


DEPARTMENT OF HEALTH AND HUMAN SERVICES
OFFICE OF DIRECTOR

ACTION REFERRAL

TO	DATE
Walshrap	1-4-12

DIRECTOR'S USE ONLY	ACTION REQUESTED
1. LOG NUMBER 001248	<input type="checkbox"/> Prepare reply for the Director's signature DATE DUE _____ <input type="checkbox"/> Prepare reply for appropriate signature DATE DUE _____ <input type="checkbox"/> FOIA DATE DUE _____ <input checked="" type="checkbox"/> Necessary Action
2. DATE SIGNED BY DIRECTOR <i>cc: Mr. Treck, Depo, Chris file</i> 	

APPROVALS (Only when prepared for director's signature)	APPROVE	* DISAPPROVE (Note reason for disapproval and return to preparer)	COMMENT
1.			
2.			
3.			
4.			

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop C2-26-12
Baltimore, Maryland 21244-1850

CENTERS for MEDICARE & MEDICAID SERVICES

Center for Medicaid and CHIP Services

December 20, 2011

JAN 03 2012

Anthony Keck, Director
SC Dept of Health and Human Services
P.O. Box 8206
Columbia, SC 29202-8206

Department of Health & Human Services
OFFICE OF THE DIRECTOR

Subject: Approval to Incorporate ARDC Funding Request in the MFP Supplemental Budget Submission

Dear Mr. Keck:

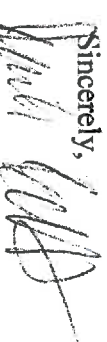
This letter is to inform you that we have approved your request to include \$369,201 in ADRC funding in the annual Money Follows the Person (MFP) supplemental budget request submission contingent upon approval of the Director/Deputy Director of the Lt. Governor's Office on Aging by January 9, 2012. The Administration on Aging (AoA) and the Centers for Medicare and Medicaid Services (CMS) congratulates you on your successful ADRC application.

The annual MFP supplemental budget request is due on January 31, 2012. In addition to your projected administrative and service expenditures for 2012, you should incorporate the ADRC funding in the Worksheet for Proposed Budget, ADRC budget line. Please note that your ADRC funding is not included in the 20% percent administrative ceiling (see attached policy dated September 1, 2011). CMS anticipates that by April 2012, States will receive one Notice of Award (NoA) that will include the annual supplemental and ADRC funding.

During the ADRC funding performance period of April 2012 through April 2014, the ADRCs will be encouraged to work with AoA and CMS through a collaborative process with other grantees, federal agency staff, TA providers and evaluation contractors to define a core set of expectations for the on-going role of ADRCs in the MFP program.

Thank you for your dedicated efforts in implementing this Demonstration Program. We remain steadfast in our commitment to provide you with the technical assistance and support to accomplish the goals and objectives of the grant. If you have any questions, please do not hesitate to contact your CMS project officer.

Sincerely,



Jennifer Burnett, Director
Division of Community Systems Transformation

Enclosure

cc: Adam Hiers

Policy Guidance

Administrative Claiming / Administrative Claiming CAP

(New and combined guidance as indicated below)

Revised and effective: September 1, 2011



This policy guidance replaces the following previous guidance:

- Expensing State Project Director's, Salary & Fringe Benefit Cost, July 30, 2009
- Administrative Claiming In Support of the MFP Grants Reimbursed at 100%, Revised March 25, 2010
- Opportunity for Enhanced Match for Information Technology (IT) Programming Modifications, April 3, 2008

Please remove these policies from your Operating Manual and discard them. They will also be removed from the TA Website and replaced with this new Policy Guidance.

Purpose:

This policy guidance will integrate the standing multiple policy guidance documents allowing reimbursement at 100% Federal Medical Assistance Percentage (FMAP) under the MFP Program. This policy guidance will also introduce the opportunity for States to be reimbursed at 100% FMAP for pre-transition activities as defined in this guidance. This opportunity is now available to States at their discretion. States are not required to add or change any project in which they have received approval for 100% reimbursement, but may consider the multiple opportunities of the availability of Administrative claim reimbursement described in this guidance. A description of a CAP on total Federal funds that may be reimbursed for administrative claiming is codified.

- **Definition of MFP Enrollee:** When an individual in a qualified institution (see *Qualified Inpatient Facility, April 1, 2011*) signs a consent form to become an MFP participant, the individual is enrolled in the MFP program. Enrollee does not refer to enrolling in a waiver or State Plan Services, only those that enroll in the MFP program.

Administrative Claiming Cap:

The total amount of Grant Funding for Administrative Claims Reimbursement is limited. Grantees are limited to no more than 20% (CAP) of the total expenditure estimates for administrative activities from the Grantee's Worksheet for Proposed Budget (WPB). To determine if your Budget is within the 20% CAP:

1. Total Expenditure Estimate Determination: Using the WPB *Demonstration Budget Summary*, Total Costs column, total dollars amount (the total estimated expenditures both Federal and State amounts for Qualified Home and Community Based, Demonstration and Supplemental Services and the Administrative activity estimates for all Administrative-- Normal, 75%, 90% and 100% administrative requests).

2. Determine the State's countable administrative activity estimates by adding together the Administrative activity expenditure estimates from the *Demonstration Budget Summary*, Total Costs column for all Administrative-- Normal, 75%, 90% and 100% administrative requests and then subtract from that amount all approved funding provided by the MFP grant for the AoA/CMS initiatives for ADRCs and/or approved administrative projects to implement MDS 3.0 and the amount for Federal Evaluation estimates.
3. Take that amount, which is the remaining administrative activity expenditure estimates after subtracting the AoA/CMS, Federal Evaluation and MDS 3.0 approved funding dollars and divide that total by the *Demonstration Budget Summary*, Total Costs column, total dollar amount #(1)- calculate as a percentage.
4. States comply with the CAP if the total of the administrative activity expenditures is no more than 20% of the *Demonstration Budget Summary*, Total Costs column, total dollars. States may request less than 20%, but no more than the 20% CAP.
5. The MFP program may allow a grantee to exceed the CAP to fund new and innovative rebalancing initiatives. If your grant funding includes these approved initiatives at the time of the release of this MFP policy guidance, CMS will consider those in review of your CAP determination.
6. All MFP administrative funding requests are subject to the approval of the State's CMS Project Officer.

Administrative claiming reimbursed at 50%, 75%, 90% FMAP

Grantees must adhere to Code of Federal Regulations, CFR42§43.15 "Rates of FFP for administration," with the exception of submission and approval of expenses that this policy guidance provides that are eligible for 100% administrative reimbursement under the grant demonstration capped at 20% as described above. The Worksheet for Proposed Budget must describe any request for administrative reimbursement at these reimbursement rates in a Budget Narrative supporting the request. The request must be broken out by what administrative functions/projects will be funded and broken out by the year of funding request.

Opportunities for Administrative claiming reimbursed at 100% FMAP

Initial Requests:

All requests for administrative reimbursement at 100% must include the following:

- A detailed justification referencing each project / item that the State is requesting to fund and how the request relates to one or more of the State's benchmarks in the Operational Protocol. This includes all positions requested except the Project Director and Assistant Project Director positions.
- A list of all projects/items requested for reimbursement with a yearly total matching the same years covered in the Worksheet for Proposed Budget, and a total of all requests. Remember that the request for reimbursement for administrative claims, including approved 100% projects / items cannot exceed the 20% CAP.

ITEMS THAT MAY BE REIMBURSED

Personnel:

The following positions may be full or part time State FTE positions, or contractual positions. The reimbursement will be for both salary and fringe benefits.

In the Justification for reimbursement for positions, grantees must include:

- A position description
- An explanation of how the position/s will help your State meet your benchmarks
- A budget estimate outlining the salary and fringe cost for each position requested by budget year.

Examples of Positions that may be requested:

- Project Director
- Deputy or Assistant Project Director
- Housing Services and Resources Specialist
- Information Management Specialist (support for data and reporting requirements)
- Community Living Specialists (state broker role as opposed to hands-on transition coordinator)
- Behavioral Health Specialists
- Quality Assurance positions
- Employment Specialist
- Other positions that may be needed by a State not listed here, with the appropriate justification and other submission requirements.

Travel (in state, out-of-state):

Each request must include a description of the travel, a justification and a budget. The travel should be broken down by number of persons, number of trips, and the estimated cost of those trips in a budget format.

- State staff (State employees & Contractual employees) travel for monitoring, case management, technical assistance, outreach, national meetings, and
- Stakeholder travel for participation in advisory council meetings.

Training:

Each request must include a description of the training including the number of individuals to be trained, a justification, and a budget.

- State staff
- Transition coordinators, CILs, AAAs, etc
- Providers
- Advocates
- People with disabilities and their families
- Nursing home, ICF/MR, PRTF & hospital staff

Outreach/Marketing:

Each request must include a description of the Marketing/Outreach project including a justification and a budget.

- Materials
- Public information /communication initiatives

IT Infrastructure:

IT infrastructure projects that support the financial and data reporting requirements to administer the program. See Attachment "1" for detailed request instructions.

Pre-transition Activities

Previous Guidance on Transition Activities provided in the institution:

To meet the guidance from CMS Olmstead Letter #3 and prior MFP policy guidance, expenditures for pre-transition activities for those individuals who sign a consent form and are enrolled in the MFP program, but do not transition out of the institution can be reimbursed through administrative claiming at 50% FMAP for up to 180 days of activities.

New Guidance:

The MFP program will allow grantees to claim pre-transition activity expenditures at 100% FMAP reimbursement within the overall 20% administrative expenditure CAP.

- For enrollees who don't transition out of the institution after pre-transition activities have been provided, and;
- The MFP program has ceased providing transition activities due to the individual not being prepared to discharge out of the institution (remains in the institution) and is therefore disenrolled from the MFP program.
- This may include, for example: case management, pre-transition activities, roommate matching, home modifications, Peer-to-Peer activities.
- In order to receive approval to fund these pre-transition services for individuals who do not transition out of the institution at 100% administrative reimbursement, grantees must provide the following documentation:

1. Justification for the request
2. Activities to be covered and the cost per year for each activity for each calendar year period
3. A detailed description of how the activity is delivered, by contracted provider or State personnel
4. The projected number of individuals expected to enroll, but not transition.

Other:

Other administrative project costs that are not listed but can be justified to enhance the Transition and/or Rebalancing effort, to meet or exceed benchmarks, to build infrastructure and/or to increase the use of HCBS and decrease the use of institutional services may be requested. For example, projects to implement MDS 3.0 and work with the local contact agencies such as ADRCS. *** Note: ADRC-AoA/CMS sub-grant award and approved MDS 3.0

Implementation Project funding will not be counted toward the 20% CAP. The following are required:

- A justification with a detailed description.
- A Line Item Budget and Budget narrative for each year requested.

Grantees must submit the Worksheet for Proposed Budget (WPB) each calendar year. A new or updated 100% ADMIN request is required that details the budget request for each calendar year. For each item/project requested, there should be a justification with a detailed description and a Line Item Budget and Budget Narrative for each year requested.

Grantees are required to report approved administrative expenditures quarterly on the MFP Demonstration Financial Reporting Form "C" (of the ABCD Form) under column marked "Other 100%" and provide a written narrative on Form "D" describing the item(s) and or position(s) claimed at 100%.

Brenda James - Fwd: Re: Log 248

From: Teeshla Curtis
To: Brenda James
Date: 01/10/2012 10:11 AM
Subject: Fwd: Re: Log 248
Attachments: Letter of Acceptance--LGOA.PDF

Brenda,

Please close Log 248. Not action necessary (see response below).

Thanks,
Teeshla

>>> Adam Hiers 1/9/2012 11:29 AM >>>
This is the award letter for a grant we wrote to establish a working relationship between the MFP program and the ADRCs here in the state. There is no response needed. CMS was waiting on approval from the Lt. Gov's Office on Aging. Here is the LGOA's letter of acceptance that has been sent to our CMS MFP project officer. The MFP staff are currently working on the budget submission.
Thanks,

Adam Hiers, LMSW
Home Again Program Coordinator
South Carolina Department of Health and Human Services
1801 Main St.
Columbia, SC 29201
Office: (803) 898-2697
Fax: (803) 255-8209
email: hiersj@scdhhs.gov

>>> Teeshla Curtis 1/9/2012 11:05 AM >>>
Please see the attached log. It is a letter from CMS regarding Approval to Incorporate ARDC Funding Request in the MFP Supplemental Budget Submission. Is this a log that requires a response? From the letter, I understand that MFP supplemental budget request is due January 31. Just let me know if any action is necessary and I will inform Brenda.

Thanks,
Teeshla



State of South Carolina
Office of the Lieutenant Governor

Ken Ard
Executive Director

Office of Aging
Tony Keister
Director

January 5, 2012

Centers for Medicaid/Medicare Services
c/o Nicole Nicholson
7500 Security Boulevard, C2-21-15
Baltimore, Maryland 21244-1850

Dear Ms. Nicholson:

On behalf of the Lieutenant Governor's Office on Aging (LGOA), I am giving my approval of the acceptance of the South Carolina MFP Supplemental Grant and Budget for our ADRCs.

The LGOA and the ten ADRCs are prepared to provide expertise, support, outreach and Options Counseling training for this grant.

We look forward to partnering with SCDEHS and CMS in an effort to rebalance the delivery of long-term services and supports in South Carolina.

Sincerely,


Tony Keister
Director

