



# Department of Developmental Disabilities

John Kasich, Governor  
John L. Martin, Director

**To:** Superintendents, SSA Directors, COG Directors, Business Managers

**From:** Lori Horvath

**Date:** May 18, 2015

**Subject:** Targeted Case Management (TCM) Claims

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The purpose of this communication is to share new information provided by the Ohio Department of Medicaid (ODM) and the Centers for Medicare and Medicaid Services (CMS) related to the ability to submit Targeted Case Management (TCM) claims for services provided on behalf of an individual after date of death, as well as for travel and documentation of case notes.

The Ohio Department of Developmental Disabilities (DODD) consulted with ODM related to claims for services provided on behalf of an individual who had died. Ohio Administrative Code 5160:1-1-51(K)(2)(b) states that Medicaid coverage terminates on the date of an individual's death. As a result, claims for TCM cannot be submitted for dates of service after any individual dies.

A request for clarification was submitted to CMS related to the ability to submit claims for travel and documentation of case notes. CMS stated that travel and recording of case notes are not permitted to be billed as TCM, since these tasks are not covered under Section 1905(a) of the Social Security Act. However, it is permissible for travel and documentation of case notes to be included as indirect components of the TCM rate.

DODD and ODM acknowledge that, until now, county boards have submitted TCM claims for these activities with the understanding that it was permissible to do so. In light of this response from CMS, **effective June 1, 2015**, TCM claims may not be submitted for travel and documentation of case notes. Since this is a new directive to boards related to TCM, no findings will be assessed for TCM claims submitted for travel or documentation of case notes for dates of service prior to June 1, 2015. Compliance with this directive is expected and findings may be assessed for claims submitted for dates of service beginning June 1<sup>st</sup>.

The financial impact of the inability of boards to submit TCM claims for travel and documentation of case notes will be mitigated by the change in how claims are reimbursed. On March 31, 2015 a state plan amendment was submitted to CMS to request the reimbursement methodology be changed from an inter-governmental transfer (IGT) process to a certified public

expenditures (CPE) process. If approved, the effective date of CPE will be retroactive to dates of service beginning January 1, 2015.

Key benefits of using CPE include:

- Boards will no longer be required to send match for TCM to DODD. This match is eventually returned to boards when they are paid for TCM claims. However, the current process ties up approximately \$7.9 million of board funds per quarter.
- Under CPE, a cost settlement methodology is used to settle TCM claims up and down. Reimbursement is provided at the lesser of actual costs or 112% of the statewide average, similar to the cost settlement process used for other services. This will bring extra FFP into the system, as current TCM rates are higher than the \$15.48 rule rate.
- Boards will be reimbursed faster than the current process. Today, boards send match to DODD. We send it to the Ohio Department of Medicaid (ODM). ODM draws down the federal funds. They send the federal funds, along with the match, back to DODD, and we, in turn, send the 100% payment to boards. This process takes 2 – 3 weeks. Under CPE, claims would be paid more immediately.

For cost reporting purposes, all units related to travel and documentation should continue to be tracked locally. However, travel and documentation time DO NOT generate units for cost reporting purposes for dates of service after the effective date of this memo. Units generated for travel and documentation WILL NOT be recorded on Schedule B-4 for dates of service after the effective date of this memo. For additional detail on SSA units, see the attached instructions.

DODD is committed to working with boards to monitor the impact of these changes. We will meet with representatives from the Ohio Association of County Boards and business managers, as needed, to review the TCM rate model and reimbursement methodology.

Please feel free to contact me at [Lori.Horvath@dodd.ohio.gov](mailto:Lori.Horvath@dodd.ohio.gov) with any questions related to billable services or Clay Weidner at [Clayton.Weidner@dodd.ohio.gov](mailto:Clayton.Weidner@dodd.ohio.gov) with any questions related to CPE and cost reporting.