



## California Children's Services Medical Therapy Program Step 3 Guidance Related to Return to In-Person Services

Updated Guidance Date: June 15, 2021

The purpose of this document is to provide guidance for post-pandemic resumption of in-person services at California Children's Services (CCS) Medical Therapy Program (MTP) Medical Therapy Units (MTU). This guidance supplements the previously released document titled California Children's Services (CCS) Medical Therapy Program (MTP) Step 2 Guidance Related to the 2019-Novel Coronavirus (COVID-19) State of Emergency September 17, 2020,<sup>1</sup> which remains in effect.

The Step 1 and Step 2 MTP COVID guidance documents issued by the Department of Health Care Services (DHCS) permitted MTUs to provide in-person services to clients with critical and urgent need.

Step 1 defined "critical need" as any client that is post-surgical/procedural. It also approved county MTPs to provide routine services such as consultation and treatment using telehealth technology when a therapist determines that telehealth is an acceptable alternative to in-person services. Re-evaluations were considered routine services for telehealth purposes.

Step 2 provided a set of conditions that comprise "urgent need." For these conditions, in-person services could be provided in the MTU when the treating therapist could justify that in-person services would prevent long-term harm, and approved by the MTU unit supervisor/lead.

### Guidance

- With the re-opening of California schools, county CCS MTPs may resume in-person services (including Medical Therapy Conferences) for all MTP clients when the following criteria are met:
  - The public school site where the MTU facility is located has resumed in-person instruction.
  - The county MTP, in conjunction with their county health department, has developed guidelines/protocols for the MTU to transition from Step 2 Guidance

to in-person services. These guidelines must include family/caregiver and client responsibilities, and required face-covering and social distancing protocols.

- As MTU programs develop guidelines and protocol for the MTU transition from Step 2 Guidance to in-person services, it is critical to avoid implementing policies that may result in a denial of a free appropriate public education under the Individuals with Disabilities Education Act.<sup>2</sup> This includes any policies regarding required face coverings which should include allowable exemptions for students unable to wear a face covering due to their disability.<sup>3</sup>
- County MTUs continue to be responsible for the provision of medically necessary occupational therapy and physical therapy, pursuant to Section 7575 of the Government Code, by reason of medical diagnosis and when contained in the child's individualized education program.

As county MTPs return to providing in-person services, MTP staff can continue utilizing telehealth as an option as appropriate, and in accordance with federal, state, and county guidance.

### **Additional Resources**

California Children's Services (CCS) Medical Therapy Programs (MTP) Guidance Relative to the 2019-Novel Coronavirus (COVID-19)

<https://www.dhcs.ca.gov/Documents/COVID-19/County-CCS-MTP-COVID-Guidance.pdf>

Telehealth and Virtual Communication in FFS and Managed Care Medi-Cal:

[https://www.dhcs.ca.gov/Documents/COVID-19/Telehealth Other Virtual Telephonic Communications V4.0.pdf](https://www.dhcs.ca.gov/Documents/COVID-19/Telehealth%20Other%20Virtual%20Telephonic%20Communications%20V4.0.pdf)

If you have any questions regarding these instructions, please contact the MTP Central mailbox at [MTPCentral@dhcs.ca.gov](mailto:MTPCentral@dhcs.ca.gov).

Sincerely,

### **ORIGINAL SIGNED BY**

Richard Nelson  
Division Chief  
Integrated Systems of Care Division

---

<sup>1</sup> Available at:

<https://www.dhcs.ca.gov/services/ccs/Documents/MTP-COVID-19-Updated-Step-2-Guidance.pdf>

<sup>2</sup> Available at: <https://uscode.house.gov/view.xhtml?path=/prelim@title20/chapter33&edition=prelim>

<sup>3</sup> Available at: <https://www.cde.ca.gov/sp/se/lr/om021121.asp>