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GAVIN NEWSOM  
GOVERNOR

DATE: March 24, 2020

**PPL 20-009**  
*Revised*

TO: Local Governmental Agency (LGA) Coordinators for the Targeted Case Management (TCM) Program

**SUBJECT: Department of Health Care Services' (DHCS') Directive for TCM Encounters Performed during State of Emergency**

The purpose of this Policy and Procedure Letter (PPL) is to provide guidance to the LGAs participating in the TCM program regarding the claiming of TCM encounters performed during the State of Emergency due to the outbreak of the novel coronavirus known as COVID-19.

### **Current Face-to-Face TCM Encounter Process**

Per Attachment 4.19-B of the California Medicaid State Plan (State Plan), “an ‘encounter’ is defined as a face-to-face contact or a telephone contact in lieu of a face-to-face contact when environmental considerations preclude a face-to-face encounter for the purpose of rendering one or more targeted case management service components by a case manager.” (State Plan, at p. 5d, ¶ A.1.b.)

When environmental considerations preclude a face-to-face encounter, DHCS requires that LGAs include the environmental considerations in the client case record documentation. (TCM Provider Manual, at p. 9-1). The documentation must state the environmental situation and the reason why the encounter could not be performed face-to-face, in addition to the remaining encounter details.

### **TCM Encounters Provided During a State of Emergency**

On March 4, 2020, Governor Newsom declared a State of Emergency in California as a result of the threat of COVID-19 stating, among other things, “state and local health departments must use all available preventative measures to combat the spread of COVID-19 . . . to prepare for and respond to any potential cases and the spread of the virus.” The Governor’s Executive Order No. N-25-20 signed on March 12, 2020 stated, “[a]ll residents are to heed any orders and guidance of state and local public health officials, including but not limited to the imposition of social distancing measures, to control the spread of COVID-19.” Further, the Governor’s Executive Order No. N-33-20 signed on March 19, 2020 ordered all residents of California “to stay home or at their

place of residence except as needed to maintain continuity of operations of the federal critical infrastructure sectors" or additional sectors designated by the State Public Health Officer.

DHCS is taking immediate action consistent with the above declaration and considers the COVID-19 outbreak to meet the criteria for an environmental consideration that precludes a face-to-face encounter, and directs LGAs to conduct TCM encounters in a non-face-to-face manner as detailed above except when the LGA determines, on a case-by-case basis, that face-to-face contact is necessary.

This PPL does not limit or restrict LGAs that require face-to-face encounters from conducting the encounter as deemed necessary by the case manager. LGAs may allow their case managers to continue conducting encounters face-to-face as necessary and upon the LGA's determination that a non-face-to-face contact is not a viable option. In all instances, DHCS encourages LGAs to take the appropriate precautions to protect themselves and their community's health, and, when possible, conduct a non-face-to-face encounter during this State of Emergency.

### **Requirement for Case Record Documentation for Non-Face-to-Face Encounters**

LGAs are required to maintain the same standard of documentation as detailed in Section 9 of the TCM Provider Manual related to billable encounters. The LGA must ensure that the documentation for all non-face-to-face encounters resulting from the COVID-19 outbreak indicate the environmental situation that prevented the face-to-face visit, and how the encounter was performed in full detail. Each encounter's client case record must indicate a county public health department or State of California directive regarding the COVID-19 outbreak and all other required information for a billable encounter per the TCM Provider Manual.

### **Termination of State of Emergency**

This PPL will cease to be in effect upon the termination of the State of Emergency, at which time LGAs must immediately resume performing face-to-face encounters except as detailed in the TCM Provider Manual when environmental considerations continue to preclude face-to-face contact. DHCS will issue a PPL notifying all LGAs of the exact date the State of Emergency has ended.

Please contact DHCS at [dhcs-tcm@dhcs.ca.gov](mailto:dhcs-tcm@dhcs.ca.gov) with any questions regarding this PPL.

Sincerely,

Shelly Taunk, Chief  
County Based Claiming and Inmate Services Section