Federal Financial Participation User's Guide for the Information and Education (I&E) Program

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I. Introduction and Purpose 3
II. I&E Program FFP Funding 4
III. FFP Reimbursement Requirements 4
IV. FFP Time Study Process 5
A. Who Completes the Time Study Documents? 6
B. Types of Reimbursement and Activity Codes 6
C. Activity Codes Used When Time Studying for I&E Program 7
D. Secondary Documentation 14
E. Weekly Time Study FFP Calculation Template 16
F. Invoice Submission Process 18
G. Supplemental Documentation Necessary to Support FFP Requirements 18
V. Privacy & Confidentiality 18
VI. Definitions 19

I. Introduction and Purpose

The purpose of this Federal Financial Participation (FFP) Guide is to help Information and Education (I&E) Program Grantees understand the FFP requirements to ensure compliance with federal funding regulations and maximize FFP reimbursement.

FFP provides federal Title XIX/Medi-Cal reimbursement for approved State programs providing specific activities that meet the following two objectives:

- Assisting Medi-Cal eligible individuals to enroll in the Medi-Cal/Family PACT Program.
- Assisting individuals on Medi-Cal to access Medi-Cal or Family PACT providers and services.

There are many activities performed within I&E Program that meet the required objectives. This guide will explain those federally-reimbursable activities and enable I&E Program Grantees to perform the required work and ensure FFP reimbursement is maximized.

The following are examples of activities that qualify for FFP reimbursement:

- Performing Outreach, including meeting with groups or individuals about Medi-Cal services available to them; i.e. participating in a Teen Health Fair at a local high school.

- Identifying Medi-Cal eligible individuals and referring them to Medi-Cal or Family PACT providers and services. The referrals are not limited to Medi-Cal medical services; Individuals may also be referred to Medi-Cal dental, mental health, drug and alcohol services.

- Identifying barriers to Medi-Cal/Family PACT eligible individuals accessing care and working on a solution; i.e. identifying local areas without Family PACT/Medi-Cal providers and identifying satellite facilities that provide services.

- Performing quality assurance activities to ensure I&E Program participants receive needed quality care; i.e. evaluating the “teen friendliness” of local Family PACT or Medi-Cal providers and working with the providers to improve access to care and services.

Many of these activities are similar to activities used to reimburse Medi-Cal funds under the Targeted Case Management (TCM) Program. FFP is the only Medi-Cal reimbursement method Grantees can use. Utilizing both FFP and TCM for the same program would constitute double billing of Title XIX and is not allowable under federal regulations.

II. I&E Program FFP Funding

Medicare and Medicaid federal regulations allow matching for administrative activities at a dollar-for-dollar match for the majority of expenses necessary for the efficient administration of the Medi-Cal program. The I&E Program has been approved by Medi-Cal to receive FFP reimbursement for federally reimbursable activities.

The California Department of Public Health (CDPH), Office of Family Planning (OFP) makes available reimbursement of FFP funds for I&E Program activities and selected administrative expenses. This reimbursement is provided through matching Title XIX Medi-Cal (Medicaid) with OFP-allocated State General Fund or with local certified county/city government funds to maximize funding for I&E Program.

Federal Medi-Cal Title XIX–Funds only those activities that are necessary for the proper and efficient administration of the State's Medi-Cal program. This refers to "Outreach" activities to reach potential Medi-Cal eligibles and assisting them with "access" to Medi-Cal services.

State General Fund (SGF)–Funds all types of I&E Program activities included in the Workplan and is used to provide dollar-for dollar matching of Title XIX funding in accordance with federal regulations.

Local Government Non-Federal Funds–Local government (city, county or non-federal tribal) funds may be used as matching funds to obtain FFP reimbursement.

III. FFP Reimbursement Requirements

To obtain FFP reimbursement, the Grantees must:

- Meet the two FFP objectives (only FFP-allowable activities will be reimbursed);
- Document all activities performed by Grantee's staff via quarterly Time Studies and Secondary Documentation Form;
- Provide certified, non- federal funds (SGF and/or local county/city government funds) to qualify for Title XIX reimbursement, and
- Have a target or target a population of adolescents that is Medi-Cal eligible (per Title XIX criteria) and/or are Medi-Cal beneficiaries.

Who is a Medi-Cal/Family PACT-eligible individual in relation to I&E Program?

"Any <u>teen/young adult</u> who is seeking confidential care/services concerning birth control, pregnancy, and/or sexually transmitted infections (STIs) is Medi-Cal/Family PACT eligible."

Individuals may or may not be eligible for Medi-Cal based on their income and other eligibility factors; however, minors under age 18 are considered a family of one and may be eligible for Medi-Cal. Minors under age 17 are considered a family of one and may be eligible for Family PACT benefits.

IV. FFP Time Study Process

The official method used to document staff time spent on all activities during the Time Study period each quarter is to complete: **1)** the Secondary Documentation Form; and **2)** the Weekly Time Study FFP Calculation Template using the information gathered on the Secondary Documentation Form. The Time Study Data Report for Summary of FFP worksheet is automatically populated from the data entered in the Weekly Time Study FFP Calculation Template. The Time Study Data Report for Summary of FFP reflects the percentage of Medi-Cal activities performed and the percentage of time spent on all activities. The Medi-Cal and time percentages generated from the Time Study Data Report for Summary of FFP will be reported on the Grantee's quarterly invoice. The Time Study Data Report for Summary of FFP is submitted to OFP with the Grantee's quarterly invoice for all employees claiming Title XIX reimbursement.

Time Study documents are used to:

- Document 100 percent of staff time spent on all activities performed during the Time Study week.
- Monitor activities to ensure they meet FFP objectives.
- Determine the percent of FFP matchable staff time spent on I&E Program activities.
- Verify high or low percentage of FFP matching activities for I&E Program.
- Substantiate the percentage of FFP matching funds for I&E Program for audit purposes.

The following are the required FFP Secondary and Time Study documents:

- The Secondary Documentation Form. The form is located at: http://www.cdph.ca.gov/programs/tpp/Documents/MO-TPP-SecondaryDocumentationForm-August-2010.doc

- The Secondary Documentation Form Instructions. The instructions are located at: http://www.cdph.ca.gov/programs/tpp/Documents/MO-TPP-SecondaryDocumentationOFPTimeStudyInstructions(2).doc

- The Secondary Documentation Sample Form. The sample form is located at: http://www.cdph.ca.gov/programs/tpp/Documents/MO-TPP-SecondaryDocumentationFormSampleforOFPTimeStudy.doc

- The Weekly Time Study FFP Calculation Template and the Time Study Data Report for Summary of FFP. The templates are located at: http://www.cdph.ca.gov/programs//Documents/MO--WeeklyTimeStudyCalTemp.xls

A. Who Completes the Time Study Documents?

All positions receiving Title XIX reimbursement (including subcontractors) must Time Study five (5) consecutive working days in a one (1) week period, accounting for 40 hours during the Time Study Period of each quarter. Time worked, or any paid /non paid time off in other programs must be documented in your I&E Time Study.

All subcontractors who provide a service, such as assisting in Outreach, training peer educators, or who assist with the implementation of the Workplan, must Time Study for 100 percent of their time. If the subcontractor is providing a product, such as a pamphlet or revised curriculum, a Time Study is not required and the lead agency's average Medi-Cal percentage will be used to determine the matching percentage for funding the subcontractor's costs.

If an agency also serves as a subcontractor for another program, the staff that work on both programs must Time Study separately for the agency and the subcontracting agency. The staff person would utilize activity code eleven (11) when working on the other program. **Each Time Study document should supplement the other for a total of 100 percent of the time.** OFP must be able to cross reference the Time Study documents for the identified staff person when he/she is working for the agency and when he/she is working for the subcontracting agency.

B. Types of Reimbursement and Activity Codes

There are three (3) types of reimbursements categorized by activity codes:

1. **Non-FFP Matchable Activities:** (1a, 2a, 7a, 8a, 9a, 11)
   Non-FFP activities are associated with the Workplan and are reimbursable through the SGF only. Any program activity that does not meet the two (2) FFP objectives will not be matched with federal Title XIX funding. They will be reimbursed through SGF or local GF.

   There are activities in your Workplan that are reimbursable with SGF that may not meet the requirements for receiving FFP reimbursement. Activities like prevention education and health education must not be removed from the Workplan without approval from your Program Consultant since many of these activities meet I&E Program statutory requirements.

2. **FFP Matchable Activities: (1b, 2b, 7b, 8b, 9b 10b)**
   FFP activities are associated with the Workplan and support the two FFP objectives. FFP will match dollar-for-dollar SGF or local GF (non federal) funds with Title XIX funding for activities that meet the two (2) FFP objectives.

3. **Allocated: (10a, 12)**
   General administration activities not directly related to program activities, and paid/unpaid time off. The time allocated to the Program is prorated between matchable and non-matchable funds.

C. Activity Codes Used When Time Studying for I&E Program

The table below consists of the activity codes used when Time Studying for I&E Program; categorized by type of funding and title. Following the activity code table is a detailed description of each activity code and examples of "a" and "b" activities.

Activity Code – Type of Funding	Title
1a—Unmatched	Non-Medical/Family PACT Outreach
1b—FFP Matched	Medi-Cal/Family PACT Outreach
2a—Unmatched	Facilitating Eligibility Application or Determination for Non-Medi-Cal/Family PACT Programs
2b—FFP Matched	Facilitating Medi-Cal/Family PACT Eligibility Application or Determination
7a—Unmatched	Program Planning, Policy Development, and Intra/Inter Agency Coordination Related to Non-Medi-Cal/Family PACT Services
7b—FFP Matched	Program Planning, Policy Development, and Intra/Inter Agency Coordination Related to Medi-Cal/Family PACT Services
8a—Unmatched	Non Medi-Cal/Family PACT Training
8b—FFP Matched	Medi-Cal/Family PACT Training
9a—Unmatched	Coordination and Monitoring of Non Medi-Cal/Family PACT Services
9b—FFP Matched	Coordination and Monitoring of Medi-Cal/Family PACT Services
10a—Allocated	General Administration
10b—FFP Matched	Medi-Cal/Family PACT (I&E specific) Administration
11—Unmatched	Activities for Other Programs and to Document Un-Worked Time
12—Allocated	Paid Time Off

Activity Code 1a
Non-Medi-Cal/Family PACT Outreach

This activity code is used when program staff is informing individuals about their eligibility for non-Medi-Cal/Family PACT Programs and/or services. This includes access, range of benefits, and how to obtain services. Includes all paperwork, clerical activities, and staff travel required to perform these activities.

Examples of 1a activities:

1. Implementing prevention education sessions and/or informational presentations focused on health education.
2. Conducting life skills sessions that include goal setting and budgeting skills.
3. Assisting with organization of service-learning activities and community events that do not focus on potential Medi-Cal/Family PACT eligibles or access to Medi-Cal or Family PACT care and services.
4. Recruiting youth to participate in youth development programs.

Time spent on preparation, travel (to and from) and documentation associated with an activity are coded to that activity. Example: preparing, traveling and conducting a prevention education session at a high school. If the prevention education activity consisted of only "a" activities, the travel time would be coded as "a" for both travel to and from the event. If the prevention education session included both "a" and "b" activities, then the travel time to and from the prevention education session would be allocated to "a" and "b" in proportion to the amount of time spent on "a" and "b" activities during the session. If the travel occurs during non-paid time (before or after the staff person's working hours) then the unpaid travel time is not coded or recorded on the Time Study.

Activity Code 1b
Medi-Cal/Family PACT Outreach

This activity code is used when program staff is informing eligible or potentially eligible individuals about Medi-Cal/Family PACT services and how to access those services. This activity includes providing information about, or assistance with the Medi-Cal/Family PACT eligibility process. Outreach coded as 1b only includes Outreach to the I&E targeted population. Includes all paperwork, clerical activities, and staff travel required to perform these activities.

Examples of 1b activities:

1. Implementing prevention education sessions and/or informational presentations focused on access to Medi-Cal/Family PACT services.
2. Conducting street Outreach and providing information and referrals regarding Medi-Cal/Family PACT services.
3. Disseminating referral materials such as flyers and brochures with information on Family PACT services including clinic locations, hours, fees, etc.
4. Distributing Teen-Line information and Medi-Cal/FPACT referral cards to participating youth in conjunction with Outreach presentations.
5. Linking youth to Family PACT services & encouraging them to continue accessing services.
6. Revising referral lists, brochure cards, flyers and coupons for linkages to Medi-Cal/Family PACT services.

7. Developing Outreach media materials, such as Public Service Announcements (PSA's) or news releases regarding access to Medi-Cal or FPACT services, for Outreach events.
8. Facilitating a group discussion in the clinic with teens explaining Family PACT services.

Time spent on preparation, travel (to and from) and documentation associated with an activity are coded to that activity. Example: preparing, traveling and conducting a prevention education session at a high school. If the prevention education activity consisted of only "a" activities, the travel time would be coded as "a" for both travel to and from the event. If the prevention education session included both "a" and "b" activities, then the travel time to and from the prevention education session would be allocated to "a" and "b" in proportion to the amount of time spent on "a" and "b" activities during the session. If the travel occurs during non-paid time (before or after the staff person's working hours) then the unpaid travel time is not coded or recorded on the Time Study.

Activity Code 2a
Facilitating Eligibility Application or Determination for Non-Medi-Cal/Family PACT Programs

This activity code is used when program staff is informing an individual about Non-Medi-Cal/Family PACT programs such as: Temporary Assistance for Needy Families (TANF), Food Stamps, Women, Infant, and Children Nutritional program (WIC), day care, legal aid, and other educational or social service programs. Includes all paperwork, clerical activities, and staff travel required to perform these activities.

Examples of 2a activities:

1. Providing information and resources to youth regarding domestic violence.
2. Assisting with resume and job application.
3. Helping with college application.
4. Aiding in arranging housing.

Activity 2b
Facilitating Medi-Cal/Family PACT Eligibility Application or Determination

This activity code is used by staff when assisting an individual with the Medi-Cal/Family PACT eligibility process. Includes all paperwork, clerical activities, and staff travel required to perform these activities.

Examples of 2b activities:

1. Explaining Medi-Cal/Family PACT eligibility.
2. Assisting youth/young adults by answering questions they may have regarding the Family PACT Client Eligibility Certification (CEC) form.
3. Providing one-on-one information to youth regarding access to Medi-Cal or Family PACT providers and services (note: Secondary Documentation must

indicate a unique identifier such as chart number or initials of client to ensure client confidentiality is protected.)

Activity Code 7a
Program Planning, Policy Development, and Intra/Inter Agency Coordination Related to Non-Medi-Cal/Family PACT Services

This activity code is used by staff when working on developing strategies to improve the coordination and delivery of non-Medi-Cal or Family PACT services for I&E Program participants. Non-Medi-Cal/Family PACT services may include social services, educational services, vocational services, and any other services not covered by Medi-Cal or Family PACT. Includes all paperwork, clerical activities, and staff travel required to perform these activities.

Examples of 7a activities:

1. Contacting high school and middle school administrators and boards regarding comprehensive sex education focused on health education topics.
2. Distributing prevention education curriculum focused on health education topics and providing permission slips to school officials and collaborators.
3. Meeting with teachers, counselors, and parents to advertise the Program and to recruit youth for prevention education sessions and/or informational presentations focused on health education topics.
4. Inviting local business people and professionals to conduct employment-related workshops focusing on the interview process, career opportunities, and application/resume development.
5. Making phone calls, and writing emails to arrange and plan for the implementation of prevention education activities focused on health education topics.

Activity Code 7b
Program Planning, Policy, and Coordination Related to Medi-Cal or Family PACT Services

This activity code is used by staff when performing activities associated with developing strategies to improve the coordination and delivery of Medi-Cal or Family PACT services for I&E Program participants and when performing collaborative activities with other programs and/or providers. Only I&E Program staff whose duty statements include program planning, policy development, and interagency coordination may use this code**.** Includes all paperwork, clerical activities, and staff travel required to perform these activities.

Examples of 7b activities:

1. Distributing prevention education curriculum focused on access to Medi-Cal or Family PACT services and providing permission slips to school officials and collaborators.
2. Meeting with teachers, counselors, and parents to provide information about Medi-Cal/Family PACT and to recruit youth for prevention education sessions

and/or informational presentations focused on access to Medi-Cal or Family PACT services.

3. Formalizing collaborative relationships with other Family PACT providers in the area.
4. Developing or updating a referral system between the Grantee and Family PACT clinics.
5. Planning and coordinating with Family PACT clinic staff to ensure easy access to appointments for teen services.
6. Attending regional collaborative meetings to address barriers related to access to Medi-Cal or Family PACT providers and services. Identifying and developing effective strategies to address barriers.
7. Reviewing technical literature and research articles concerning I&E Program target populations to address and assist with their needs related to access to Medi-Cal or Family PACT providers and services.
8. Participating in staff meetings to discuss Outreach strategies and/or implementation of the Workplan activities to increase access to Medi-Cal or Family PACT services for I&E Program participants.
9. Making phone calls and writing emails to arrange and plan for the implementation of I&E Program Outreach activities related to increasing access to Medi-Cal or Family PACT services for I&E Program participants.
10. Participating in development, maintenance, and analysis of program management information regarding the Medi-Cal/Family PACT program.

Activity Code 8a
Non-Medi-Cal/Family PACT Training

This activity code is used by staff when coordinating, conducting, or participating in training events and/or seminars that are <u>not directly related to the Medi-Cal/Family PACT programs and Medi-Cal or Family PACT services</u>. Includes all paperwork, clerical activities, and staff travel required to perform these activities.

Examples of 8a activities:

1. Training program staff to implement prevention education sessions focused on health education topics.
2. Attending trainings on “How to Use Power Points.”
3. Training program staff on classroom management.

Activity Code 8b
Medi-Cal/Family PACT Training

This activity code is used by staff when coordinating, conducting, or participating in training events and/or seminars that are directly related to the Medi-Cal/Family PACT programs and Medi-Cal or Family PACT services. Includes all paperwork, clerical activities, and staff travel required to perform these activities.

Examples of 8b activities:

1. Conducting in-service training for all staff regarding local Medi-Cal/Family PACT clinic resource information as well as Grantee referral tracking mechanisms.
2. Providing in-service training to program staff, including volunteers and peer educators, regarding Family PACT services, referral process, and materials.
3. Participating in training related to I&E evaluation requirements for Medi-Cal/Family PACT.
4. Training program staff on using evaluation tools for Medi-Cal/Family PACT.
5. Training that would enhance skills needed to perform Medi-Cal/Family PACT Outreach services i.e., best practices—effective Outreach strategies, developing referral systems, etc.
6. Participating in OFP's conference calls regarding FFP.

Activity Code 9a
Coordination and Monitoring of Non-Medi-Cal/Family PACT Services

This activity code is used by staff when coordinating and/or monitoring/evaluating non-Medi-Cal/Family PACT activities, such as social and educational services. Includes all paperwork, clerical activities, and staff travel required to perform these activities.

Activity Code 9b
Coordination and Monitoring of Medi-Cal/Family PACT Services

This activity code is used when coordinating and/or monitoring/evaluating the medical/dental/mental health services and/or Medi-Cal or Family PACT services for eligible Medi-Cal/Family PACT individuals. Includes all paperwork, clerical activities, and staff travel required to perform these activities.

Examples of 9b activities:

1. Conducting periodic analysis of youth referred to determine any increase in adolescents accessing/utilizing clinical services at the agency's Family PACT clinic or other area Family PACT providers.
2. Conducting surveys of youth regarding knowledge of access to family planning services.
3. Collecting and analyzing local evaluation data related to Medi-Cal/Family PACT.
4. Participating in Medi-Cal/Family PACT related phone interviews and site visits with evaluation team.
5. Reviewing evaluation data forms and local data reports, Continuous Program Improvement (CPI) evaluation findings and local evaluation, and applying lessons learned for program planning improvements and modifications.

Activity Code 10a
General Administration

This activity code is used for activities that are not directly related to I&E Program activities. This includes non-program related paperwork, general clerical work, and staff travel required to perform these activities.

Since activities coded under 10a support a variety of agency operated Programs, such costs are allocated to I&E Programs. The costs allocated to I&E Programs are then funded with the same percentage of General Funds and Federal Funds.

Note: Certain functions such as: payroll, maintaining inventories, executive direction, etc., are considered overhead and, therefore, are reimbursable through the indirect cost rate.

Examples of 10a activities:

1. Answering & responding to general letters, phone calls, and e-mails.
2. Attending non-I&E Program related staff meetings or meetings with topics not related to the increase of access to Medi-Cal or Family PACT services for I&E Program participants.
3. Attending required agency trainings such as new employee orientations, bioterrorism training, sexual harassment prevention training, or general agency required meetings or trainings.
4. Attending general agency meetings on health insurance coverage, family medical leave act requirements, or other benefits.
5. Reviewing department or unit procedures and rules not specific to I&E Program.
6. Attending seminars on retirement benefits.
7. This code is used for any administrative activity that staff must do because they are an employee of the organization.

Activity Code 10b
Medi-Cal/Family PACT (I&E specific) Administration

This activity code is used when performing activities related to the specific administration of I&E Program, which are identifiable and directly charged to I&E Programs.

Examples of 10b activities:

1. Completing weekly Time Studies and Secondary Documentation for I&E Program when the Time Study is completed at the end of the Time Study week.
2. Reviewing weekly Time Studies and associated documentation.
3. Developing and implementing I&E Program-specific administrative policies and procedures in compliance with Medi-Cal/Family PACT program requirements.
4. Coordinating distribution of Medi-Cal/Family PACT information including procedural manuals and brochures.
5. Supervising staff, including students, peer educators, or others working with I&E program.
6. Developing I&E Program budget and monitoring expenditures.

7. Developing/revising I&E Program Workplan, curricula, or duty statements to reflect activities that improve access to Medi-Cal or Family PACT services.
8. Drafting, analyzing, and reviewing reports, documents, correspondence, and legislation affecting I&E Program target population and their access to Medi-Cal or Family PACT providers and services.
9. Performing or directing recruitment, selection, and hiring of I&E Program employees and performing employee evaluations.

Activity Code 11
Activities for Other Programs and to Document Un-Worked time

This activity code is used for any activity or time spent doing activities that are not part of I&E Program.

Examples of code 11 activities:

1. Performing Community Challenge Grant (CCG) Program activities.
2. Performing HIV/AIDS program activities that are not included in I&E Program Workplan.
3. Performing work on other non-I&E Program Workplans.
4. Developing budgets and monitoring program expenditures for other programs.
5. Document part-time employee's un-worked time.

Activity Code 12
Paid Time Off

This activity code is for any staff paid time off.

Examples of code 12 activities:

1. Vacation
2. Holidays
3. Sick Leave
4. Educational Leave
5. Family Leave
6. Jury Duty (only if reimbursed by employer)

D. Secondary Documentation

Secondary Documentation is the information and data that substantiate and support reimbursable activities on the Time Study. The Secondary Documentation Form Instructions on how to complete the form and a sample of a completed Secondary Documentation Form are located at: http://www.cdph.ca.gov/programs/tpp/Pages/FederalFinancialParticipationInformation.aspx.

Secondary Documentation:

- Is an OFP requirement.
- Monitors for appropriate FFP Program activities.
- Creates an audit trail that supports the reimbursable time billed to I&E Program.
- Clearly identifies the client or entity for which the activity or service is provided, i.e. Group, Medi-Cal number or client first & last names.
- Distinguishes different activities and programs.

If the Secondary Documentation states that a “b” activity was performed, then the Secondary Documentation must list sufficient information to substantiate, for an auditor, that the activity is a federally reimbursable activity. For example, Secondary Documentation for “Outreach” should include the date, location, type of Outreach, and target population. Outreach brochures that were used would be considered supplemental materials. Provisions of this level of detail substantiate the activity to meet federal requirements and qualify for FFP reimbursement.

The information documented for a “b” activity code must clearly identify who, what, when, where and, if applicable, the why for each activity performed. The documentation provided must be specific enough to enable an auditor to determine that the activity qualifies for FFP reimbursement. Please see example below.

Time spent on preparation, travel (to and from) and documentation associated with an activity are coded to that activity. Example: preparing, traveling and conducting a prevention education session at a high school. If the prevention education activity consisted of only “a” activities, the travel time would be coded as “a” for both travel to and from the event. If the prevention education session included both “a” and “b” activities, then the travel time to and from the prevention education session would be allocated to “a” and “b” in proportion to the amount of time spent on “a” and “b” activities during the session. If the travel occurs during non-paid time (before or after the staff person’s working hours) then the unpaid travel time is not coded or recorded on the Time Study. Please see example below.

8:00 AM	I&E	1a	Arrive at office, get supplies for Prevention Ed Session 5 STD/clinic
8:30 AM	I&E	1a	(Session 5 cont) travel to Rose High School to present Prevention Ed session 5 STD/clinic information. Set up for presentation.
9:00 AM	I&E	1a	(Session 5 cont) pretest, STD transmission/protection, answer questions.
9:30 AM	I&E	1b	(Session 5 cont) discuss access to Medi-Cal or Family PACT services,
10:00 AM	I&E	1b	(Session 5 cont) travel back to the office. Write up class notes.

Lunch is not coded because it is unpaid time.

Breaks are paid time and are not coded separately but are absorbed into the activity performed either before or after the break. Break time is not captured because of the limited length of time (i.e. 15 minutes or less).

If staff completes the Time Study documents immediately after each activity, code the time spent completing the Time Study documents the same as the actual activity. If the Time Study documents are completed at the end of the Time Study Period, code it as 10b, Program-Specific Administration.

Activities identified on the Secondary Documentation should be consistent with I&E Program Workplan.

If an "a" activity code is documented on the Secondary Documentation form then only the activity code, program, and the time spent on the activity is required. Additional information is not required.

When an activity includes providing information to an individual client to facilitate access to Medi-Cal or Family PACT services, a unique client identifier is required in the Secondary Documentation. For example, the documentation could refer to a client by the client's initials or by a case number if one were assigned. Staff must adhere to client confidentiality requirements in accordance with the Healthy Insurance Portability and Accountability Act (HIPAA).

Helpful Hints

- Complete your Secondary Documentation in pen or electronically. Pencil is not appropriate for a legal document.
- Complete the Secondary Documentation form daily.
- Secondary Documentation must match the Weekly Time Study FFP Calculation Template.
- Enter I&E or "Other" in the Program Code column on the Secondary Documentation.
- The signature on the original Secondary Documentation should be in blue ink.
- Documentation shall be legible, concise, and completed in a timely manner.
- Correct errors with a strike through, and date and initial the correct information. Never use white out, liquid paper or dry line on errors; these are not acceptable on legal documents.

E. Weekly Time Study FFP Calculation Template

Input all information requested on the Weekly Time Study FFP Calculation Template worksheet. You will need to complete one worksheet for each staff person Time Studying. The information entered in the Weekly Time Study FFP Calculation Template populates in the Time Study Data Report for Summary of FFP. The Time Study Data Report for Summary of FFP reflects the percentage of Medi-Cal and/or SGF activities performed and the percentage of time spent working on all programs. The Medi-Cal and time percentages generated from the Time Study Data Report for Summary of FFP will be reported on the Grantee's quarterly invoice. Refer to the instructions on the Weekly Time Study FFP Calculation Template posted on the TPP Website at:

http://www.cdph.ca.gov/programs/tpp/Documents/MO-TPP-WeeklyTimeStudyCalTemp.xls

The Time Study periods will be randomly selected by OFP and Grantees will be provided approximately six weeks notice prior to the Time Study Period.

All activities performed during the Time Study Period are to be categorized into specific activity codes identified on page eight (8), paragraph C.

Complete the Time Study Documents in 30-minute increments capturing time for a full-time employee (a 40 hour week). Identify all time and activities pertaining to I&E Program. Time worked in other programs, as well as any un-worked time is coded as Activity Code 11. A part-time employee still needs to account for a 40 hour week; this can be done by coding the un-worked time as Activity Code 11.

If the activity takes more than 15 minutes, round up to 30 minutes. For example: Providing clinical linkages information from 9:00 am to 9:20 am is documented as 9:00 am to 9:30 am. If the time spent on an activity is less than 15 minutes round down to the previous 30 minute increment. For example: Meeting with School Administrator from 9:00 am to 9:40 am is documented as 9:00 am to 9:30 am.

Completed Time Study Documents must be reviewed by I&E Program supervisor. The Secondary Documentation Form must be signed by the employee and the Time Study Form must be approved and signed by both the employee and supervisor. The supervisor is responsible for verifying the completeness and accuracy of all Time Study Documents.

The Time Study Documents are legal documents and must be retained by the agency or subcontractor for three (3) years from the date of the last payment of the fiscal year or final resolution on any audit findings, and stored in a safe and secure manner for State and Federal audit purposes.

Ensure each staff person's job title and budget line number match on both the budget and Time Study Worksheet.

- Ensure the following match the budget:
    - The agency name
    - Employee's name
    - Employee's Job title
    - Grant Agreement number
    - Positions Full Time Equivalent (FTE)
    - Budget line number

F. Invoice Submission Process

At the end of each quarter, I&E Program Director or Coordinator submits an invoice to OFP to be reimbursed for expenses incurred. The Time Study Data Report for Summary of FFP is submitted with the invoice.

NOTE: OFP may request copies of the FFP Time Study documents upon review of the above items. Documents shall be maintained in compliance with the grant agreement.

G. Supplemental Documentation Necessary to Support FFP Requirements

Supplemental documentation consists of documents that support the Secondary Documentation. These documents may include the following:

- **Workplan:** Should reflect both I&E and FFP objectives.
- **Curriculum:** Should reflect both I&E and FFP objectives.
- **Duty Statements/Job Descriptions**: **Every staff position** in I&E Program's budget is required to have a duty statement specific to the roles and responsibilities of each position. The duty statement should reflect activities that meet the I&E and FFP objectives. Duty statements should be accurate and concise.

NOTE: The Supplemental Documentation must be available for review upon request by OFP, and State or Federal auditors.

V. Privacy & Confidentiality

FFP program documents may contain information or data that is considered private and/or confidential. It is the staff's responsibility to protect this information from disclosure. The types of FFP program documents that should be protected if client-specific information is included are the:

- Weekly Time Study FFP Calculation Template
- Secondary Documentation Form
- Supplemental Documentation

VI. Definitions

Activity Code –A code that defines a program activity.

Audit –An unbiased formal examination and evaluation of an organization's procedures, records, and financial situation to verify the accuracy and completeness of the records or their compliance with state requirements and standards.

Confidentiality –The obligation of staff to protect the right of privacy of a person's information.

Contract Manager (CM) –State OFP staff person who performs fiscal and administrative program, budget and invoicing duties.

Federal Financial Participation (FFP) –A means to obtain federal funding (reimbursement) for activities that are necessary for the "proper and efficient administration" of the Medi-Cal/Family PACT program. This includes "Outreach" to potential Medi-Cal/Family PACT eligibles and improving access for eligibles for Medi-Cal/Family PACT services.

Health Insurance Portability and Accountability Act (HIPAA)– The Act that governs protected health information. **HIPAA** requires via **Federal statute**- that all organizations develop and implement privacy and security standards that safeguard the confidentiality, availability, and integrity of Protected Health Information (PHI).

Medi-Cal Administrative Activities (MAA) –FFP is also referred to as MAA.

Medi-Cal –State of California's Medicaid (Title XIX) health insurance program that provides health care and service to persons who meet Medi-Cal eligibility requirements and are enrolled in Medi-Cal.

Outreach –Informing and connecting people to available programs, providers, services and/or care.

Privacy –A person's right to have personal information maintained in a manner that is not publicly available

Program Consultant (PC) –State OFP staff person who provides consultation concerning program planning and implementation.

Quarterly –Each three month period of the state fiscal year (1st quarter = July – September, 2nd quarter = October – December, 3rd quarter = January – March, 4th quarter = April - June).

Reimbursement –To pay an entity or person back for allowable expenses incurred as delineated in the program scope of work and budget. I&E Program Grantees are reimbursed with State General Fund for qualifying activities and with FFP Title XIX funds.

Secondary Documentation –Documentation that provides detail regarding an activity and substantiates that the activity qualifies for FFP reimbursement.

Supplemental Documentation –Documentation of the information that support the secondary documentation; for example, Outreach brochures, workplans, curricula and duty statements.

Time Study –The method used to record time spent on all activities for all staff time reimbursed wholly or partially by FFP.

Time Study Period –The amount of time within the quarterly period that will be time studied (i.e., one week of a specific month in the quarter).

Workplan –An agreement that provides additional agency-specific detail than is contained in the program scope of work regarding the agency's activities to meet goals and objectives of a program.