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Department of Health Care Services



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PPL No. 09-023

TO: All Local Governmental Agency Coordinators for  
Targeted Case Management Programs

SUBJECT: Guidance regarding CMS 2237-F rescission for Targeted Case  
Management Programs

This Policy and Procedure Letter (PPL) is notification of how the partial rescission of CMS 2237–F affects Public Guardian and Adult Probation TCM programs.

The partial rescission of CMS 2237–F removed explicit language eliminating federal financial participation (FFP) for Adult Probation and Public Guardian programs. However, the language citing FFP is not available “when the case management activities constitute the direct delivery of underlying medical, educational, social, or other services”, still remains. CMS has not yet provided guidance for how these new rules will be interpreted. Therefore, DHCS advises LGAs that any claiming for TCM services performed for the Adult Probation and Public Guardian target populations after June 20, 2009, is at the LGA’s own risk.

The Department will advise all LGAs of further guidance when it is available.

If you have any questions regarding this PPL, please contact Tracy Albano at [Tracy.Albano@dhcs.ca.gov](mailto:Tracy.Albano@dhcs.ca.gov) or by telephone at (916) 552-9538.

Sincerely,

**Original Signed by Elizabeth Touhey**

Elizabeth Touhey, Chief  
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