

How to Add Subcontractors to CMAA Claiming Plans

Counties can subcontract the performance of CMAA to Community Based Organizations (CBOs), Personal Services Contractors (individuals), and Vendors. Subcontractors can only be reimbursable at the 50-percent rate of Federal Financial Participation (FFP). Subcontractor costs reimbursed through CMAA must be paid with valid sources of [Certified Public Expenditure \(CPE\)](#), such as county general funds and state general funds, and counties must ensure that those funds are not also being used to match other federal funds.

CBO Options

1. Counties can contract with a CBO that time surveys. In this option, the CBO would have a CMAA claiming plan indicating who would time survey. CBO must have enough allowable revenue sources to be used as [CPE](#).
2. Counties can contract with a CBO in a CMAA specific contract to [direct charge](#). As an example, if a county were to pay a CBO \$30,000 for performing CMAA Outreach, the \$30,000 cost to the county could be claimed in the county's CMAA claim via a direct charge for Medi-Cal Outreach. This approach does not require that the CBO time survey. However, the county must obtain and maintain documentation from the CBO indicating that the entire \$30,000 is directly related to providing CMAA as agreed to in the contract. An LGA is only eligible for reimbursement of CBO costs that are directly related to providing Medi-Cal eligible activities and/or services stipulated in the contract. The county must fund the contract with an allowable source(s) of [CPE](#).

Personal Services Subcontractor (Individual rather than organization) Options

1. Counties can contract with an individual that will complete a time survey. In this option, the county will add the subcontractor to its claiming plan, provide time survey about the direct charge code(s), and collect a signed Duty Statement from the individual. The county will ensure that it pays the subcontractor for its CMAA claimed hours with an allowable source of [CPE](#). Sample time study contract language can be found [here](#).
2. Counties can contract with an individual for direct charge. In this option, the county will add the subcontractor to its claiming plan, provide training about the direct charge code(s), collect a signed Duty Statement, and the subcontractor will document their time in distinct blocks of time to 1 or 2 CMAA allowable activities. The county will ensure that it pays the subcontractor for its CMAA claimed hours with an allowable source of [CPE](#). Sample direct charge contract language can be found [here](#).

Vendor Options

1. Counties can contract with vendors that provide CMAA-specific services such as online time study platforms and consulting for CMAA claiming. Note: consultants for CMAA activities that only have 1 staff person could be considered Personal Services Subcontractors, but consulting firms with more than 1 staff person, would be considered vendors. Vendors providing CMAA-specific services can be claimed under Code 19 for Performing CMAA/TCM Coordination and Claims Administration and counties can be reimbursed up to 50% of the cost if the vendor is paid from an allowable CPE source. Vendors usually have their own standard contract, but it should detail the CMAA-specific activities they will perform.

Claiming Requirements

- Update the Claiming Unit Functions Grid (CUFG) to include the subcontractor name.
- Add Subcontractors to Activity Sheets for the Codes they are allowed to perform – should match the CUFG. And, attach copies of their contracts as back-up documentation.
- Create and keep copies of signed Duty Statements from CBO staff and Personal Services Subcontractors (not required for vendors) – CMAA codes and title should match the CUFG.
- Provide initial and annual refresher (spring) time survey or direct charge training specific to the code(s) the subcontractor will be using.
 - Training only needs to be provided to CBOs and Personal Services Subcontractors (not required for vendors)
 - Keep signed logs as documentation of training.
 - Training must be provided by the county's LGA Coordinator or an approved Alternate.
- Keep copies of paid invoices from subcontractor as these may be requested during a state desk review.
- Ensure that subcontractors are paid by allowable sources of CPE and collect documentation for audit files. Options include:
 - Keeping documentation of CPE funds used to pay subcontractor invoices. Examples of documentation could also include contracts or funding notices from the entity providing CPE (such as the state or county) or General Ledgers showing payments to subcontractors.

- Signed CPE Certifications from other entities (outside of your county) providing the CPE to the subcontractor. LGA Coordinators also need to sign these Certifications. Or, if county funds are being used as CPE, the county department issuing the funds must attest that those funds are from an eligible CPE source and are not already being used to pull down matching federal funds.
- Examples of allowable CPE sources include:
 - ☐ County General Funds
 - ☐ Mental Health Services Act (MHSA)
 - ☐ Prevention and Early Intervention (PEI)
 - ☐ Child Abuse Prevention, Intervention and Treatment Program (CAPIT)
 - ☐ Differential Response Services (DRS)
 - ☐ Multi-Disciplinary Interview Center (MDIC)
 - ☐ 1991 & 2011 Realignment - Sales Tax & Motor Vehicle License Fees (MVLFF)
 - ☐ Tobacco Tax - Props 56 and 99
 - ☐ First 5 Revenues
 - ☐ Local Tax Dollars
 - ☐ CMAA Revenues earned in prior years
 - ☐ Interest on government funds
 - ☐ State Veterans Affairs: License Plate Fund and Vets Subvention
- For contracts being direct charged, time spent on direct charge activities must be documented/logged if less than 100% of their time is being direct charged. Direct Charge Log Must Include:
 - Identifying subcontractor information
 - Date activity was performed
 - Amount of time spent
 - Total hours paid for day, month, or quarter
 - Activity description
 - If subcontractor invoices include the above information, invoices can serve as the Direct Charge Log.

Adding Subcontractors to the CUFG

- Subcontractors whose costs will be claimed to CMAA must be identified on CUFG with the activity code(s) they are expected to perform.
- Personal Services Contractors must also be included in the total number of CMAA participants (Cell N3 on CUFG).

- Vendors with multiple staff that provide a service should be notated in the CUFG as DIRECT CHARGE Non-SPMP with an “X” rather than a number of staff. An example of this type of contract is CMAA time Survey Software Vendors.
- Two sample CUFG’s are below with various examples of subcontractors.

Name of LGA				Fiscal Year & Quarter																
				8																
Name of Claiming Unit				Number of Staff																
Address																				
Contact Person				Phone Number																
Description of Claiming Unit Functions																				
				NUMBER OF STAFF				MEDI-CAL ADMINISTRATIVE ACTIVITY CODE (ENTER NUMBER OF STAFF UNDER EACH ACTIVITY)												
STAFF JOB CLASSIFICATIONS & SUBCONTRACTORS				SPMP	NON-SPMP	DIRECT CHARGE SPMP	DIRECT CHARGE Non-SPMP	4	6	8	10	12	13	15	16	17	18	19	20	
MAA Claiming Consultant (Personal Services Subcontractor)						1													1	
Public Health Nurse (Personal Services Subcontractor)					1			1	1					1		1				1
Medi-Cal Outreach Specialist (Personal Services Subcontractor)						1		1	1											
Family Resource Center (CBO)							5	5												
Subcontractor - MAA Time Survey Software Vendor							X													X

What is Direct Charge?

- A shortened time survey and claiming methodology
- Staff or Contractors time survey to a maximum of 2 claimable CMAA activities
- Their salaries and benefits or contracted costs are reported separately from staff using the perpetual time survey

Allowable Direct Charge Expenses can include:

- Contracts specific to one or two CMAA activities if it:
 - Describes the claimable activities to be performed
 - Specifies the dollar amount for each claimable activity
 - Does not include Contingency fees

Sample Direct Charge Contract Language (depends on Code(s) assigned)

Program Planning & Policy Development (Code 17) Example

Add to Scope of Work:

In addition to the above stated duties, the Contractor may also provide the following Program Planning and Policy Development for Medi-Cal Services for Medi-Cal Clients and Non-Medi-Cal Clients (Code 17) for the Medi-Cal Administrative Activities (CMAA) Program:

- Development of strategies to assess and increase Medi-Cal system capacity and close Medi-Cal service gaps.
- Analysis of Medi-Cal data related to a specific program or specific group.
- Interagency coordination to improve delivery of Medi-Cal services.
- Examples include implementation of the California Advancing and Innovating Medi-Cal (CalAIM) program and attending meetings with the MCP for X County.

Contractor agrees to document the time spent on these Medi-Cal eligible activities in a monthly log, invoice, and/or calendar.

Add to Fiscal Section:

CERTIFIED PUBLIC EXPENDITURE

The Medi-Cal Administrative Activities (CMAA) direct charge for Program Planning and Policy Development for Medi-Cal Services for Medi-Cal Clients and Non-Medical Clients (Code 17)

portion of this contract is funded by [insert name of state or local funding such as Realignment and Medi-Cal Administrative Activities prior year revenues].

Medi-Cal Outreach (Code 4) Example

Add to Scope of Work:

In addition to the above stated duties, the Contractor may also provide the following Medi-Cal Outreach (Code 4) services for the Medi-Cal Administrative Activities (CMAA) Program:

- Bringing potentially eligible persons into the Medi-Cal system to determine their Medi-Cal eligibility.
- Bringing Medi-Cal eligible people into Medi-Cal services.
- Providing information to Medi-Cal eligible people about Medi-Cal covered services at community events.
- Informing Medi-Cal beneficiaries on how to effectively access, use, and maintain participation in healthcare services under the Medi-Cal program.
- Informing individuals or the general public about the benefits and services that the Medi-Cal program offers and encouraging and referring them to apply for Medi-Cal benefits.
- Providing initial referral assistance to families to Medi-Cal services.

Contractor agrees to document the time spent on these Medi-Cal eligible activities in a monthly log, invoice, and/or calendar.

Add to Fiscal Section:

CERTIFIED PUBLIC EXPENDITURE *(add to fiscal section)*

The Medi-Cal Administrative Activities (CMAA) direct charge for Medi-Cal Outreach (Code 4) portion of this contract is funded by [insert name of state or local funding such as Realignment and Medi-Cal Administrative Activities prior year revenues].

Sample Time Study Contract Language (depends on Code(s) assigned)

Add to Scope of Work:

In addition to the above stated duties, the Contractor may also provide the following Medi-Cal Administrative Activities (CMAA) based upon client need or upon request of the County:

- Medi-Cal Outreach (Code 4): Activities that bring families into Medi-Cal/Health services.

- Referral, Coordination, and Monitoring of Medi-Cal Services (Code 6): Activities that involve making referrals for coordinating and/or monitoring the delivery of Medi-Cal covered services.
- Program Planning and Policy Development (PP&PD) (Codes 15-18): Activities that develop strategies to increase the capacity of the Medi-Cal system and close the gap in Medi-Cal services.
- Training (Code 20): Activities related to providing and attending annual or refresher time survey coding training.
- Contractor agrees to conduct an on-going time study which will identify all time spent on each of the allowable Medi-Cal Administrative Activities, non-claimable activities, and general administration. All non-CMAA related activities shall be time studied to non-CMAA activities such as Other Programs/Activities. Contractor shall complete an online time study in the county's designated Time Study platform by the end of each month.
- Contractor agrees to complete time study training with the County's CMAA Coordinator prior to starting to time study.

CERTIFIED PUBLIC EXPENDITURE (CPE) *(Add to Fiscal Section)*

A portion of this contract is funded by [insert name of state or local funding such as Realignment and Medi-Cal Administrative Activities prior year revenues] which is [state or local] funds that meet the requirements for CPE; thus allowable activities documented in monthly CMAA time studies and expenditures made under this contract can be claimed for CMAA reimbursement.