Corrected #21-69-04: DHS extends temporary changes to Targeted Case Management face-to-face contact requirements

TOPIC
Policy modification to targeted case management services to temporarily allow phone and video visits in place of in-person face-to-face contact until the federal public health emergency ends.

PURPOSE
Temporary instructions for claiming Medical Assistance reimbursement for phone and video visits in place of in-person face-to-face contacts for child welfare targeted case management (CW-TCM), children’s mental health targeted case management (CMH-TCM), adult mental health targeted case management (AMH-TCM), vulnerable adult targeted case management (VA-TCM), and adult with developmental disability targeted case management (DD-TCM). This bulletin replaces #20-69-02C.

CONTACT
For child welfare targeted case management policy or fiscal questions:

- dhs.csp.cwtcm@state.mn.us, or Luke Simonett, 651-431-4528, Luke.Simonett@state.mn.us

For adult developmental disability targeted case management policy or fiscal questions:

- Disability Services Response Center, dhs.dsd.responsecenter@state.mn.us

For mental health targeted case management policy or fiscal questions:

- Diane M. Marshall, Children’s Mental Health Consultant, 651-431-2328, diane.marshall@state.mn.us or
- Darrin P. Helt, Adult Mental Health Consultant, 651-431-2325, darrin.helt@state.mn.us
For vulnerable adult targeted case management policy and fiscal questions:
- Melissa Vongsy, Aging and Adult Services, 651-472-7780, melissa.vongsy@state.mn.us

For Medical Assistance coverage policy, claims, or MN–ITS documentation questions:
- Provider Call Center, 651-431-2700 or 800-336-5411, TTY: 711 or 800-627-3529

For SSIS documentation questions:
- SSIS Help Desk at 651-431-4801 or dhs.ssishelp@state.mn.us

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**TERMINOLOGY NOTICE**

The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services (DHS) supports the use of "People First" language.
I. Background

In response to the COVID-19 pandemic, the Minnesota Department of Human Services (department) continues to review opportunities to temporarily modify policy and practice to align with measures to slow the spread of COVID-19 through social distancing and quarantine.

Various state laws establish the minimum frequency of face-to-face contact required for a provider to receive Medical Assistance reimbursement for different types of targeted case management (TCM). The following table lists the statutory authority and the minimum frequency of face-to-face contact required for each type of TCM.

<table>
<thead>
<tr>
<th>Targeted case management type</th>
<th>Statute</th>
<th>Required frequency of face-to-face contact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Child welfare targeted case management (CW-TCM)</td>
<td>Minnesota Statutes, section 256B.094, subdivision 6</td>
<td>Once per month. For IHS/638 Tribal provider, once per encounter.</td>
</tr>
<tr>
<td></td>
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<td><strong>Exception</strong> - if the child is placed more than 60 miles beyond the county or reservation boundaries, telephone contact is claimable for up to two consecutive months and there must be face-to-face contact at least once every three months.</td>
</tr>
<tr>
<td>Children’s mental health targeted case management (CMH-TCM)</td>
<td>Minnesota Statutes, section 256B.0625, subdivision 20</td>
<td>Once per month. For IHS/638 Tribal provider, once per encounter.</td>
</tr>
<tr>
<td>Adult mental health targeted case management (AMH-TCM)</td>
<td>Minnesota Statutes, section 256B.0625, subdivision 20</td>
<td>Once every three months. For IHS/638 Tribal provider, once per encounter.</td>
</tr>
<tr>
<td>Vulnerable adult and developmental disabilities targeted case management (VA/DD-TCM)</td>
<td>Minnesota Statutes, section 256B.0924, subdivision 6</td>
<td>Once every three months.</td>
</tr>
</tbody>
</table>

II. Modified policy

On March 20, 2020, Governor Tim Walz signed Emergency Executive Order 20-12 permitting the department’s commissioner to temporarily waive or modify state statute. In response to the state statutory waiver, the commissioner approved a waiver to temporarily modify the minimum face-to-face contact requirements for
targeted case management (TCM). In the 2021 First Special Session, the Minnesota Legislature authorized an extension of this waiver. This waiver, which temporarily allows visits by phone or video to satisfy the face-to-face contact requirements for TCM, will remain in effect until the COVID-19 federal public health emergency ends.

For TCM services provided from March 19, 2020, through the end of the COVID-19 federal public health emergency, all contacts made by real-time, two-way audio-only (for example, phone call) or interactive audio and visual communication (for example, FaceTime) satisfy the minimum face-to-face contact requirements.

When the federal public health emergency expires, permanent changes to TCM passed by the Minnesota Legislature in the 2021 Special Session will become effective. Those permanent changes will allow continued use of interactive video to satisfy face-to-face contact requirements in most circumstances. Additional information regarding permanent changes will be released in a future bulletin.

**Tribal provider requirements**

This change means that Indian Health Service (IHS), Sec. 638 Tribal providers, may receive the daily encounter payment when the contact between the case manager and the person receiving services happens by telephone instead of through an in-person face-to-face visit. Although the mode of how a service may be delivered is temporarily changing (for example, TCM visits can occur via telephone temporarily), there are no changes to the payment methodology for the daily encounter payment. The same services and types of providers that are required to generate a daily encounter payment continue to be required when TCM services are delivered during the COVID-19 emergency period.

**III. Instructions for Social Service Information System (SSIS) and MN–ITS users**

Carefully read the following instructions and follow precisely to ensure successful submission of claims. Documenting claims as described in the following examples is essential for verifying circumstances for auditing purposes.

**A. Agencies that claim TCM in SSIS**

Continue to document contacts and claim TCM as is currently done in a recipient’s time record. However, when making a TCM claim for a phone or video contact instead of in-person face-to-face contact, the following procedures apply. In the:

- “Sub-service” field, select “87-COVID 19, Related”
- “Activity” field, select “Client contact” or “collateral contact” (as appropriate)
- “Method” field, select “Face-to-face”
- “Location” field, select the location where the recipient was when contact was made (for example, client’s residence, field, office)
- “Note” section, document that contact was made via phone or video (whichever method was used) in lieu of face-to-face due to COVID-19. For auditing purposes, the expectation is that each
case file will include this information when phone or video contact was made in lieu of face-to-face contact.

See the following SSIS screen shots for an example of correct documentation for each targeted case management type.

**Child Welfare Targeted Case Management**

![SSIS screen shot](image)

Note: Phone and videoconference in lieu of face to face contact due to COVID-19.
Children’s Mental Health Targeted Case Management

Note: Phone or Videoconference in lieu of Face to Face Contact, due to COVID-19
Adult Mental Health Targeted Case Management

Activity

Workgroup: AMH Workgroup- March 2020
Program: 410 - Adult Mental Health
Service: 491 - Adult Rule 79 Targeted Case Mgmt
County sub-service: 87 - COVID-19 Related
Activity: Client contact

Note:

Note: Phone or Videoconference in lieu of face to face contact

Contact:

Purpose:

Status: [ ] Completed [ ] Attempted

Method: Face to face
Location: Field/home

Allocate Time

No. of Persons: 0

allocate time box empty
Vulnerable Adult Targeted Case Management

Note: Telephone or videoconference in lieu of Face to Face Contact.
Developmental Disability Targeted Case Management

B. Agencies that claim TCM in MN–ITS

Review the instructions under Targeted Case Management under the Billing heading of the Coronavirus (COVID-19) section of the MHCP Provider Manual.

IV. Documentation

A. Provider responsibility

Review the instructions under Documentation under the Changes in Requirements heading of the Coronavirus (COVID-19) section of the MHCP Provider Manual.
B. Department responsibility

The department will maintain records that indicate that TCM contact via phone or video in lieu of in-person face-to-face contact was assumed to be in compliance with the waiver granted under Executive Order 20-12(2)(g). These records will indicate that this waiver went into effect March 19, 2020 and will remain in effect until the federal public health emergency ends.

V. Resources

For information and resources, see:

- Centers for Disease Control and Prevention webpage
- Minnesota Department of Human Services webpage (sign up for email notifications)
- Minnesota Department of Health
- BeReadyMN
- Administration for Children and Families, Children’s Bureau
- Monthly Caseworker Visits Modified to Permit Video-conferencing, department bulletin 20-68-11

Americans with Disabilities Act (ADA) Advisory

This information is available in accessible formats for people with disabilities by calling 651-431-4670 (voice) or by using your preferred relay service. For other information on disability rights and protections, contact the agency’s ADA coordinator.