



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



GAVIN NEWSOM  
GOVERNOR

DATE: December 29, 2020 **PPL 20-055**

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

**SUBJECT: Duplicate Encounters Under Multiple Target Populations**

This Policy and Procedure Letter (PPL) notifies participating TCM LGAs that the Department of Health Care Services (DHCS) will disallow encounters for an individual client invoiced under multiple target populations. A valid encounter must belong to only one of the five TCM target populations.

### **Background**

Prior to the beginning of each state fiscal year (SFY), LGAs must submit an Annual Participation Prerequisite (APP) indicating the TCM target populations the LGA intends to serve in the upcoming SFY (TCM Provider Manual, at Section 3, p. 3-8). DHCS relies upon this data when preparing a State Plan Amendment (SPA) that informs the Centers for Medicare and Medicaid Services (CMS) of the geographic regions within the state in which TCM services will be provided to each target population.

Upon SPA approval, an LGA may submit claims to DHCS and receive Federal Financial Participation (FFP) for TCM services rendered to the identified target population. Moreover, per the TCM Provider Manual, Section 9, page 9-6:

When multiple TCM services are provided during the same face-to-face visit, only one encounter may be billed. TCM Case Managers can only bill for one encounter, no matter how many TCM services were provided during the visit.

Accordingly, a valid encounter must belong to only one of the five target populations; therefore, encounters submitted under multiple target populations are ineligible for FFP.

### **Determining the Appropriate Target Population**

When a client is eligible for multiple target populations, the LGA must take the following steps:

- Determine the most appropriate (or best-fit) target population for the client.
- Only submit invoices to DHCS for encounters under the client's most appropriate target population.
- Review the LGA encounter log to ensure that the same client and service is not billed under another target population.

DHCS will disallow any extra encounters (duplicates) billed for the same client and service under more than one target populations.

### **The TCM System and LGA Coordinator Responsibility**

DHCS uses the TCM System to identify duplicate TCM encounters based on the date of service, TCM case manager, and client ID within a target population. The TCM System does not identify duplicate encounters across multiple target populations. Therefore, the LGA Coordinator must ensure that the LGA does not bill for the same client/encounter across multiple target populations.

LGA Coordinators must also ensure the encounter logs contain accurate and updated information, including maintaining only one target population per encounter. According to the TCM Provider Manual Section 3, page 3-3:

LGAs are required to maintain a TCM encounter log to keep a list of all the encounters (claimable and un-claimable client interactions) in their jurisdiction. The LGA Coordinator must use the encounter log information to enter/upload encounters into the TCM System and submit invoices based on the date of service and target population.

### **Reassessing a Target Population**

Per the TCM Provider Manual Section 9, page 9-11, LGAs must conduct an assessment/reassessment of a client's most appropriate target population every six months. This assessment/reassessment should include reference to the case manager or case manager supervisor making a determination of the client's correct target population.

Notably, when clients in the "Children Under the Age of 21" target population (14), are approaching the age of 21, LGAs are required to conduct an assessment/reassessment prior to the client's 21st birthday to ensure that the client can receive services under a different and more appropriate target population once they are over the age of 21.

### **Preventing Inaccurately Billed Encounters**

Each LGA is responsible for ensuring all claims submitted to DHCS are eligible for FFP prior to submittal. To that end, LGAs are encouraged to design, implement, and monitor quality control procedures that will enable the LGA to detect and prevent duplicate encounters under multiple target populations. The LGA should take precautionary measures to identify and resolve any duplication issues that may exist. The TCM Provider Manual, Section 8, beginning at page 8-23 provides the LGA with additional instructions on how to handle duplicate TCM encounters.

Furthermore, in Section 8, at page 8-32, the TCM Provider Manual states:

It is best practice to reconcile the encounter log with the TCM Online System generated report. This ensures the TCM encounters in the LGA's TCM encounter log are accurately billed in the TCM Online System to properly secure payments from DHCS. The LGA's TCM encounter log is also utilized to ensure that the TCM encounters reported in the TCM Cost Report are correct.

The LGA must follow all the above requirements and implement any additional internal procedures deemed necessary to prevent duplication of encounters across all five TCM target populations.

### **FFP Recoupments**

If at any time, either the LGA or DHCS discover or determine that an encounter is provided and claimed under multiple target populations, the LGA must immediately refund any associated payments to DHCS. DHCS will recoup any FFP amount not refunded to DHCS for ineligible encounters as outlined in this PPL.

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

Sincerely,

### **ORIGINAL SIGNED BY**

Shelly Taunk, Chief  
County Based Claiming and Inmate Services Section