



State of California—Health and Human Services Agency
Department of Health Care Services



GAVIN NEWSOM
GOVERNOR

DATE: November 10, 2020

PPL No. 20-052

TO: All Local Educational Agency (LEA),
Local Educational Consortia (LEC), and
Local Governmental Agency (LGA) Coordinators in the
School-Based Medi-Cal Administrative Activities (SMAA) Program and
LEA Medi-Cal Billing Option Program

SUBJECT: Claiming Targeted Case Management (TCM) Costs for the School-Based
Medi-Cal Programs

This Policy and Procedure Letter (PPL) provides guidance to stakeholders participating in both the Local Educational Agency Billing Option Program (LEA BOP) and SMAA Program concerning the options available to LEAs for claiming the costs associated with TCM services.

State Plan Amendment (SPA) 15-021, approved by the Centers for Medicare and Medicaid Services on April 27, 2020, integrated the Random Moment Time Survey (RMTS) process into LEA BOP. RMTS is a common cost allocation methodology used to identify reimbursable costs and capture the amount of time staff spend providing Medi-Cal services. The RMTS process also helps to ensure that Time Survey Participant (TSP) costs are allocated correctly between LEA BOP and the SMAA Program in order to avoid duplicate billing. Accordingly, both LEA BOP and SMAA Program participants must comply with the RMTS process, and meet each program's requirements in order to participate and to receive federal financial participation.

SPA 15-021 also reinstated TCM services as a covered service available to students under the LEA BOP with an Individualized Education Plan or Individualized Family Service Plan¹, employing a new reimbursement methodology within LEA BOP.

In order to prevent duplicate billing of TCM services through the SMAA Program and LEA BOP, LEA coordinators must choose how they will bill TCM services from one of the following options:

¹ Note that SPA 16-001, approved by CMS on October 22, 2020, with an effective date of January 2, 2016, expands access to federal Medicaid funds for LEAs that provide TCM services to Medicaid beneficiaries outside of special education for those covered by an Individualized Health and Support Plan (IHSP) or a "Care Plan"¹.

1. Claim TCM costs through the LEA BOP only (The LEA cannot bill SMAA for those TSPs)

- LEA BOP TCM TSPs will appear in Participant Pool 1 and must have a valid TCM Certification Statement that is completed each quarter.
- TCM TSPs must be properly identified in the RMTS System with *TCM following their official job title.
- The TCM Certification Statement will identify all Participant Pool 1 staff that the LEA intends to bill for TCM services under the LEA BOP.
- LEAs will submit interim claims through the Fiscal Intermediary (FI) for all TCM services meeting the LEA BOP billing requirements.
- Participant Pool 1 TSP costs are the only costs allowable to be included on the LEA BOP Cost and Reimbursement Comparison Schedule (CRCS).
- In order for costs to be included on the CRCS for a particular quarter, the TSP must have been identified on the certified Participant Pool 1 TSP list for that quarter.
- For any practitioners that the LEA identifies on the quarterly TCM Certification Statement, the LEA **must** remove these practitioners' costs from the SMAA invoice for the respective quarter. This will ensure that LEAs do not receive duplicate reimbursement for TCM services.
- RMTS moments from TCM certified TSPs must not be coded to codes 8, 10, or 12.
- For more information on the requirements for TCM practitioners, TCM certification, and claiming TCM costs through the LEA BOP, please refer to PPL 20-033.
- Please note: To choose this option, the LEA must participate in the LEA BOP and meet the requirements to bill for TCM services in the LEA BOP.

2. Claim TCM costs through SMAA Program only - Participant Pool 1 (The LEA chooses to claim under SMAA rather than LEA BOP)

- All direct service practitioners will appear in Participant Pool 1. No TCM Certification Statement is required.
- LEAs will submit their LEA BOP interim claims for Participant Pool 1 TSPs through the FI for allowable direct services, **except** for TCM services. LEAs choosing this option are not eligible to receive interim reimbursement for TCM services under the LEA BOP. Claims submitted through the LEA BOP will be for **non-TCM services only**, such as assessments, nursing treatment services, psychology/counseling treatment services, etc.
- Participant Pool 1 practitioner costs will be included on the LEA BOP CRCS. Interim reimbursement included on the CRCS will **not** include any TCM service reimbursement for Participant Pool 1 practitioners that choose this option.

- Participant Pool 1 practitioner costs must be included on Tab 5 of the SMAA invoice (Payroll Data - Participant Pool 1).
 - Please note: To choose this option, the LEA must participate in both the SMAA program and the LEA BOP.
3. Claim TCM costs through the SMAA Program only- Participant Pool 2 (The LEA chooses to claim under SMAA Only – Not under LEA BOP)
- Direct service practitioners not approved for Participant Pool 1 that provide SMAA activities will appear in Participant Pool 2 under either Job Classification #3 or #4 per the 2019 SMAA Manual.
 - Participant Pool 2 practitioner costs are not eligible to be included on the LEA BOP CRCS. The LEA should not receive interim reimbursement through the LEA BOP for Participant Pool 2 TSPs.
 - Participant Pool 2 practitioner costs must be included on the SMAA invoice on Tab 5.
 - Please note: To choose this option, the LEA must participate in the SMAA program.

For more information on the requirements to claim TCM services through LEA BOP, please refer to PPL 20-033 (Reinstatement of TCM Claiming through LEA BOP).

If you have questions concerning this PPL, please contact DHCS by e-mail at SMAA@dhcs.ca.gov.

Sincerely,

ORIGINAL SIGNED BY

Jacob Mills, Chief
School-Based Claiming Services Section