

Transportation Time Billing Requirements For CLS, Skill Building, Clubhouse and Supported Employment Services FOR ADULTS (as understood by BABH; as of 09/12/24)

If billing this service...	If transport is provided by...	If traveling between the following locations...	Can travel time be included in the billed time (i.e., units)?
Clubhouse – 15 Minute	Clubhouse staff	Spec. Resid., SIP/SIAP, or own home	<p>No</p> <p><u>Medicaid Manual (as of 7/1/2024, Clubhouse Model Programs):</u> “The Clubhouse ensures that access to the building, Clubhouse-sponsored community activities, and employment sites are available through public transportation or other alternative modes of transportation. The Clubhouse provides or arranges for effective alternatives whenever access to public transportation is limited.”</p> <p><u>MDHHS Code Chart (as of SFY 2023, Clubhouse/Psychosocial Rehabilitation Program):</u> “Excludes time spent in transport to and from clubhouse”</p>
CLS - Per Diem	CLS staff	Spec. Resid., SIP/SIAP, or own home	<p>.”</p> <p>CLS Per Diem billing is not allowed at the time of this revision.</p>
CLS - 15 Minute	CLS staff	Spec. Resid., SIP/SIAP, or own home	<p>Community activity or volunteer sites</p> <p>Yes, if:</p> <ol style="list-style-type: none"> The plan indicates CLS services are to be provided Service documentation reflects delivery <p><u>Medicaid Manual (as of 07/1/2024, Community Living Supports):</u> “Coverage includes: “Transportation from the beneficiary’s residence to community activities, among community activities, and from the community activities back to the beneficiary’s residence.”</p>
			<p>Medical appointments</p> <p>No, if:</p> <ol style="list-style-type: none"> The person does <u>not</u> require assistance, support or training to travel to and participate in the medical appointment (i.e., if just transportation is needed, DHS must be contacted for transportation). <p>Yes, if:</p> <ol style="list-style-type: none"> The plan indicates the person does require assistance, support or training by CLS staff to travel to and participate in the medical appointment. Service documentation reflects delivery. Use of the Indirect Code (IND18) is required. To be used when CLS staff are assisting consumers during medical appointments. Time spent when CLS staff are in waiting room lobbies without the consumer present is not a reimbursable expense. As such, those costs are incorporated into the unit rate. <p><u>Medicaid Manual (as of 07/01/2024), Community Living Supports:</u> “Coverage includes: Staff assistance, support and/or training with activities such as: ...attendance at medical appointments...”</p> <p><u>Medicaid Manual (as of 07/01/2024, Community Living Supports):</u> “...(transportation to and from medical appointments is excluded)...”; “Transportation to medical appointments is covered by Medicaid through MDHHS or the Medicaid Health Plan.”</p>

		Vocational Provider's Facility OR Community activity or volunteer sites	Community activity or volunteer sites	Yes, if: <ol style="list-style-type: none">1. The plan indicates CLS services are to be provided2. Service documentation reflects delivery <p><i>Medicaid Manual (as of 07/01/2024, Community Living Supports: "Coverage includes: "Transportation ... among community activities ... participation in regular community activities and recreation opportunities (e.g., attending classes ... volunteering...)."</i></p>
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If billing this service...	If transport is provided by...	If traveling between the following locations...	Can travel time be included in the billed time (i.e., units)?
Skill Building – 15 Minute	Skill Building Staff	Spec. Resid., SIP/SIAP, or own home	<p>Community activity or volunteer sites</p> <p>Yes, if:</p> <ol style="list-style-type: none"> 1. The plan indicates skill building services are to be provided 2. Service documentation reflects delivery <p><u>Medicaid Manual (as of 07/01/2024, Skill Building Assistance:</u> <i>“If a beneficiary has a need for transportation to participate, maintain or access the skill building services, the same provider may be reimbursed for providing this transportation only after it is determined that it is not otherwise available and it is the least expensive available means suitable to the beneficiary’s need in accordance with the NEMT Chapter.”</i></p> <p><u>MDHHS Code Chart (as of FY 2023 Skill Building Assistance:</u> <i>“Costs includes staff, facility, equipment, travel, transportation, contract services supplies and materials. “Skill-building in the community (outside a facility-based program) may include transportation time to and from the site(s).”; “If the same staff provides transportation and skill-building, include time of transportation from pick-up time through the entire episode to drop-off.”</i></p>
		Spec. Resid., SIP/SIAP, or own home	<p>Vocational Provider’s Facility</p> <p>No</p> <p><u>MDHHS Code Chart (as of 01/01/19) Skill Building Assistance:</u> <i>“Exclude time spent in transport to and from facility-based program”</i></p>
		Vocational Provider’s Facility OR Community activity or volunteer sites	<p>Community activity or volunteer sites</p> <p>Yes, if:</p> <ol style="list-style-type: none"> 1. The plan indicates skill building services are to be provided 2. Service documentation reflects delivery <p><u>Medicaid Manual (as of 07/01/24), Skill Building Assistance:</u> <i>“If a beneficiary has a need for transportation to participate, maintain or access the skill building services, the same provider may be reimbursed for providing this transportation only after it is determined that it is not otherwise available and it is the least expensive available means suitable to the beneficiary’s need in accordance with the NEMT Chapter.”</i></p> <p><u>MDHHS Code Chart (as of FY 2023) Skill Building Assistance:</u> <i>“Skill-building in the community (outside a facility-based program) may include transportation time to and from the site(s).”; “If the same staff provides transportation and skill-building, include time of transportation from pick-up time through the entire episode to drop-off.”</i></p>

Supported Employment – 15 Minute	SE staff	Spec. Resid., SIP/SIAP, or own home OR Community Employment Sites	Community employment sites	<p>No, if:</p> <ol style="list-style-type: none"> 1. The person does <u>not</u> require supported employment services while in transit to their job site (i.e., if just transportation is needed). <p>Yes, if:</p> <ol style="list-style-type: none"> 2. The plan indicates the person does require supported employment services to be provided while being transported to their job site. The plan should also address how supported employment staff assistance with travel will be faded to increase independence. 3. Service documentation reflects delivery <p>Caution: Guidance from MDHHS remains contradictory; BABH’s position is subject to change if further guidance is received.</p> <p><u>Medicaid Manual (as of 07/01/24), Supported/ Integrated Employment Services:</u> <i>“Transportation is included in the Supported Employment services.”</i></p> <p><u>MDHHS Code Chart (FY 2023 Supported Employment Services):</u> <i>“Exclude transportation time and units, unless where appropriate to include transportation costs such as: to and from supported employment services. Include cost of indirect job development”;</i> <i>“Between SE and Transportation: Add costs of transportation to SE when transporting to and from a job site when other SE services are being provided. Transportation to a job, when other job supports are not identified in the IPOS, is not an allowable Medicaid expense.”</i></p>
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Revision Log

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06/04/19	Janis Pinter	Medicaid Manual; MDHHS Code Chart	NEW
08/22/19	Janis Pinter	MSHN Feedback	Revised to add fading of SE during transportation and caution regarding MDHHS guidance.
01/15/20	Janis Pinter	Provider Feedback	Revised to address CLS staff time when traveling from a vocational provider facility to community sites, between community sites, and back to the vocational provider's facility.