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CCS MTP Guidance Relative to Coronavirus (COVID-19) Public Health Emergency

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The purpose of this guidance is to provide temporary direction to County California Children's Services (CCS) Medical Therapy Programs (MTPs). In light of both the federal Health and Human Services (HHS) Secretary's January 31, 2020, public health emergency declaration, as well as the President's March 13, 2020, national emergency declaration, the Department of Health Care Services (DHCS) began exploring options to temporarily waive and/or modify certain requirements of the programs DHCS oversees, including Medi-Cal Fee-for-Service (FFS) and the CCS program. In response to the 2019 Novel Coronavirus known as COVID-19, DHCS has issued several policy letters pertaining to the provision of services during the public health emergency. These policy letters are [posted](#) on the DHCS website. As DHCS continues to closely monitor the emerging 2019 Novel Coronavirus (COVID-19) situation, DHCS will provide updated guidance to CCS counties.

On March 19, 2020, Governor Newsom issued a stay-at-home [Executive Order](#) to protect the health and well-being of all Californians and to establish consistency across the state in order to slow the spread of COVID-19. On April 23, 2020, Governor Newsom issued an Executive Order to temporarily suspend Health and Safety Code sections 123950 and 123870(b) and California Code of Regulation, Title 2, section 60330 to allow MTPs to offer physical and occupational therapy services in non-school settings.

Guidance

For the duration of this public health emergency, CCS MTPs may provide physical and occupational therapy services in non-school settings. DHCS encourages CCS MTPs to stay in contact with families to provide alternative options for routine therapy appointments due to the school and Medical Therapy Unit (MTU) closures. County CCS MTPs should seek to implement telehealth methods that would allow therapists to provide remote consultation and treatment for routine therapy and equipment needs.

MTP therapists must use their clinical and professional judgement to determine if services can be appropriately and effectively provided using telehealth. DHCS issued [guidance](#) regarding the use of telehealth as an alternate means of providing critical, medically necessary services.

Typically, physical therapy and occupational therapy require prior authorization; however, DHCS has federal Section 1135 authority to waive prior authorization requirements for the duration of the public health emergency. Prior authorization requirements are temporarily suspended for physical therapy and occupational therapy. However, treatment authorization requests (TARs) and service authorization requests (SARs) are still required. Providers are instructed to incorporate the statement, "Patient impacted by COVID-19" within the Miscellaneous Information field on the TAR and the Freeform Message Text field on the SAR. TARs/SARs with this designation may be submitted after services have been rendered and will be expedited and approved, as appropriate, if the TAR/SAR indicates that the beneficiary is impacted by COVID-19 and the provider will be reimbursed for the claim for the Medi-Cal benefits and services. Providers must still submit supporting documentation to justify the need or medical necessity and maintain documentation of medical necessity in the patient's medical file. For additional information, please see DHCS' guidance [Medi-Cal Fee-For-Service Prior Authorization Section 1135 Waiver Flexibilities](#).

MTUs that see clients face-to-face during the state of emergency must follow all necessary infection control protocols established by the Centers for Disease Control and Prevention (CDC) and their county health department, including having all necessary preventative supplies. MTU staff must follow current social distancing guidelines. For more information, the California Department of Public Health's [website](#) has detailed guidance for protecting yourself and others from the risk of contracting and transmitting COVID-19. If the MTU remains open, and the county health department permits it with all proper precautions for the clients' safety, clients that are critical (post-surgical/procedural) may be brought in for services at the MTU. If the MTU is not open, county MTPs should authorize clients to receive these services in a hospital setting with CCS paneled providers.

Medical Therapy Conferences (MTCs) should be held remotely in lieu of face-to-face conferences. Prescriptions for therapy and Durable Medical Equipment (DME) that expire during the state of emergency can be extended without a face to face encounter with the physician. Please see DHCS' [guidance](#) addressing Medi-Cal Fee-For-Service Prior Authorization Flexibilities for additional information about flexibilities regarding DME authorizations and requirements related to treatment authorization requests and service authorization requests.

In addition, County MTPs should inform MTP families that if their CCS-approved supplies or medications are running low, they should contact the vendor, pharmacy, or prescribing specialist. If they need help with this, please have them contact your CCS Case Manager.

DHCS encourages County MTPs to remind staff or clients who show any signs of illness to stay home and to contact their primary care physician. If either clients or MTP staff become diagnosed with COVID-19, they should immediately notify their county health department and the CCS administrative office.

If you have any questions regarding these instructions, please contact the MTPCentral mailbox at MTPCentral@dhcs.ca.gov

Additional Resources

Medicare Telemedicine Health Care Provider Fact Sheet

<https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet>

Section 1135 Flexibilities

<https://www.dhcs.ca.gov/Documents/COVID-19/CA-1135-Flexibilities-Approval-Letter-Rev-032320.pdf>

COVID-19 Emergency Declaration Health Care Providers Fact Sheet

<https://www.cms.gov/files/document/covid19-emergency-declaration-health-care-providers-fact-sheet.pdf>