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PPL 16-014

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

SUBJECT: **TCM Program Encounter Log; Requirements, Best Practices, and Current Issues**

Recent TCM programmatic site reviews conducted by the Department of Health Care Services (DHCS) revealed that some LGAs have not been properly maintaining the TCM Encounter Logs in regards to program requirements. This Policy and Procedure Letter (PPL) restates the requirements for the TCM Encounter Log for LGAs participating in the TCM Program.

Background

To accurately report costs in the TCM Cost Report, LGAs must properly maintain their TCM Encounter Log and correctly submit information in the TCM System. (The TCM System is an online web-based system that the LGAs use to claim for reimbursement for providing TCM services and can be accessed at https://tcm.dhcs.ca.gov/tcm/Pages/index_login.jsp.)

LGAs are required to maintain a TCM Encounter Log to keep a listing of all the encounters (claimable and unclaimable client interactions) in their jurisdiction. The LGA Coordinator uses the encounter log information to enter encounters into the TCM System and submit invoices based on the date of service and target population. The TCM System verifies the following information:

- Medi-Cal eligibility of TCM encounters through the Medi-Cal Eligibility Data System (MEDS),
- Duplicative encounters,
- Invoices submitted within the 12 month claiming deadline, and
- Valid case manager National Provider Identifier (NPI).

After the TCM System completes all appropriate verifications on the encounter information, DHCS staff further verifies the claims (invoices submitted by the LGAs) to either approve or deny them. The information reported in the TCM System is used to develop the TCM Cost Report.

TCM Encounter Log Requirements

The TCM Encounter Log is used by the LGA to record the necessary information required to compile the LGA's claim for federal reimbursement. A suggested TCM Encounter Log template is attached for reference. Note that the TCM Encounter Log does not supplant the need for detailed client case records.

Required Information for the TCM Encounter Log

The information required on the TCM Encounter Log includes:

- The client's name.
- The client's date of birth and include the mother's date of birth in the case of newborns.
- The client's Medi-Cal number, Beneficiary Identification Number, or Social Security number.
- The date of the TCM service (encounter).
- The name of the provider agency.
- The name or ID number of the case manager.

For clients residing in institutions, the TCM Encounter Log should include the following in addition to the above stated requirements:¹

- The location of the service (home, office, or type of institution; for example: Board and Care, Intermediate Care Facility, Hospital, Nursing Facility, Psychiatric Facility, Institutions for Mental Diseases, etc.).
- The client's admission and discharge date from an institution.

For the purpose of developing the TCM Cost Report accurately, it is necessary to maintain a list of all TCM encounters for both Medi-Cal and non-Medi-Cal clients. A separate log may be maintained to record encounters for clients for whom reimbursement will not be claimed through the TCM Program.

¹ When TCM clients reside in nursing facilities, hospitals, convalescent homes, or other facilities that are not their private residence, TCM case managers must make good faith effort, as specified in their Performance Monitoring Plan, not to claim for services that have already been provided.

A. Reconciling TCM Encounter Log to the TCM System

LGAs are expected to reconcile their TCM Encounter Log to the data in the TCM System for the following three encounter categories. (Encounters will be identified in these three categories after they have been entered into the TCM System.) This is a necessary step to accurately complete the TCM Cost Report.

1. Claimable Medi-Cal Encounters
2. Non-Claimable Medi-Cal Encounters
3. Non-Medi-Cal Encounters

B. Newborn Date of Birth

There has been some confusion regarding “newborn” status for the TCM Program. Pursuant to Title 22, California Code of Regulations (CCR), section 50733 (c), a mother’s Medi-Cal Benefits Identification Card (BIC) shall be authorization for services for her newborn child during the month of birth and month following the month of birth. However, PPL 10-003 clarifies that subsequent to the month following the month of birth, TCM services provided to the infant must be claimed using the infants own Medi-Cal BIC and the infant’s date of birth.

Example:

If a baby is born on July 15, 2013, starting September 1, 2013, the baby’s Medi-Cal number must be used for billing, instead of the mother’s Medi-Cal number.

Therefore, a client is considered a newborn only from the time of birth until the end of the month following the month of birth referred to as Newborn Date-Range. In accordance with the above regulation, newborn encounters beyond the Newborn Date-Range will be marked as “Expired” in the TCM System and will not be reimbursed until the newborn’s Medi-Cal number is entered in the TCM System for invoicing.

TCM Encounter Log Issues

Below is a list of issues identified by DHCS during recent site reviews where LGAs TCM Encounter Logs did not meet program requirements:

- Missing Client Date of Birth
- Missing Client ID
- Billing the encounter under the wrong TCM Case Manager name and National Provider Identifier (NPI) number

- Not having a continuous/all-inclusive TCM Encounter Log. The TCM Encounter Log should be continuous/all-inclusive and include all encounters provided during the entire fiscal year.

TCM Encounter Log Best Practices

In addition to the TCM Encounter Log requirements, DHCS recommends adding the information below to the TCM Encounter Log as best practices for the TCM Program:

1. Program Type: (Target Population)
 - For example: 14, 15, 16, 17, and/or 18
2. Location of the Encounter:
 - For example: Home, Office, Other (specify other)
3. Encounter Log versus Client File:
 - Procedures need to be in place to ensure that the encounters listed on the TCM Encounter Log match the client case files (for all requirements listed above), prior to billing for the encounter through the TCM System.
 - Client's full name must be spelled correctly within both the TCM Encounter Log and client case file.

If you have any questions regarding this PPL, e-mail the DHCS TCM Program at dhcs-tcm@dhcs.ca.gov.

Sincerely,

ORIGINAL SIGNED BY MICHELLE KRISTOFF

Michelle Kristoff, Chief
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Enclosure