for both February and March 2006, and to report the data to the CMS Branch on the attached summary sheet. The pilot time study summary sheet must be submitted to the CMS Branch by April 15, 2006, at the following address:

**Children's Medical Services Branch  
P.O. Box 997413  
MS 8102  
Sacramento, CA 95899-7413  
Attn: Jeff Powers, PT Consultant**

This information will be utilized for determination of baseline allocations for the number of therapy liaison and IEP activity positions for the 2006-2007 Fiscal Year (FY).

### **IV. Time Study Activities**

Activities covered by the time study are divided into two separate categories, interagency activities (liaison and IEP) and non-interagency activities.

#### **A. Interagency Activities:**

##### **1. Liaison Activities**

- Interagency Planning and Coordination – participation in interagency meetings and workgroups to develop and assist in implementation of local interagency activities, policies and procedures (includes negotiations for MTU space and equipment).
- Interagency Program Development – participation in the development/modification of county procedures to meet interagency needs.

- Interagency Administration – consultation with county CCS program staff or LEA staff on interagency activities.
- Interagency Mediation – mediation of local interagency activity complaints and preparing for special education fair hearings.
- Interagency Staff Development – planning and implementation of interagency in-services training.

## 2. IEP Activities

- IEP Preparation – preparation of documents for IEP meetings (specific to an individual CCS client's IEP); sending reports/notifications to an IEP team; meeting with family, school or CCS personnel to discuss/plan for an IEP; and review of documents provided by an IEP team in preparation for the meeting.
- IEP Participation – actual time spent in an IEP meeting.
- IEP Related Travel – time spent going from the therapist's main place of work to an IEP meeting and return.
- IEP Follow-Up – includes coordination of approved therapy plan activities that have been included in an IEP. Activities include establishing classroom programs, consulting with classroom personnel and preparation/provision of any additional documents discussed in an IEP meeting.

## B. Non-Interagency Activities

- Patient Treatment – hands-on treatment (individual or group), instruction by demonstration in the management of a patient, monitoring and supervised activities of support personnel.
- Patient Evaluation – measurement, assessment, and observation of patients.
- Case Conference – therapist participation in the medical therapy conference (MTC) or private physician/special center clinic visit.
- Consultation (Non-Interagency) – meeting with members of the health care team (includes medical, educational, and home support personnel), in person, or by other means on behalf of the patient.
- Case Management (Non-Interagency) – patient scheduling, documentation, authorizations, and updating of records.

**V. State Allocations of PT and OT Positions for county CCS programs**

The quarterly time study for the MTP will supersede the method currently in use for determining staff needed for interagency responsibilities. However, no staff positions will be lost as a result of changing the allocation methodology for these positions. Funding for OT and PT positions may be switched from 100 percent SGF to 50 percent State/50 percent county funding and vice-versa, based on the interagency needs during a particular quarter, but the state will continue to participate in funding all state approved positions established for the 2006-2007 FY.

**VI. Completing the Quarterly Time Study for MTP**

All activities, whether interagency or non-interagency, will be reported in increments of 15 minutes (.25 hour). The daily total must add up to the number of hours in the employee's workday for the time period being studied. This includes all paid and unpaid leave time.

Top of the Page – enter the month being reported.

**Box 1** (Employee Name): enter the name of the staff member who provided interagency services during the time period being reported.

**Box 2** (Position/Employee Number): enter the position or employee number of the staff member entered in Box 1.

**Box 3** (Personnel Classification): enter the county personnel classification for the staff member entered in Box 1.

**Box 4** (County): enter the name of the county that employs the staff member entered in Box 1.

**Box 5** (Time Base): enter the time base (full, part-time) of the staff member entered in Box 1.

**Interagency Activities**

Liaison Activities – enter the time the staff member spent on interagency planning and coordination, program development, administration, mediation, or staff development in the appropriate day using the proper increments.

IEP Activities – enter the time the staff member spent on preparation for, participation in an IEP, travel to and from an IEP, and implementation of CCS related services in the IEP, in the appropriate day, using the proper increments.

**Non-Interagency Activities** – enter the time spent on provision of patient treatment, evaluation, case conferences, consultation (non-interagency), and case management (non-interagency) in the appropriate day, using the proper increments.

Bottom of the page – the employee and their supervisor must sign and date the form.

### **Summary Sheet**

After a county CCS program collects the quarterly time study for the MTP data from the MTUs, the information must be entered onto the attached Summary Sheet for the Quarterly Time Study for the MTP. The name of the county employee who provided interagency services during the time study period is entered onto the table, along with their classification (PT, OT or PHN), and the hours of each type of activity they provided that month. The staff member who completes the summary sheet must sign and date the bottom of the page and send the summary sheet to the CMS Branch at the address contained in III above. County CCS programs should keep original time study forms on file as documentation for future audits or state program reviews.

The attachments to this information notice are available on the CMS website. If you have any questions, please contact your regional office therapy consultant. Thank you for your assistance in this process.

**Original signed by Harvey Fry for Marian Dalsey, M.D., M.P.H.**

Marian Dalsey, M.D., M.P.H., Acting Chief  
Children's Medical Services Branch

Attachments