TRAVEL TIME GUIDELINES Mental Health Plan (MHP)

The Mental Health Plan (MHP) permits claiming for travel time when it is linked to the delivery of a specialty mental health service (SMHS). However, travel time between provider sites or from a staff member's residence to a provider site may not be claimed. When claiming for travel time, programs shall document in the progress note the "from" location and the "to" location for the delivery of the SMHS. This is a required element for documentation to increase accuracy in travel time claimed and reduce audit risk. The "from" and "to" locations should be descriptive to reasonably account for the travel time claimed, but exact addresses are not required. For example: "Staff traveled roundtrip from the office in North Park to the client's home in Santee."

Additionally, extended travel time may be claimed to account for the "normal flow" of traffic. Normal flow of traffic is defined as consistent and repetitive peak usage periods that occur regularly and can be predicted with reliability (i.e. rush hour). Documentation should substantiate extended travel time claimed in order to reduce audit risk. For example: "Staff traveled from office in Mission Valley to client's ILF in Chula Vista at 5:30pm. Travel time accounts for rush hour traffic." Travel time may not be claimed for unpredictable incidents such as accidents, breakdowns, or debris in travel lanes which cause congestion on the roadway. Situational examples are below.

1. Traveling to Multiple Off-Site Locations

It is permissible to claim for travel between different off-site locations when providing services to more than one client. In order to claim for travel time, the following shall be done:

- A. Document the starting and ending point in a progress note. It is not permissible to claim the entire travel time for both clients to one client.
 - a. Clinician travels from office to Client A's home. Claim for travel time from office to Client A's home.
 - b. Clinician then travels from Client A's home to Client B's home. Claim for travel time from Client A's home to Client B's home.
 - c. If Clinician travels back to the office, travel time can be claimed from Client B's home to the office.
 - i. <u>Documentation Example</u>: Client A: "Clinician traveled from office in Mission Valley to client's home in Escondido." Client B: "Clinician traveled from Escondido to client's home in Carlsbad and back to the office in Mission Valley."

2. Travel Time when Starting or Ending at Home

A. Travel time may be claimed when starting or ending the workday at home. In order to claim, the time must be the same or less than normal travel time from office to client's location.

- a. Clinician claims travel time from their home in Clairemont to client's home in Escondido, then claims travel time to the office in Mission Valley after the service. (This is acceptable because Clairemont is closer to the client's home in Escondido than the office in Mission Valley).
- b. Clinician travels from home in Chula Vista to client's location in Fallbrook to start the day. Office is in Mission Valley. When traveling from clinician's home to client's location, if the distance is **farther** than office to client's location, clinician may only claim the standard travel time from the office to client's location. For example: clinician home to client location is 50 minutes, but office to client's location is 30 minutes, then clinician can only claim 30 minutes travel time.
 - i. <u>Documentation Example</u>: "Clinician traveled from home in Chula Vista to client's location in Fallbrook, but travel time only includes standard travel time from office in Mission Valley to client's location."

3. Travel Time with Multiple Staff

- A. When more than one clinician travels to provide a service to an off-site location, the need for the second staff must be documented. Per DHCS, there must be a "compelling clinical reason" for multiple providers and/or field-based services.
 - a. It is up to the program/staff to use the best clinical judgment and clearly substantiate the need for multiple staff for field based services.
 - b. Travel time is not the same as service time.
 - c. Two staff travel 30 minutes to the client's house.
 - i. Each staff may claim for the 30 minutes travel time.
 - ii. Documentation must substantiate a "compelling clinical reason" for the presence of multiple staff. Each staff will claim only their unique contribution to the session and write their own individual progress note.

4. Travel Time for Multiple Clients and Same Location

- A. Travel time can be claimed when traveling to one location to visit multiple clients. Travel time must be divided equally among the clients. It is not permissible to claim the entire travel time to one client.
 - a. A staff travels one hour to one location to see two clients. When claiming for the travel time, it must be divided and 30 minutes would be documented for each client and this should be explained in both clients' progress notes.

5. Travel Time between Provider Sites

Is it permissible to claim for travel between provider sites when providing Specialty Mental Health Services (SMHS)?

- A. Travel time between provider sites or from a staff member's residence to a provider site may not be claimed. A provider site is defined as a site with a provider number. This includes affiliated satellite sites and school sites.
 - a. A staff member travels from office in Mission Valley to attend a wrap meeting at another BHS provider's office. Program may not claim for this travel time when delivering SMHS as the provider's office is Medi-Cal certified with a Provider number.
 - b. A staff member travels from main office in Mission Valley to affiliated office in North County. Program may not claim for travel time when delivering SMHS as the affiliated office has its own individual Medi-Cal certification and Provider number.
 - c. A staff member travels from program office to client's residence, picks up client and drives client to another BHS provider (with a provider number). Program may not claim for travel time. This would be considered traveling from provider site to provider site, even though the travel was interrupted by stopping at client's home.
 - d. When a staff member travels from the program office and provides a SMHS at an offsite location (home, B&C, community location), and then goes from the offsite location to another provider site, the travel time may be claimed if it is a component of a reimbursable SMHS provided by said staff member at 'other' site.