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Provider Notice Policy Clarification

To: PerformCare TCM Provider Network
From: Scott Daubert, VP Operations
Date: April 1, 2013
Subject: PC-03 Mental Health Targeted Case Management (TCM) Transportation Clarification

Claims Payment and Clinical Policy Clarification

Question/Issue:

Can a Mental Health Targeted Case Management service (ICM, RC, BCM) be delivered and appropriately billed to PerformCare if the TCM is speaking to the consumer face-to-face while driving or escorting the consumer in a car?

Source Documentation / References:

OMHSAS Bulletin OMHSAS-13-01, issued 1/18/2013, Targeted Case Management (TCM) – Travel and Transportation Guidelines.

55 Pa. Code § 5221 Mental Health Intensive Case Management

PerformCare Answer/Response:

This question was submitted by a TCM provider who asserted that a Case Manager could actively perform case management services face-to-face in the car with the consumer while transporting or escorting the consumer. The TCM provider asked whether this was an acceptable scenario for a billable encounter in light of the recently issued OMHSAS Bulletin on Travel and Transportation.

PerformCare does not agree that this would be a billable encounter for Intensive Case Management, Resource Coordination, or Blended Case Management.

Appendix A Intensive Case Management Guidelines of 55 Pa. Code § 5221 defines *Linking with Services* as “assisting the consumer in locating and obtaining services specified in the treatment or services plan, or both, including arranging for the consumer to be established with the appropriate service provider.” However, OMHSAS-13-01, which is based on the federal regulation at 42 CFR § 440.169 (relating to case management services) makes clear that the time a case manager spends “transporting or escorting consumers to appointments or other places is not identified as a

component of case management services”. Furthermore, OMHSAS-13-01 states that “transporting a consumer to a service to which a consumer is referred or escorting a consumer to a service is not a component of case management services.” Consequently, time spent transporting or escorting consumers should not be billed as a unit of service, irrespective of whether the Case Manager is speaking with the consumer.