

EFMAP & FREED- UP MATCH

GUIDELINES FOR COUNTY BOARDS
OF DEVELOPMENTAL DISABILITIES

BOARD AS FUNDER

VS.

BOARD AS PROVIDER

BOARD AS FUNDER

- THESE GUIDELINES APPLY WHEN CBDDs PROVIDE THE LOCAL MATCH FOR WAIVER SERVICES (E.G. HPC, DAY) RENDERED BY PRIVATE PROVIDERS.
- IN THIS SCENARIO, CBDDs DO NOT RECEIVE ANY ACTUAL EFMAP \$\$\$.
- THUS, CBDDs ONLY NEED TO TRACK THE “FREED-UP MATCH” GENERATED FROM EFMAP IN THIS SCENARIO.

BOARD AS FUNDER

- TO FACILITATE THE TRACKING OF THE “FREED-UP MATCH, CLAY WILL SEND AN “INVOICE SPREADSHEET” EVERY QUARTER OF THIS BIENNIUM.
- THE SPREADSHEET GIVES QUARTERLY ESTIMATES OF “FREED-UP MATCH” AMOUNTS FOR EACH CBDD (*SEE COLUMN S*).
- CBDDs SHOULD TRACK ALL “FREED-UP MATCH” *INTERNALLY*, (SO IT CAN BE EASILY IDENTIFIED BY OUTSIDE AUDITORS).

BOARD AS FUNDER

- CBDD CAN USE THIS “FREED-UP MATCH” \$\$\$ FOR ANYTHING AUTHORIZED UNDER ORC 5126.
- MUST USE THE “FREED-UP MATCH” \$\$\$ IN A “REASONABLE TIME PERIOD”
- CURRENT INTERPRETATION OF A “REASONABLE TIME PERIOD”: NOW UNTIL END OF JUNE 2011. CBDDs NEED TO SPEND THIS ON AN ONGOING BASIS.

BOARD AS PROVIDER

- THESE GUIDELINES APPLY WHEN CBDDs ACTUALLY PROVIDE SERVICES
- IN THIS SCENARIO, THE CBDD IS PAYING UP FRONT FOR SERVICES, THEN IS REIMBURSED THE COST FOR THEIR PROVISION.
- FEDERAL STIMULUS CREATES A GREATER % OF FEDERAL DOLLARS IN THE REIMBURSEMENT (I.E. ENHANCED FMAP).

BOARD AS PROVIDER

- IN THIS SCENARIO, CBDD SHOULD TRACK EFMAP REVENUE & EXPENDITURES.
- CBDD SHOULD ALSO TRACK “FREED-UP MATCH” REVENUE & EXPENDITURES.
- TRACKING OF EFMAP & FREED-UP MATCH CAN BE DONE USING THE MBS REPORTS.

BOARD AS PROVIDER

- EACH WEEK, CBDD SHOULD ADD UP THE AMOUNT OF EFMAP DISPLAYED ON MBS (EXCLUDING MARTIN)
- THEN THE CBDD SHOULD CALCULATE THE “FREED-UP MATCH” AMOUNT.
- THE “FREED-UP MATCH” AMOUNT IS EQUAL TO AMOUNT OF EFMAP GENERATED (EXCLUDING MARTIN).

BOARD AS PROVIDER

- CBDD SHOULD SET UP A SEPARATE FUND/ACCOUNT/LINE ITEM WITH COUNTY AUDITOR FOR EFMAP \$\$\$.
- EFMAP SHOULD THEN BE SPENT ON CONTINUING EXPENSES DIRECTLY ASSOCIATED WITH MEDICAID (E.G. WAIVER MATCH).

BOARD AS PROVIDER

- CBDD SHOULD USE THEIR INTERNAL “FREED-UP MATCH” METHOD TO TRACK THE “FREED-UP MATCH” AMOUNT CALCULATED THROUGH MBS.
- CBDD CAN SPEND THIS “FREED-UP MATCH” REVENUE IN ANYWAY AUTHORIZED BY ORC 5126.
- BOARD MUST THEN SPEND IT IN A “REASONABLE TIME PERIOD”.

RETROACTIVE PAYMENTS

- RETROACTIVE EFMAP: PENDING BECAUSE, (PRIOR TO FY 2010) CBDDs WERE REIMBURSED FOR CBDD SERVICES AT PRE-ENHANCED FMAP LEVELS.
- RETROACTIVE “FREED-UP MATCH”: PENDING BECAUSE (PRIOR TO 2010) CBDDs PAID MORE LOCAL MATCH FOR PRIVATELY PROVIDED SERVICES THAN WAS ULTIMATELY NEEDED (DUE TO ARRA).
- ODODD WILL SEPARATELY IDENTIFY THE EFMAP AND “FREED-UP MATCH” PORTIONS OF THE RETROACTIVE PAYMENTS.

SMALL COUNTIES

- SOME CBDDs DON'T PROVIDE MATCH (E.G. STATE ALLOCATION SUFFICIENT) & CAN'T SPEND EFMAP ON WAIVER MATCH.
- IF THIS IS THE CASE, CBDD SHOULD USE EFMAP FUNDS TO PAY A SHARE OF SALARIES.
- IF CBDD SPENDS EFMAP ON SALARIES, THE FUNDS SPENT SHOULD BE APPROPRIATED IN DIRECT PROPORTION TO THE AMOUNT OF MEDICAID ELIGIBLE SERVICES PERFORMED BY THE CBDD.

COGS

- COGS RECEIVE TCM FUNDS FROM CBDDs FOR MEDICAID ELIGIBLE SERVICES THE COGS PROVIDE
- WHEN CBDDs BILL ODODD FOR THE TCM SERVICES PROVIDED BY THE COGS, THE CBDD MUST TRACK THE RECEIPT OF THE COG TCM EFMAP FUNDS FROM THE STATE AND THE EVENTUAL TRANSFER OF THE EFMAP FUNDS TO THE COGS.

COGS

- COGS MUST THEN INTERNALLY TRACK THE EFMAP REVENUE THEY RECEIVE.
- COGS MUST ALSO SPEND THE EFMAP ON EXPENSES DIRECTLY RELATED TO MEDICAID.
- *EXAMPLE*: COG SPENDING EFMAP TO PAY A SHARE OF SALARIES THAT IS PROPORTIONAL TO THE AMOUNT OF MEDICAID ELIGIBLE SERVICES THEY PROVIDE

COGS

- SOME COGS PAY WAIVER MATCH TO ODODD FOR THEIR CBDDs.
- COGS SHOULD USE CLAY'S INVOICE SPREADSHEET TO IDENTIFY THE AMOUNT OF FREED-UP MATCH TO BE SPENT AND TRACKED FOR EACH SEPARATE COUNTY.

ADMINISTRATIVE COSTS

- SPENDING EFMAP ON WAIVER MATCH IS THE LEAST RISKY OPTION.
- BUT, IT *MAY* BE POSSIBLE TO SPEND IT ON ADMINISTRATIVE COSTS *DIRECTLY RELATED TO MEDICAID*.
- IN THIS CASE, SOME KIND OF ALLOCATION METHODOLOGY WILL BE NEEDED TO DISPLAY THAT EFMAP IS SPENT ON COSTS DIRECTLY RELATED TO MEDICAID.

ODODD ARRA
SUBRECIPIENT
MONITORING

REVIEW PROCEDURES

SUBRECIPIENT MONITORING

REVIEW PROCEDURES

- SEVERAL COUNTY BOARDS WILL BE SELECTED EACH QUARTER.
- INITIALLY, WE WILL REQUEST AN EMAIL SUMMARY OF HOW EFMAP AND FREED-UP MATCH ARE BEING TRACKED AT THE BOARD INCLUDING:
 - A DESCRIPTION OF RECORDS MAINTAINED AND INTERNAL CONTROLS ESTABLISHED.
 - SAMPLE RECORDS WHICH WE MAY REQUEST.

SUBRECIPIENT MONITORING

REVIEW PROCEDURES

- WE WILL REQUEST DOCUMENTATION OF QUARTERLY ACTIVITY FOR EFMAP AND FREED-UP MATCH.
- WE MAY REQUEST SUPPORT FOR RECEIPTS AND/OR DISBURSEMENTS OF EFMAP AND FREED-UP MATCH ALLOCATION AND DISBURSEMENTS.

SUBRECIPIENT MONITORING

REVIEW PROCEDURES

- WE WILL REVIEW RAINY DAY/RESERVE FUND BALANCES FOR INCREASES.
- WE MAY REQUEST SUPPORT FOR SERVICE CLAIMS AT THE END OF EACH STATE FISCAL YEAR.

SUBRECIPIENT MONITORING

REVIEW PROCEDURES

- WE REQUEST EACH COUNTY BOARD EMAIL US THE NAME OF A DESIGNATED CONTACT PERSON AND THE DESIGNEE'S PHONE NUMBER AND EMAIL ADDRESS AS SOON AS POSSIBLE.
- EXCEPTIONS WILL BE COMMUNICATED TO THE BOARD.

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