

Federal Financial Participation (FFP) Overview

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Presentation Overview

- Purpose of the FFP Presentation
- Federal and State Authority
- FFP Objectives
- Prior Federal Audit Findings
- FFP Eligible, Non-Eligible and Allocated Activities
- Decision Tree
- Secondary and Supplemental Documentation Required for Claiming FFP
- Questions



Purpose of this Training

- Ensure grantees understand the FFP requirements and correctly claim allowable Title XIX funds
- Ensure compliance with Federal and State funding regulations:
 - Code of Federal Regulations (CFR) Title 42, Parts 432 and 433
 - Social Security Act, Sections 1903(a)(2) through 1903(a)(7)
 - Welfare and Institutions Code, Section 14132.47
- Understand activities related to past audit exceptions



Authority

Pursuant to Welfare and Institutions Code, Section 14132.47, Medi-Cal Administrative Activities (MAA) became a covered Medicaid benefit effective January 1, 1995.

- I & E FFP models these regulations.



Authority (con't)

- Prior to 1995 the program was known as “Medi-Cal Administrative Claiming”
- 1995 “MAC Settlement” (Medi-Cal Administrative Claiming agreement)
 - Legal agreement between HCFA (now CMS) and the California Department of Health Services as a result of a major audit.
 - Gives authority and elements of guidance over the current I & E FFP program.
- 2003 Medicaid School-Based Administrative Claiming Guide
 - Provides more detailed guidance for MAA programs and MAA-related programs such as I & E FFP.



Certified Public Expenditures

- 42 Code of Federal Regulations (CFR), 433.51 requires that the public agency certifies 100% public expenditures to be eligible for FFP
- I & E Agencies may only use certified, non-federal funds such as State General Funds or funds provided by a public entity (city, county, government agency) to qualify for Title XIX reimbursement.
- I & E Agencies are not public entities and may not use any of their own funds to claim Title XIX



FFP Federal Definition

- A program that allows *eligible entities* to draw down Title XIX federal reimbursement for *activities* necessary for the *proper and efficient administration* of the Medi-Cal Program



FFP Objectives

Federal Medi-Cal/Medicaid Title XIX Funds provides FFP reimbursement for *approved programs* that provide *specific activities* that meet the two objectives:

- 1) Assisting individuals eligible for Medi-Cal to enroll in the Medi-Cal/FPACT program and/or**
- 2) Assisting individuals on Medi-Cal/FPACT to access Medi-Cal Services**



Prior Federal Audit Findings

- 1995 - 8 Federal Findings of improper FFP claiming
- \$378 Million FFP Disallowance in 1995
- 1995 MAC Settlement (HCFA/CMS and DHS)
- Focus on 4 of these 8 audit findings to ensure compliance with I & E FFP activities:
 - Claiming Targeted Case Management as Administration
 - Claiming Broad Public Health Activities as Administrative Costs
 - Time Study and MAC (FFP) Code Validity (allowable and unallowable activities were improperly combined)
 - Claiming for Periods Without Time Study Documentation (secondary documentation)



FFP Eligible Activities

- 1b** Medi-Cal/Family PACT Outreach
- 2b** Facilitating Medi-Cal/Family PACT Eligibility Application or Determination
- 7b** Program Planning, Policy Development, and Inter/ Intra Agency Coordination Related to Medi-Cal/Family PACT Services
- 8b** Medi-Cal/Family PACT Training
- 9b** Coordination and Monitoring of Medi-Cal/Family PACT Services
- 10b** Medi-Cal/Family PACT (I&E specific) Administration



FFP Eligible

1b: Medi-Cal/Family PACT Outreach

Personally meeting with I & E participants regarding outreach Information about Medi-Cal/Family PACT Eligibility or Access

- Teaching and providing information to I&E participants about eligibility for Medi-Cal/Family PACT and how to access services and providers
- Conducting Targeted Prevention Activities (outreach) to increase Medi-Cal/Family PACT access to services and providers
- Provide I & E participant Medi-Cal/Family PACT provider information



FFP Eligible

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

Personally meeting with I & E participants regarding Medi-Cal/Family PACT Application or Determination

- Explaining eligibility for Medi-Cal/Family PACT services and assisting with the application
- Explaining how to access Medi-Cal/Family PACT providers/services through the application process
- Assist and advise the applicant of the necessary information required for Medi-Cal/Family PACT application



FFP Eligible

7b: Program Planning, Policy Development, and Intra/Inter Agency Coordination Related to Medi-Cal/Family PACT Services

- Meeting with teachers, counselors, parents to provide information about Medi-Cal Family PACT training or services associated with scheduling trainings or meetings about Medi-Cal/Family PACT
- Developing collaborative relationships, developing referral systems, attending meetings with Medi-Cal/Family PACT providers



FFP Eligible

8b: Medi-Cal/Family PACT Training

- Training staff, volunteers and peers about local Medi-Cal/Family PACT clinics, services, referral process, eligibility, etc.
- Attending MCAH training about Medi-Cal Family PACT
- Attending FFP documentation training



FFP Eligible

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

- Evaluation activities to determine participants knowledge of how to access Medi-Cal/Family PACT services to increase capacity
- Staff collaborating with or participating in Medi-Cal/Family PACT-related evaluation and/or site visits



FFP Eligible

10b: Medi-Cal/Family PACT (I&E) Specific Administration

Administrative activity directly related to Medi-Cal/FPACT eligibility or access to services

- Completing FFP Monthly Time Study documents
- Training staff about the requirements for FFP claiming



Non- FFP Eligible Activities

- 1a** Non-Medical/Family PACT Outreach

- 2a** Facilitating Eligibility Application or Determination for Non-Medi-Cal/Family PACT Program

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

- 8a** Non-Medi-Cal/Family PACT Training

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

- 11** Activities for Other Programs and to Document time **Not Worked**

Federal Financial Participation (FFP)



NON-FFP Eligible

1a: Non-Medical/Family PACT Outreach

Information about anything other than Medi-Cal or Family PACT Eligibility or Access

- Teaching I&E participants about reproductive health, STI, HIV, contraception
- Developing lesson plans, materials, etc., that deal with the above topics



NON-FFP Eligible

2a: Facilitating Eligibility Application or Determination for Non-Medi-Cal/Family PACT Program

Informing an I&E participant about other supportive services such as:

- Temporary Assistance for Needy Families (TANF)
- Cal Fresh (Food Stamps)
- Housing



NON-FFP Eligible

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

- Explaining, discussing, coordinating, scheduling Reproductive Health Education with schools, administrators, youth clubs, etc.
- Developing and revising work plans and lesson plans not focused on Medi-Cal/Family PACT eligibility or access.



NON-FFP Eligible

8a: Non-Medi-Cal/Family PACT Training

Non-Medi-Cal/FPACT Training related to:

- Classroom management
- Data collection
- Cultural competence
- Public Speaking



NON-FFP Eligible

9a: Coordination and Monitoring of Non-Medi-Cal Services

- Service provision for social services, housing, schooling & domestic violence
- Evaluation of social services provided or reproductive health education.



NON-FFP Eligible

11: Other Programs

- Performing any other program's activities
- Document part-time employee's un-worked time during month.



Allocated Activities

10a General Administration

12 Paid Time Off



Allocated

10a: General Administration

Any activity not directly related to increasing Medi-Cal/Family PACT eligibility or access to services

- Supervising employees, students, peer educators, or volunteers working with the I&E program
- Developing duty statements, procedure manuals, etc.
- Answering and responding letters, phone calls and emails



Allocated

12: Paid Time Off

- Vacation, sick leave, holiday, etc.



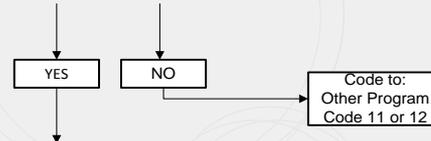
FFP Decision Tree

Use the FFP Decision Tree to determine if activities are FFP Claimable.



FFP DECISION TREE

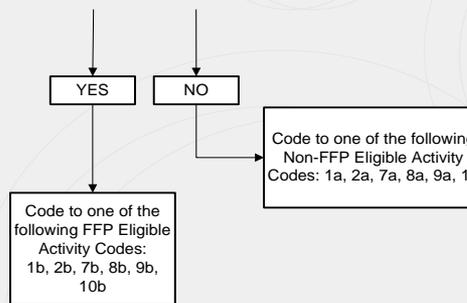
1. Is this activity in the I & E Scope of Work?



2. Does this activity meet FFP Objectives #1 or #2?

Objective #1 - Assisting individuals eligible for Medi-Cal to enroll in the Medi-Cal/FPACT program*

Objective #2 - Assisting individuals on Medi-Cal/FPACT to access Medi-Cal providers, care, or services*



Code 10a Non-Program specific general administration: This code is used for activities that are not directly related to I & E Program activities. This code is to be used by staff when attending an Agency required meeting, training, staff development, etc. Examples: Sexual Harassment training, Workplace Violence, IT Security. Any training or meeting that is mandatory for your employment.

Code 12 Paid time off : Sick Leave, Vacation, and Paid Holidays.

*Includes program activities that support the proper and efficient administration of the Medi-Cal Program.



FFP Decision Tree

Step 1:

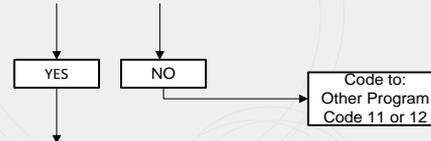
Is this activity in the I & E Scope of Work?

- If **NO**, then code to other programs, Code 11 or Code 12
- If **YES**, proceed to Step 2



FFP DECISION TREE

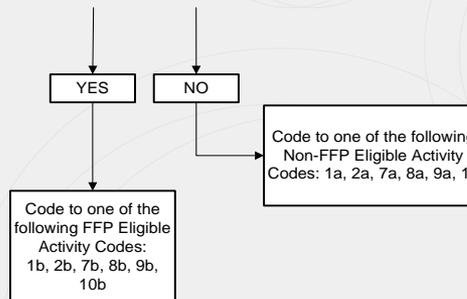
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FFP Decision Tree

Step 2:

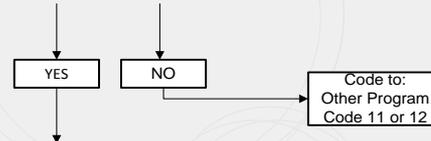
Does this activity meet FFP Objective 1 or Objective 2?

- Objective 1: Assisting individuals eligible for Medi-Cal to enroll in the FFACT/Medi-Cal Program* and/or
- Objective 2: Assisting individuals on FFACT/Medi-Cal access Medi-Cal providers, care or services*
 - If **NO**, Code to 1a, 2a, 7a, 8a, 9a or 11
 - If **YES**, Code to 1b, 2b, 7b, 8b, 9b or 10

* Includes program activities that support the proper and efficient administration of the Medi-Cal Program.

FFP DECISION TREE

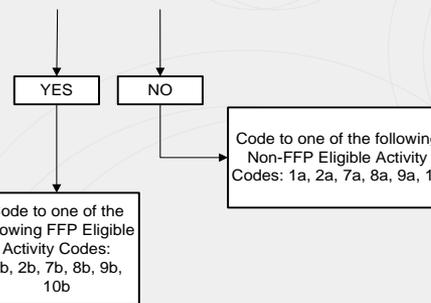
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2. Does this activity meet FFP Objectives #1 or #2?

Objective #1 - Assisting individuals eligible for Medi-Cal to enroll in the Medi-Cal/FPACT program*

Objective #2 - Assisting individuals on Medi-Cal/FPACT to access Medi-Cal providers, care, or services*



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Code 12 Paid time off : Sick Leave, Vacation, and Paid Holidays.

*Includes program activities that support the proper and efficient administration of the Medi-Cal Program.



Allocated Activities

Code 10a - Non-Program specific general administration:

- This code is used for activities that are not directly related to FFP activities.
- Examples – staff development, general training, attendance at agency required meetings such as Workplace Violence Training

Code 12 - Paid time off: Sick leave, Vacation and Paid Holidays.



Exercise Using the Decision Tree

You are attending a Health Fair to meet with potential I & E participants. You spoke to a youth about a variety of subjects:

1. You spent 22 minutes speaking to that youth regarding the FPACT program, explaining how and where to apply for services.
2. You spent an additional 20 minutes with the same youth providing information about reproductive health

Using the Decision Tree, how would you code this time on your Time Study?



Exercise Using the Decision Tree

1. 22 minutes speaking about how and where to apply for FPACT services.

Using the Decision Tree:

Step 1: Is this activity in the I & E Scope of Work? – **YES**, go to step 2

Step 2: Does this activity meet Objective #1 or #2 ? (Assisting individuals eligible for Medi-Cal to enroll in the Medi-Cal/FPACT program and/or Assisting individuals on Medi-Cal to access Medi-Cal/FPACT providers, care or services) – **YES**

Answer: Claim 30 minutes on Code 1b.

2. 20 minutes providing information about reproductive health.

Using the Decision Tree:

Step 1: Is this activity in the I & E Scope of work? – **YES**, go to step 2

Step 2: Does this activity meet Objective #1 or #2? – **NO**

Answer: Claim 30 minutes on Code 1a.



Secondary Documentation

- Supports FFP Activities
- Ensures Program Integrity
- Informs Auditor
- Provides documentation of claimable activities in the event that you are no longer with the program.



Secondary Documentation

Include the following:

- Date
- Time spent on activity (start and stop time)
- Description of the activity
- Program name
- Identify: who, what, when, why
- Activity code



Supplemental Documentation

- Daily Logs
- Appointment Books, Calendars
- Meeting Agendas or Minutes, sign-in sheets
- Materials used during the activity/event i.e., referral cards, health fair flyers, brochures etc.



Important Points in FFP Claiming

- Too many variables to list all possible FFP claiming scenarios. Use the Decision Tree to determine if an activity is FFP claimable.
- If Secondary/Supplemental Documentation is not adequately documented, it may not be FFP claimable.
- Reported activities on the Time Study should be reasonable and should consist of both claimable and non-claimable time.
- The DHCS has advised that intent of the FFP program is outreach and referral through initial personal contact. Activities such as Social Networking, e-mail blasts are not claimable FFP activities.



Federal Financial Participation

Questions ?

Federal Financial Participation (FFP)