

## DEPARTMENT OF HEALTH SERVICES

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May 30, 1997

N.L.: 16-0597  
Index: Medical Therapy  
Program

TO: All County California Children Services (CCS) Administrators, Medical Consultants, Chief/Supervising Therapists, State CCS Regional Office Administrators, Medical and Therapy Consultants

SUBJECT: MEDICAL THERAPY PROGRAM (MTP) CLERICAL SUPPORT STAFFING

The purpose of this numbered letter is to:

1. Allow funding of clerical staff who are performing duties in direct support of therapy services through the therapy program allocation funds and, therefore, claimable on the quarterly Therapy Expenditure Claim form.
2. Provide a staff ratio for the number of clerical positions necessary in the support of direct patient care provided through the MTP based on the caseload review approved therapy staff.
3. Clarify the process for approval of funding of clerical staff who are responsible for the preparation of Medi-Cal fee-for-service claims for physical and occupational therapy services provided at a medical therapy unit (MTU).

## BACKGROUND

The county and state CCS program share in the cost of providing services to children with physically handicapping conditions. Medically necessary physical and occupational therapy services and Medical Therapy Conference (MTC) services provided in a MTU at a public school are funded by the county and state CCS allocation known as Diagnosis, Treatment, and Therapy Budget.

Approval for the number of therapy staff to be charged to the therapy funding allocation is based on a caseload review completed by Children's Medical Services (CMS) Branch. Guidelines for determining the ratio of staff to clients served are found in the CCS Manual of Procedures, Chapter 4.4.5E, The CCS Program for Children with Cerebral Palsy and Other Physical

Handicaps in the Public School. The staffing ratio provides for staff therapists, unit supervisors/seniors, chief/supervising therapist, and therapy aides. No provision is made for approval of clerical staff required to support the physical and occupational therapists providing services to children in the MTP. These clerical responsibilities which directly support therapy services include, but are not limited to, scheduling and arranging therapy appointments at the MTU, arranging for vendored therapy provided outside the MTU, requesting medical and therapy reports, and scheduling of MTC appointments. With the lack of clerical funding and staffing approval, these clerical responsibilities are being handled by therapy staff resulting in decreased therapy hours available to children in the MTP. Since there was no provision for approval of clerical staff, no funding has been allowed through the therapy allocation via the "Quarterly Report of Expenditures, Medical Therapy Program" claim form.

In 1992, instructions were issued in Numbered Letters 23-0992 and 28-1092 providing for clerical staff supporting MTP services to be placed on the county CCS Administrative Budget. However, when MTUs became certified as outpatient rehabilitation clinics, clerical staff assisting the therapy staff were considered part of the cost of providing direct client service and could no longer be charged to the CCS administrative staffing budget.

With the certification of an MTU as an outpatient rehabilitation clinic, CCS county programs were able to bill the Medi-Cal program for therapy services provided at these approved sites. Implementation of billing the Medi-Cal program for physical and occupational services received by Medi-Cal beneficiaries at an MTU also added to the need for clerical support staff. CCS Numbered Letter 40-1094, titled "County Recovery of the State Share of Costs Associated with Billing Medi-Cal for Therapy Service Provided by Medical Therapy Units (MTUs)" provided counties with a funding authority through an approved budget to cover costs, particularly clerical personnel, associated with implementation of billing the Medi-Cal program for physical and occupational therapy services for Medi-Cal beneficiaries. However, this did not fund clerical staff to directly support therapy services provided in an MTU.

Changes in the CCS administrative budget that prohibited charges of MTP clerical staff and the introduction of a "Therapy Budget" to provide for assistance in billing Medi-Cal have resulted in lack of appropriate funding authority for clerical staff assigned to support therapy services in the MTP.

#### MTP CLERICAL STAFF USED IN SUPPORT OF MTP SERVICES

Clerical support staff for the MTP is defined as staff needed to support the provision of physical and occupational therapy services at a MTU site and include functions such as scheduling therapy appointments, answering telephones, typing and filing therapy treatment reports, faxing

needed client information to the general CCS program office, and requesting medical reports. Clerical support is also required to assist the MTC team in activities such as scheduling of conference appointments, typing and mailing written notifications to clients/parents, pulling and refiling clients therapy records for the conference, and transcribing, copying, and filing of conference dictation reports. MTP clerical support staff **do not** participate in the actual delivery of patient care.

Clerical support positions assigned to an MTU to perform the duties described above shall be approved and invoiced on the Diagnostic, Treatment and, Therapy expenditure Claim Form (see Invoicing Section below) when the clerical staffing pattern meets the policy guidelines in the CCS Manual of Procedures, Chapter 4.4.5B (Revised April 1997). These requirements are as follows:

1. A MTU with **four** full time equivalent (FTE) therapists may have one FTE clerical support staff primarily assigned to the unit.
2. A MTU with less than **four** FTE therapists may have a part-time (**.5 FTE**) clerical support staff assigned to the MTU.
3. Clerical support for a satellite MTU shall be provided from the MTU to which the satellite is attached.

Claiming for the clerical support staff based on the staffing ratio above does not require prior approval from the state CCS program. If a county MTP requires greater ratio of clerical support than the one described above, the request for additional clerical staff shall require submission of a description of the clerical duties and a time study that demonstrates the unique clerical needs for the county MTP to support the request. Requests will be evaluated by the CMS Branch therapy consultants on a case by case basis.

#### CLERICAL STAFFING IN SUPPORT OF MEDI-CAL CLAIMING OF MTP SERVICES

Clerical support staff required to complete Medi-Cal claim forms for therapy services provided at a MTU shall be approved through submission of a MTP budget request as stated in CCS Numbered Letter 40-1094. The MTP budget shall include both personnel and other costs associated with completing a claim for payment for Medi-Cal beneficiaries who receive services at a MTU certified as an outpatient rehabilitation clinic. The budget and supporting documentation shall be reviewed and the budget approved by the regional office therapy and administrative consultants.

## INVOICING INSTRUCTIONS

A. Invoicing instructions for claiming Therapy program expenditures for approved therapy staff to be charged to the CCS Therapy Allocations were issued in the following numbered letters:

1. Numbered Letter 33-1293 Revised Diagnostic, Treatment, and Therapy Expenditure Claim Forms for Independent Counties.
2. Numbered Letter 35-0994 Revised Diagnostic, Treatment, and Therapy Expenditure Claim Forms for Counties Using the Department of Health Services Fiscal Intermediary.

The instructions in these two numbered letters will be revised to permit the claiming of clerical staff as described in the policy guidelines above. Pending revision of these claiming instructions, the clerical staff shall be listed in the Quarterly Report of Expenditures, Medical Therapy Program, Section I. County Employed MTU staff.

B. Invoicing instructions for claiming personnel and other costs based on an approved MTP budget:

MTP costs for clerical staff required to complete claims for therapy services provided at a MTU for Medi-Cal beneficiaries shall be claimed on the Quarterly Report of Expenditures, Medical Therapy Program, Section III, Total Other Expenditures.

## GENERAL INFORMATION

The sections in the CCS Manual of Procedures, Chapter 4, relating to staffing approvals for the MTU will be reissued with a revision addressing the clerical staffing ratio. The revision will restate the clerical support positions that are allowed based on the caseload review approved therapy staff ratio. This revision will be issued as a manual revision to Chapter 4 and will come out as a separate bulletin.

Instructions on submitting a budget to cover the costs associated with billing MTP therapy services for Medi-Cal beneficiaries in CCS Numbered Letter 40-1094 are being revised. The instructions will be distributed for inclusion in the Children's Medical Services (CMS) Plan and Fiscal Guideline Manual, Section Seven, CMS Budget Instructions.

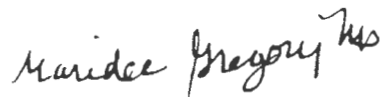
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Invoicing instructions for claiming costs on the "Quarterly Report of Expenditure, Medical Therapy Program," for patients served through the MTP as part of the Therapy Funding Allocation are also being revised. The revised instructions will be reissued to be part of the invoicing instructions in the CMS Plan and Fiscal Guidelines Manual, Section 9, Invoicing Instructions.

Thank you for your patience and cooperation while the CMS Branch staff work to clarify MTP clerical support staffing guidelines and claiming. If you have any questions about MTP clerical staffing, please contact the therapy consultant assigned to your region. If you have questions relating to completion of a MTP budget or claiming of clerical staff, please contact the administrative consultant assigned to your region.

A handwritten signature in black ink that reads "Maridee Gregory M.D." with a stylized flourish at the end.

Maridee A. Gregory, M.D., Chief  
Children's Medical Services Branch