

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



March 27, 2002

COUNTY FISCAL LETTER (CFL) NO. 01/02-53

TO: COUNTY WELFARE DIRECTORS
COUNTY FISCAL OFFICERS

SUBJECT: COUNTY CLAIMING FOR ADULT PROTECTIVE SERVICES
SOCIAL WORKERS AND SKILLED PROFESSIONAL MEDICAL
PERSONNEL

REFERENCES: CFL No. 92/93-41 AND CALIFORNIA DEPARTMENT OF HEALTH
SERVICES (DHS) MEDI-CAL ADMINISTRATION ACTIVITIES (MAA)
GUIDES AND EXAMPLES

The purpose of this CFL is to provide clarification and instruction for claiming enhanced Federal Financial Participation (FFP) under the Medicaid Program for Skilled Professional Medical Personnel (SPMP).

The California Department of Health Services (DHS) and California Department of Social Services (CDSS) implemented a system to pass-through federal funding (i.e., reimbursement) for claiming of health related Medi-Cal administrative activities performed by County Welfare Departments (CWD). This claiming process allows counties to match federal Title XIX dollars with claimable expenditures for administrative activities reported on the county expense claim using the appropriate FFP rates.

It has come to our attention that some counties may be classifying their Adult Protective Services (APS) social workers as "Medical Social Workers" (MSW), if these caseworkers hold a Master's of Social Work degree and took medical courses while obtaining their degree or interned/worked in a medical facility. Upon meeting this criteria, some counties have claimed enhanced FFP for social workers providing services to Medi-Cal eligible APS clients. It has been suggested that claiming enhanced FFP for such staff is supported by an audit exception upheld for New Jersey and other states, which allowed this specific criterion to be used to claim enhanced FFP for social workers. Some counties have expressed a belief that these audit exceptions would apply in the event of an audit in California.

California operates a specific approved federal claiming mechanism for Medi-Cal

Administrative Activities (MAA), under the terms of a California 1995 federal audit exception settlement. This audit settlement provides the rules for California's county health and welfare departments to claim FFP for their program activities. It is CDSS' position that audit exceptions for other states do not apply to California and would not supersede the 1995 California audit criteria.

Enhanced Federal Financial Participation

When determining whether or not SPMP enhanced claiming is appropriate, the administrative activity being performed is the first consideration. The activity being performed controls whether enhanced FFP claiming is allowed. The status of the employee performing the activity is the second consideration.

The only activities performed by APS caseworkers that are eligible for enhanced FFP are program planning and policy development, as defined in the MAA Guides and Examples, for Medi-Cal eligible clients. In addition, program policy and development activities may only be claimed, at the level of SPMP, if the worker performing the activity meets the requirements to be an SPMP.

SPMP Requirements

The requirements defined in the Social Services Function Program Code Descriptions and CFL No. 92/93-41 for a county worker to be considered SPMP eligible are as follows:

- Must have completed a two-year or longer program leading to an academic degree or certificate in a medically related profession.
- Must possess a medical license or certificate issued by a recognized national or state medical licensure or certifying organization or a degree in a medical field issued by a college or university certified by a professional medical organization (e.g., licensed clinical social worker).
- Must be in a position that requires their professional medical knowledge and skills as evidenced by position descriptions, job announcements, or job classifications; and
- Must be CWD or other county agency staff contracted to perform allowable activities.

With regard to whether or not APS social workers with a master's degree qualify as SPMPs, we provide the following information:

- In order for a caseworker to be considered an SPMP, they must be an employee of a public agency and have completed a two-year or longer program leading to an

academic degree or certification in a medically related profession. They must also perform duties described in their position description or duty statement that require medical knowledge and skills.

- A person holding a Master's of Social Work degree is not considered as having the professional education and training in the field of medical care or appropriate medical practice. There must be a concentration of medical course work for the field to be health-related.
- In order for a social worker holding a Master's in Social Work to meet the requirements of an SPMP, a concentration of coursework in health care, including fieldwork must be completed. Fieldwork may be considered part of a two-year program that leads to a degree or certificate in a medically related profession, but internships or on-the-job training are not given the same consideration as course work and cannot substitute for it.
- Courses that are considered to be medical or have a health-related focus are usually directed toward the delivery of primary care and result in the issuance of a certificate, license, or degree in a medically related profession (e.g., public health nurses).

Claiming Instructions

When a county APS agency, or any other contracted agency has SPMP qualifying employees who perform an eligible activity, SPMP enhanced funding may be claimed. Services rendered by an SPMP must be to a Medi-Cal eligible individual and be a qualifying activity in order to be claimed and reimbursed at the enhanced FFP level (i.e., 75%). Counties should carefully record the time SPMP staff spends performing enhanced FFP activities from the time worked on other activities that are reimbursed at the non-enhanced rate (i.e., 50%).

Enhanced FFP for SPMP may also be claimed to other programs outside of APS (i.e., In-Home Supportive Services [IHSS], County Services Block Grant [CSBG], Child Welfare Services [CWS], and Family Preservation Program [FFP]). With each of these programs, counties are required to employ the same rules in claiming the enhanced FFP. Activities must meet the standard of an allowable activity and the person performing these activities must also meet the California criteria for SPMP.

Program Codes

The relevant program codes, under the social services function, that may be used to claim

enhanced FFP for SPMP are as follows:

1020 IHSS-SKILL-PROF-MED PERS
1130 CSBG-SPMP
1380 CWS-SPMP
1590 FPP-SPMP
5710 APS-SPMP-RESPONSE
5720 APS-SPMP-CASE MANAGEMENT

Should you have any questions regarding information provided in this CFL, please contact the Fiscal Policy Bureau at (916) 657-3440.

***Original Document Signed by
MARGE DILLARD on 03/27/02***

MARGE DILLARD, Chief
Fiscal Systems and Accounting Branch